



Department of Energy
Richland Operations Office
P.O. Box 550
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APR 03 2012

12-AMCP-0088

Ms. J. A. Hedges, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
3100 Port of Benton
Richland, Washington 99354

Dear Ms. Hedges:

**PROPOSED CLASS 2 RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)
PERMIT MODIFICATIONS AND REQUEST FOR TEMPORARY AUTHORIZATION AT
THE HANFORD FACILITY 400 AREA WASTE MANAGEMENT UNIT (TSD: S-4-2)**

The U.S. Department of Energy Richland Operations Office (RL) as owner/operator and CH2M HILL Plateau Remediation Company (CHPRC) as the co-operator (hereinafter referred to as the Permittees) are in receipt of the February 21, 2012, letter from Ron Skinnerland (12-NWP-024) "Reinstatement of Original Permit Conditions, Addendum H, Section H.1.1, Section H.1.2 and Table H.1 for Inspection Frequency, Type, and Schedule for the Two Permitted Container Storage Units at the 400 Area Waste Management Unit." To implement the State of Washington Department of Ecology's (Ecology) letter, the Permittees have reviewed the Part III Chapter of the Hanford Facility RCRA Permit, Revision 8C for the 400 Area Waste Management Unit (400 Area WMU). As a result, Class 1 and Class 2 modifications have been identified to addendums of the 400 Area WMU Permit. Class 1 modifications will be processed separately according to Permit Condition I.C.3 of the Hanford Facility RCRA Permit, Revision 8C.

Ecology's letter rejected the March 31, 2009, permit modification request to decrease the frequency of inspections at the 400 Area Interim Storage Area and Fuel Storage Facility. In order to respond effectively to emergencies during the course of the inspections, and to properly inspect and manage the emergency equipment at the 400 Area WMU, the Permittees are requesting Class 2 RCRA Permit Modifications to the Contingency Plan (Addendum J) and the Inspection Requirements (Addendum I) for the 400 Area WMU in accordance with Washington Administrative Code (WAC) 173-303-830(4)(e).

Temporary authorization requests are required to include the elements in WAC 173-303-830(4)(e)(ii)(B) as follows: The Class 2 modifications are described as changing the emergency response procedures (e.g., take cover, evacuation), and modifying the type, quantity, and capability of emergency equipment to reflect current operations, and changing the inspection frequency to weekly as required by Ecology's letter.

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The changes described above are necessary to follow the required inspection schedule, and to ensure personnel can respond appropriately to emergencies while performing the weekly inspections at the 400 Area WMU. The 400 Area WMU is a final status operating unit in the current Hanford Facility RCRA Permit and therefore meets the applicable standards in WAC 173-303-280 through 173-303-395, and WAC 173-303-600 through 173-303-680.

The temporary authorization is necessary to enable the Permittees to prevent disruption of ongoing dangerous waste management activities [WAC 173-303-830(4)(e)(iii)(B)(III)].

The notice required by the Permittees in WAC 173-303-830(4)(b) will be included in the appropriate Hanford Federal Facility Agreement and Consent Order publication or list server, as described in Hanford Facility RCRA Permit Condition I.C.3, and will place a notice in the Tri-City Herald. The public comment period will begin on the date the public notice appears in, the Tri-City Herald, and will remain open for 60 days. In addition, the Permittees will hold a public meeting.

If Ecology finds the temporary authorization request adequate, please respond with your approval. If you have any questions, please contact me, or your staff may contact Jonathan Dowell, Assistant Manager for the Central Plateau, on (509) 373-9971.

Sincerely,


Matt McCormick
Manager

AMCP:DHC

Attachments

cc: See Page 3

Ms. J. A. Hedges
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cc w/attachs:

D. B. Bartus, EPA
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F. W. Bond, Ecology
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K. Niles, ODOE
D. Rowland, YN
R. R. Skinnarland, Ecology
Administrative Record (FFTF, TSD: S-4-2)
Environmental Portal
Ecology Library

cc w/o attachs:

L. M. Dittmer, CHPRC
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1 **Addendum J** **Contingency Plan**

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J CONTINGENCY PLAN

The requirements for a contingency plan at the 400 Area WMU are satisfied in the following documents: Portions of the Hanford Facility RCRA Permit (Permit) Attachment 4 *Hanford Emergency Management Plan* (DOE/RL-94-02) and this section.

This Addendum is based upon the unit-specific building emergency plan because the building emergency plan also serves to satisfy a broad range of other requirements [e.g., Occupational Safety and Health Administration standards (29 CFR 1910), *Toxic Substances Control Act of 1976* (40 CFR 761), and U.S. Department of Energy Orders]. Addendum J contains those sections of the building emergency plan that meet the requirements of WAC 173-303-350(3). Therefore, revisions made to Addendum J are governed by the requirements of WAC 173-303 and will be considered as a modification subject to WAC 173-303-830 or Permit Condition I.C.3.

Table J.1 identifies the sections of documents used to meet WAC 173-303-350(3) contingency plan requirements identified in this application. In addition, Section J.6 contains information written to meet WAC 173-303 requirements identifying where copies of Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02) and the building emergency plan are located and maintained on the Hanford Facility.

Table J.1. Hanford Facility Documents Containing Contingency Plan Requirements of WAC 173 303-350(3)

| Requirement | Permit Attachment 4 <i>Hanford Emergency Management Plan</i> (DOE/RL-94-02) | Building Emergency Plan ¹ (HNF-IP-0263-FFTF) | Addendum J |
|---|---|--|---|
| <u>-350(3)(a)</u> - A description of the actions which facility personnel must take to comply with this section and <u>WAC 173-303-360</u> | X ² Section 1.3.4 | X ² Sections 7.1, 7.2 through 7.2.5, and 7.3 ³ Sections 4.0, 8.2, 8.3, 8.4, and 11.0 | X ² Sections J.3.1, J.3.2 through J.3.2.5, and J.3.3 ³ Sections J.3, J.3.4, J.3.5, J.3.6, and J.5 |
| <u>-350(3)(b)</u> - A description of the actions which shall be taken in the event that a dangerous waste shipment, which is damaged or otherwise presents a hazard to the public health and the environment, arrives at the facility, and is not acceptable to the owner or operator, but cannot be transported pursuant to the requirements of <u>WAC 173-303-370(5)</u> , Manifest system, reasons for not accepting dangerous waste shipments | X ² Section 1.3.4 | X ^{2,4} Section 7.2.5.1 | X ^{2,4} Section J.3.2.5.1 |
| <u>-350(3)(c)</u> - A description of the arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams to coordinate emergency services as required in <u>WAC 173-303-340(4)</u> . | X Sections 3.2.3, 3.3.1, 3.3.2, 3.4, 3.4.1.1, 3.4.1.2, 3.4.1.3, 3.7, and Table 3-1 | | |

| Requirement | Permit Attachment 4 <i>Hanford Emergency Management Plan</i> (DOE/RL-94-02) | Building Emergency Plan ¹ (HNF-IP-0263-FFTF) | Addendum J |
|--|---|---|---|
| <p><u>-350(3)(d)</u> - A current list of names, addresses, and phone numbers (office and home) of all persons qualified to act as the emergency coordinator required under <u>WAC 173-303-360(1)</u>. Where more than one person is listed, one must be named as primary emergency coordinator, and others must be listed in the order in which they will assume responsibility as alternates. For new facilities only, this list may be provided to the department at the time of facility certification (as required by <u>WAC 173-303-810 (14)(a)(i)</u>), rather than as part of the permit application.</p> | | <p>X⁵ Sections 3.1 and 13.0</p> | <p>X⁵ Sections J.2 and J.7</p> |
| <p><u>-350(3)(e)</u> - A list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems, and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.</p> | | <p>X Section 9.0</p> | <p>X Section J.4</p> |
| <p><u>-350(3)(f)</u> - An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary. This plan must describe the signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.</p> | <p>X⁶ Figure 7-3 and Table 5-1</p> | <p>X⁷ Section 1.5</p> | <p>X⁷ Section J.1 and facility operating record</p> |

1 An 'X' indicates requirement applies.

2 ¹ Portions of Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02) not enforceable through Appendix A
 3 of that document are not made enforceable by reference in the building emergency plan.

4 ² Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02) contains descriptions of actions relating to the
 5 Hanford Site Emergency Preparedness System. No additional descriptions of actions are required at the site level. If other
 6 credible scenarios exist or if emergency procedures at the unit are different, the description of actions contained in the building
 7 emergency plan will be used during an event by a building emergency director.

8 ³ Sections J.1, J.2 through J.2.5, and J.3 of Addendum J are those sections subject to the Class 2 "Changes in emergency
 9 procedures (i.e., spill or release response procedures)" described in WAC 173-303-830, Appendix I, Section B.6.a.

10 ⁴ This requirement only applies to TSD units that receive shipment of dangerous or mixed waste defined as offsite shipments in
 11 accordance with WAC 173-303.

12 ⁵ Emergency Coordinator names and home telephone numbers are maintained separate from any contingency plan document
 13 on file in accordance with Permit Condition II.A.4 and is updated, at a minimum, monthly.

14 ⁶ The Hanford Facility (site wide) signals are provided in this document. No unit/building signal information is required unless
 15 unique devices are used at the unit/building.

16 ⁷ An evacuation route for the TSD unit must be provided. Evacuation routes for occupied buildings surrounding the TSD unit are
 17 provided through information boards posted within buildings.

1 **J.1 BUILDING EVACUATION ROUTING**

2 All Fast Flux Test Facility (FFTF) facilities identified in this plan are unoccupied. Personnel enter these
3 facilities infrequently for periodic surveillance, maintenance, and transition activities. In the event an
4 evacuation is required, personnel will evacuate to a safe, upwind location based on current meteorological
5 conditions at the time of the event. The Building Emergency Director (BED) will communicate any
6 additional evacuation information to personnel via cell phone or radio. An evacuation routing map is
7 maintained in the facility operating record.

8 **J.2 BUILDING EMERGENCY DIRECTOR**

9 Emergency response will be directed by the BED until the Incident Commander (IC) arrives. The
10 incident command system (ICS) and staff, with supporting on-call personnel, fulfill the responsibilities of
11 the Emergency Coordinator as discussed in WAC 173-303-360. During events, WMU personnel perform
12 response duties under the direction of the BED. The Incident Command Post (ICP) is managed by either,
13 the senior Hanford Fire Department member present or senior Hanford Patrol member present on the
14 scene (security events only). These individuals are designated as the IC and as such, have the authority to
15 request and obtain any resources necessary for protecting people and the environment.

16 The BED becomes a member of the ICP and functions under the direction of the IC. In this role, the BED
17 continues to manage and direct 400 Area WMU operations.

18 A listing of the BEDs by title, work location, and work telephone number is contained in Section J.7. The
19 BED is on the premises or is available through an "on-call" list 24-hours-a-day. Names and home
20 telephone numbers of the BEDs are available from the Patrol Operations Center (POC) in accordance
21 with Permit Condition II.A.4.

22 **J.3 IMPLEMENTATION OF THE PLAN**

23 In accordance with WAC 173-303-360(2)(b), the BED ensures that trained personnel identify the
24 character, source, amount, and areal extent of the release, fire, or explosion to the extent possible.
25 Identification of waste can be made by activities that can include, but are not limited to, visual inspection
26 of involved containers, sampling activities in the field, reference to inventory records, or by consulting
27 with facility personnel. Samples of materials involved in an emergency might be taken by qualified
28 personnel and analyzed as appropriate. These activities must be performed with a sense of immediacy
29 and shall include available information.

30 The BED shall use the following guidelines to determine if an event has met the requirements of
31 WAC 173-303-360(2)(d):

- 32 1. The event involved an unplanned spill, release, fire, or explosion,
33 AND
34 2.a The unplanned spill or release involved a dangerous waste, or the material involved became a
35 dangerous waste as a result of the event (e.g., product that is not recoverable),
36 OR
37 2.b The unplanned fire or explosion occurred at the 400 Area WMU or transportation activity subject to
38 RCRA contingency planning requirements,
39 AND
40 3. Time-urgent response from an emergency services organization was required to mitigate the event,
41 or a threat to human health or the environment exists.

42 As soon as possible after stabilizing event conditions, the BED shall determine, in consultation with the
43 site contractor environmental single-point-of-contact, if notification to the Washington State Department
44 of Ecology (Ecology) is needed to meet WAC 173-303-360 (2)(d) reporting requirements. If all of the
45 conditions under 1, 2, and 3 are met, notifications are to be made to Ecology. Additional information is
46 found in Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02), Section 4.2.

1 If review of all available information does not yield a definitive assessment of the danger posed by the
2 incident, a worst-case condition will be presumed and appropriate protective actions and notifications will
3 be initiated. The BED is responsible for initiating any protective actions based on their best judgment of
4 the incident.

5 The BED must assess each incident to determine the response necessary to protect the personnel, facility,
6 and the environment. If assistance from Hanford Patrol, Hanford Fire Department, or ambulance units is
7 required, the Hanford Emergency Response Number (911 from site office phones/373-0911 from cellular
8 phones) must be used to contact the POC and request the desired assistance. To request other resources
9 or assistance from outside the 400 Area WMU, the POC business number is used (373-3800).

10 **J.3.1 Protective Action Responses**

11 Protective action responses are discussed in the following sections. The steps identified in the following
12 description of actions do not have to be performed in sequence because of the unanticipated sequence of
13 incident events.

14 **J.3.1.1 Evacuation**

15 There are no FFTF building evacuation alarms. The 400 Area evacuation siren is controlled from the
16 POC.

17
18 All FFTF facilities identified in this plan are unoccupied. Any personnel entering one of these facilities
19 will be part of a work group that will have the ability to be in radio/cellular phone contact with the BED.
20 In the event personnel need to evacuate one of these facilities, they will go to the upwind side of the
21 facility and report to their Field Work Supervisor (FWS). The FWS will report accountability to the
22 BED. The BED will provide further instructions based on notifications. Personnel working in a
23 radiological zone shall exit through the nearest door consistent with existing conditions. If evacuation is
24 required prior to obtaining an exit survey or while still wearing personal protective equipment (PPE),
25 those personnel shall segregate themselves from the rest of the group until they obtain a complete survey.

26 The BED will contact the POC to inform them of the event and ensure that necessary onsite and offsite
27 protective actions are initiated.

28 **J.3.1.2 Take Cover**

29 A take cover will be signaled by the 400 Area sirens. When the take-cover alarm is activated personnel
30 shall take cover in the nearest suitable (consider water supply, bathroom facilities, size, etc.) building or
31 trailer. The following actions shall be taken or considered:

- 32 • Closing all exterior doors and windows.
- 33 • Reporting your location to your manager or BED.
- 34 • Secure (turn off) ventilation and unnecessary electronic or electric equipment, if possible.
- 35 • Stand by for information or further instructions.
- 36 • Personnel working in radiological areas will exit using normal radiological exit procedures.
- 37 • Determine if anyone has been potentially exposed to hazardous material and, if so, request help
38 for medical evaluation.

39 **J.3.2 Response to Facility Operations Emergencies**

40 Depending on the severity of the event, the BED reviews the site-wide and FFTF emergency response
41 procedure(s) and, as required, categorizes and/or classifies the event. If necessary, the BED initiates area
42 protective actions and Hanford Site Emergency Response Organization activation. The steps identified in
43 the following description of actions do not have to be performed in sequence because of the unanticipated
44 sequence of incident events.

1 **J.3.2.1 Loss of Utilities**

2 A loss of utilities is not expected to lead to an emergency condition or require implementation of
3 protective actions.

4 A case-by-case evaluation is required for each event to determine loss of utility impacts. When a BED
5 determines a loss of utility impact, actions are taken to ensure dangerous and/or mixed waste is being
6 properly managed, to the extent possible given event circumstances. As necessary, the BED will stop
7 operations and take appropriate actions until the utility is restored.

8 **J.3.2.2 Major Process Disruption/Loss of Plant Control**

9 There are no process upsets or losses of plant control that can have any effect at FFTF.

10 **J.3.2.3 Pressure Release**

11 There are no pressure containing systems at FFTF that would result in a potential emergency condition.

12 **J.3.2.4 Fire and/or Explosion**

13 In the event of a fire, the discoverer activates a fire alarm (pull box); calls 911 from site office
14 phones/373-0911 from cellar phones or verifies that the Hanford Emergency Response Number has been
15 called. Automatic initiation of a fire alarm (through the smoke detectors) is also possible.

- 16 • Unless otherwise instructed, personnel shall evacuate the area/building by the nearest safe exit and
17 proceed to the designated staging area for accountability.
- 18 • On actuation of the fire alarm, ONLY if time permits, personnel should shut down equipment, and
19 secure waste. The alarm automatically signals the Hanford Fire Department.
- 20 • The BED proceeds directly to the ICP, obtains all necessary information pertaining to the incident,
21 and sends a representative to meet Hanford Fire Department.
- 22 • The BED provides a formal turnover to the IC, when the IC arrives at the ICP.
- 23 • The BED informs the Hanford Site Emergency Response Organization as to the extent of the
24 emergency (including estimates of dangerous waste and mixed waste quantities released to the
25 environment).
- 26 • If operations are stopped in response to the fire, the BED ensures that systems are monitored for
27 leaks, pressure buildup, gas generation, and ruptures.
- 28 • Hanford Fire Department firefighters extinguish the fire as necessary.

29 **J.3.2.5 Hazardous Material, Dangerous and/or Mixed Waste Spill**

30 Spills can result from many sources including container spills or leaks, damaged packages or shipments,
31 or personnel error. Spills of mixed waste are complicated by the need to deal with the extra hazards
32 posed by the presence of radioactive materials.

- 33 • The discoverer notifies the BED and initiates SWIMS response:
 - 34 – Stops work
 - 35 – Warns others in the vicinity
 - 36 – Isolates the area
 - 37 – Minimizes exposures to the hazards
 - 38 – Requests the BED Secure ventilation
- 39 • The BED determines if emergency conditions exist, requiring response from the Hanford Fire
40 Department based on classification of the spill and injured personnel, and evaluates the need to
41 perform additional protective actions.

- 1 • If the Hanford Fire Department resources are not needed, the spill is mitigated with resources
2 identified in Section J.4 and proper notifications are made.
- 3 • If the Hanford Fire Department resources are needed, the BED calls 911 from the site phones/373-
4 0911 from cellular phones.
- 5 • The BED sends a representative to meet the Hanford Fire Department.
- 6 • The BED provides a formal turnover to the IC when the IC arrives at the ICP.
- 7 • The BED informs the Hanford Site Emergency Response Organization as to the extent of the
8 emergency (including estimates of dangerous waste and mixed waste quantities released to the
9 environment).
- 10 • If operations are stopped in response to the spill, the BED ensures that systems are monitored for
11 leaks, pressure buildup, gas generation, and ruptures.
- 12 • Hanford Fire Department stabilizes the spill.

13 **J.3.2.5.1 Damaged or Unacceptable Shipments**

14 During the course of receiving an onsite transfer of mixed waste at the 400 Area WMU, an unanticipated
15 event could be discovered resulting in a conformance issue concerning the waste. Damaged or
16 unacceptable shipments resulting from onsite transfers are not subject to WAC 173-303-370; however,
17 conformance issues must be resolved in order to maintain proper records.

18 The following actions are taken to resolve the conformance issue:

- 19 • Operations management is notified of the damaged or unacceptable waste to be received.
- 20 • If the conformance issue results in a spill or release, actions described in Section J.3.2.5 are taken
- 21 • The generating organization is notified of the conformance issue
- 22 • An operations representative, in conjunction with the generating organization, determines the course
23 of action to resolve the conformance issue.

24 **J.3.3 Prevention of Recurrence or Spread of Fires, Explosions, or Releases**

25 The BED, as part of the ICP, takes the steps necessary to ensure that a secondary release, fire, or
26 explosion does not occur. The BED will take measures, where applicable, to stop processes and
27 operations; collect and contain released wastes and remove or isolate containers. The BED shall also
28 monitor for leaks, pressure buildups, gas generation, or ruptures in valves, pipes, or other equipment,
29 whenever this is appropriate.

30 **J.3.4 Incident Recovery and Restart of Operations**

31 A recovery plan is developed when necessary in accordance with Permit Attachment 4, *Hanford*
32 *Emergency Management Plan* (DOE/RL-94-02), Section 9.2. A recovery plan is needed following an
33 event where further risk could be introduced to personnel, the FFTF, or the environment through recovery
34 action and/or to maximize the preservation of evidence.

35 If this plan was implemented according to Section J.3, Ecology must be notified before operations can
36 resume. Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02), Section 5.1
37 discusses different reports to outside agencies. This notification is in addition to those required reports
38 and must include the following statements:

- 39 • There are no incompatibility issues with the waste and released materials from the incident.
- 40 • All the equipment has been cleaned, fit for its intended use, and placed back into service.

1 The notification required by WAC 173-303-360(2)(j) may be made via telephone conference. Additional
2 information that Ecology requests regarding these restart conditions will be included in the required
3 15-day report identified in Section J.5.

4 For emergencies not involving activation of the Hanford-EOC, the BED ensures that conditions are
5 restored to normal before operations are resumed. If the Hanford Site Emergency Response Organization
6 was activated and the emergency phase is complete, a special recovery organization could be appointed at
7 the discretion of DOE to restore conditions to normal. This process is detailed in DOE and contractor
8 emergency procedures. The makeup of this organization depends on the extent of the damage and its
9 effects. The onsite recovery organization will be appointed by the appropriate contractor's management.

10 **J.3.5 Incompatible Waste**

11 After an event, the BED or the onsite recovery organization ensures that no waste that might be
12 incompatible with the released material is treated, stored, and/or disposed of until cleanup is completed.
13 Clean up actions are taken by 400 Area WMU personnel or other assigned personnel. Permit
14 Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02), Section 9.2.3, describes actions
15 to be taken.

16 Waste from cleanup activities is designated and managed as newly generated waste. A field check for
17 compatibility before storage is performed, as necessary. Incompatible wastes are not placed in the same
18 container. Containers of waste are placed in approved storage areas appropriate for their compatibility
19 class.

20 If incompatibility of waste was a factor in the incident, the BED or the onsite recovery organization
21 ensures that the cause is corrected.

22 **J.3.6 Post Emergency Equipment Maintenance and Decontamination**

23 All equipment used during an incident is decontaminated (if practicable) or disposed of as spill debris.
24 Decontaminated equipment is checked for proper operation before storage for subsequent use.
25 Consumables and disposed materials are restocked. Fire extinguishers are replaced.

26 The BED ensures that all equipment is cleaned and fit for its intended use before operations are resumed.
27 Depleted stocks of neutralizing and absorbing materials are replenished; protective clothing is cleaned or
28 disposed of and restocked, etc.

29 **J.4 EMERGENCY EQUIPMENT**

30 Emergency resources and equipment for the FFTF are presented in this section.

31 **J.4.1 Fixed Emergency Equipment**

32

| FIXED EMERGENCY EQUIPMENT | | |
|---------------------------|----------|------------|
| TYPE | LOCATION | CAPABILITY |
| N/A | N/A | N/A |

33

1 **J.4.2 Portable Emergency Equipment**

| PORTABLE EMERGENCY EQUIPMENT | | |
|------------------------------|--|---|
| TYPE | LOCATION | CAPABILITY |
| Fire Extinguisher | A fire extinguisher is available at the ISA pad. | A portable Class D fire extinguisher is available for use to respond to fires at the FSF and the ISA. |
| Emergency Response Kit | An emergency response kit is available in a government vehicle | Boundary control, PPE for response, and other various emergency response functions. |

2 **J.4.3 Communications Equipment/Warning Systems**

| COMMUNICATIONS EQUIPMENT | | |
|--|--|---|
| TYPE | LOCATION | CAPABILITY |
| Fire Alarm Continuously Ringing Bell Or Electronic Gong And Strobe | At or near building exits in buildings 405; 491E, S, & W; 4621E & W; and 4703. | Alerts personnel of a potential fire and notifies Fire Department |
| 2-Way Radio/Cell Phone | At least one with personnel while in the TSD unit location. | Notify personnel to summon emergency assistance |
| Argon pressure monitoring system | FFTF argon dewar pad | Notify personnel of over or under pressure in the inert cover gas for piping and components containing sodium residuals |

3 Note: Site wide communications and warning systems are identified in Permit Attachment 4, *Hanford*
 4 *Emergency Management Plan* (DOE/RL-94-02), Table 5.1.

5 **J.4.4 Personal Protective Equipment**

| PERSONAL PROTECTIVE EQUIPMENT | | |
|-------------------------------|---|---|
| TYPE | LOCATION | CAPABILITY |
| PPE clothing | Personal Protective Equipment is available and will be staged when work is performed at the TSD unit location | Protection from specific exposure hazards |

6 **J.4.5 Spill Control and Containment Supplies**

| SPILL KITS AND SPILL CONTROL EQUIPMEMNT | | |
|--|---|---|
| TYPE | LOCATION | CAPABILITY |
| Spill Control Materials <ul style="list-style-type: none"> • Absorbent materials • Bags • Step-off pads • Barrier tape • Rags • Scissors | A Spill Kit will be available when work is performed at the TSD unit location | Control and mitigation of radioactive and chemical spills |

7 **J.4.6 Incident Command Post**

8 The ICPs can be identified in a fixed location or the IC can determine a location appropriate for the event.
 9 Emergency resource materials are stored at each location. The IC could activate the Hanford Fire
 10 Department Mobile Command Unit if necessary.

1 **J.5 REQUIRED REPORTS**

2 Post-incident written reports are required for certain incidents on the Hanford Site. The reports are
3 described in Permit Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02), Section 5.1.
4 Facility management must note in the TSD-unit operating record, the time, date, and details of any
5 incident, which requires implementation of the contingency plan. Within 15 days after the incident, a
6 written report must be submitted to Ecology. The report must, at a minimum, include the elements
7 specified in WAC 173-303-360(2)(k).

8 **J.6 PLAN LOCATION AND AMENDMENTS**

9 Copies of this plan are maintained in the following locations
10 • Shift Operations Office (MO-294).

11 This plan will be reviewed and immediately amended as necessary, in accordance with Permit
12 Attachment 4, *Hanford Emergency Management Plan* (DOE/RL-94-02), Section 14.3.1.1.

13 **J.7 BUILDING EMERGENCY ORGANIZATION BUILDING EMERGENCY DIRECTOR**

| FFTF BEDs | | |
|---------------------|---------------|------------|
| TITLE | WORK LOCATION | WORK PHONE |
| Facility Operations | MO 294 | 373-1355 |

14 Names and home telephone numbers of the BEDs are available from the POC (373-3800) in accordance with Permit
15 Condition II.A.4.

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I. INSPECTION REQUIREMENTS

This section describes the method and schedule for inspection of the 400 Area WMU. The purpose of the inspections are to prevent malfunctions and deterioration, operating errors, discharges, identify leaking containers, improperly stored containers, and degradation of containment and safety equipment and/or systems (e.g., inert gas pressure in feed line). These inspections help to ensure that situations do not exist that might cause or lead to the release of waste to the environment or that might pose a threat to human health. Abnormal conditions identified by inspections are corrected in accordance with WAC 173-303-320(3).

I.1 GENERAL INSPECTION REQUIREMENTS

The content and frequency of inspections are described in this section. Inspections, implemented through operating requirements, are documented on inspection checklists and log sheets. Inspection records are maintained in accordance with Permit Condition II.I.1, and contain the following information:

- Date and time of inspection,
- Printed name and the handwritten signature of the inspector,
- Notation of the observations made, and
- Date and nature of any repairs or remedial actions taken

The inspection checklists consist of a listing of items that are to be assessed during each inspection. For each item listed, a yes/no response are made. A 'yes' response means that the item complies with the conditions stated on the checklist. Any problems identified during the inspection, as indicated by a 'no' response on the checklist, are reported to the S & M Operations Manager.

I.1.1 Types of Inspections

A qualified person performs an inspection of the active 400 Area WMU storage areas and containers for any signs of malfunctions, deterioration, discharges, and other anomalies. Specific items and/or problems to be noted during weekly inspections include the following:

- Condition of concrete floor, curbing, and walls in the FSF
- Container structural integrity
- Containers closed
- Inert gas pressure in feed line to CCP boxes in the FSF
- Significant corrosion of containers
- Evidence of spills or leaks
- Accumulated liquids
- Container labels and markings in place, legible, and un-obscured
- Moisture in modules including condensation in the ISA storage modules

Monthly, personnel will conduct inspections of safety equipment. Testing of the equipment will be completed as necessary. These inspections and tests include a portable fire extinguisher, emergency response kit, and spill kit. For addition information, refer to Table I.1, Inspection Schedule.

I.1.2 Frequency of Inspections

The following inspection frequencies exist (refer to Table I.1):

- Daily inspections of those portions of the 400 Area WMU that are in the process of receiving waste or transferring waste out to document any deficiencies noted and to immediately bring deficiencies to the attention of the S & M Operations Manager
- Weekly container inspections
- Monthly, fire extinguisher, emergency response kit, and spill kit
- Annual ignitable/reactive waste storage area inspections

1 **I.2 SCHEDULE FOR REMEDIAL ACTION FOR PROBLEMS REVEALED**

2 Consistent with WAC 173-303-320(3), if inspections identify leaks, spills, and/or precipitation, in the
 3 secondary containment; the resultant material will be removed on a schedule that prevents hazards to
 4 human health and the environment. If corrosion or other obvious structural deficiency is observed on
 5 containers, corrective actions shall be pursued in a timeframe established by the S & M Operations
 6 Manager.

7 On receipt and before containers are accepted for storage in the 400 Area WMU, personnel inspect each
 8 container to confirm appropriate documentation, labeling, and soundness of containers. Depending on the
 9 severity of any container anomalies, corrective actions could range from continued monitoring to
 10 correcting on discovery or longer if procurement of needed materials and personnel are required. Other
 11 conditions that are not a threat to human health and the environment will be dispositioned in a timeframe
 12 established by the S & M Operations Manager.

13 **Table I.1. Inspection Schedule**

| Requirement Description | Inspection Frequency | Types of Problems |
|--|----------------------|--|
| Inspections of those portions of the 400 Area WMU that are in process of receiving or transferring waste out | Daily | Document any deficiencies noted and immediately bring the deficiencies to the attention of the S & M Operations Manager |
| Container storage areas (FSF) | Weekly | Condition of concrete floor, container structural integrity, containers closed, inert gas pressure in feed line to large boxes, significant corrosion of containers, evidence of leaks, spills, accumulated liquids, container labels and markings in place, legible, and un-obscured |
| Container storage, large boxes, and unique components (ISA) | Weekly | Condition of containers/large boxes/unique components structural integrity, containers closed, significant corrosion of containers, evidence of leaks, spills, accumulated liquids, , container labels and markings in place, legible, and un-obscured, and moisture and condensate in the storage modules |
| Portable fire extinguisher, portable emergency response kit, and spill kit | Monthly | Check for equipment not present and test, as appropriate |
| Ignitable or reactive waste | Annual | Storage in compliance with <u>WAC 173-303-395(l)(d)</u> |

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