

Rocky Flats Citizens Advisory Board Recommendation 2001-3



to the U.S. Department of Energy

Comments on the Working Draft (May 2001) of the Environmental Restoration RFCA Standard Operating Protocol for Routine Soil Remediation (ER RSOP)

Approved August 2, 2001

The Rocky Flats Citizens Advisory Board (RFCAB) has reviewed a Working Draft of the Environmental Restoration RFCA Standard Operating Protocol for Routine Soil Remediation (ER RSOP), dated May 2001, and offers the following comments and recommendations. It should be noted that the RFCAB will review and may make additional comments and recommendations on further revisions to the draft ER RSOP.

1. RFCAB recognizes the need to standardize the decision-making process for routine remediation of soils and associated debris at over 200 IHSS, PACs, and UBC sites. Therefore, RFCAB supports the overall premise of the ER RSOP, which is to provide a streamlined and consistent approach to making remedial decisions as defined in the scope of the ER RSOP.
2. The Rocky Flats Stewardship Working Group has recommended that a robust stewardship analysis be conducted at the planning stage of remediation projects. RFCAB feels that such analysis is crucial to making informed remediation decisions. A key question DOE and Kaiser-Hill need to address when planning remediation projects is whether the burden of leaving contamination behind is greater than the cost of cleaning it up. The ER RSOP, which explains the basis for remedial decisions, makes no mention of stewardship considerations. A section should be added to define how long-term stewardship will be incorporated into remedial decisions.
3. RFCAB notes that the decision-making process outlined in the ER RSOP does not include consideration of the ALARA principle. DOE has long been committed to the possibility of cleanup beyond the regulatory minimum. RFCAB recommends that the language of the ER RSOP be amended to identify the mechanism whereby the ALARA principle could be used to accomplish greater cleanup. The ER RSOP should define the process for documenting the application of the ALARA principle.

4. The ER RSOP states that soils contaminated with volatile organic compounds (VOCs) may be treated via thermal desorption and then used as backfill. RFCAB requests clarification on the backfill criteria. Specifically, RFCAB is concerned that the ER RSOP appears to allow soils treated in this manner to be used as backfill, even if relatively high levels of other hazardous constituents remain. For instance, it appears that backfill soil may be contaminated with heavy metals or PCBs up to the Tier I Action Level. RFCAB questions whether soil approaching the Tier I Action Level that has already been subject to a removal action should be returned to the environment.
5. RFCAB feels that it may be premature for DOE to consider implementing this RSOP before the RSALs have been determined and the ALARA process is more clearly defined. On both counts, the ER RSOP lacks sufficient detail. Furthermore, remedial decisions under the ER RSOP are predicated upon the two-tiered action level framework, which may change as a result of the RSAL review. Therefore, RFCAB requests that the ER RSOP include a specific provision prohibiting implementation until final decisions are made on the RSALs and the ALARA process.
6. RFCAB requests a section of the ER RSOP to clearly delineate the regulator's role in implementing this RSOP. It should describe what checks-and-balances are going to be in place to ensure that field implementation of remediation projects is consistent with the intent of the ER RSOP. At what points during a project is regulatory approval required? RFCAB feels that regulators should be given complete access to project-specific information and opportunity to interface with the ER staff during all phases of the project.
7. In addition to user-friendly summaries of the documentation required by RFCA, RFCAB requests that the ER staff provide regular updates to the Board on the status of remediation projects. Their broad purpose would be to inform the public of work completed, in progress, and still to come. Particular objectives might include answers to the following questions: What analysis informed the decision on how far to excavate, or if no remediation was done, why not? On a project-specific basis, how has the site considered long-term stewardship and ALARA? By receiving such information on ER projects in real-time, rather than in a report prepared after the fact, the community would be in a better position to affect cleanup decisions.

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.
