



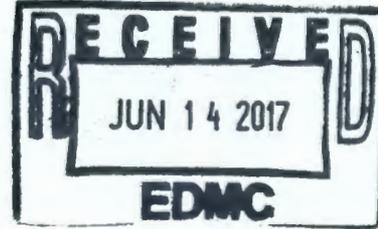
Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

1244813
(0069678H)

17-AMRP-0189

JUN 09 2017

Ms. Alexandra K. Smith, Program Manager
Nuclear Waste Program
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354



Dear Ms. Smith:

**REVISED RESPONSE TO CLOSURE NOTICE OF CONTAINER STORAGE AREAS
LOCATED IN THE 400 AREA WASTE MANAGEMENT UNIT**

The purpose of this letter is to address the U.S. Department of Energy Richland Operations Office's (RL) intentions regarding the container storage areas located in the 400 Area Waste Management Unit (400 Area WMU), including the Interim Storage Area (ISA) and Fuel Storage Facility (FSF).

In the April 12, 2017, Washington State Department of Ecology (Ecology) letter (17-NWP-042), Ecology determined that the previous RL response (17-ESQ-0030) dated February 1, 2017, "does not comply with the requirements of WAC 173-303-610(3)(c)(ii)(A)" or provide all of the requested information. RL officially received this letter on April 13, 2017.

The following information is provided regarding how the WAC 173-303-610(3)(c)(ii)(A) requirements are being met and the steps RL and the CH2M HILL Plateau Remediation Company (CHPRC) are taking to prevent threats to human health and the environment, including compliance with applicable permit requirements for the 400 Area WMU:

- **Stated Purpose of the Requested Extension**

RL anticipates that the 400 Area WMU will receive additional dangerous waste and the Unit is permitted for long-term storage. The 400 Area WMU is currently the only dangerous waste management unit at the Hanford Facility that has the capability for storage of sodium (Na) or sodium-potassium (NaK) mixed waste. In the unlikely event of a Na/NaK leak within the Fast Flux Test Facility (FFTF), the 400 Area WMU will be needed to store the Na/NaK mixed waste and sodium contaminated material from clean-up.

- **Lack of Fixed Date for the Start of Closure**

The RL baseline defines the date for start of closure activities (Deactivation, Decommission, Decontamination, and Demolition) for the FFTF as Fiscal Year 2030. The finalization of closure would require an additional 5 years for completion, thus a final closure date of Fiscal Year 2035 is anticipated. A closure date of Fiscal Year 2035 will allow the 400 Area

JUN 09 2017

WMU to be used to receive Na/NaK mixed waste and debris as part of the decommissioning process at the FFTF.

- **Demonstration that the Unit has Additional Capacity to Receive Waste**

The process design capacities identified in the Hanford Facility Resource Conservation and Recovery Act (RCRA) Permit, Part III Unit-Specific Conditions for Final Status Operations, 400 Area WMU Permit (OUG 16), Addenda A (Hanford Facility RCRA permit), Part A Form, current inventory and the date of the last dangerous waste received into the 400 Area WMU are identified in the following table:

400 Area WMU	Maximum Process Design Capacity (Gallons)	Amount of Waste Currently Stored (Gallons)	Date of Last Dangerous Waste Receipt
ISA	1,000	810	June 24, 2009
FSF	19,000	12,550	July 19, 2006

- **Demonstration that All Steps Have and Will Continue to be Taken to Prevent Threats to Human Health and the Environment, Including Compliance with Applicable Permit Requirements**

The 400 Area WMU is operated and maintained in accordance with the final status permit conditions identified in the 400 Area WMU Hanford Facility RCRA permit for long-term storage of Na/NaK mixed waste. The permit was publically reviewed, comments addressed, and subsequently approved by Ecology in November 2007. RL and its contractor (currently CHPRC) will continue to maintain compliance with the 400 Area WMU permit conditions and associated Dangerous Waste Regulations (WAC 173-303) to prevent threats to human health and the environment.

If you have any questions, please contact me, or you staff may contact Joe Franco, Assistant Manager for the River and Plateau on (509) 373-9971.

Sincerely,



Doug S. Shoop
Manager

AMRP:RLL

cc: See page 3

JUN 09 2017

cc: D. B. Bartus, EPA
G. Bohnee, NPT
J. L. Boller, EPA
J. W. Cammann, MSA
K. A. Conaway, Ecology
D. R. Corriell, CHPRC
L. J. Cusack, CHPRC
D. A. Faulk, EPA
M. N. Jaraysi, CHPRC
R. Jim, YN
J. A. Lerch, CHPRC
J. B. Price, Ecology
R. R. Nielson, CHPRC
K. Schanilec, EPA
C. J. Simiele, CHPRC
D. G. Singleton, CHPRC
R. Skeen, CTUIR
E. R. Skinnerland, Ecology
J. F. Williams, CHPRC
Administrative Record, TSD: S-4-2 (Hardcopy)
Ecology NWP Library (Hardcopy)
Environmental Portal
HF Operating Record (J. K. Perry, MSA A3-01)