

# START

0024347

Change Number M-20-92-6	FEDERAL FACILITY AGREEMENT AND CONSENT ORDER CHANGE CONTROL FORM <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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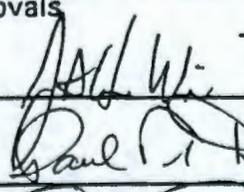
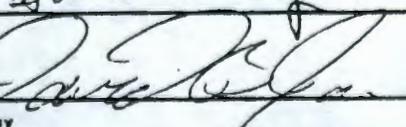
Class of Change <input type="checkbox"/> I - Signatories (Section 13.0) <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager
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Change Title DEFER SUBMITTAL OF MASF PART B PERMIT APPLICATION (M-20-29)
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Description/Justification of Change  SEE THE ATTACHED.
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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.
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Affected Documents Hanford Federal Facility Agreement and Consent Order Action Plan Table D-3 and Figure D-1
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Approvals	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
 DOE	9/30/92 Date
 EPA Ecology	10/4/92 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.

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