

000007132

CORRES CONTROL
OUTGOING LTR. NO.

89 RF 2174

Rocky Flats Plant
Aerospace Operations
Rockwell International Corporation
P.O. Box 464
Golden, Colorado 80402-0464
(303) 966-7000



Rockwell
International

Contractor to U.S. Department of Energy

89-RF-2174

JUN 23 1989

Edward S. Goldberg
Acting Area Manager
DOE, RFAO

DOE/COLORADO AGREEMENT IN PRINCIPLE (AGREEMENT)

The purpose of this letter is to provide an analysis regarding our ability to achieve closure on the specifically scheduled objectives of the subject Agreement.

A summary of all the stated objectives has been prepared and is Attachment I to this letter. Each objective is listed and assigned to either the state, DOE, or Rockwell. For those items assigned to Rockwell, a Director and a specific individual is assigned the responsibility to assure that the objective is accomplished using plant resources as required.

In accordance with your request, we have analyzed each item with a specific due date established in the Agreement to assure Rockwell's ability to achieve the technical and schedule objectives. These items were quickly reviewed based on the assumptions that they have highest plant priority and that funding and personnel levels are not constraints.

The results of our analysis indicate that each of the currently defined objectives is achievable if additional funding and personnel are provided immediately and DOE expedites resolution of certain environmental issues as described herein.

Perhaps the least certain objective is the completion of all sludge removal and pondcrete disposal by October 1991 (Item B.3). This will require approximately three times the current level of effort and require large expense and capital funding increases.

Details on each of the specifically requested objectives is provided in Attachment II.

DIST.	RE	EX
ANCHINI, D.J.	X	X
ANDERSON, C.P.		
BEFURD, H.J.	X	X
BENTLEY, R.		
COOPER, D.C.	X	X
JENSEN, E.H.		
NEZHE, J.E.		
IRBY, W.A.		
OWETT, J.F.		
EVERS, G.W.	X	X
HECKER, J.M.		
HANNON, W.M.	X	X
KESTON, W.F.	X	X
KOZNIK, B.D.		
OUNG, E.A.		
ETCHER, D.H.	X	X
ARNIVAL, G.J.		
ERRERA, D.W.		
ARMAN, L.K.		
EBERT, J.I.	X	X
DEY, J.B.		
OFFMAN, R.B.		
LAMANN, R.L.		
RIED, D.M.		
DUDENBURG, G.E.		
KIMLEY, K.B.	X	X
AIMON, E.A.	X	X
EWBY, R.L.		
VRNER, M.L.		
ELASQUEZ, R.N.		
DOES CONTROL	X	X
CONTRACT ADMIN.		
CLASSIFICATION		
UNCLASSIFIED		
CONFIDENTIAL		
SECRET		
EXEMPT CLASSIFICATION		
DATE		
IN REPLY TO LTR. NO.		

CO: 9/57/9/54
APPROVALS
NO: [Signature]
FWS: [Signature]
JE: KYE, J.L.H.
G & DIST INITIALS
B: blg
45482 (Rev. 4-82)

REVIEWED FOR CLASSIFICATION/UCM
BY: [Signature] 1370
DATE: 8-25-91



E. S. Goldberg
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We are also preparing a preliminary cost assessment of each item within the Agreement and other directions received related to improvements/enhancements in our environmental activities. Those items requiring supplemental FY89 and/or FY90 funding will be clearly identified. We will coordinate the development of this data with your staff. This analysis will be provided to you by 6/28/89 to support your efforts in obtaining supplemental funding.

D. J. Sanchini
President

Orig. and 1 cc - E. S. Goldberg
Encs.

DOE/CDH AGREEMENT IN PRINCIPLE

ATTACHMENT I

STATUS AS OF 5/23/89

A. EXPANDED ENVIRONMENTAL MONITORING SYSTEM

ITEM NO.	TASK DESCRIPTION	ACTION	DUE DATE	RESPONSIBILITY		COMMENTS
				DIRECTOR	ASSIGNED TO	
1	State convened independent panel to review results.	COH				
2	Broomfield, Westminster, Thornton, Northglenn sampling support.	COH				
3	Periodic samples of Standley and Great Western water.	COH				
4	Provide full set of samples for organic chemicals and radionuclides prior to all discharge.	RI	Ongoing	ERF	Setlock	achievable; cost impact
5	Improvements to ground water monitoring sys. as recommended by CDH. Including 50 additional wells.	RI	12/31/89	WES	McKinley	achievable; currently planned
6	Prepare a comprehensive air emissions inventory.	RI	TBD	ERF	Setlock	under review
7	Provide comprehensive mass balance of VOC's	RI	TBD	ERF	Setlock	under review
8	Identify all toxic & radioactive emissions from the plant & dev. model to predict any areas of offsite impacts. Conduct stack tests to verify.	RI	TBD	ERF	Setlock	under review
9	Install continuous emission monitors in all appropriate sources.	RI	TBD	ERF	Setlock	under review
10	Implement improvements to the air monitoring system used by CDH/EPA.	COH				
11	Purchase of VOC ambient monitors for offsite use by CDH.	COH				

STATUS AS OF 6/23/89

B. ACCELERATED CLEANUP ACTIVITIES

ITEM NO.	TASK DESCRIPTION	ACTION	DUE DATE	RESPONSIBILITY		COMMENTS
				DIRECTOR	ASSIGNED TO:	
1	881 Hillside groundwater cleanup. Assess and clean up heavy metals and radioactive constituents. Initiate ground water cleanup and expedite investigation of sources.	RI	9/30/89	WES	McKinley	achievable if regulatory process and contracts expedited
2	Expedite completion of the assessment of ground-water contamination at Mound, East Trench, 903 pad and begin construction activities.	RI	1/31/90	WES	McKinley	achievable if regulatory process expedited
3	Expedite pondcrete disposal. Remove sludge and ship pondcrete.	RI	10/31/91	WES	Arnold	achievable; numerous constraints
4	Accelerate cleanup of all other identified sites.	RI	TBD	WES	McKinley	achievable; Impacts under review
5	Initiate a new review of off-site soils and Lake sediments contamination.	RI	TBD	WES	McKinley	achievable; Impacts under review

C. ACHIEVE A MORE COMPREHENSIVE AND INTEGRATED ENVIRONMENTAL MANAGEMENT SYSTEM

ITEM NO.	TASK DESCRIPTION	ACTION	DUE DATE	RESPONSIBILITY DIRECTOR	ASSIGNED TO:	COMMENTS
1	Expediently provide information to State on all releases.	RI	Ongoing	ERF	Setlock	achievable; cost impact
2	Expand DOE regulatory and compliance personnel and reorganize the RFP office.	DOE				
3	Expedite O clearances of state officials.	DOE				
4	Establish office space on site for EPA and CDH.	RI	6/30/89	FER	Whiting	achievable
5	Complete comprehensive environmental compliance audit.	DOE				
6	Complete comprehensive waste minimization audit.	DOE				
7	Conduct study of all available methods to eliminate RFP discharges (including a source reduction review).	RI	TBD	FER	Buetler	under review
8	Conduct background characterization studies to determine base level of naturally occurring radioactive and hazardous constituents. a) Water Report b) Soil Report	RI	11/1/89 12/30/89	WES WES	McKinley McKinley	achievable
9	Update and revise the plant's current waste characterization plan. Expand and provide more detail. a) Status Report b) Draft Report	RI	9/30/89 9/30/90	WES	Detamore	achievable; cost impact
10	Develop plan for low-level mixed waste treatment and disposal.	RI	11/30/89	WES	Detamore	achievable; cost impact
11	Expedite delivery and operation of the proposed supercompactor. a) permitting b) equipment c) operation	RI	TBD TBD TBD	WES FER WES	McKinley Knutson Naimon	achievable pending permit

STATUS AS OF 6/23/89

C. ACHIEVE A MORE COMPREHENSIVE AND INTEGRATED ENVIRONMENTAL MANAGEMENT SYSTEM (cont)

ITEM NO.	TASK DESCRIPTION	ACTION	DUE DATE	RESPONSIBILITY		COMMENTS
				DIRECTOR	ASSIGNED TO:	
12	Provide data on restart/operation of incinerators, emissions from stacks, regular status reports, allow state access, etc.	RI	TBD	WES	Sherrill	under review
13	Make available all documents and reviews on compliance concerns. a) safety b) environmental - RCRA/CERCLA c) environmental - waste operations d) environmental - HS&E	RI	Ongoing Ongoing Ongoing Ongoing	ERF WES WES ERF	L. C. Smith McKinley Detamore Setlock	achievable; cost impact
14	Implement policy for state access to records and buildings for environmental compliance issues.	RI	7/1/89	MEY	Young	achievable; no impact
15	Clarify in writing the "need to know" policy.	RI	TBD	MEY	Young	achievable; completion 6/29/89
16	Provide monthly air emissions data.	RI	Ongoing	ERF	Setlock	achievable (see items C1 and C12)
17	Meet all State/EPA clean-up milestones.	RI	Ongoing	WES	McKinley	achievable pending negotiation
18	Provide Monthly Report on <u>Facility Status</u> .	RI	TBD	ERF	<u>L.C. Smith</u>	achievable

<u>ITEM NO.</u>	<u>TASK DESCRIPTION</u>	<u>DUE DATE</u>
B.3	EXPEDITE PONDCRETE DISPOSAL	10-31-91

ACHIEVABLE: YES, SUBJECT TO NUMEROUS QUALIFICATIONS

RESULTS ANTICIPATED:

SHIPMENT TO NTS OF:

- . INVENTORY OF GOOD TRIWALL BOXES - 10,600
 - . INVENTORY OF TRIWALL BOXES REQUIRING REMIX - 5,000
 - . POND SLUDGE YET TO BE CEMENTED - 3,000
- TOTAL TRIWALL BOXES 18,600

MAJOR CONSTRAINTS/ASSUMPTIONS:

1. PONDCRETE REMIXING PROCESS WILL BE OPERATIONAL IN JULY 1989 AND REMIXING WILL PERFORM AS EXPECTED. THE EXISTING REMIX PROCESS SHOULD BE ENCLOSED WITHIN A BUILDING. AN ADDITIONAL REMIX FACILITY MAY BE REQUIRED TO ACHIEVE/MAINTAIN REMIXING OR NEW SLUDGE RATES.
2. PONDCRETE MEETS ALL FUTURE LAND DISPOSAL RESTRICTIONS (LDR) FOR EMPLACEMENT AT THE NEVADA TEST SITE (NTS). THEREFORE, ADDITIONAL TREATMENT WILL NOT BE REQUIRED FOR ANY PROPOSED CONSTITUENT, SUCH AS CYANIDE, CADMIUM OR OTHERS.
3. NTS CAN CONTINUE TO RECEIVE ALL PONDCRETE SHIPMENTS.

ITEM NO.

TASK DESCRIPTION

DUE DATE

B.3

MAJOR CONSTRAINTS/ASSUMPTIONS, CONTINUED

4. APPROXIMATELY 9 MILLION GALLONS OF POND WATER CAN BE EVAPORATED IN THE BUILDING 374 EVAPORATOR OR IN A PORTABLE EVAPORATOR AT THE PONDS BY THE FALL OF 1990. ALTERNATIVELY, THE POND WATER COULD BE CEMENTED AND SHIPPED TO NTS AS LL-MIXED WASTE. USE OF THE BUILDING 374 EVAPORATOR FOR POND WATER COULD SERIOUSLY IMPACT THE TREATMENT OF OTHER PLANT WASTES. CEMENTING AND SHIPPING OF POND WATER WOULD ADD CONSIDERABLE COST.
5. THE EXISTING SALTCRETE PROCESS IN BUILDING 374 CAN IMMOBILIZE AND SHIP THE BRINE PRODUCED BY THE EVAPORATOR.
6. EXTENSIVE SUPPORT FOR PONDCRETE DISPOSAL (AND ALSO FOR THE ASSOCIATED SALTCRETE DISPOSAL) WILL BE REQUIRED FROM MANY PLANT ORGANIZATIONS INCLUDING: MAINTENANCE (CLOSING BOXES AND MAINTENANCE OF PROCESSES IN 788 AND 374), NDA, WASTE CERTIFICATION, RADIATION MONITORING, TRUCKING, TRAFFIC, FACILITIES ENGINEERING, AND SHIPPING OPERATIONS-BUILDING 664. THESE ORGANIZATIONS AS WELL AS LIQUID WASTE-BUILDING 374 AND 788 WILL REQUIRE ADDITIONAL PERSONNEL TO SUPPORT BOTH PONDCRETE AND BUILDING 374.
7. A HEATED BUILDING AT 750 PAD OR 904 PAD WILL BE REQUIRED FOR WINTERTIME INSPECTION OF STORED BLOCKS AND FOR STAGING FOR SHIPMENT.
8. A ONE MILLION GALLON TANK FOR INTERIM STORAGE OF INTERCEPTOR TRENCH WATER FROM THE POND HILLSIDE WILL BE REQUIRED BY MARCH 1991. THE WATER WILL REQUIRE TREATMENT IN THE BUILDING 374 EVAPORATOR OR A GROUND WATER TREATMENT FACILITY AT THE HILLSIDE.

DUE DATE

TASK DESCRIPTION

ITEM NO.

6-30-89

ESTABLISH OFFICE SPACE FOR CDM AND EPA

C.4

ACHIEVABLE: YES

RESULTS ANTICIPATED:

TWO OFFICES INCLUDING FURNITURE.

MAJOR CONSTRAINTS/ASSUMPTIONS:

TWO OFFICES WILL BE PROVIDED IN THE NEW T115A COMPLEX BEING CONSTRUCTED FOR A 7/20/89 OCCUPANCY. OFFICE SPACE IN BUILDING 111, ROOM 217 WILL BE AVAILABLE UNTIL NEW OFFICE SPACE IS READY.



DUE DATE

TASK DESCRIPTION

ITEM NO.

C.8
CONDUCT BACKGROUND CHARACTERIZATION STUDIES
 . WATER REPORT
 . SOIL REPORT

11-1-89
12-30-89

ACHIEVABLE: YES

RESULTS ANTICIPATED:

BACKGROUND CHARACTERIZATION STUDIES ARE UNDERWAY. AT THIS TIME ALL SOIL SAMPLES HAVE BEEN COLLECTED AND ARE BEING ANALYZED. GROUND WATER SAMPLING IS NEARLY COMPLETE. THE BACKGROUND SOIL REPORT WILL BE SUBMITTED 12/89 AND A PRELIMINARY BACKGROUND WATER REPORT BASED ON ONE-ROUND OF SAMPLING WILL BE SUBMITTED 11/89.

MAJOR CONSTRAINTS/ASSUMPTIONS:

COMPLYING WITH THESE DEADLINES ASSUMES NO SIGNIFICANT ADDITIONAL WORK REQUESTED TO TAKE PRIORITY OVER WORK CURRENTLY PLANNED (INCLUDING THAT IDENTIFIED IN THIS AGREEMENT). SIGNIFICANT ADDITIONAL WORK COULD OVERWHELM THE PRACTICAL LIMITS OF MANPOWER AND LABORATORY SUPPORT NECESSARY TO COMPLY WITH THIS DEADLINE.

DUE DATE

9-30-89
9-30-90

TASK DESCRIPTION

ITEM No.

C.9 UPDATE CURRENT WASTE CHARACTERIZATION PLAN

- STATUS REPORT
- DRAFT REPORT

ACHIEVABLE: YES

RESULTS ANTICIPATED:

THE STATUS REPORT WILL SUMMARIZE THE CURRENT WASTE STREAM CHARACTERIZATION PROGRAM. THE DRAFT REPORT WILL PROVIDE ALL DATA NEEDED TO CHARACTERIZE WASTE STREAMS PLUS AN ANALYSIS OF THE INFORMATION. THE PROJECT IS COMPRISED OF (1) DATA VERIFICATION OF CURRENT DATA; (2) FIELD VERIFICATION OF DATA; (3) PHYSICAL SAMPLING AND RESULTS; (4) DATA ANALYSIS; AND (5) REPORT PREPARATION.

MAJOR CONSTRAINTS/ASSUMPTIONS:

SUBCONTRACTED SUPPORT AND ADDITIONAL STAFFING REQUIRED.

