

Rocky Flats Citizens Advisory Board Recommendation 96-4

to the Department of Energy

on the Accelerated Site Action Project

Approved February 1, 1996

The Rocky Flats Citizens Advisory Board (RFCAB) would like to transmit preliminary thoughts regarding the Accelerated Site Action Project (ASAP). We find it difficult to comment on the concept that has been presented thus far (ASAP 1) in the absence of a guiding vision. Therefore, the attached recommendation for the Vision should also be taken as guidance for ASAP. Issues identified at this point are preliminary in nature and are intended to provide guidance in the planning process. RFCAB has not had time to discuss these issues in detail, however, they have been identified as issues of concern that we will look at more closely, and hope that DOE and Kaiser-Hill will also look at closely.

GENERAL CONCERNS ABOUT ASAP:

- Regulatory relief and waiver of DOE standing orders
 - If this is necessary and prudent, use only on case-by-case basis
 - Only in cases of overwhelming need
- Cost as driving factor
 - Also, plan is driven by current budgets without thought that recent cutbacks may be short-lived
- Lacking section on environmental protection measures to be used during cleanup
- There should be no open access to buffer zone while plutonium is onsite
 - Concerns about targetability and the possibility of exposure
- The document lacks acknowledgment of both long-term financial and monitoring responsibility
 - Lifespan of waste far outlasts the vision of this plan

- Image in computer photo at front seems to want to "hide" the dangers that still remain
- If not total cleanup, we need to pass along information about the site to future generations
- Need to address potential remediation/corrective actions in future if cap were to fail
- Onsite disposal plans disregard CAB waste recommendation
- Risk levels are not quantified
 - Might want to include "risk logics"
 - Analyze offsite risks
- Need to consider alternatives to tearing down buildings as quickly as possible (i.e mothballing)
- Lack of NEPA consideration

POSITIVE ASPECTS OF ASAP:

- Good idea to do cleanup quicker
- Shows action, will be useful/persuasive about Rocky Flats (to Congress)
- First overall plan
- Good strategies/basic approach
- Kaiser-Hill is showing revised work culture (i.e. projectizing)
- Gives opposite end of the spectrum from BEMR estimates
- Good step towards openness, working together with citizens
- Good, simple organization of document (i.e. tasks), user-friendly

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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