

Rocky Flats Citizens Advisory Board Recommendation 2001-4



to the Rocky Flats Cleanup Agreement Agency
Principals

Regarding Radionuclide Soil Action Levels

Approved October 19, 2001

The Rocky Flats Citizens Advisory Board (RFCAB) appreciates the opportunity to provide input on the Radionuclide Soil Action Level (RSAL) Review currently being conducted by the Rocky Flats Cleanup Agreement (RFCA) parties. RFCAB has closely followed the evolution of the RSALs since their initial development in 1996. Over the last year, RSALs have been a major thrust of the RFCAB work plan. RFCAB has invested a great deal of time and effort in understanding RSAL issues and promoting community education. As you are aware, RFCAB recently co-sponsored a two-day workshop on modeling related to the RSALs, in addition to holding numerous discussions on RSAL issues at monthly Board meetings.

RFCAB remains committed to the best possible cleanup at Rocky Flats. We realize that the RSAL decision is only one component of the overall cleanup framework. Accordingly, we anticipate collaborating with the RFCA parties on future cleanup decisions in order to devise an end-state that minimizes risk. Implementation of the RSAL and how to build long-term stewardship into cleanup decisions are just a few of the issues we plan to follow after the RSALs have been determined. Beyond that, we look forward to working closely with the Department of Energy over the coming years to develop a robust stewardship plan whereby the necessary mechanisms will be in place to ensure the safety of future generations and achieve cleanup to average background levels when the technology becomes available.

RFCAB is pleased to submit the following recommendations regarding the important risk-management decision to be made by the RFCA Principals in selecting a site-wide RSAL. It should be noted that RFCAB may have additional comments on the RSAL decision once the Task 3 Parameter Selection Report and the final report on the RSAL Review have been released.

Technical Work Done by RSAL Working Group

RFCAB acknowledges and appreciates that the agencies have put considerable effort into the review of the RSALs. Through this regulatorily and scientifically based analysis, a range of

values has been generated from which the agencies plan to select an RSAL. However, RFCAB recognizes that the scientific knowledge, methods, and data used in the RSAL analysis are limited by the level of knowledge and science that exists today. Therefore, the results should be considered limited and used conservatively in establishing RSALs. The RSALs should be revisited in the future when better knowledge, methods, and data become available.

Risk Level

The RSAL should be set at the most protective end of the CERCLA risk range in order to provide the highest-level protection to future users of the site: that is, 10^{-6} (the probability of one excess cancer per million). This level should serve as the point of departure for consideration of a cleanup level. The RFCAB agencies should challenge themselves to reach a cleanup goal equal to the RSAL level and develop a creative plan to meet this challenge. If a cleanup to this level cannot be achieved, the cleanup should be as close to the 10^{-6} risk level as possible, with full justification given to the community for why the target cleanup cannot be achieved.

Scenarios

RFCAB recognizes the probable conversion of Rocky Flats to a wildlife refuge and acknowledges this scenario as the most likely in the foreseeable future. The resident scenario should be assumed for the period of time beyond the foreseeable future. The RSAL should provide protection both to the currently projected user (wildlife refuge worker) and to a possible future residential user.

Additional Points

The RSAL represents an initial level of cleanup. The end-state or ultimate goal for cleanup should be to background, as recommended in 1996 by the Rocky Flats Citizens Advisory Board, and restated in RFCAB's Vision for Rocky Flats issued in 1999.

To move toward this end-state goal, the Rocky Flats site should be regarded as a demonstration site for the development of technology for cleaning sites contaminated with plutonium.

The Record of Decision, or other legally binding document, should state that after closure, periodic reviews (every five years or more frequently) should be conducted to assess: a) reliability of any controls in place on the site; b) availability of new technology that may be of use for achieving better cleanup of the site; and c) whether specific measures should be implemented to achieve better cleanup.

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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