



## Department of Energy

Idaho Operations Office  
1955 Fremont Avenue  
Idaho Falls, ID 83415

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Nicholas Ceto, INL Project Manager  
EPA Region 10  
309 Bradley Landing, Suite 115  
Richland, WA 99352

Daryl F. Koch, FFA/CO Manager  
Waste Management and Remediation Division  
Idaho Department of Environmental Quality  
1410 North Hilton  
Boise, Idaho 83706-1255

SUBJECT: Addendum to Table 1 of the Action Memorandum for General Decommissioning Activities under the Idaho Cleanup Project – (EM-FMDP-08-010)

Dear Mssrs. Ceto and Koch:

The Idaho Cleanup Project (ICP) requests concurrence from DEQ and EPA for inclusion of buildings TRA-613, TRA-761, and CPP-648 with the list of structures to be decommissioned pursuant to the *Action Memorandum for General Decommissioning Activities under the Idaho Cleanup Project* (DOE/ID-11293, October 2006). This non-time critical removal action (NTCRA) is intended to simplify administrative processes for management of wastes generated during decommissioning. The potential for modifying the scope of the NTCRA subsequent to the signing of the Action Memorandum was addressed during the public review period of the *Engineering Evaluation/Cost Analysis for General Decommissioning Activities under the Idaho Cleanup Project* (DOE/ID-11291, August 2006). This provision to modify the list was memorialized in the Action Memorandum itself in Section 1., Statement of Basis and Purpose, which states,

“ICP may be asked to decommission other INL buildings and structures with similar characteristics, contaminants, and complexity to those specifically identified in Section 2.1.8, Table 1. This Action Memorandum intends to allow the potential future inclusion of such buildings and structures under the scope of this NTCRA, as appropriate. If additional buildings and structures are added to the list in Table 1, concurrence from DEQ and EPA will first be obtained, and a letter will be placed in the Administrative Record for this NTCRA identifying the building or structure and explaining why it is sufficiently similar to the facilities specifically identified in this Action Memorandum and appropriate for inclusion under the scope of the NTCRA.”

Buildings TRA-613 and TRA-761 are located in the southeastern portion of the Reactors Technology Complex (RTC), and building CPP-648 is located in the southwestern portion of the Idaho Nuclear Technology and Engineering Center (INTEC). Further descriptions of buildings TRA-613, TRA-761, and CPP-648 are provided in the enclosure. The descriptions explain why these buildings are similar in "characteristics, contaminants, and complexity" to the other buildings identified for general decommissioning by Table 1., and are appropriate for inclusion under the scope of the NTCRA.

Please note that the scope of the NTCRA excludes completion of activities covered by the Voluntary Consent Order (VCO), and the Action Memorandum states, "When the decommissioning involves management and/or generation of wastes subject to regulation under the Idaho Hazardous Waste Management Act/Resource Conservation and Recovery Act (HWMA/RCRA), these wastes will be addressed pursuant to the requirements of those regulations." Therefore, the removal, closure, and disposal of HWMA/RCRA hazardous waste at these buildings will not be performed under the scope of the NTCRA. The scope of activities to be performed subject to the NTCRA will include the removal and disposal of radiological and asbestos wastes, as described by the applicable or relevant and appropriate requirements (ARARs) identified in the Action Memorandum. Upon receipt of your concurrence with this determination, this letter and attachment, along with your concurrence letters, will be posted to the Administrative Record, and will serve as an addendum to Section 2.1.8, Table 1., of the Action Memorandum.

Sincerely,

*J. R. Cooper for  
R. B. Provencher*

Richard B. Provencher, Deputy Manager  
Idaho Cleanup Project

Enclosure

## Descriptions of TRA-613, TRA-761, and CPP-648

### TRA-613

The TRA-613 metal weather enclosure is a prefabricated metal structure that was erected in the southeast portion of RTC in 1995 to prevent precipitation infiltration into the TRA-613 pump vaults. TRA-613 metal weather enclosure is located over an unreinforced concrete slab. The building is 22 ft 3 in by 47 ft 4 in by 9 ft tall with a sloped metal roof. The radiological inventory is associated with the pump vaults and piping, which are part of VCO system TRA-004. There is potential for radiological contamination associated with the metal weather enclosure itself. The TRA-613 metal weather enclosure is similar in characteristics, contaminants, and complexity to other structures currently subject to decommissioning under the general NTCRA at RTC, and the pump vaults managed wastes that originated from these other RTC buildings (e.g., TRA-603, TRA-604, and TRA-661).



Photograph of TRA-613.

### TRA-761

The Tank Truck Loading Facility (TRA-761) is part of the TRA Hot Waste Management System (Voluntary Consent Order system TRA-004). TRA-761 is located in the southeastern portion of RTC and is a reinforced concrete arch located over an unreinforced concrete slab with an adjacent steel staircase. TRA-761 is also equipped with a 1 ½" vent line and a separate 1 ½" transfer line that was used to fill tank trucks with hot waste. The hot waste within the TRA-004 tank system that required disposal was pumped from the TRA-613 pump vaults to TRA-761 via line 1 ½" HDA-613. Currently, line 1 ½" HDA-613 and its vent line are isolated from the TRA-613 pump vaults. TRA-761 is approximately 15.5-ft high by 21-ft wide by 10-ft thick with an opening that

is approximately 15.5-ft wide by 12-ft high. The structures' footings are approximately 5-ft below grade on undisturbed sand and gravel. The concrete slab below TRA-761 is approximately 15.5-ft by 20-feet wide. TRA-761 is similar in characteristics, contaminants and complexity to other structures identified in the general NTCRA. The source term for the 1 ½" HDA-613 and its vent line were obtained from EDF-7857 and are shown in the table below:

Source term for 1 ½"-HDA-613 and its vent line.

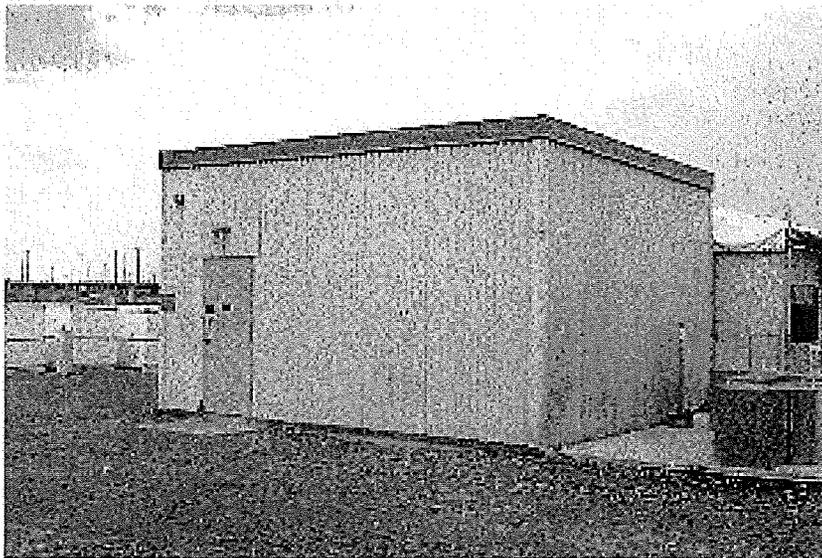
Radionuclide	Total Source Term (Ci)
Am-241	3.5E-10
Co-60	4.6E-06
Cs-137	3.3E-04
Fe-55	6.9E-08
Ni-59	1.7E-07
Ni-63	2.0E-07
Pu-238	3.9E-10
Pu-239	2.6E-10
Pu-240	2.6E-10
Pu-241	1.5E-08
Sr-90	2.4E-08
Te-99	2.0E-06
U-233	1.2E-09
U-234	1.2E-09
U-235	3.8E-11
U-238	8.3E-11
Total	3.3E-04



Photograph of TRA-761.

### CPP-648

CPP-648 is a single story abovegrade structure located in the southwestern portion of INTEC. The structure was constructed in 1957, with a footprint of approximately 16 ft by 21 ft. This building also has 2 below grade vault areas, the pump vault is 16 ft by 38 ft directly beneath the building structure, and the tank vault is 21 ft by 53 ft adjacent to the pump vault. This building houses the VES-SFE-106 tank system that was used to store characteristically hazardous wastes that were generated as a result of the CPP-603 spent nuclear fuel storage activities, including treatment of the basin water that provided radioactive shielding for the spent nuclear fuel. The abovegrade structure is constructed with corrugated transite panel walls and roof, supported by a structural steel frame. The below grade portions of the facility are constructed with poured reinforced concrete slab and house the VES-SFE-106 25,000-gal waste storage and treatment tank and associated piping system. The tank system and associated components are being closed under the State of Idaho Hazardous Management Act (HWMA) requirements and will be managed in accordance with the closure plan. CPP-648 is similar in characteristics, contaminants, and complexity to other structures at INTEC currently being decommissioned under the general NTCRA.



Photograph of CPP-648.