



Department of Energy

Idaho Operations Office
1955 Fremont Avenue
Idaho Falls, Idaho 83415

March 26, 2009

Mr. Richard Campbell
INL Program Manager
US EPA Region 10-Hanford Project Office
309 Bradley Blvd., Suite 115
Richland, Washington 99352

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

SUBJECT: Addendum to Table One (1) of the Action Memorandum for General Decommissioning Activities Under the Idaho Cleanup Project (DOE/ID-11293, Revision 1) EM-FMDP-09-021

Dear Mr. Campbell and Mr. Koch:

The Department of Energy, Idaho Operations Office (DOE-ID), has identified 43 additional surplus facilities that can be decommissioned under the American Recovery and Reinvestment Act of 2009 (ARRA). The ARRA contains provisions to fund additional accelerated decommissioning work at the Idaho Cleanup Project (ICP). DOE-ID hereby formally requests concurrence from the Idaho Department of Environmental Quality (DEQ) and U.S. Environmental Protection Agency, Region 10 (EPA) for including these 43 facilities into the list of facilities to be decommissioned pursuant to the *Action Memorandum for General Decommissioning Activities under the Idaho Cleanup Project*, (DOE/ID-11293, Revision 1, January 2009).

Adding these facilities to the Action Memo for general decommissioning will expedite this important environmental cleanup work in accordance with the goals of the ARRA, and contribute to the overall footprint reduction of contaminated and surplus structures at the Idaho National Laboratory. This non-time critical removal action (NTCRA) was developed by DOE-ID, DEQ, and EPA to simplify and streamline the administrative processes for managing wastes generated during decommissioning. The approach has proven to be an effective and efficient means to meet regulatory requirements and perform accelerated decommissioning activities under the ICP.

The potential need for modifying the scope of the NTCRA subsequent to the issuance of the

Action Memorandum was recognized during the development of the *Engineering Evaluation/Cost Analysis for General Decommissioning Activities under the Idaho Cleanup Project* (DOE/ID-11291, August 2006). The Engineering Evaluation/Cost Analysis (EE/CA) contains provisions that allow the addition or deletion of structures from the Action Memorandum, Table 1 (List of Buildings and Structures). Any such modification to the Action Memorandum is subject to certain conditions and concurrence from DEQ and EPA. The EE/CA was released for public comment from September 9, 2006 through October 9, 2006, and was presented at a meeting of the INL Citizens Advisory Board on September 19, 2006, with open participation by the general public. The provision allowing addition or deletion of structures to Table 1 is included in Section 1 of the Action Memorandum, 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 2.1.10, 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.”

The list of structures identified for inclusion into Table 1 is enclosed. These surplus structures and buildings may contain hazardous substances, as described herein, to which if no action was taken and current surveillance and maintenance activities ceased, these structures would present the same threat to public health, welfare, and the environment as those structures presently identified in Table 1 of the Action Memorandum. In general, the nonradioactive hazardous substances expected to be encountered during decommissioning may include, but is not limited to, asbestos-containing material, heavy metals (including lead and mercury), poly-chlorinated biphenyls, refrigerants, lubricants, solvents, chemically reactive material, and corrosives. Also, in general, the primary radionuclide hazardous substances that are expected to be encountered may include, but is not limited to, americium-241, cesium-137, cobalt-60, europium isotopes, plutonium isotopes, strontium-90, technetium-99, tritium, and uranium isotopes.

Although this addenda request includes buildings MFC-767, EBR-II Reactor Building; and TRA-632, Hot Cell Building, the disposition of the EBR-II reactor vessel itself, the three hot cells within TRA-632, and the end-state decisions for the footprints beneath the two buildings are specifically excluded from this request and from the scope of the NTCRA. Section 1 of the Action Memorandum states,

“The scope of the removal action is intended to encompass demolition of miscellaneous buildings and structures, as well as decommissioning preparatory activities (for example, isolation of utilities, chemical removal, removal of piping and equipment) for the more substantial and significant facilities that are being or have been addressed through separate non-time critical removal actions.”

Mr. Campbell
Mr. Koch

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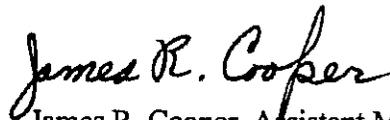
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Due to the nature of the chemical and radiological operations historically performed within the EBR-II vessel and the three TRA-632 hot cells, these components are considered to present more significant and substantial hazards, and warrant further review. Therefore, the disposition of the EBR-II reactor vessel and the TRA-632 hot cells will be covered by separate Engineering Evaluation/Cost Analyses and Action Memorandums. The decommissioning activities that will be performed at TRA-632 and MFC-767 under the scope of the existing *Action Memorandum for General Decommissioning Activities under the Idaho Cleanup Project*, (DOE/ID-11293, Revision 1, January 2009) will include asbestos abatement, and the removal and disposal of potentially contaminated and uncontaminated structural materials, waste containers, pumps, pipes, tanks, boilers, compressors, ductwork, electrical components, and other equipment.

Please note that the scope of the NTCRA excludes completion of activities covered by the Voluntary Consent Order (VCO) and 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." The scope of the activities to be performed under the scope of the NTCRA also excludes closure of HWMA/RCRA units included within existing HWMA/RCRA permits. Therefore the removal, closure, and disposal of HWMA/RCRA hazardous waste at these structures 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 those wastes other than HWMA/RCRA hazardous waste, as described by the applicable or relevant and appropriate requirements (ARARs) identified in Section 4.4 of the Action Memorandum.

The Idaho Cleanup Project concludes that the structures identified in this addenda request are sufficiently similar in characteristics, contaminants, and complexity to those previously included in Table 1 of the Action Memorandum, and are appropriate for inclusion under the scope of the NTCRA. Upon receipt of concurrence with this determination from DEQ and EPA, this letter, and your concurrence letters, will be placed in the Administrative Record and will serve as an addendum to Section 2.1.10, Table 1, of the Action Memorandum. If you have any questions or concerns, please contact Mark Shaw of my staff at 208-526-6442.

Sincerely,



James R. Cooper, Assistant Manager
Facility and Material Disposition
Idaho Cleanup Project

Enclosure

Cc: Dennis Faulk, EPA

Table 1. Addenda to List of Buildings and Structures

INL Structure ID	Name/Description	Major Facilities	Minor Facilities
CPP-602	CPP-602 Laboratory/Offices Bldg		X
CPP-630	CPP-630 Safety/Spectrometry		X
CPP-641	Waste Holdup Pump House		X
CPP-679	Tent Fabrication Facility		X
CPP-711	Unloading Shelter at CPP-603		X
CPP-719	Nitric Acid Storage System		X
CPP-720	Aluminum Nitrate Storage System		X
CPP-730	Liquid Nitrogen Storage Tank		X
CPP-736	Salt Storage Pit		X
CPP-751	Service Waste Monitor Station		X
CPP-752	Service Waste Diversion Station		X
CPP-757	Vault Fluoric Acid Supply Systems		X
CPP-762	West Side Condensate Pump Pit		X
CPP-796	West Side Service Waste Building		X
CPP-1637	FPR Weld Fab Shop Warehouse		X
CPP-1638	Radiological Contaminated Storage Building		X
CPP-1672	Access Control Building (TF)		X
CPP-1682	Kerosene Tank Pump House		X
CPP-1760	Kerosene Storage Tank Basin		X
CPP-1794	Pad For Trailers		X
CPP-2716	HIC Enclosure		X
NCE-140-1	VES-NCE-140-1 Diesel Underground Storage Tank		X
NCE-140-2	VES-NCE-140-2 Diesel Underground Storage Tank		X
SAA-101	Liquid Nitrogen Tank		X
SAA-104	Liquid Nitrogen Tank		X
Uti-709	Sulfuric Acid Tank		X
Wo-129	Liquid Nitrogen Tank		X
Wo-130	Liquid Nitrogen Tank		X
MFC-750A	EBR-II Experimental Building		X
MFC-757A	EBR-II Cooling Tower		X
MFC-766	EBR-II Sodium Boiler		X
MFC-767	EBR-II Reactor Building (EBR-II reactor vessel disposition and final facility end state are not included in this AM and will be covered by a separate EE/CA and AM.)	X	
MFC-793A	Alcohol Recovery Facility Pad & Tank		X
MFC-793B	Alcohol Recovery Facility Annex		X
MFC-793E/F	SCMS Storage Buildings		X
MFC-795	EBR-II Cover Gas Cleanup System		X
PBF-609	WERF Incinerator Building		X
PBF-756	WERF Exhaust Stack		X
PBF-761	WERF Spray Dryer Absorber		X
TRA-612	Retention Basin Sump Pump House		X
TRA-632	TRA Hot Cell Building (Disposition of the three hot cells and the final facility end state are not included in this AM and will be covered by a separate EE/CA and AM.)	X	
TRA-712	Retention Basin		X
TRA-760	Retention Basin Monitoring Station		X