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0302418  
CC Recd: 06/16/2003

Department of Energy  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

03-RCA-0262

JUN 12 2003

Mr. Michael A. Wilson, Program Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
1315 W. Fourth Avenue  
Kennewick, Washington 99336

RECEIVED  
JAN 22 2004

EDMC

Dear Mr. Wilson:

**REQUEST FOR PROCEDURAL CLOSURE OF THE SODIUM STORAGE FACILITY AND SODIUM REACTION FACILITY (TSD: TS-4-1)**

With this letter, the U.S. Department of Energy (DOE), Richland Operations Office (RL) requests the State of Washington Department of Ecology's (Ecology) concurrence on procedural closure of the Sodium Storage Facility and the Sodium Reaction Facility (SSF/SRF). Submittal of this letter and the enclosed certification that these facilities have never treated, stored, or disposed of dangerous waste, satisfies the interim Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone M-20-29B requirement to submit to Ecology by June 30, 2003, a request for SSF/SRF procedural closure as defined in Section 6.3.3 of the Tri-Party Agreement Action Plan. The SSF/SRF treatment, storage, or disposal (TSD) units meet the requirements of Section 6.3.3 for procedural closure because these units never handled hazardous waste. Enclosed is a certification signed by RL as Owner/Operator and Fluor Hanford, Inc. as Co-operator, using wording specified in Dangerous Waste Regulations, 173-303-810(13) Washington Administrative Code (WAC), attesting that these units were never used to treat, store, or dispose of hazardous waste.

RL, Ecology, and the U.S. Environmental Protection Agency (EPA) established milestones for deactivation of the Fast Flux Test Facility (FFTF). Included were milestones documenting the agreement that upon removal from the piping system, the FFTF sodium would be stored at the SSF as product material pending an evaluation of the acceptability of the sodium for the high-level waste tank sludge pretreatment process (M-81 series). Construction of the SSF was completed in 1997 to provide WAC 173-303 compliant storage for radioactive sodium drained from FFTF in the event that the sodium was determined not to be product material but to be waste regulated pursuant to the requirements of WAC 173-303. The SRF, although never constructed, was included in the Hanford Facility Dangerous Waste, Part A, Permit Application, Form 3, for the SSF.

Mr. Michael A. Wilson  
03-RCA-0262

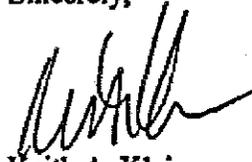
-2-

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In April 2001, the DOE Office of River Protection (ORP) committed to using FFTF sodium (after its removal from the systems and conversion to sodium hydroxide) as a process chemical at the Waste Treatment Plant and/or in the Double-Shell Tanks System. Based on the intended use(s) by DOE ORP, Ecology determined that FFTF sodium does not meet the regulatory definition of solid waste and, therefore, is not a hazardous waste. Because the FFTF sodium is not hazardous waste, the SSF/SRF never managed nor will manage hazardous waste, and these units meet the requirements for procedural closure.

On Ecology's acceptance of the enclosed certification, the Part A, Form 3 for the SSF/SRF will be revised to reflect that these units have undergone procedural closure and will be submitted to Ecology for approval. If you have any questions, please contact Ellen Dagan, of my staff, on (509) 376-2835.

Sincerely,



Keith A. Klein  
Manager

RCA:EBD

Enclosure:

cc w/encl:

N. Ceto, EPA

G. Davis, Ecology

R. H. Engelmann, FHI

R. Gay, CTUIR

R. H. Gurske, FHI

R. Jim, YN

C. A. Kooiker, FHI

S. N. Luke, FHI

D. L. Nielsen, FHI

S. W. Scott, FHI

P. Sobotta, NPT

J. Williams Jr., FHI

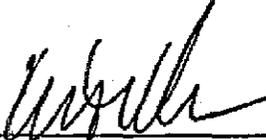
Environmental Portal, LMSI

**PROCEDURAL CLOSURE CERTIFICATION  
FOR  
SODIUM STORAGE FACILITY AND SODIUM REACTION FACILITY**

*The following statement is provided in support of the request for procedural closure of the Sodium Storage Facility and the Sodium Reaction Facility in accordance with the requirements of Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Milestone M-20-29B and Section 6.3.3 of the Tri-Party Agreement Action Plan.*

The Sodium Storage Facility and the Sodium Reaction Facility have never been used to treat, store, or dispose of hazardous waste, including mixed waste, regulated pursuant to the requirements of Chapter 173-303, Dangerous Waste Regulations, Washington Administrative Code (WAC).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

  
\_\_\_\_\_  
Owner/Operator  
Keith A. Klein, Manager  
U.S. Department of Energy  
Richland Operations Office

6/12/03  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Co-operator  
David B. Van Leuven  
President and  
Chief Executive Officer  
Fluor Hanford, Inc.

5/22/03  
\_\_\_\_\_  
Date

**ENVIRONMENTAL PORTAL DISTRIBUTION COVERSHEET**

**REGULATORY INFORMATION**

Author  
K. A. Klein/RL

Addressee  
M. A. Wilson/DOEC

Correspondence No.  
0302418  
DOE-RL: 03-RCA-0262  
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Subject: **REQUEST FOR PROCEDURAL CLOSURE OF THE SODIUM STORAGE FACILITY AND SODIUM REACTION FACILITY (TSD: TS-4-1)**

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		D. C. Bragg	H8-49	X
		R. C. Brunke	N1-26	X
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		N. R. Dahl	N2-57	X
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		C. A. Kooiker	N2-57	X
		R. D. Morrison	A1-14	X
		E. J. Murphy-Fitch	A1-14	X
		T. W. Noland	H8-67	X
		J. K. Perry	L1-04	X
		R. E. Piippo	A1-14	X
		S. M. Price	H8-67	X
		A. N. Singer	T3-02	X
		S. L. Stolle	H8-67	X
		M. S. Strickland	B3-70	X
		D. J. Watson	X3-79	X
		L. F. Willis	H8-73	X
		J. A. Winterhalder	A1-14	X

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<b>OUTLOOK ADDRESS: ^CORRESPONDENCE CONTROL-PHMC</b>
Contact: 376-8111 or 372-3931

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		<u>U. S. Department of Energy, Richland Operations Office</u>		
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		O. A. Farabee	N2-36	X
		C. R. Haas	L1-04	X
		J. B. Hall	A2-15	X
		H. M. Rodriguez	A5-15	X
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		B. D. Williamson	A4-52	X