776
8-8

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE

REGULATORY CONTACT RECORD

DOCUMENT CLASSIFICATION REVIEW WAIVER PER CLASSIFICATION OFFICE
(ex-105-01

Date/Time: June 16, 2000/

Site Contact(s): Ted A. Hopkins

Phone: 303-966-7652

Regulatory Contact: James Hindman/Edd Kray

Phone: 303-692-3345

Agency: CDPHE

Purpose of Contact: Proposal for Clean Closure in accordance with B777/776 DOP

Discussion

Building 776/777 Environmental Compliance is requesting approval to conduct Clean Closure activities for the following Units:

UNIT	Location	Regulatory Status	Description
90.85	Room 152 Pyrochemical Vault SET 53	To be closed in accordance with the Building DOP	Mixed Residue Container Storage Unit…fixed shelf position, and drum storage

FEB 2002
RECEIVED
RECORDS CENTER

ADMIN RECORD
B776-A-000132

2501	Room 478 B-Vault SET 46	Interim Storage Area Mixed Residue Consent Order	ISA, fixed shelf storage area
777.1	Room 448, SET 32 NDT Vault	Permitted Unit Container Storage Area	Permitted Unit, fixed shelf positions

DOP 4.5.1.1 RCRA regulated units may be "clean closed" either by documenting the absence of contamination or by decontaminating the unit. For units having a complete, detailed operating history, clean closure will be demonstrated when the following criteria are met:

1. An administrative review of the RCRA Operating Record indicates hazardous or mixed waste was never spilled in the unit, or if a spill did occur, it was cleaned up and the spill area was decontaminated; and
2. A visual inspection of the unit and associated ancillary equipment notes an absence of hazardous or mixed waste stains and/or residuals.

In addition requirements #1 and #2 above, B776/777 Environmental Compliance is proposing using analytical data from radioactive contamination smears to support administrative documentation that all spill/release (if any) were cleaned up. All three vaults stored high activity radioactive mixed waste. Any releases to the storage area [shelving, floor, walls, etc.] would have resulted in SAAM/CAM alarms and high level contamination being present in those areas. If a spill or release had not been cleaned up, the areas would be posted as a High Contamination Area. Today, there are no special requirements (e.g., respirator, supplied air, etc.) needed to enter these areas. After analytical testing, it is anticipated that shelving, water wall containers, etc. will be judged to be free of contamination and will either be reused or disposed of as Low Level Waste.

Since no decommissioning activities are required for closure of these units, B776/777 Environmental Compliance is requesting that a Contact Record certifying Clean Closure be accepted in lieu of a Minor Modification to the DOP. This Contact Record will include the information required for Closure as detailed in the B777/776 DOP.

Contact Record Prepared by: Ted A. Hopkins

w/w

Required Distribution: Additional Distribution:

D. Grosek, RFFO S. Dahlgren, 776

R. DiSalvo, RFFO M. Ferri, 776

C. Burbach, CDPHE C. Hicks, 776

F. Phillips, K-H C. Smiley, 776

K. North, K-H ESS B. Cathel, 776

W. Wierzbicki, K-H ESS R. Lesser, 776

T. Hopkins, 776

J. Wrapp, 371

R. Leitner, 771

K. Lavorato, 707

S. Nesta, RISS

J. Berardini, MS

A. Rosenman, K-H ESS

E. Kray, CDPHE

J. Hindman, CDPHE