

# Rocky Flats Citizens Advisory Board Recommendation 98-1

to the U.S. Department of Energy

## Comments on the Building 779 Decommissioning Operations Plan

Approved January 8, 1998

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The Rocky Flats Citizens Advisory Board has reviewed the Decommissioning Operations Plan (DOP) for Building 779 at the Rocky Flats Environmental Technology Site and offers the following comments and recommendations.

1. Over the past several years, there have been safety problems at Rocky Flats during activities such as tank draining and the Trench T3/T4 remediation. As D&D operations begin in earnest, the site is likely to encounter unforeseen problems and conditions. Contingency procedures must be in place to allow flexible and prompt responses to ensure worker and environmental safety. The DOP does not seem to contain an overarching plan that details the responses and the layers of protection needed to meet these unexpected situations. Plans to manage these type of contingencies need to be in place before D&D begins. Therefore, RFCAB recommends that a comprehensive safety management plan be developed before D&D activities commence.
2. All protective and monitoring systems must be kept in operational condition. Specifically, the HEPA filter testing program should be maintained during D&D work. These filter systems in the gloveboxes as well as the building itself are important to ensuring that the community and environment are not negatively impacted by fugitive contaminant emissions during cleanup. Maintenance documentation for these filters needs to be provided as well as the proposed monitoring plans for D&D work. RFCAB also recommends that the site implement real-time beryllium exposure monitoring.
3. The DOP does not discuss the disposition of 2,000 pieces of equipment in Building 779. Equipment designated for reuse should be certified as clean. Removal of equipment either for release or designation as surplus should happen expeditiously so as not to impede the progress of D&D work.
4. We recommend that a schedule of activities with a timeline and completion date be established for all work that must be completed prior to demolition of Building 779. This timeline will provide assurance that work is being done in a scheduled manner that does not compromise safety for the sake of achieving a performance measure.

5. The staging area for building rubble needs to have a containment system in place to catch runoff from storm events. Although Building 779 is to be cleaned up to safe radionuclide levels, many rooms in this facility contain chemical contaminants that have the potential to migrate into surface waters leaving the site.
6. In a December 15, 1997 Weapons Complex Monitor article, RFCAB learned that the Defense Board has reviewed a DOE Headquarters planning document on Life Cycle Management and criticized DOE for its decommissioning planning, specifically that a "step-wise decommissioning process [should] not proceed beyond the initial deactivation step without reasonable assurance that subsequent steps leading to eventual restoration can and will be safely conducted." During Building 779 D&D, RFCAB understands that DOE intends to bring the building down to the foundation, but then leave the foundation in place until a decision is reached on how to remediate the entire Industrial Area of the site. RFCAB questions whether safety might be compromised by leaving the foundation and surrounding contamination in place while waiting for eventual restoration of the entire Industrial Area. Therefore, seeing a parallel in the criticism by the Defense Board, RFCAB recommends that DOE develop a comprehensive restoration plan for the Industrial Area before D&D work begins on Building 779. RFCAB believes that the D&D plan for Building 779 must complement the overall remediation strategy for the Industrial Area in order to provide maximum health, safety and environmental protection.
7. Stakeholders need to be kept informed regularly on progress with the D&D work and be provided with opportunities to participate in evaluating the effectiveness of the on-going work and the success of the overall project.
8. The most effective and safest technologies must be available and utilized for D&D work.

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The Rocky Flats Citizens Advisory Board is a community advisory group that reviews and provides recommendations on cleanup plans for Rocky Flats, a former nuclear weapons plant outside of Denver, Colorado.

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