

ROCKY FLATS SITE

REGULATORY CONTACT RECORD 2026-01

Purpose: Reportable condition for uranium at Point of Evaluation (POE) GS10

Contact Record Approval Date: September 14, 2026

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Regulatory Contacts and Affiliations: Brian Walker, Colorado Department of Public Health and Environment (CDPHE); Brandon Nichalson, U.S. Environmental Protection Agency (EPA)

Date of Consultation Meeting: September 3, 2026

Consultation Meeting Participants: Brian Walker, CDPHE; Brandon Nichalson, EPA; Michelle Franke, DOE

Related Contact Records: Contact Record (CR) 2021-02, CR 2022-03, CR 2023-01, CR 2025-01

Discussion:

DOE identified a reportable condition at POE GS10 (Figure 1) during routine data evaluation for uranium. DOE performed the evaluation in accordance with *Rocky Flats Legacy Management Agreement* (RFLMA), Attachment 2, Figure 6, “Points of Evaluation,” which will result in a calculated 12-month rolling average concentration for uranium on June 30, 2026, that exceeds the applicable RFLMA, Attachment 2, Table 1 standard of 16.8 micrograms per liter (µg/L), once DOE analyzes the current in-progress composite sample and validates the data. This projected 12-month rolling average includes available sample results for the period from July 1, 2025, through June 30, 2026.¹

Although DOE has received no recent validated sample data for POE GS10 (the most recent results are from the composite sample for the period from April 20, 2026, to June 11, 2026), routine data evaluation indicates that the 12-month rolling average for uranium will trigger a reportable condition for June 30, 2026.² Since the composite sample started on June 11, 2026, is still in progress due to low flows, analytical results are not available for June 11 through June 30, 2026. However, DOE continuously collects flow data, allowing for the calculation of a projected 12-month rolling uranium average. DOE is making this early determination based on the small volume of water represented by the current in-progress sample through the month of June and

¹ This method entails calculating the 12-month rolling average for the last day of each month, using daily flow and concentration values from the previous 12 months. DOE calculates and evaluates 12 average values each year.

² This is the date when DOE usually receives validated results identifying a reportable condition, either by sample result value or calculated average, depending on location and analyte. In this case, DOE determined on August 10, 2026, that uranium concentrations at surface water POE location GS10 will become reportable; regardless of the uranium concentration (once analyzed), the limited volume of surface water flow associated with the current in-progress composite sample will not lower the average below the standard. DOE is providing this notification earlier than required within the RFLMA flowchart for POEs to maintain the timely notification intent.

the insignificant effect this sample will have on the 12-month rolling average once validated results are available.

It has been a very dry year at the Rocky Flats Site, Colorado. The year 2026 is on track to have some of the lowest surface water flows since closure in 2005. The unusually low spring runoff and the extended dry periods (no streamflow) have resulted in 12-month rolling average concentrations that are more influenced by the dry conditions than by increased water quality variation. At POE GS10, as the 12-month rolling average period progresses through 2026, relatively lower uranium concentration water from 2025 falls outside the calculation period. Additionally, due to the lower spring runoff in 2026 and more recent dry periods, relatively higher uranium concentration water makes up a larger portion of the average.

The RFLMA Parties considered the following information to develop a path forward as outlined in this CR:

- There has been no flow at WALPOC, which is downstream, since June 16, 2025, and no flow has left the Site; therefore, DOE has collected no samples at WALPOC since that time.
- POEs are intended to provide an early indication of water-quality trends that may affect water quality at downstream Points of Compliance. The most recent uranium concentrations at POE GS10 are consistent with concentrations observed during the 21 years since closure. The latest concentrations do not suggest a new source term or a significant increasing trend.
- Uranium in groundwater in the POE GS10 area is variable, and some monitoring wells have higher concentrations of naturally occurring uranium. Since closure, DOE has sent numerous samples from POE GS10 to Los Alamos National Laboratory (LANL) or Lawrence Berkeley National Laboratory (LBNL) for isotopic analysis to determine the percentages of natural and anthropogenic uranium. Historically, naturally occurring uranium has made up a much greater proportion of the concentration at POE GS10, averaging about 70%.³
- The elevated uranium concentrations observed since closure at POE GS10 are primarily the result of proportionally increased groundwater contributions to surface water base flow due to reduced surface runoff resulting from the removal of impervious surfaces (e.g., pavement, buildings) that were present before closure.
- The RFLMA Parties expect uranium concentrations in surface water to fluctuate due to the natural variability in environmental conditions, such as precipitation runoff and groundwater recharge. Uranium concentrations at POE GS10 have periodically exceeded the RFLMA standard since Site closure. In more recent years, uranium concentrations have decreased.
- A study conducted by geochemistry experts detailed the variability of the uranium concentration, the results of which are published in the *Evaluation of Water Quality Variability for Uranium and Other Selected Parameters in Walnut Creek at the Rocky Flats Site* (September 2015). This report has been updated three times, most recently in 2024. The 2024 report is available at https://lmpublicsearch.lm.doe.gov/lmsites/rfs_evaluation_of_water_quality_variability_walnut_creek_oct_2024.pdf.

³ DOE includes LBNL and LANL data as appendixes to the Rocky Flats Site annual reports for the years when these isotopic analyses are completed.

Proposed Plan and Path Forward:

The following actions are consistent with the response to previous reportable conditions for uranium at POE GS10 and serve as the plan and schedule for the evaluation:

- DOE will continue sampling in accordance with RFLMA, Attachment 2, Table 2
- DOE will routinely analyze flow-paced composite samples from POE GS10 on an accelerated 2-week turnaround
- DOE will make available, upon CDPHE's request, a split sample from an upcoming composite sample collected at POE GS10
- DOE will report the results of continued monitoring and of the subsequent evaluation in RFLMA quarterly and annual reports of surveillance and maintenance activities

Resolution:

CDPHE, after consultation with EPA, approves this CR.

Action Complete:

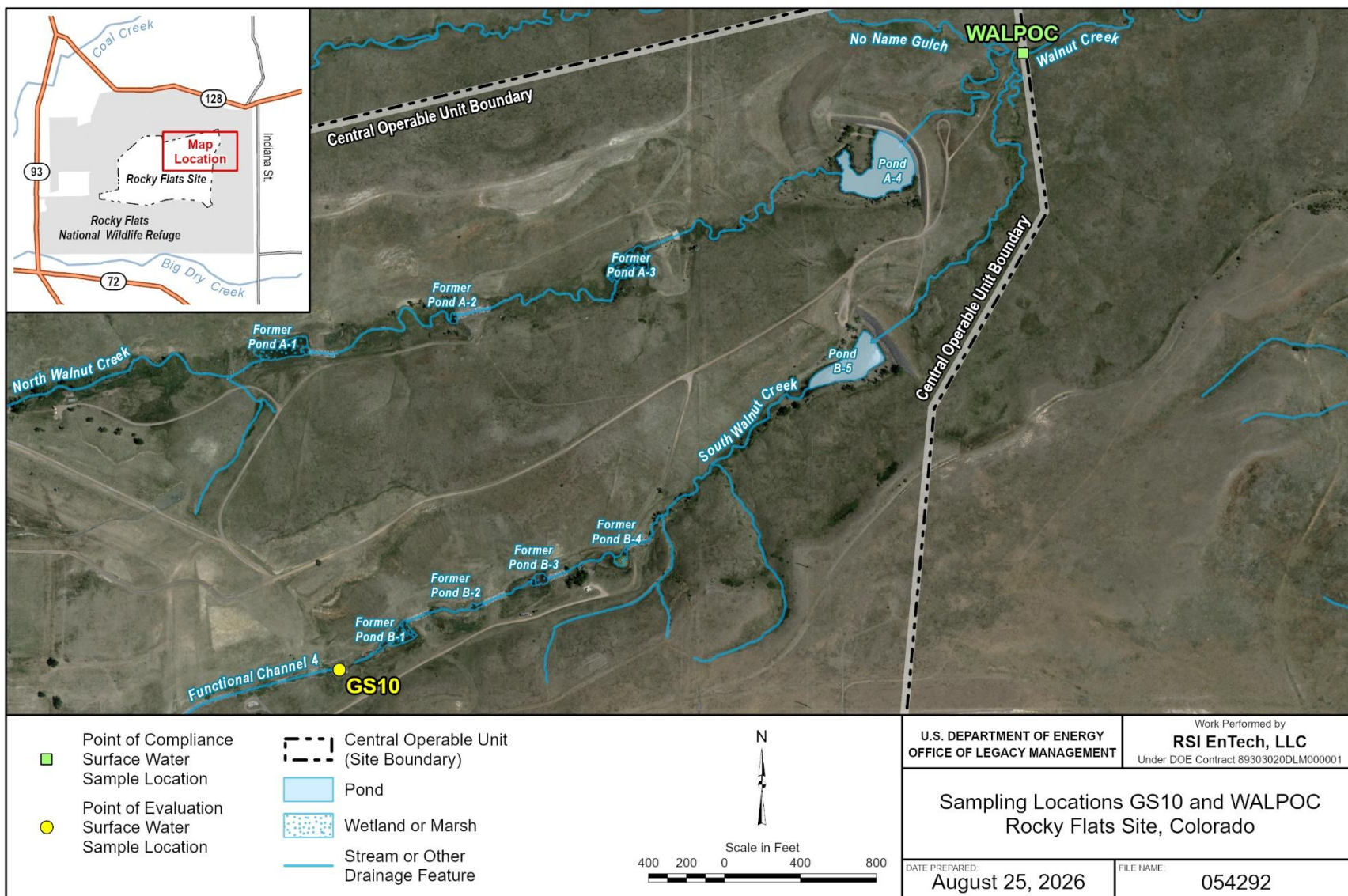
The actions approved in this CR will continue as part of routine surface water monitoring and reporting, as identified in the sections above and documented within the RFLMA. The RFLMA Parties will document any future changes to these steps separately.

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Figure 1. POE GS10 and WALPOC Locations