



Department of Energy

Idaho Operations Office
1955 Fremont Avenue
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July 25, 2011

Mr. Dennis Faulk
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Mr. Daryl Koch
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Idaho Department of Environmental Quality
1410 N. Hilton
Boise, ID 83706

SUBJECT: Addendum to Table 1. of the Action Memorandum for General Decommissioning Activities under the Idaho Cleanup Project (DOE/ID-11293, Revision 1) (WDP-RWMC-11-037)

Dear Mr. Faulk and Mr. Koch:

The Idaho Cleanup Project (ICP) requests concurrence from the Department of Environmental Quality (DEQ) and the Environmental Protection Agency (EPA) for inclusion of the following buildings or structures 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, Revision 1, January 2009): Building MFC-799, Sodium Process Facility; Building MFC-799A, Caustic Storage Tank Building; MFC-770C, Nuclear Calibration Lab; and those portions of MFC-765, Fuel Conditioning Facility, and MFC-768, Power Plant, that are necessary to support demolition of the MFC-767, EBR-II Reactor Building containment dome. This non-time critical removal action (NTCRA) approach 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 2.1.10, 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.”

Buildings MFC-799, MFC-799A, and MFC-770C are all located in the northwestern portion of the Materials and Fuels Complex (MFC). Further descriptions of the three buildings are provided in the attachment, and the locations of the buildings are shown in Figure 4 of the attachment. Buildings MFC-765 and MFC-768 are connected to MFC-767. Connecting portions of MFC-765 and MFC-768 will need to be removed and new walls constructed to support demolition of the EBR-II containment dome. Decommissioning of MFC-767 is currently being performed under a separate removal action pursuant to the *Action Memorandum for the EBR-II Final End-State* (DOE/ID-11426, Rev. 0). Additionally, the inter-building coffin (IBC) that remains in building MFC-768 will need to be removed and dispositioned. Further descriptions of the portions of the buildings for inclusion under the scope of the NTCRA are provided in the attachment. The descriptions define the scope of the decommissioning activities and explain why these building and structures 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 any activities covered by the Voluntary Consent Order (VCO) and/or Idaho Hazardous Waste Management Act/Resource Conservation and Recovery Act closure activities upon permitted units. 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 or 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 industrial, 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 2.1.10, Table 1. of the Action Memorandum.

Mr. Faulk and Mr. Koch

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WDP-RWMC-11-037

If you have any questions or concerns, please contact Mr. Mark Shaw at (208) 526-6442.

Sincerely,



Kathleen E. Hain,
FFA/CO Project Manager

Enclosures

cc: S. Reno, CWI, MS 6193

ID DISTRIBUTION:

DOE-ID Administrative Support Center

FFA/CO

Mark Shaw

Nicole Hernandez

CONCURRENCE:

Mark Shaw *MS* 7/25/11
Ken Whitham *KW* 7/25/11
Nicole Hernandez *NH* 7/25/11

RECORD NOTES:

1. This letter adds a set of buildings at MFC to the D&D General EE/CA to allow them to be demolished under CERCLA authority.
2. This letter was drafted by CWI, reviewed by Mark Shaw, discussed with the regulatory agencies in draft form and finalized by Kathleen Hain. As stated in the letter, MFC-765 and MFC-768 are connected to MFC-767. The agencies have agreed that any debris generated by separation of these facilities from MFC-767 and the reestablishment of building integrity may be considered a result of D&D even though these 2 structures are not being demolished. The agency designation of this material as D&D debris provides a path to disposal (ICSF) for any radioactively contaminated material that may be generated. Similarly, MFC-799 is being "decommissioned", interior structures and radioactive material removed, not demolished. The general EE/CA does not require demolition of a building to provide CERCLA Removal Action authority.
3. This letter/memo closes Pegasus number N/A
4. The attached correspondence has no relation to the Naval Nuclear Propulsion Program.
5. The attached correspondence relates to the ARRA stimulus funding.

[Note: Concurrence required by Federal Program Director and AM if stimulus funded]

MFC-799, Sodium Process Facility

Construction of the MFC-799 Sodium Process Facility was completed in 1986. The facility was used for the storage and treatment of mixed wastes. Three tank systems in the building are currently managed under an Idaho Hazardous Waste Management Act/Resource Conservation and Recovery Act permit. These tank systems will be closed pursuant to the closure plans in the permit. The building also contains systems that are radiologically contaminated. The levels of radiological contamination and the concentration of chemical constituents after HWMA/RCRA closure is complete are expected to be similar to other buildings decommissioned under the General D&D Action Memorandum. Waste from the D&D of this structure is expected to be acceptable for on-site disposal at the Idaho CERCLA Disposal Facility (ICDF) and/or the MFC CERCLA Demolition Waste Landfill (MCDWL).



Figure 1. Photograph of MFC-799 from the Southeast.

MFC-799A, Caustic Storage Tank Building

The MFC-799A Caustic Storage Tank Building contains a 4,000 gallon caustic storage tank. The tank is currently under a HWMA/RCRA permit and will be subject to HWMA/RCRA closure. Upon completion of the HWMA/RCRA closure activities, the remaining non-hazardous wastes and demolition debris will be managed under the NTCRA. The building is not believed to contain radiological contamination and the concentration of chemical constituents after HWMA/RCRA closure is complete is expected to be similar to other buildings decommissioned under the General D&D Action Memorandum. Waste from the D&D of this structure is expected to be acceptable for on-site disposal at the ICDF and/or the MCDWL.



Figure 2. Photograph of MFC-799A from the South.

MFC-770C, Nuclear Calibration Lab

The MFC-770C, Nuclear Calibration Lab became operational in 1963. The building was used for calibrating nuclear measurement instrumentation. All of the radiological sources used in the building have been removed. The building is not currently believed to contain radiological contamination and the concentration of chemical constituents is expected to be similar to other buildings decommissioned under the General D&D Action Memorandum. Asbestos and lead are present in the building. The lead will be removed and shipped to an off-site disposal facility. Waste from the D&D of this structure is expected to be acceptable for on-site disposal at the ICDF and/or the MCDWL.



Figure 3. Photograph of MFC-770C from the Southeast.

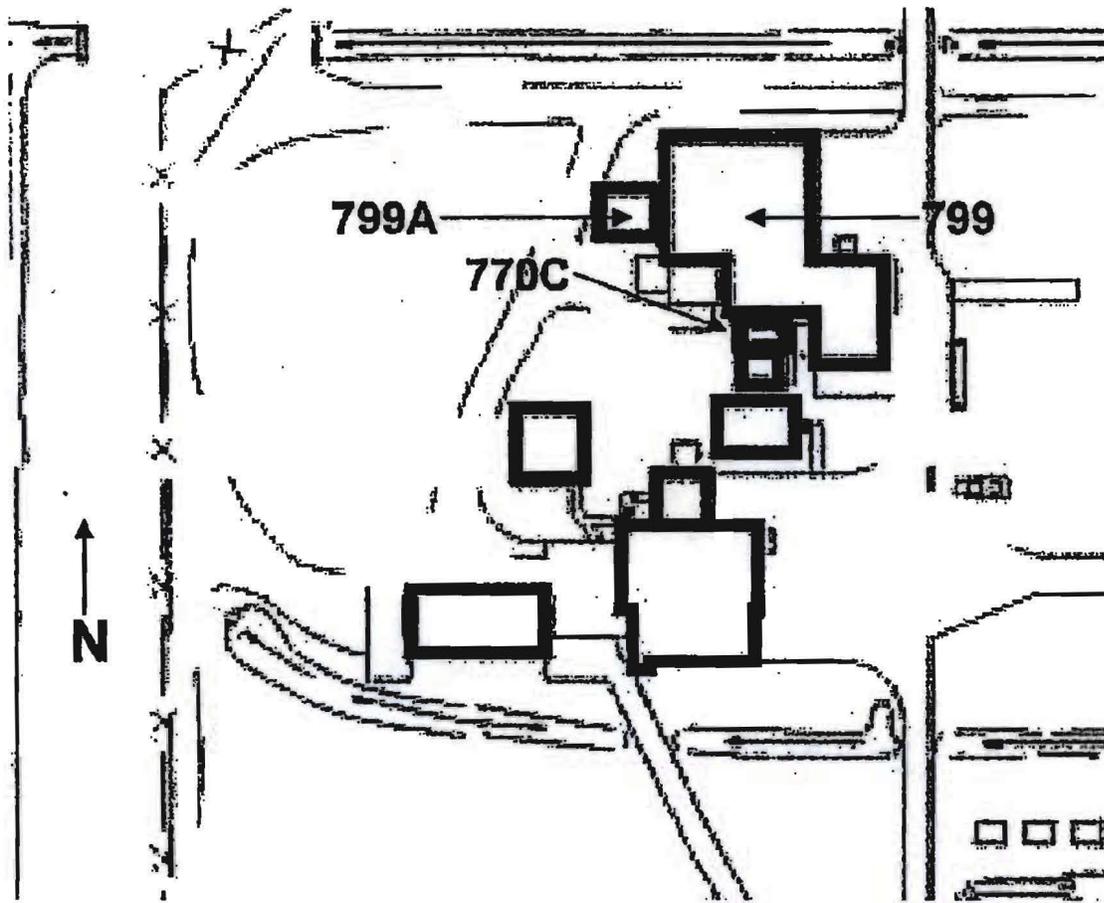


Figure 4. Plot of Northwestern Corner of MFC, Showing MFC-799, MFC-799A, and MFC-770C.

Portions of MFC-765, Fuel Conditioning Facility; and MFC-768, Power Plant to be Removed and New Walls Constructed to Support Decommissioning of EBR-II Containment Dome.

Building MFC-765 will be isolated from the MFC-767 containment dome by erecting a debris barrier wall made of reinforced concrete and concrete masonry unit (CMU) blocks. The location of the barrier wall will be on the column line approximately twenty-two (22) feet east of the MFC-767 dome. This will leave an approximate 22 ft gap between the new MFC-765 barrier wall and MFC-767. The MFC-765 office complex will remain intact. There is approximately 9 ft between the office complex and the MFC-767 containment dome. There is also an interbuilding coffin (IBC) that will need to be removed from MFC-765. The IBC in MFC-765 is one of two IBCs that were used to move EBR-II subassemblies between MFC-767 and MFC-765. The other IBC is currently located within MFC-767 and is being dispositioned under the *Action Memorandum for the EBR-II Final End State* (DOE/ID-11426, Rev. 0). The equipment airlock tank and crawl space above the airlock will be filled with grout. Electrical equipment and other interferences within these portions of the building will also be removed.

Building MFC-768 will be isolated from the MFC-767 containment dome by erecting a debris barrier wall made of reinforced concrete and CMU blocks. The physical location of the debris barrier wall will be on the first column line south of the 767 dome. The wall will extend from floor to ceiling, which is approximately thirteen (13) feet high. The remaining first and second story structure of MFC-768 will be temporarily supported, structurally isolated from MFC-767, and demolished using heavy equipment. This will leave an approximate 15 ft gap between the two buildings. Electrical equipment and other interferences within these portions of the building will also be removed.

The levels of radiological contamination and the concentration of chemical constituents are expected to be similar to other buildings decommissioned under the General D&D Action Memorandum. Waste from the D&D of portions of these structures is expected to be acceptable for on-site disposal at the Idaho CERCLA Disposal Facility (ICDF) and/or the MFC CERCLA Demolition Waste Landfill (MCDWL). The locations of MFC-765 and MFC-768 relative to MFC-767 are shown in Figure 5.

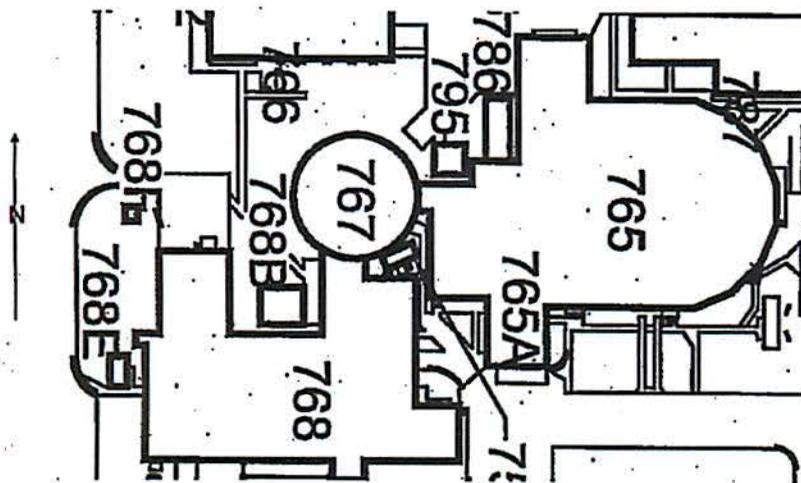


Figure 5. MFC-767 Area Plot Showing Connecting Portions of MFC-765 and MFC-768.