



# Department of Energy

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Richland Field Office

P.O. Box 550

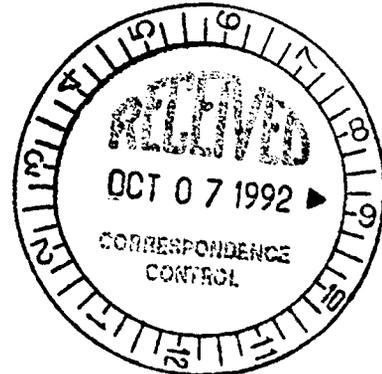
Richland, Washington 99352

SEP 17 1992

92-RPB-222

Mr. Paul T. Day  
Hanford Project Manager  
U.S. Environmental Protection Agency  
Region 10  
712 Swift Blvd., Suite 5  
Richland, Washington 99352

Mr. David B. Jansen, P.E.  
Hanford Project Manager  
State of Washington  
Department of Ecology  
Post Office Box 47600  
Olympia, Washington 98504-7600



Dear Messrs. Day and Jansen:

DEFERRAL OF MAINTENANCE AND STORAGE FACILITY PART B PERMIT APPLICATION  
(INTERIM MILESTONE M-20-29)

Enclosed for your review and approval is a Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Class II Change Control Form (Number M-20-92-6) requesting deferral of the Tri-Party Agreement Interim Milestone, M-20-29, for submittal of the Maintenance and Storage Facility (MASF) Resource Conservation and Recovery Act (RCRA) Part B permit application. Interim Milestone M-20-29 presently requires that a Part B Dangerous Waste Permit Application for MASF be submitted by November 1993.

A RCRA Part A permit application was originally submitted November 1985, for washing residual sodium from Fast Flux Test Facility (FFTF) spent nonfuel components prior to their storage/disposal. Two tanks are included in the permit: the Large Diameter Cleaning Vessel and the Small Diameter Cleaning Vessel. The former would be used for major sodium components and the latter for spent control rods and reflectors. To date, the MASF systems have never been operated for any dangerous waste management activities.

This Class II change to defer the existing Interim Milestone for submittal of the MASF Part B permit application (submittal date of November 1993) is requested because of the recent directive by the U.S. Department of Energy-Headquarters (DOE-HQ) to place the FFTF into a standby condition (March 1992). If FFTF had continued to operate, MASF would have been required to be operational by the end of 1995. However, the recent FFTF standby directive has essentially extended the need date out to the 1999



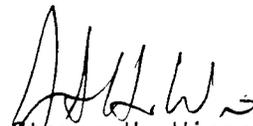
time frame, at the earliest. If a long term mission for FFTF is obtained, MASF operation will be required. However, if FFTF is directed to shutdown, it is highly probable that the regulated sodium removal process at MASF will not be required. Until the DOE reaches a final determination on the future of the FFTF, a decision on whether to proceed with submittal of the Part B permit application, or petition to withdraw the Part A, cannot be finalized. In light of this operational uncertainty and the substantial cost of the permitting process, deferral would allow the DOE to efficiently manage resources.

When the future mission for the FFTF is determined, the MASF permitting requirements will be assessed and the appropriate documentation will be developed and submitted to support implementation of that mission.

The original copy of the Change Request was transmitted via this letter to the State of Washington Department of Ecology (Ecology) for disposition. Subsequently, Ecology is requested to forward the original to the U.S. Environmental Protection Agency.

If you or your staff have any questions regarding the enclosed Change Control Form, please contact me on (509) 376-6798.

Sincerely,



Steven H. Wisness  
Hanford Project Manager

Enclosure

cc w/encl:  
R. E. Lerch, WHC  
D. J. Swaim, WHC  
T. B. Veneziano, WHC

Change Number M-20-92-6	<b>FEDERAL FACILITY AGREEMENT AND CONSENT ORDER CHANGE CONTROL FORM</b> <small>Do not use blue ink. Type, or print using black ink.</small>	Date
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Originator C. E. Clark	Phone (509) 376-9333
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Class of Change  
 I - Signatories (Section 13.0)   
 II - Project Manager   
 III - Unit Manager

Change Title  
DEFER SUBMITTAL OF MASF PART B PERMIT APPLICATION (M-20-29)

Description/Justification of Change

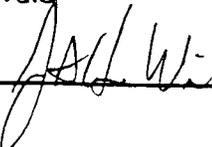
SEE THE ATTACHED.

Impact of Change

Interim Milestone M-20-29 will be deferred until the DOE determines the future of the FFTF (i.e., continued operation or shutdown). A revised submittal date for the Part B, or petition to withdraw the Part A, will be negotiated at that time. The MASF Part A will remain in effect until either a Part B Dangerous Waste Permit Application or a petition to withdraw the Part A are submitted.

Affected Documents

Hanford Federal Facility Agreement and Consent Order Action Plan  
Table D-3 and Figure D-1

Approvals	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved
DOE	 <u>9/30/92</u> Date
EPA	 Date
Ecology	 Date

## DESCRIPTION/JUSTIFICATION OF CHANGE

This Class II Change Request is to defer the existing interim milestone for submittal of the MASF Part B permit application from November 1993 to a timeframe consistent with a decision on the future of FFTF, while compatible with Major Milestone M-20-00, "Submit Part B permit applications or closure plans for all RCRA TSD units."

Interim Milestone M-20-29 requires that a Part B Dangerous Waste Permit Application for MASF be submitted to the Washington State Department of Ecology and the U.S. Environmental Protection Agency by November 1993. The permit allows washing residual sodium from Fast Flux Test Facility (FFTF) spent nonfuel components prior to their storage/disposal. To date, the MASF has never been used for dangerous waste management activities. This Class II Change to defer the existing Interim Milestone for submittal of the MASF Part B permit application (submittal date of November 1993) is requested because of the recent directive by DOE to place the FFTF into a standby condition (March 1992). If FFTF had continued to operate, MASF would have been required to be operational by the end of 1995. However, the recent FFTF standby directive has essentially extended the need date out to the 1999 time frame, at the earliest. If a long term mission for FFTF is obtained, MASF operation will be required. However, if FFTF is directed to shutdown, it is highly probable that the regulated sodium removal process at MASF will not be required. Until the DOE reaches a final determination on the future of the FFTF, a decision on whether to proceed with the Part B application, or petition to withdraw the Part A, cannot be finalized. In light of this operational uncertainty and the substantial cost of the permitting process, deferral is the best approach.

# CORRESPONDENCE DISTRIBUTION COVERSHEET

Author: SH Wisness, RL      Addressee: PT Day, EPA      Correspondence No.: Incoming: 9206583  
 DB Jansen, Ecology

Subject: DEFERRAL OF MAINTENANCE AND STORAGE FACILITY PART B PERMIT APPLICATION  
 (INTERIM MILESTONE M-20-29)

## INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
		Correspondence Control	A3-01	X
		President's Office		
		B. A. Austin	B2-35	X
		S. L. Bradley	B3-06	
		G. D. Forehand	B2-35	
		C. J. Geier	B2-19	X
		G. W. Jackson (Assignee)	B2-35	X
		R. E. Lerch	B2-35	
		P. J. Mackey	B3-15	
		H. E. McGuire (Level I)	B3-63	
		R. D. Morrison	B2-35	X
		S. M. Price	H4-57	X
		D. J. Swaim	N2-51	
		<b>EDMC</b>	<b>H4-22</b>	X
		D. R. Dillie	B3-50	X
		J. M. Knoll		
		J. G. Cassady		
		L. R. Olsen	B3-62	X
		F. D. Lee	B3-62	X
		G. M. Wise	B3-70	X
		E. P. Vodney		X

