

AR TARGET SHEET

The following document was too large to scan as one unit, therefore, it has been broken down into sections.

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TITLE: Hanford Facility RCRA
Permit, Dangerous Waste
Portion, Rev 008, 9/04

CHAPTER 7.0
CONTINGENCY PLAN

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Table 7-1 Hanford Facility Documents Containing Contingency Plan Requirements of WAC 173-303-350(3)

1

Requirement	Hanford Emergency Management Plan (DOE/RL-94-02): Attachment 4 of the Hanford Facility RCRA Permit (Dangerous Waste Portion)	RPP-WTP Emergency Response Plan ¹
-350(3)(a) – A description of the actions which facility personnel must take to comply with this section and WAC 173-303-360.	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, 11.0
-350(3)(b) – 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 WAC 173-303-370(5), Manifest system, reasons for not accepting dangerous waste shipments.	X ² Section 1.3.4	X ^{2,4} Section 7.2.5.1
-350(3)(c) – 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 WAC 173-303-340(4).	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	
-350(3)(d) – A current list of names, addresses, and phone numbers (office and home) of all persons qualified to act as the emergency coordinator required under WAC 173-303-360(1). 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 WAC 173-303-810 (14)(a)(i)), rather than as part of the permit application.		X ⁵ Section 3.1, 13.0

Requirement	Hanford Emergency Management Plan (DOE/RL-94-02): Attachment 4 of the Hanford Facility RCRA Permit (Dangerous Waste Portion)	RPP-WTP Emergency Response Plan ¹
-350(3)(e) – 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.	X Hanford Fire Department: Appendix C	X Section 9.0
-350(3)(f) – 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.	X ⁶ Figure 7-3 and Table 5-1	X ⁷ Section 1.5

1

2 **An “X” indicates requirement applies.**

3 ¹Portions of the *Hanford Emergency Management Plan* not enforceable through Appendix A of that
 4 document are not made enforceable by reference in the *RPP-WTP Emergency Response Plan*.

5 ²The *Hanford Emergency Management Plan* contains descriptions of actions relating to the Hanford Site
 6 Emergency Preparedness System. No additional description of actions are required at the Hanford Site
 7 level. If other credible scenarios exist or if emergency procedures at the WTP are different, the
 8 description of actions contained in the WTP Emergency Response Plan will be used during an event by a
 9 building emergency director.

10 ³Sections 7.1, 7.2 through 7.2.5, and 7.3 of the building emergency plan are those sections subject to the
 11 Class 2 “Changes in emergency procedures (i.e., spill or release response procedures)” described in
 12 WAC 173-303-830, Appendix I, Section B.6.a.

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

15 ⁵Emergency Coordinator names and home telephone numbers are maintained separately from the
 16 contingency plan document, on file in accordance with Hanford Facility RCRA Permit (Dangerous Waste
 17 Portion) General Condition II.A.4, and is updated, at a minimum, monthly.

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

20 ⁷An evacuation route for the WTP is provided. Evacuation routes for occupied buildings surrounding the
 21 WTP are provided through information boards posted within buildings.

- 1 **Appendix 7A**
- 2
- 3 **Emergency Response Plan**

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**APPENDIX 7A
EMERGENCY RESPONSE PLAN**

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1.0 GENERAL INFORMATION

The River Protection Project – Waste Treatment Plant (WTP) will be a dedicated treatment plant that will treat mixed waste transferred from the United States Department of Energy, Richland Operations Office (DOE-RL) Double-Shell Tank System Unit at the Hanford Site. The WTP is located on the Hanford Site, a 560-square-mile (1,450-square kilometer) United States Department of Energy (DOE) site in southeastern Washington State. The WTP is located in the East portion of the 200 Area near the center of the Hanford Site. Figures 7A-1 and 7A-2 show the location of the WTP with respect to the Hanford Site and the 200 East Area of the Hanford Site.

The Hanford Site Emergency Preparedness Program is based on the incident command system that allows a graded approach for response to emergency events. This plan contains a description of WTP facility specific emergency planning and response and is used in conjunction with DOE/RL-94-02, *Hanford Emergency Management Plan*. Response to events is performed using WTP and/or Hanford Site level emergency procedures.

This plan is being issued to meet permitting requirements. This plan will be updated to provide additional necessary information prior to the introduction of bulk quantities of hazardous chemicals into the WTP.

1.1 FACILITY NAME

United States Department of Energy Hanford Site
River Protection Project – Waste Treatment Plant

1.2 FACILITY LOCATION

Benton County, Washington, within the 200 East Area.

Buildings/facilities covered by this plan are:

- Pretreatment plant
- Laboratory
- Low Activity Waste (LAW) vitrification plant
- High Level Waste (HLW) vitrification plant
- Balance of Facilities (e.g., support buildings)

1.3 OWNER

United States Department of Energy
Office of River Protection
P.O. Box 450
Richland, Washington 99352

Facility Manager:

Bechtel National, Inc.
3000 George Washington Way
Richland, Washington 99352

1.4 DESCRIPTION OF THE WTP FACILITY AND OPERATIONS

The WTP will be composed of a pretreatment building that includes the waste receipt tanks, a separate laboratory, two vitrification plants, and an assortment of other support facilities collectively referred to as

1 the Balance of Facility (BOF). Figure 7A-3 shows the layout of the WTP, with the major buildings
2 identified.

3
4 The WTP will receive waste from the double-shell tank (DST) system located in the 200 Area of the
5 Hanford Facility. The waste to be treated meets the regulatory definition of "radioactive high level
6 waste" referred to in the Land Disposal Restriction Treatment Standards (40 CFR 268.40). The WTP will
7 pretreat the tank waste by separating the waste into Low Activity Waste (LAW) feed and High Level
8 Waste (HLW) feed. After separating the waste into two feed streams, the waste will be piped to the
9 vitrification plants; LAW vitrification and HLW vitrification. The vitrification process involves mixing
10 waste feed with glass-forming materials, pouring the mixture into a melter, heating until it is liquefied,
11 pouring it into stainless steel containers (called canisters), and then welding on a lid after each canister
12 finishes cooling.

13
14 The canisters of immobilized HLW will remain on the Hanford Site until a permanent repository is
15 available. The immobilized LAW, containing relatively small amounts of radioactive material, will be
16 disposed of on the Hanford Site.

17
18 The air emissions (off-gas) from the pretreatment and vitrification processes will be treated to ensure safe
19 levels before being released to the atmosphere. Air emissions are regulated by the Washington State
20 Departments of Ecology and Health, and the United States Environmental Protection Agency, and will be
21 treated to a level protective of human health and the environment. The WTP will discharge air emissions
22 through four primary stacks, one each for pretreatment, LAW vitrification, HLW vitrification, and the
23 laboratory.

24
25 The WTP will use the following four types of permitted dangerous waste management units:

- 26 • Storage in containers
- 27 • Treatment and storage in tanks
- 28 • Treatment in miscellaneous units (the melters)
- 29 • Containment buildings

30
31 The locations of these dangerous waste management units are summarized in Table 7A-1.

32
33 The buildings used for treating and storing waste will be constructed of reinforced concrete and structural
34 steelwork. Below-grade portions of buildings will be reinforced concrete construction, and the
35 superstructure will be made of reinforced concrete and structural steelwork with a metal roof. The plant
36 structure will be supported by a reinforced concrete mat foundation.

37
38 Except for two outdoor on-ground storage tanks surrounded by a concrete berm for secondary
39 containment, all other tanks and treatment processes managing dangerous waste will be located inside
40 buildings. Container storage areas will be located in buildings or covered storage areas. Where floors
41 and walls provide secondary containment they either will be lined with stainless steel, a protective
42 coating, or a combination of both. The WTP dangerous waste management units will be equipped with
43 leak detection systems and inspected regularly.

44
45 The waste and off-gas treatment processes will generate "secondary wastes," such as used equipment,
46 laboratory waste, and other chemically and radiologically contaminated materials. (These "newly
47 generated wastes" also are referred to as "miscellaneous wastes"). Secondary waste either will be
48 transferred elsewhere in the WTP for treatment or transferred to another permitted treatment, storage, or
49 disposal (TSD) facility. Non-radiological dangerous waste may also be generated by laboratory and

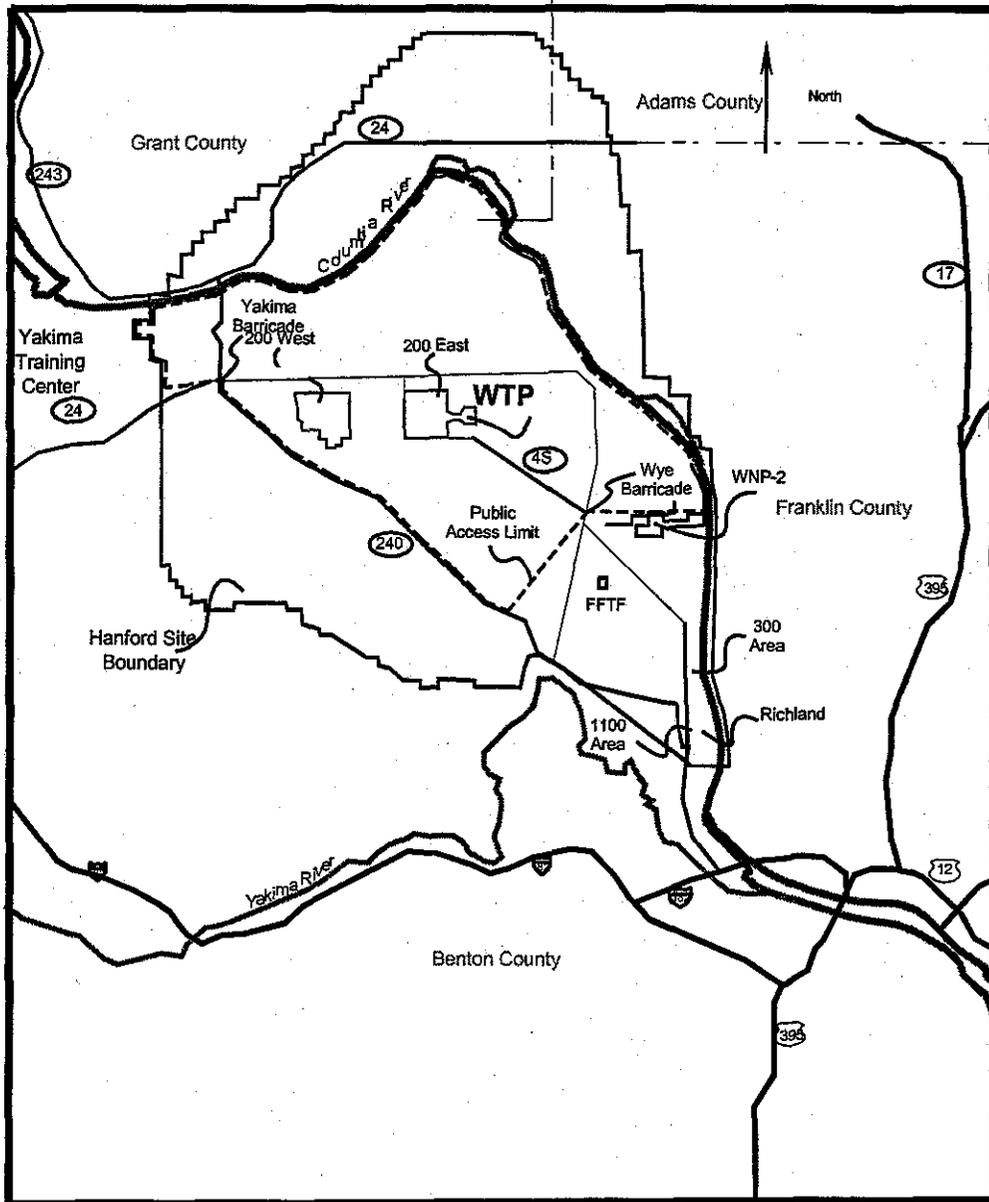
1 maintenance activities. Such waste will be managed in containers at the WTP until it can be transferred
2 to a permitted TSD facility.
3

4 The three primary processes at the WTP (pretreatment, LAW vitrification, and HLW vitrification) are
5 supported by BOF systems and utilities. The BOF will include support systems and utilities required for
6 the waste treatment processes within the main process areas (pretreatment, LAW vitrification, and HLW
7 vitrification). The BOF support systems and utilities will include, but not be limited to, heating and
8 cooling, process steam, process water, chilled water, and compressed air.
9

10 **1.5 BUILDING EVACUATION ROUTING**

11 Figure 7A-1 shows evacuation routes for the Hanford Site. Identification of the primary and secondary
12 staging areas, a general layout of the evacuation routes and evacuation routes for each of the primary
13 buildings which comprise the WTP will be provided in a revision of this document before the
14 introduction of bulk quantities of hazardous chemicals into the WTP. These evacuation routes will be
15 placed in Appendix 7A-B. Alternate evacuation routes will be used on a case-by-case basis, based on
16 meteorological conditions at the time of an event.
17

1 **Figure 7A-1** **Location of the WTP on the Hanford Site**



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Figure 7A-2

Location of the WTP Within the 200 East Area

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Figure 7A-3

WTP Site Layout

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Table 7A-1 Locations of Dangerous Waste Management Units

Dangerous Waste Management Unit	General Location
Container Storage Areas	Immobilized LAW (ILAW) storage in LAW vitrification building. ILAW Lag Storage building.
	Immobilized HLW (IHLW) storage in HLW vitrification building
	Miscellaneous waste container storage in pretreatment building, LAW vitrification building, HLW vitrification building, and Central Waste Storage Area, Out of Service melter storage areas.
Tank Systems	LAW feed receipt in pretreatment building
	LAW evaporation in pretreatment building
	Entrained solids and Sr/TRU separation in pretreatment building
	Cesium removal in pretreatment building
	Technetium removal in pretreatment building
	LAW intermediate waste storage in pretreatment building
	LAW and glass-formers mixing in LAW vitrification building
	HLW feed receipt in pretreatment building
	HLW ultrafiltration in pretreatment building
	HLW mixing with LAW intermediate waste in pretreatment building
Miscellaneous Thermal Treatment Units (melters)	HLW melter (1 used) in HLW vitrification building
	LAW melters (3 used) in LAW vitrification building
Containment Buildings	Pretreatment hot cells, maintenance areas and air filtration areas.
	LAW locally shielded melter gallery, container finishing and C3 workshops.
	HLW melter caves, container finishing, C3 workshops, air filtration areas and drum transfer tunnel.

2
3

2.0 PURPOSE

This plan describes both the facility hazards and the basic responses to upset and/or emergency conditions within the WTP. These events may include spills or releases caused by equipment failure during processing, fires and explosions, transportation activities, movement of materials, packaging, storage of hazardous materials, and natural and security contingencies. When used in conjunction with DOE/RL-94-02, this plan meets the requirements for contingency planning as required by WAC 173-303. Sections 1.5, 3.1, 4.0, 7.1, 7.1.1, 7.1.2, 7.2, 7.2.1, 7.2.2, 7.2.3, 7.2.4, 7.2.5, 7.2.5.1, 7.3, 8.2, 8.3, 8.4, 9.0, 9.1, 9.2, 9.3, 9.4, 9.5, 9.6, 11.0, 12.0, 13.0 of this plan are enforceable sections meeting Resource Conservation and Recovery Act (RCRA) contingency planning requirements. Enforceable sections cannot be changed without coordinating the change with the Hanford Facility RCRA Permit modification process.

3.0 WTP EMERGENCY RESPONSE ORGANIZATION

The WTP Emergency Response Organization (ERO), as described in this section and in Section 2.2 of the *Hanford Emergency Management Plan* (DOE-RL-94-02, 1999), will be available 24 hours each day to respond to events at the plant. The Building Emergency Director (BED) will be prepared to carry out his or her duties immediately and whenever an imminent or actual emergency exists, as required by *Washington Administrative Code* (WAC) 173-303-360 (2)(a), (b), and (c). The *Hanford Emergency Management Plan* (DOE-RL-94-02, 1999), Section 2.2.1, details the responsibilities of the BED. The on-duty Pretreatment shift operations manager will be the designated primary BED. A designated alternate BED will be available on each shift. Other ERO personnel will be on duty with either primary or alternate responsibilities. A BED, Incident Command Post (ICP) Hazards Communicator, ICP Communicator, and a Hazards Assessor (chemical or radiological, or both, depending on the event) will staff the ERO along with various BED support personnel. In addition, the BED will act as the plant operations specialist for the Hanford Fire Department (HFD) personnel.

3.1 BUILDING EMERGENCY DIRECTOR

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

The BED becomes a member of the ICP and functions under the direction of the IC. In this role, the BED continues to manage and direct WTP operations.

A listing of primary and alternate BEDs by title, work location and work telephone number is contained in Section 13.0 of this plan. The BED will be on the premises or will be available through an "on-call" list 24-hours-a-day. Names and home telephone numbers of the BEDs will be available from the Patrol Operations Center (POC), in accordance with Hanford Facility RCRA Permit, Dangerous Waste Portion, General Condition II.A.4.

3.2 OTHER MEMBERS

As a minimum, facility management appoints and ensures training is provided to individuals to perform as Personnel Accountability Aides and Staging Area Managers. The Personnel Accountability Aides are responsible for facilitating the implementation of protective actions (evacuation or take cover) and for facilitating the accountability of personnel after the protective actions have been implemented. Staging Area Managers are responsible for coordinating and conducting activities at the staging area. In addition,

1 the BED can identify additional support personnel (radiological control, maintenance, engineering,
2 hazardous material coordinators, etc.) to be part of the WTP Emergency Response Organization as
3 necessary.

4
5 The complete WTP Emergency Response Organization listing of positions, names, work locations and
6 telephone numbers will be maintained in a separate location in a format determined appropriate by WTP
7 management. Copies will be distributed to appropriate WTP locations and to the Hanford Emergency
8 Operations Center.

10 4.0 IMPLEMENTATION OF THE PLAN

11 This plan will be implemented when the BED has determined that a release, fire, or explosion has
12 occurred at the facility or in adjacent site facilities. Actions determined in DOE/RL-94-02 and the
13 requirements of WAC 173-303 will be implemented as described below.

14
15 The BED ensures that trained personnel identify the character, source, amount, and aerial extent of the
16 release, fire, or explosion to the extent possible. Identification of waste can be made by activities that can
17 include, but are not limited to: visual inspection of involved containers, sampling activities in the field,
18 reference to inventory records, or by consulting with facility personnel.

19
20 Samples of materials involved in an emergency may be taken by qualified personnel and analyzed as
21 appropriate. These activities must be performed with a sense of immediacy and shall include available
22 information.

23
24 The BED shall use the following guidelines to determine if an event has met the requirements of
25 WAC 173-303-360(2)(d):

26
27 1 The event involved an unplanned spill, release, fire, or explosion,

28 AND

29 2 a The unplanned spill or release involved a dangerous waste, or the material involved became a
30 dangerous waste as a result of the event (e.g., product that is not recoverable.), or

31 2 b The unplanned fire or explosion occurred at the WTP or transportation activity subject to RCRA
32 contingency planning requirements,

33 AND

34 3 Time-urgent response from an emergency services organization was required to mitigate the event, or
35 a threat to human health or the environment exists.

36
37 As soon as possible, after stabilizing event conditions, the BED shall determine, in consultation with the
38 WTP environmental single-point-of-contact, if notification to Ecology is needed to meet
39 WAC-173-303-360 (2)(d) reporting requirements. If all of the conditions under 1, 2, and 3 are met,
40 notifications are to be made to Ecology. Additional information is found in DOE/RL-94-02, Section 4.2.

41
42 If review of all available information does not yield a definitive assessment of the danger posed by the
43 incident, a worst-case condition will be presumed and appropriate protective actions and notifications will
44 be initiated. The BED is responsible for initiating any protective actions based on his best judgment of
45 the incident.

46
47 The BED must assess each incident to determine the response necessary to protect the personnel, facility,
48 and the environment. If assistance from Hanford Patrol, Hanford Fire Department, or ambulance units is
49 required, the Hanford Emergency Response Number (911) must be used to contact the POC and request

1 the desired assistance. To request other resources or assistance from outside the WTP, the POC business
2 number is used (509-373-3800).

3 4 5.0 FACILITY HAZARDS

5 Chemical and radiological constituent hazards that could occur at the WTP will be identified and
6 evaluated in the hazards assessment required by the *Hanford Emergency Management Plan* (DOE-RL 94-
7 02 1999), Section 1.3.3.2. The objective of this section is to describe in a general manner the hazards
8 that pose significant risks to human health or to the environment.

9
10 Prior to the implementation of this plan, before the introduction of bulk quantities of hazardous chemicals
11 into the WTP, additional information will be provided in this section. Information to be provided will
12 include the following:

- 14 • Updates on chemical and radiological hazards upon completion of the hazards assessment
- 15 • Updates based on the Draft Work Plan for Screening Level Risk Assessment for the WTP
16 (BNFL Inc. 1999b)]

17 18 5.1 HAZARDOUS MATERIALS

19 Potentially hazardous materials are used for normal operations, maintenance, and support functions at the
20 WTP. These materials could include acids, caustics, oils, diesel fuel, and solvents.

21
22 Material Safety Data Sheets (MSDSs) are provided in the control rooms, storage areas, and operating
23 areas of the WTP.

24
25 The following is a representative list of the types of hazardous materials that will be stored and used in
26 the WTP.

27
28
29 Double Shell Tank Solids
30 Double Shell Tank Supernate
31 Nitric Acid
32 Sodium Hydroxide
33 Sodium Nitrate
34 Sodium Permanganate
35 Strontium Nitrate
36 Solvents
37 Urea

38
39 Safe design of the plant, Job Safety Analysis, Job Control System Work Packages, and MSDSs provide
the basis for safe use of the materials in the workplace. Plant procedures and training that address these
hazardous materials will be in place before the introduction of bulk chemicals into the plant. Employees
who work with or handle hazardous wastes will be trained according to requirements identified in the
River Protection Project – Waste Treatment Plant Dangerous Waste Training Plan (BNI, 2001a).

34 35 5.2 INDUSTRIAL HAZARDS

36 Industrial hazards associated with the WTP will include electrical equipment, pressurized equipment and
37 systems, high temperature equipment, rotating equipment, confined spaces, forklifts, cranes, lifting
38 operations, and compressed gas cylinders.

1 Safe design of the plant, Job Safety Analysis, Job Control System Work Packages, and MSDSs provide
2 the basis for the safe use of this equipment in the workplace. Plant procedures that address these hazards
3 will be in place prior to the implementation of this plan. Employees will be trained in the safe use and
4 handling of compressed gas cylinders, cranes, forklifts etc as applicable.

5
6 **5.3 RADIOACTIVE, DANGEROUS, AND MIXED WASTE**

7 Safe design of the plant, Job Safety Analysis, Job Control System Work Packages, and MSDSs provide
8 the basis for safe handling of radioactive, dangerous, and mixed waste. Plant procedures that address the
9 management of these wastes will be in place prior to operation of the WTP.

10
11 Dangerous waste categories treated at the WTP will be identical to the Double-Shell Tank Farms.
12 Categories include characteristic, listed, and state-only wastes, two of which are designated as extremely
13 hazardous waste (WT01 and WP01). The following summarizes the dangerous waste numbers for the
14 WTP.

15
Characteristic Waste Numbers

D001	D002	D003	D004
D005	D006	D007	D008
D009	D010	D011	D018
D019	D022	D028	D029
D030	D033	D034	D035
D036	D038	D039	D040
D041	D043		

Listed Waste Numbers

F001	F002	F003	F004
F005	F039 ^a		

State-only Wastes^b

WT01	WT02	WP01	WP02
------	------	------	------

a Multi-source leachate (F039) is included as a waste derived from non-specific wastes F001 through F005.

b Washington State criteria

16
17 The WTP will use the following four types of permitted dangerous waste management units:

- 18
19 • Storage in containers
20 • Treatment and storage in tanks
21 • Treatment in miscellaneous units (the melters)
22 • Containment buildings

23
24 **Solid Form**

25 Radioactive, dangerous, and mixed wastes will be generated at the WTP during sampling,
26 decontamination, and maintenance activities. This waste will be accumulated in a designated
27 accumulation area(s) and transported to a permitted storage area.

1 Liquid Form

2 Highly radioactive mixed waste solutions and slurries will be processed at the WTP and stored in the
3 pretreatment plant, HLW plant, and LAW plant for further treatment. Although these solutions and
4 slurries will contain chemicals that are hazardous, the bounding consequence for spills or releases of this
5 waste is usually based on the radiological components of the waste.

6
7 Gaseous Form

8 Airborne effluent streams will be produced through the following:

- 9
10 • Radiological control area Heating Ventilation Air Conditioning (HVAC) system – exhaust from
11 radiological controlled areas.
12 • Vessel off-gas systems – vapors and gases from tanks and process equipment including the melters.

13
14 The off-gas systems will remove particulate, condensate Nox and organic vapors from the air stream
15 before discharging them to the radiological controlled area HVAC system. The combined air stream will
16 pass through HEPA filtration and will be monitored for radioactivity and chemicals.

17
18 **5.4 CRITICALITY**

19 Analyses have shown that there is no credible criticality event that can be postulated to occur at the WTP
20 (BNI 2001b).

21
22 **6.0 POTENTIAL EMERGENCY CONDITIONS**

23 Potential emergency conditions, under both WAC 173-303 and the DOE, may include one of three basic
24 categories: 1) operations (process upsets, fires and explosions, loss of utilities, spills, and releases), 2)
25 natural phenomena (e.g., earthquakes), and 3) security contingencies (bomb threat, hostage situation,
26 etc.). The following are conditions that may lead to an emergency at the WTP. For a summary of
27 responses to emergency conditions see Section 7.2.

28
29 The results of the WTP hazards assessment will be used to update the information presented in this
30 section.

31
32 **6.1 FACILITY OPERATIONS EMERGENCIES**

33 **6.1.1 Loss of Utilities**

34 **6.1.1.1 Loss of Electrical Power**

35 A loss of electrical power to the WTP is possible. The power will be provided to the WTP from two
36 power transformers, supplied by two independent 230 kV transmission lines. The transformers will
37 deliver a 13.8 kV secondary voltage for internal distribution at the plant. The plant loads will be divided
38 into two load groups, normal, and alternate (Load Groups A and B).

39
40 **6.1.1.2 Loss of Water**

41 A loss of water, potable, raw or fire suppressant will not likely result in a plant emergency or evacuation
42 of the WTP. Operations may be limited in order to minimize impact from the loss of water. A loss of
43 water to the fire suppression system could result in a plant emergency, if a fire should develop.

44

1 **6.1.1.3 Loss of Ventilation**

2 A loss of ventilation could cause a change to plant operation and could require local evacuation of
3 personnel if a loss of contamination control is suspected.
4

5 **6.1.1.4 Loss of Process Air or Instrument Air**

6 A loss of process air or instrument air could cause a change to plant systems but would not require
7 implementation of personnel-protective actions.
8

9 **6.1.2 Major Process Disruption/Loss of Plant Control**

10 A major process disruption could be caused by a failure of the Process Control System (PCS). A loss of
11 the PCS could cause plant abnormalities that would lead to increased radiological challenges to the
12 WTP's protection systems.
13

14 **6.1.3 Pressure Release**

15 The WTP will have high-pressure steam and low-pressure compressed air and steam systems. Loss of the
16 compressed air or steam system or systems could result in loss of plant control or a process disruption.
17 Process disruption or loss of plant control could interrupt the treatment processes. However, it is not
18 likely that this event would be classified as an emergency.
19

20 Pressurized gases will be used throughout the WTP. Additionally, compressed gas cylinders will be
21 stored in the compressed gas storage area. The inventory of gases includes flammable and nonflammable
22 gases. These gases pose a hazard in the immediate storage area, or in the immediate area of the location
23 being used. Failure of compressed gas bottles could cause flying debris hazards. This condition is
24 addressed in Section 6.1.4.
25

26 A process system pressure release is categorized as a condensate spray release. This condition is
27 addressed in Section 6.1.5.
28

29 **6.1.4 Fire and/or Explosion**

30 A fire or explosion could generate highly toxic or corrosive fumes, or release of radioactive material.
31 Flying debris might result from explosions or compressed gas cylinder failure. Process system disruption,
32 loss of plant control, and breach of process system boundaries could result from the flying debris. In
33 addition, heavy smoke could disrupt the operation of the ventilation system.
34

35 **6.1.5 Hazardous Material Spill**

36 Prior to the introduction of bulk quantities of hazardous chemicals into the WTP, this plan will be revised
37 to include the types of hazardous materials that will be present, their locations, quantities, and
38 characteristics. Additionally the potential effects from an accidental release of hazardous materials will
39 be discussed.
40

41 **6.1.6 Dangerous/Mixed Waste Spill**

42 Dangerous waste or mixed waste could spill, due to equipment failure or operator error. The severity of
43 the event would be dependent on the nature and quantity of the spill.
44

1 **6.1.7 Transportation and /or Packaging Incidents**

2 A transportation or packaging event involving hazardous chemicals, samples or radioactive material could
3 result in personnel exposure to hazardous materials. Potential environmental damage could occur due to
4 the release of hazardous or radioactive materials.

5
6 **6.1.8 Radiological Waste Release**

7 The WTP processes include large quantities of radioactive liquids and slurries. Radioactive waste could
8 accumulate in various treatment systems. The plant has the potential for concentrating radioactive waste;
9 therefore, responses for abnormal radiation levels and radioactive waste releases are included in the scope
10 of emergency planning. The release could come as a result of either failure of the ventilation system or a
11 catastrophic leak of mixed waste.

12
13 The ventilation system is designed to provide an air supply from areas of no contamination potential to
14 areas of high contamination potential. Areas within the WTP are classified into one of three zones, C2,
15 C3 and C5, according to their potential for radioactive contamination, with C5 having the highest
16 potential for radioactive contamination. The C3 and C5 exhaust fans maintain a negative pressure in
17 areas where radioactive contamination is most likely to occur. Failure of the C3 or C5 exhaust fans could
18 cause a reverse flow and cause a release of radioactive contamination.

19
20 **6.1.9 Criticality**

21 Analyses have shown that there is no credible criticality event that can be postulated to occur at the WTP
22 (BNI 2001b).

23
24 **6.2 NATURAL PHENOMENA**

25 The WTP is designed such that it will not fail under a design basis event. Therefore, natural phenomena
26 events are not expected to cause structural damage to the WTP, which would constitute an emergency, or
27 cause a release to the environment. However, the following natural phenomena that have the potential to
28 cause conditions which are beyond the facility design basis are discussed: a beyond design basis seismic
29 event, high winds, volcanic eruption and ash fall, a flood, a range fire, and an aircraft crash.

30
31 **6.2.1 Seismic Event**

32 Depending on the magnitude of the beyond design basis event, severe structural damage can occur
33 resulting in serious injuries or fatalities and the release of hazardous materials to the environment.
34 Damaged electrical circuits and wiring could result in the initiation of fires.

35
36 **6.2.2 Volcanic Eruption/Ash fall**

37 Though not expected to cause structural damage, the ash resulting from a volcanic eruption could cause
38 shorts in electrical equipment and plug ventilation system filters.

39
40 **6.2.3 High Winds/Tornadoes**

41 High winds that are defined as sustained winds above a threshold that would potentially or actually cause
42 significant structural damage to the facility, are not expected to occur. (Significant structural damage is
43 interpreted to mean a breach of facility containment/confinement systems sufficient to cause an actual or
44 potential release of hazardous material to the environment). However, dirt and dust from windstorms
45 could cause shorts in electrical equipment, or could plug ventilation system filters. Disruption of normal
46 operations is possible.

47

1 **6.2.4 Flood**

2 The 200 Area is well above projected flood elevations for the Columbia and Yakima Rivers; therefore, a
3 flood is not considered a credible natural event for the WTP. The grading and drainage features that are
4 provided ensures that precipitation, even from a downpour, would infiltrate the ground or drain off toward
5 the Columbia River without significant flooding. The WTP is not sited in a wetlands or coastal
6 high-hazard area.

7
8 **6.2.5 Range Fire**

9 The hazards associated with a range fire are similar to those associated with a building fire plus potential
10 site access restrictions and travel hazards such as poor visibility. Smoke and ash from a range fire can
11 also cause shorts in electrical equipment, or plug ventilation system filters. Disruption of normal
12 operations is possible.

13
14 **6.2.6 Aircraft Crash**

15 In addition to the potential for serious injuries or fatalities, an aircraft crash could result in the direct
16 release of hazardous materials to the environment or cause a fire that could lead to the release.

17
18 **6.3 SECURITY CONTINGENCIES**

19 Security contingencies are discussed in the following sections.

20
21 **6.3.1 Bomb Threat/Explosive Device**

22 A bomb threat may be received by anyone who answers the telephone or receives mail. The major effect
23 on the WTP is that personnel will need to initiate emergency shutdown before evacuation. If an explosive
24 device detonates, the effects are the same as those discussed under fire and explosion.

25
26 **6.3.2 Hostage Situation/Armed Intruder**

27 A hostage situation or the entry of an armed hostile intruder(s) can pose an emergency if either of these
28 conditions has the potential to adversely affect facility operations. This could result in a loss of facility
29 control or the coercion of an employee to take some malevolent action. The severity of the emergency
30 would be based on actual or potential damage to the WTP or release of hazardous material or radioactive,
31 dangerous, or mixed waste.

32
33 **6.3.3 Suspicious Object**

34 A suspicious object could result in an explosion. If a suspicious device were to detonate, the effects
35 would be the same as those discussed under fire and explosion. The response to a suspicious device with
36 the potential to contain a bomb would be the same as a bomb threat discussed in Section 6.3.1 above.

37
38 **7.0 INCIDENT RESPONSE**

39 The initial response to any emergency is to immediately protect the health and safety of persons in the
40 affected area. Identification of released material is essential to determine appropriate protective actions.
41 Containment, treatment, and disposal assessment are secondary responses.

42
43 The following sections describe the process for implementing basic protective actions as well as
44 descriptions of response actions for the events listed in Section 6.0 of this plan. DOE/RL-94-02,
45 Section 1.3, provides concept of operations for emergency response on the Hanford Site. Site specific
46 procedures are detailed in DOE-0223 and will be used as necessary. Facility specific actions will be
47 denoted in WTP emergency response procedures. Procedure titles will be included in Appendix 7A-A

1 when the documentation is revised prior to the introduction of bulk quantities of hazardous chemicals into
2 the WTP.

3 4 **7.1 PROTECTIVE ACTION RESPONSES**

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

8 9 **7.1.1 Evacuation**

10 The WTP may need to be evacuated when conditions warrant (such as fire, explosion, release of
11 hazardous material, etc.). Evacuation will be initiated by automatic alarms or directed by the BED. The
12 evacuation alarm is a steady siren signal. The BED will use WTP emergency response procedures,
13 experience and training to determine when conditions warrant evacuation.

14
15 The BED may initiate the evacuation of a building(s) or the entire WTP site with a verbal announcement
16 or by manually initiating an evacuation alarm. The evacuation alarm will be delivered by a combination
17 of the WTP siren system and warning lights. Specific instructions can be provided to personnel via the
18 WTP public address system. As conditions warrant, the 200 Area evacuation alarms will be activated by
19 telephoning the POC, using either 911 (preferred) or 373-3800. The BED will determine if an alternate
20 staging area should be used based on the location of the event, wind direction, and WTP emergency
21 procedures.

22
23 The Hanford Site evacuation routes are shown in Figure 7A-B-1, Appendix 7A-B. Evacuation routes out
24 of the buildings will be provided in a revision of this document before the introduction of bulk quantities
25 of hazardous chemicals into the WTP. These routes will be based on providing simple egress.
26 Employees are trained on evacuation routes and procedures. Routes will be clearly marked and
27 maintained clear of all obstructions. The BED will determine the operating configuration of the WTP and
28 identify any additional protective actions needed for limiting exposure of personnel to the hazard.

29
30 Staging areas will be designated when the site and building layouts have been finalized. The exterior
31 staging areas will be based on prevailing wind direction (NW), gates, and roadways leading off the site.
32 These locations will be based on historical wind data in the 200 East Area. Alternate staging areas will be
33 available for use if the wind direction or other circumstances necessitate.

34
35 For an immediate evacuation, accountability will be performed at the staging area. Personnel
36 Accountability Aides (PAAs) and Staging Area Managers (SAMs) will ensure evacuation actions are
37 taken at all applicable WTP buildings. These positions are standing assignments. Implementing actions
38 executed by the PAAs and SAMs will be directed by site or plant emergency response procedures. When
39 evacuation actions are complete, the PAAs will report to the SAMs. The Staging Area Managers will
40 report to the BED via radio communications or other means, as necessary. When personnel cannot be
41 accounted for active searches will be conducted. ERO personnel, utilizing personal protective equipment
42 appropriate for the conditions, will conduct these searches.

43
44 To evacuate from any WTP building, personnel will proceed to the nearest exit. Stairways, not elevators,
45 will be used to ascend or descend to the main level (0 ft. elevation). From the building, personnel will
46 proceed to the primary staging areas unless otherwise instructed by the BED or other ERO personnel.
47 Personnel in protective clothing when an evacuation alarm sounds will make every effort to follow
48 normal exit procedures when exiting from radiological control areas, unless threatened by the emergency
49 event. Personnel unable to remove protective clothing will remain separated from the others and report to

1 the contaminated personnel staging sign (there will be a sign at each staging area). These personnel will
2 notify staging area personnel that they need a radiation survey.

3
4 Personnel will immediately evacuate the building and proceed to the primary staging area (unless directed
5 otherwise by the BED or other ERO personnel), when a fire alarm is heard. The discoverer of the fire
6 will contact the Central Control Room (CCR) via telephone or radio. The BED will make an
7 announcement on the public address system, stating which building has initiated the fire alarm, and
8 inform personnel to stand clear of the area.

9
10 The BED may direct personnel to evacuate to an offsite location, if required. Personnel will remove and
11 leave protective clothing in the parking lot and obtain a radiation survey prior to entering a vehicle.
12 Personnel will use their privately owned vehicles. Personnel with their own vehicles will be asked to
13 accommodate other personnel who are without transportation. Government vehicles may be available and
14 may be obtained upon request from the RL Emergency Operations Center (RL-EOC).

15 16 **7.1.2 Take Cover**

17 The BED will initiate a local take cover notice for the WTP using the facility communications systems.
18 Where area 200 could be affected, the BED will initiate the take cover alarm by telephoning the POC,
19 using either 911 (preferred) or 509-373-3800. The take cover alarm is a wavering siren signal. Actions to
20 complete a take cover order will be directed by WTP emergency response procedure. Determination of
21 additional take cover actions will be based on operating configuration, weather conditions, type and
22 duration of release, and other conditions, as applicable to the event and the associated hazard. The intent
23 of this protective action is to minimize personnel exposure to hazardous materials and move personnel to
24 locations where additional instructions can be provided.

25
26 When the take cover alarm is activated, personnel shall halt work, place equipment in a safe condition,
27 and take cover in the nearest building capable of providing shelter from an airborne hazard. Exterior
28 doors and windows will be closed; and heating, ventilation, and air conditioning (HVAC) systems will be
29 secured. If possible, personnel will follow normal exit procedures from radiological controlled areas in
30 preparation for evacuation. The PAAs have responsibility to ensure that take cover actions are taken.
31 These positions are standing assignments. When take cover actions are complete, the PAAs will provide
32 the BED with a status report via communications paths identified in WTP procedures.

33 34 **7.2 RESPONSE TO FACILITY OPERATIONS EMERGENCIES**

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

40
41 The following emergency signals will be used to initiate emergency response:

- 42
- 43 • Evacuation - steady siren
- 44 • Take Cover - wavering siren
- 45 • Fire - Gong/Bell
- 46

1 **7.2.1 Loss of Utilities**

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

7 **7.2.1.1 Loss of Electrical Power**

8 Should there be a partial or total loss of electrical power to the WTP, automatic measures ensure the plant
9 is in a safe operational configuration. (Safe operational configuration is defined as a shutdown to
10 minimal operations that will prevent releases and prevent unnecessary damage to the equipment.)
11

12 The emergency power system (EPS) will consist of three automatically controlled 4.16kV emergency
13 diesel generators (EDGs) connected to three separate 4.16kV emergency switchgear. Upon loss of power,
14 the emergency power system generators will automatically start. The EDGs are capable of starting,
15 accelerating and being loaded with the design load within a short time period (under 10 seconds). The
16 EPS will be connected to essential Important to Safety (ITS) loads in order to ensure only a short-term
17 power interruption for those loads designated as essential.
18

19 Standby power will be provided by three 13.8kV standby diesel generators (SDGs). The SDGs are
20 started manually or automatically in the event of a prolonged loss of offsite power. This source is
21 primarily associated with the LAW and HLW melters. Critical indicators and controls are backed up by
22 un-interruptible power supplies and batteries. The plant will remain in a safe condition during loss of
23 electrical power. Operational response to this event is in accordance with *Loss of Electrical Power*
24 procedures.
25

26 Egress lighting will consist of self-contained fixtures with battery packs and charging systems. These
27 lighting systems will be located in stairways, exit routes and fire alarm stations and will come on
28 automatically upon loss of normal power to the fixture. A selected part of the normal lighting will
29 operate as essential lighting, and will provide a minimum level of illumination throughout the plant to aid
30 in restoring the plant to normal operation. Essential lighting will be powered by the EPS and will be
31 available after an offsite power loss, following a delay required to start the emergency power supply
32 diesel generators and for the generators to pick up the essential loads.
33

34 Selected instrumentation and controls will also be powered by an un-interruptible power supply (UPS)
35 system and therefore will be unaffected by a loss of offsite power. UPS systems will be battery backed,
36 and the battery chargers will be connected to the EPS. Radiation monitors, such as Continuous Air
37 Monitors (CAMs) and area radiation monitors, are also powered by the UPS systems and continue
38 operating during power failure.
39

40 **7.2.1.2 Loss of Water**

41 Upon loss of the raw water system, operations will be restricted. Upon loss of potable water chemical
42 operations will be terminated until safety showers and eyewash stations are available. Upon loss of the
43 fire suppression system, the plant will be placed in a safe configuration, and corrective actions will be
44 implemented.
45

46 **7.2.1.3 Loss of Ventilation**

47 A cascade ventilation system is used at the WTP in conjunction with physical building containment
48 features to confine transferable radioactive contamination in the event of an accidental release, spill, or
49 system failure. The ventilation system is designed to maintain building differential pressures so air will

1 flow from areas of lesser contamination potential to areas of greater contamination potential through
2 containment boundary penetrations such as engineered air gaps and air in-bleed ductwork.

3
4 The WTP is divided into numbered zones with the higher number indicating the greater hazard potential
5 and therefore the greater degree of control/restriction required. Radiation (R1 to R5) and contamination
6 (C1 to C5) zones are classified independently in order to differentiate between the need for shielding or
7 confinement.

8
9 Supply air in C2 areas flows via C3 to the C5 areas, where it will be discharged by the C5 exhaust fans.
10 In some instances, the airflow will flow from the C2 areas to the C3 areas, where it will be discharged by
11 the C3 exhaust fans. Some C2 air flow will be directly exhausted. Upon loss of the ventilation system,
12 restoration of the C3 and C5 exhaust fans will be immediately attempted. If the C3 and C5 exhaust fans
13 cannot be restored immediately, the C2 supply fans are automatically stopped, and personnel may be
14 notified to evacuate C3 areas, as a precautionary measure.

15
16 The BED and either the ERO or the IC will take the following actions:

- 17
- 18 • Locate the source of the problem, and take steps necessary to control the event
 - 19 • Ensure appropriate areas have been evacuated
 - 20 • Monitor contamination levels in the plant
 - 21 • Restore ventilation system
- 22

23 **7.2.1.4 Loss of Process or Instrument Air**

24 The process air system will use redundant air compressors. One will be in operation and the other(s) will
25 be in autostart mode. If the standby compressor fails to start on loss of the operating compressor, a
26 backup compressor will be started locally.

27 28 **7.2.2 Major Process Disruption/Loss of Plant Control**

29 If there is a major process disruption, the BED will be notified while an attempt is made to return the
30 system to service. The BED will compare the situation to criteria provided in the facility
31 categorization/classification procedure to determine if an Operational Emergency is occurring. If it is
32 determined that an Operational Emergency is in progress, the BED will make the appropriate
33 categorization/classification, initiate protective actions, begin the notification process, and request that the
34 ERO be activated. The system condition will be assessed, and mitigative/corrective actions will be
35 implemented.

36 37 **7.2.3 Pressure Release**

38 Pressure hazards in plant buildings associated with pressurized gases or compressed gas bottles could
39 require changes to the plant operation and may require local evacuation. A fire or explosion caused by a
40 release of pressurized gas will be responded to in accordance with Section 7.2.4. If a mixed waste release
41 occurs, actions identified in Section 7.2.5 will be performed.

42 43 **7.2.4 Fire and/or Explosion**

44 In the event of a fire, the discoverer activates a fire alarm (pull box); calls 911 (509-373-3800 if using a
45 cellular phone) or verifies that 911 has been called; and calls the CCR. Automatic initiation of a fire
46 alarm (through the smoke detectors and sprinkler systems) is also possible. Activation of a fire alarm
47 automatically signals the HFD and the Hanford POC and will be audible in the CCR.

1 As soon as non-essential personnel are notified of a fire (verbally or by fire alarm activation), they will
2 immediately exit the WTP area or building by the nearest safe exit, proceed to the nearest staging area
3 upwind of the area/building, check-in with PAAs, and follow the instructions of responding personnel. If
4 personnel are reported missing, and might be within the WTP area/building, the BED will be notified. A
5 search will be made, if safe to do so. The BED will initiate emergency response procedures and will
6 notify ERO members and the incident command structure.

7
8 Initial actions to be taken by non-response personnel will consist of:

- 9
10 • Unless otherwise instructed, personnel shall evacuate the area/building by the nearest safe exit and
11 proceed to the designated staging area for accountability.
12 • On actuation of the fire alarm, ONLY if time permits, personnel should shut down equipment, and
13 secure waste.

14
15 Trained and certified operations personnel may initiate a plant shutdown depending on the location and
16 severity of the fire, and the location and type of hazards in the affected area. The BED will interface with
17 the appropriate agencies of the incident command structure and will perform the following:

- 18
19 • Proceed directly to the ICP, obtain all necessary information pertaining to the incident, and send a
20 representative to meet Hanford Fire Department.
21 • Provide a formal turnover to the IC, when the IC arrives at the ICP.
22 • Inform the Hanford Site Emergency Response Organization as to the extent of the emergency
23 (including estimates of dangerous waste, mixed waste, or radioactive material quantities released to
24 the environment).
25 • If operations are stopped in response to the fire, ensure that systems are monitored for leaks, pressure
26 buildup, gas generation, and ruptures.

27
28 The following is representative of the type of information that the BED may be called upon to provide to
29 the incident command structure or other response agencies:

- 30
31 • Location and health of personnel, including missing personnel and possible locations for fire fighters
32 to search for them
33 • Location and severity of fire, including character, exact source, and the amount, area, and extent of
34 any released materials
35 • Known hazardous conditions (such as, radiological, non-radiological, electrical, thermal, flammable
36 materials, pressurized cylinders, toxic gas, pressure systems, batteries, radiation areas)
37 • Plant operating status
38 • Utility systems status
39 • Support for WTP radiological control personnel (that is, monitoring, surveys, sampling,
40 decontamination)
41 • WTP layout
42 • Support for firefighter activities as required
43 • Notifications as required in accordance with plant procedures and DOE/RL-94-02, Section 5.1.1

44
45 Following a fire and/or explosion, WAC 173-303-640(7) will be addressed for any WTP tank systems
46 that may have been affected regarding fitness for use.

1
2 **7.2.5 Hazardous Material, Dangerous and/or Mixed Waste Spill**

3 The WTP has engineering controls to contain or minimize spills. These controls include containment
4 berms, dedicated spill control sumps, remote leak detection systems, remote gauges and level indicators
5 as well as shielding on chemical pipe flanges. WTP procedures provide alarm response and maintenance
6 actions for leak detection equipment, surveillance of possible leak locations, and response actions for
7 detected spills.

8
9 Spills can result from many sources including process leaks, container spills or leaks, damaged packages
10 or shipments, or personnel error. Spills of mixed waste are complicated by the need to deal with the extra
11 hazards posed by the presence of radioactive materials.

12
13 The following actions will be taken in response to a spill or release of hazardous material, dangerous
14 and/or mixed waste:

- 15
16 • The discoverer notifies the BED and initiates SWIMS response:
17
18 Stops work
19 Warns others in the vicinity
20 Isolates the area
21 Minimizes the spill if possible
22 Requests the BED Secure ventilation.
23
24 • The BED determines if emergency conditions exist requiring response from the Hanford Fire
25 Department based on classification of the spill and injured personnel, and evaluates need to perform
26 additional protective actions.
27 • If the Hanford Fire Department resources are not needed, the spill is mitigated with resources
28 identified in Section 9.0 of this plan and proper notifications are made.
29 • If the Hanford Fire Department resources are needed, the BED calls 911 (509-373-3800 if using a
30 cellular phone).
31 • The BED sends a representative to meet the Hanford Fire Department.
32 • The BED provides a formal turnover to the IC when the IC arrives at the ICP.
33 • The BED informs the Hanford Site Emergency Response Organization as to the extent of the
34 emergency (including estimates of dangerous waste, mixed waste, or radioactive material quantities
35 released to the environment).
36 • If operations are stopped in response to the spill, the BED ensures that systems are monitored for
37 leaks, pressure buildup, gas generation, and ruptures.
38 • Hanford Fire Department stabilizes the spill.

39
40 As necessary, the BED will also initiate or arrange for the following:

- 41
42 • Notify plant personnel of the spill or release by sounding the appropriate alarm, using the public
43 address system, or other available means.
44 • Establish a control point at a safe location, and coordinate further spill mitigation activities.
45 • Obtain all available information pertaining to the event, evaluate the need for event categorization or
46 classification, and begin ERO activation as necessary.
47 • Initiate use of plant and emergency response procedures.

- 1 • Arrange for care of any injured persons.
- 2 • Maintain access control at the event site by keeping unauthorized personnel and vehicles away from
- 3 the area. Security personnel can be used to assist in site control. In determining which areas are to be
- 4 controlled, the BED will consider environmental factors such as wind velocity and direction.
- 5 • Arrange for proper remediation of the event after evaluation, and if required, incident investigation
- 6 processes have been initiated.
- 7 • Remain available for fire, patrol, and other authorities on the scene, and provide all required
- 8 information.
- 9 • Enlist the assistance of alternate BED(s) or ERO personnel, if response activities are projected to be
- 10 long term.
- 11 • Ensure the use of proper protective equipment, remedial techniques, transfer procedures and
- 12 decontamination procedures by all involved personnel, if remediation is performed by plant
- 13 personnel.
- 14 • Remain at the scene to oversee activities and provide information, if remediation is performed by the
- 15 HFD HAZMAT Team or other response teams.
- 16 • Ensure proper containerization, packaging, and labeling of recovered spill materials.
- 17 • Ensure decontamination (or restocking) and restoration of emergency equipment used in the spill
- 18 remediation before resuming operations.
- 19 • Provide required reports after the event in accordance with plant procedures.

20
21 Additional actions to be taken in response to a leaking tank include:

- 22 • Removal of the leaking tank from service.
- 23 • Conduct an investigation to determine the cause of the event.
- 24 • Perform repairs or replacements before the tank is returned to service, with, as required, a final
- 25 approval from an independent certified professional engineer.
- 26 • Following an emergency event involving a tank system, address all requirements of WAC
- 27 173-303-640(7) regarding fitness for use.

30 **7.2.5.1 Damaged or Unacceptable Shipments**

31 No wastes will be received at the WTP from outside of the Hanford Site. Therefore, this section of the
32 plan is not applicable to the WTP.

34 **7.2.6 Radiological Material Release**

35 **7.2.6.1 C2, C3 or C5 Ventilation System Release**

36 If high radiation alarms indicate the occurrence of a radiological material release from the C2, C3 or C5
37 ventilation system the operating ventilation system can be immediately switched over to the standby
38 HEPA filtration system. Near-contact radiation surveys and additional assessment making use of on-line
39 instruments will be performed to determine the extent of the radiological material released. The actions
40 described in Section 7.2.1.3 will be performed.

42 **7.2.6.2 Release of Mixed Waste into the Plant**

43 If a catastrophic dumping of mixed waste occurs, affected plants or processes will be immediately shut
44 down. The actions described in Section 7.2.5 will be performed.

1
2 If a catastrophic dumping causes a high radiation alarm on the C5 or C3 ventilation systems, the standby
3 systems will be started, and actions described in Section 7.2.1.3 will be performed.

4 5 **7.2.7 Criticality**

6 Analyses have shown that there is no credible criticality event that can be postulated to occur at the WTP
7 (BNI 2001b).

8 9 **7.3 PREVENTION OF RECURRENCE OR SPREAD OF FIRES, EXPLOSIONS, OR** 10 **RELEASES**

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

16 17 **7.4 RESPONSE TO NATURAL PHENOMENA**

18 Depending on the severity of the event, the BED reviews sitewide and WTP emergency response
19 procedure(s) and, as required, categorizes and/or classifies the event. If necessary, the BED initiates area
20 protective actions and Hanford Site Emergency Response Organization activation. The steps identified in
21 the following description of actions do not have to be performed in sequence because of the unanticipated
22 sequence of incident events.

23 24 **7.4.1 Seismic Event**

25 The Hanford Site Emergency Response Organization's primary role in a seismic event is coordinating the
26 initial response to injuries, fires, and fire hazards and acting to contain or control radioactive and/or
27 hazardous material releases.

28
29 Individuals should remain calm and stay away from windows, steam lines, and hazardous material storage
30 locations. Once the shaking has subsided, individuals should evacuate carefully and assist personnel
31 needing help. The location of any trapped individuals should be reported to the BED or is reported to 911
32 (509-373-3800 if using a cell phone).

33
34 The BED takes whatever actions are necessary to minimize damage and personnel injuries.
35 Responsibilities include the following:

- 36
37 • Coordinating searches for personnel and potential hazardous conditions (fires, spills, etc.)
38 • Conducting accountability.
39 • Securing utilities and facility operations.
40 • Arranging rescue efforts, and notifying 911 for assistance.
41 • Determining if hazardous materials were released.
42 • Determining current local meteorological conditions.
43 • Warning other facilities and implementing protective actions if release of hazardous materials poses
44 an immediate danger.
45 • Providing personnel and resource assistance to other facilities, if required and possible.
46

1 **7.4.2 Volcanic Eruption/Ash fall**

2 When notified of an impending ash fall, the BED will implement measures to minimize the impact of the
3 ash fall. BED actions may include the following:

- 4
- 5 • Installing filter media over building ventilation intakes
 - 6 • Installing filter media or protective coverings on outdoors equipment that may be adversely affected
7 by the ash (diesel generators, equipment rooms etc.)
 - 8 • Shutting down some or all operations and processes
 - 9 • Sealing secondary use exterior doors

10
11 If other emergency conditions arise as a result of the ashfall (e.g., fires due to electrical shorts or
12 lightning), response is as described in other sections of this plan.

13
14 **7.4.3 High Winds/Tornadoes**

15 Upon notification of impending high winds, the BED takes steps necessary to secure all outdoor waste
16 and hazardous material containers and storage locations.

17
18 All doors and windows are shut, and personnel are warned to use extreme caution when entering or
19 exiting the building. Ventilation, utilities, and operations will be shut down as appropriate to lessen the
20 severity of the impact.

21
22 **7.4.4 Flood**

23 Since the 200 Area is well above projected flood elevations for the Columbia and Yakima Rivers, this
24 section is not applicable.

25
26 **7.4.5 Range Fire**

27 Responses to range fires are handled by preventive measures (i.e., keeping hazardous material and waste
28 accumulation areas free of combustible materials such as weeds and brush). If a range fire breaches the
29 WTP boundary, the response is as described in Section 7.2.4.

30
31 **7.4.6 Aircraft Crash**

32 The response to an aircraft crash is the same as for a fire and/or explosion (Section 7.2.4).

33
34 **7.5 SECURITY CONTINGENCIES**

35 Depending on the severity of the event, the BED reviews sitewide and WTP emergency response
36 procedure(s) and, as required, categorizes and/or classifies the event. If necessary, the BED initiates area
37 protective actions and Hanford Site Emergency Response Organization activation. The steps identified in
38 the following description of actions do not have to be performed in sequence because of the unanticipated
39 sequence of incident events.

40
41 **7.5.1 Bomb Threat/Explosive Device**

42 Response to a bomb threat/explosive device is discussed in the following sections.

43
44 **7.5.1.1 Telephone Threat**

45 Individuals receiving telephoned threats attempt to get as much information as possible from the caller
46 (using the bomb threat checklist if available). Upon conclusion of the call, notify the BED and Hanford

1 Patrol by calling 911 (do not use a cellular phone or hand-held radio for reporting a bomb
2 threat/explosion unless beyond 300 feet from suspected object).

3
4 The BED evacuates the WTP and questions personnel at the staging area regarding any suspicious
5 objects. When Hanford Patrol personnel arrive, their instructions will be followed.

6 7 **7.5.1.2 Written Threat**

8 Receivers of written threats should handle the letter as little as possible. The BED and Hanford Patrol
9 will be notified by calling 911 (do not use a cellular phone or hand-held radio for reporting a bomb
10 threat/explosion unless beyond 300 feet from suspected object). Depending on the content of the letter,
11 the BED might evacuate the affected locations. The letter is turned over to Hanford Patrol and their
12 instructions are followed.

13 14 **7.5.2 Hostage Situation/Armed Intruder**

15 The discoverer of a hostage situation or armed intruder reports the incident to 911 (509-373-3800 if using
16 a cell phone) and to the BED if possible. The BED, after conferring with Hanford Patrol, might covertly
17 evacuate areas not observable by the hostage taker(s)/intruder. No alarms will be sounded.

18
19 Hanford Patrol will determine the remaining response actions and will activate the Hostage Negotiating
20 Team, if necessary.

21 22 **7.5.3 Suspicious Object**

23 The discoverer of a suspicious object reports this object to the BED and to 911 (do not use a cellular
24 phone or hand-held radio for reporting a bomb threat/explosive device unless beyond 300 feet from
25 suspected object), if possible, and ensures that the object is not disturbed.

26
27 The BED will evacuate the WTP and (based on the description provided by the discoverer) attempt to
28 determine the identity or owner of the object. Personnel will be questioned at the staging area to attempt
29 to identify the owner of the object.

30
31 If the identity/ownership of the object cannot be determined, then Hanford Patrol will assume command
32 of the incident. The canine unit will be used to determine if the package contains explosives. If there is a
33 positive indication of explosives or it cannot be assured that there are no explosives, then an Explosive
34 Ordnance Disposal Team will be dispatched to properly dispose of the object.

35 36 **8.0 TERMINATION OF EVENT, INCIDENT RECOVERY, AND RESTART OF** 37 **OPERATIONS**

38 DOE/RL-94-02, Section 9.0, describes actions for event termination, incident recovery, and restart of
39 operations. The extent by which these actions are employed is based on the incident classification of each
40 event. In addition, DOE/RL-94-02, also contains actions for the management of incompatible wastes that
41 might apply.

42 43 **8.1 TERMINATION OF EVENT**

44 For events where the Hanford Emergency Operations Center (Hanford-EOC) is activated, the RL/ORP
45 Emergency Manager has the authority to declare event termination. This decision is based on input from
46 the BED, IC, and other emergency response organization members. For events where the Hanford-EOC
47 is not activated, the incident command system and staff will declare event termination.

1 **8.2 INCIDENT RECOVERY AND RESTART OF OPERATIONS**

2 A recovery plan is developed when necessary in accordance with DOE/RL-94-02, Section 9.2. A
3 recovery plan is needed following an event where further risk could be introduced to personnel, the WTP
4 facilities, or the environment through recovery action and/or to maximize the preservation of evidence.

5
6 If the WTP ERP is implemented in accordance with Section 4.0 of this plan, Ecology must be notified
7 before operations can resume. This notification is in addition to the required reports discussed in Section
8 5.1 of DOE/RL-94-02 and must include the following statements;

- 9
10 • There are no incompatibility issues with the waste and released materials from the incident.
11 • All the equipment has been cleaned, fit for its intended use, and placed back into service.

12
13 The notification required by WAC 173-303-360(2)(j) may be made via telephone conference. Additional
14 information that Ecology requests regarding these restart conditions will be included in the required
15 15-day report identified in Section 11.0 of this plan.

16
17 For emergencies not involving activation of the Hanford-EOC, the BED ensures that conditions are
18 restored to normal before operations are resumed. If the Hanford Site Emergency Response Organization
19 was activated and the emergency phase is complete, a special recovery organization could be appointed at
20 the discretion of RL to restore conditions to normal. This process is detailed in RL and contractor
21 emergency procedures. The makeup of this organization depends on the extent of the damage and the
22 effects. The onsite recovery organization will be appointed by the appropriate contractor's management.

23
24 **8.3 INCOMPATIBLE WASTE**

25 After an event, the BED, or the onsite recovery organization ensures that no waste that might be
26 incompatible with the released material is treated, stored, and/or disposed of until cleanup is completed.
27 Clean up actions are taken by WTP personnel or other assigned personnel. DOE/RL-94-02, Section 9.2.3
28 describes actions to be taken.

29
30 Waste from cleanup activities is designated and managed as newly generated waste. A field check for
31 compatibility is performed before storage, as necessary. Incompatible wastes are not placed in the same
32 container. Containers of waste are placed in approved storage areas appropriate for their compatibility
33 class.

34
35 If incompatibility of waste was a factor in the incident, the BED or the onsite recovery organization
36 ensures that the cause is corrected

37
38 **8.4 POST EMERGENCY EQUIPMENT MAINTENANCE AND DECONTAMINATION**

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

42
43 The BED ensures that all equipment is cleaned and fit for its intended use before operations are resumed.
44 Depleted stocks of neutralizing and absorbing materials are replenished, self-contained breathing
45 apparatus are cleaned and refilled, protective clothing is cleaned or disposed of and restocked, etc.

9.0 EMERGENCY EQUIPMENT

Hanford Site emergency resources and equipment are described and listed in DOE/RL-94-02, Appendix C. Emergency resources and equipment for the WTP are presented in this section.

9.1 FIXED EMERGENCY EQUIPMENT

The following table lists the fixed emergency equipment available at the WTP.

Table 7A-2 Fixed Emergency Equipment

Type	Location	Capability
Safety shower/eye wash station	Throughout the WTP in locations designated by facility procedures.	Assist in flushing chemicals/materials from body or eyes and face.
Automatic sprinkler system	Throughout the WTP.	Assist in the control of fire.
Fire alarm pull boxes	Throughout the WTP.	Activates the building fire alarm and notifies fire department, as developed by Coordination Agreements.
Emergency diesel generators	East of the LAW vitrification building.	Provide emergency power.
Fire hose connections	Throughout the WTP in locations designated by facility procedures.	Allow for connection of fire hoses to site water system for manual fire suppression.
Personnel decontamination rooms	TBD	Personnel decontamination.

Note: TBD = To be determined

9.2 PORTABLE EMERGENCY EQUIPMENT

The following table lists available portable emergency equipment.

Table 7A-3 Portable Emergency Equipment

Type	Location	Capability
General purpose fire extinguishers	Throughout the WTP.	Fire suppression for class A, B, and C fires.
CO ₂ or clean-agent fire extinguishers	Throughout the WTP.	Suppress electrical fires.
Miscellaneous emergency equipment	Throughout the facility located in emergency equipment cabinets as designated by facility procedures.	Safety harnesses, blankets, first aid kits, stretchers, emergency lights, and emergency tools.

9.3 COMMUNICATIONS EQUIPMENT/WARNING SYSTEMS

The following table lists all communications and warning systems.

Table 7A-4 Communications Equipment

Type	Location	Capability
Siren System Evacuation STEADY SIREN Take Cover WAVERING SIREN Fire GONG/BELL	Throughout the WTP.	Alert facility personnel of emergency conditions.
PA System	Throughout the WTP.	Provides for information dissemination to facility personnel.
Crash Alarm Telephone system	Throughout the 200 Area.	Telephone system used to disseminate emergency messages.
Fire alarm pull boxes	Throughout the WTP.	Summon aid in the event of a fire.
Telephone system	WTP CCR, office areas, and other plant locations.	Internal and external communications.
Portable two-way radios	Throughout the WTP.	Communications to the CCR.
Pagers	Assigned to key personnel.	To alert key personnel to respond, either individually or by group alert.

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9.4 PERSONAL PROTECTIVE EQUIPMENT

The following table lists types of protective equipment available.

Table 7A-5 Personal Protective Equipment

Type	Location	Capability
Waterproof coveralls, Leather protective wear, Respirators, Filtered masks, Oxygen supplies, Escape Paks, SCBAs.	Throughout the facility in or near emergency equipment cabinets as designated by facility procedure.	Protection from various hazards (e.g., smoke, fumes, oxygen deficient atmosphere, chemicals, high airborne radioactivity concentrations, radiological contamination)

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10

9.5 SPILL CONTROL AND CONTAINMENT SUPPLIES

The following table lists the locations of spill kits and includes a basic listing of contents.

Table 7A-6 Spill Kits and Spill Control Equipment

Type	Location	Capability
Absorbent materials 55-gal drums Overpack drums Bags Step-off pads Protective clothing Chemical resistant coveralls Surgical and chemical gloves Acid Goggles/Face shields Sodium-bicarbonate Barrier Tape Rags Scissors Flashlight Batteries pH paper Mop handles Mop heads Mop bucket with wringer Hazardous material labels Non-sparking shovel Hazardous absorbent booms Ear plugs Portable barriers	Throughout the facility in or near spill kit cabinets as designated by facility procedures.	Control and mitigation of radioactive and chemical spills.

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9.6 INCIDENT COMMAND POST

The WTP primary ICP is located in the administration building. Alternate locations will be determined at the time of the emergency, if necessary. The location may be inside a building or outside, and may change depending on the weather, wind direction, and location and severity of the event. The IC could also activate the Hanford Fire Department Mobile Command Unit if necessary.

The ICP will contain the following:

- Telephone communications, (including speakerphones and headsets) including the Hanford Site crash telephone system

- 1 • Radio communications
- 2 • Access to the public address system
- 3 • Access to plant operations data
- 4 • Access to plant systems information
- 5 • Access to accountability and building access control information
- 6 • Access to the Hanford Local Area Network (HLAN) as necessary

8 10.0 COORDINATION AGREEMENTS

9 RL has established a number of coordination agreements, or memoranda of understanding (MOU) with
10 various agencies to ensure proper response resource availability for incidents involving the Hanford Site.
11 A description of the agreements is contained in DOE/RL-94-02, Section 3.0, Table 3-1.

12 11.0 REQUIRED REPORTS

14 Post incident written reports are required for certain incidents on the Hanford Site. The reports are
15 described in DOE/RL-94-02, Section 5.1.

17 Facility management must note in the WTP operating record, the time, date, and details of any incident
18 that requires implementation of the contingency plan (refer to Section 4.0 of this plan). Within fifteen
19 (15) days after the incident, a written report on the incident must be submitted to Ecology. The report
20 must include all items specified in WAC 173-303-360(2)(k).

22 If a release from a tank system occurs that requires notification according to WAC 173-303-640 (7),
23 notification as described in WTP procedures will be followed.

24 12.0 PLAN LOCATION AND AMENDMENTS

26 Copies of this plan are maintained at the following locations:

- 28 • WTP CCR
- 29 • RL-EOC
- 30 • POC
- 31 • HFD

33 Portions of the plan will be reviewed and immediately amended if necessary, when conditions described
34 in DOE/RL-94-02, Section 14.3.1.1 occur. In addition, the plan will be revised prior to the introduction
35 of bulk quantities of hazardous chemicals into the WTP. This will include information that is not
36 currently available. Subsequently, the plan will be reviewed and updated annually.

37 13.0 FACILITY/BUILDING EMERGENCY RESPONSE ORGANIZATION

39 The following table lists the BEDs by job title.

41 **Building Emergency Director**

42 **Table 7A-7 WTP BEDs**

Title	Location	Phone
-------	----------	-------

Shift Operations Manager (SOM), Pretreatment Building	Central Control Room, Pretreatment Building	TBD
SOM, LAW Building	Control Room, LAW Building	TBD
SOM, HLW Building	Control Room, HLW Building	TBD

1
2 Names and home telephone numbers of the BEDs will be available from the POC (509-373-3800) in
3 accordance with Hanford Facility RCRA Permit, Dangerous Waste Portion, General Condition II.A.4.
4 This list will be available prior to the introduction of bulk quantities of hazardous chemicals into the
5 WTP.
6

7 14.0 REFERENCES

- 8 BNFL Inc. 1999b. *Draft Work Plan for Screening Level Risk Assessment for the RPP-WTP*,
9 RPT-W375-EN00001, Revision D, 15 November 1999. BNFL Inc., Richland, Washington, USA.
- 10 BNI 2001a. *River Protection Project – Waste Treatment Plant Dangerous Waste Training Plan*,
11 Revision 1, August 2001. Bechtel National Incorporated, Richland, Washington, USA.
- 12 BNI 2001b. *Criticality Safety Evaluation Report for RPP-WTP*, 24590-WTP-RPT-NS-01-001,
13 Revision 0, Sept 4, 2001. Bechtel National Incorporated, Richland, Washington, USA.
- 14 DOE Order 232.1, *Occurrence Reporting and Processing of Operations Information*, United States
15 Department of Energy, Washington D.C.
- 16 DOE/RL-94-02, *Hanford Emergency Management Plan*, as amended
- 17 WAC 173-303, *Washington State Dangerous Waste Regulations, Washington Administrative Code*,
18 Washington State Department of Ecology, Olympia, Washington, as amended
- 19 Ecology, 1994, *Dangerous Waste Portion of the Hanford Facility Resource Conservation and Recovery*
20 *Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste*, Permit Number
21 WA7890008967, Washington State Department of Ecology, Olympia, Washington, as amended.

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1 **Appendix 7A-A**

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3 **List of Emergency Response Procedures**

4

5 DOE-0223, *Emergency Plan Implementing Procedures*: RLEP 3.4, "Emergency Termination, Reentry,
6 and Recovery"

7 DOE-0223, *Emergency Plan Implementing Procedures*: RLEP 1.1, "Hanford Incident Command System
8 and Event Recognition and Classification"

9 DOE-0223, *Emergency Plan Implementing Procedures*: RLEP 1.0, "Recognizing and Classifying
10 Emergencies," Appendix 1-X.X.

11 Facility specific procedures will be available prior to the introduction of bulk quantities of hazardous
12 chemicals into the WTP.

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1 **Appendix 7A-B**

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3 **Evacuation Routes**

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6 This Appendix will contain figures of:

7

- 8 • The site plot plan showing the position of the staging areas.
9 • Floor plans for each WTP building showing evacuation routes.

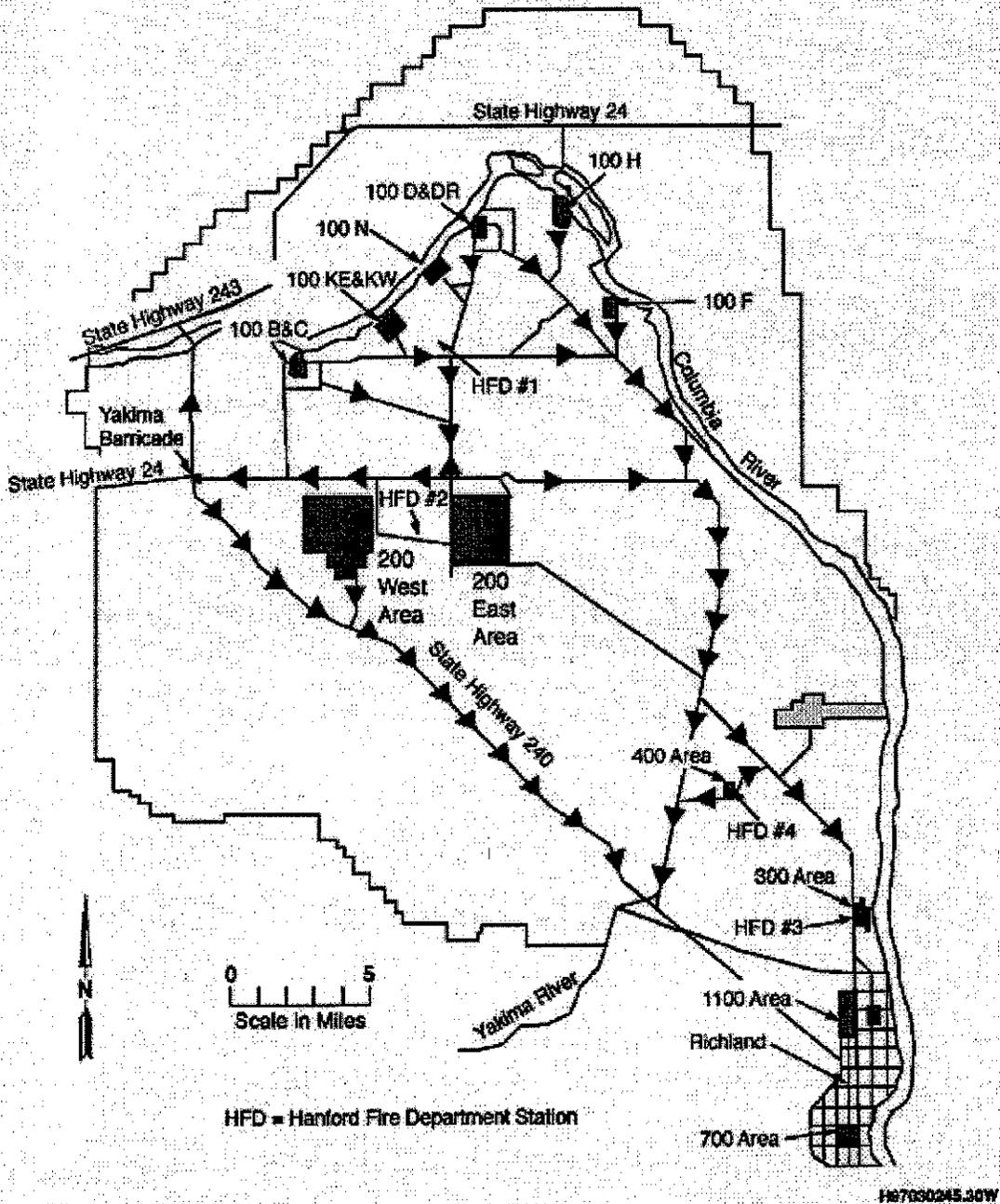
10

11 These figures will be provided prior to the introduction of bulk quantities of hazardous chemicals into the
12 WTP.

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Figure 7A-B-1 Hanford Site Evacuation Routes



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- 1 **Chapter 8.0**
- 2
- 3 **Personnel Training**

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CHAPTER 8.0
PERSONNEL TRAINING

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4 8.1 Outline of Introductory and Continuing Training Programs Att 51-8-1
5 8.1.1 Introductory Training..... Att 51-8-1
6 8.1.2 Continuing Training..... Att 51-8-2
7 8.2 Description of Training Design Att 51-8-2
8 8.3 Description of Training Plan..... Att 51-8-3

9 **Tables**

10 Table 8.1. Typical WTP Training Matrix..... Att 51-8-5

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8.0 PERSONNEL TRAINING [H]

This chapter discusses personnel training requirements based on Washington Administrative Code (WAC) 173-303 and the *Dangerous Waste Portion of the Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste* (Ecology 1994a). In accordance with WAC 173-303-806(4)(a)(xii), the Hanford Facility Dangerous Waste Part B Permit Application must contain two items:

- 1 "An outline of both the introductory and continuing training programs by owners or operators to prepare persons to operate or maintain the TSD facility in a safe manner as required to demonstrate compliance with WAC 173-303-330"
- 2 "A brief description of how training will be designed to meet actual job tasks in accordance with the requirements in WAC 173-303-330(1)(d)"

The Hanford Facility RCRA Permit (Dangerous Waste [DW] portion)(Ecology 1994a), Condition II.C (personnel training) contains training requirements applicable to Hanford Facility personnel and non-facility personnel.

Compliance with these requirements at the River Protection Project - Waste Treatment Plant (WTP) is demonstrated by information contained in both Chapter 8.0 of the *Hanford Facility Dangerous Waste Permit Application, General Information Portion* (DOE-RL 1998), Attachment 33 of the Hanford Facility RCRA Permit (DW Portion), and this chapter. This chapter supplements Chapter 8.0 of DOE/RL-91-28.

8.1 OUTLINE OF INTRODUCTORY AND CONTINUING TRAINING PROGRAMS

The introductory and continuing training programs are designed to prepare personnel during the operations phase, to manage and maintain the WTP in a safe, effective, and environmentally sound manner. In addition to preparing personnel to manage and maintain the WTP under normal conditions, the training programs ensure that personnel are prepared to respond in a prompt and effective manner should abnormal or emergency conditions occur. Emergency response training is consistent with the description of actions contained in Chapter 7.0, *Contingency Plan*. The introductory and continuing training programs contain the following objectives:

- Teach WTP personnel to perform their duties in a way that ensures the WTP's compliance with WAC 173-303
- Teach WTP personnel dangerous waste management procedures (including implementation of the contingency plan) relevant to the job titles and positions in which they are employed
- Ensure that WTP personnel can respond effectively to emergencies

8.1.1 Introductory Training

Introductory training includes general Hanford Facility training and WTP-specific training. General Hanford Facility training is described in DOE/RL-91-28, Section 8.1, and provided in accordance with the Hanford Facility RCRA Permit (DW Portion), Condition II.C.2. WTP-specific training is provided to WTP personnel allowing personnel to work unescorted, and in some cases is required for escorted access. WTP personnel cannot perform a task for which they are not properly trained, except to gain required experience while under the direct supervision of a supervisor or coworker who is properly trained. WTP personnel must be trained within six months after their employment at or assignment to the WTP. If personnel are assigned to a new job title or position at the WTP, any additional position-specific training must be completed within six months.

1 General Hanford Facility training: Refer to description in DOE/RL-91-28, Section 8.1.
2

3 Contingency plan training: WTP personnel receive training on applicable portions of the *Hanford*
4 *Emergency Management Plan* (DOE-RL 1999)(Attachment 4 of the Hanford Facility RCRA Permit [DW
5 Portion]) in General Hanford Facility training. In addition, WTP personnel receive training on the
6 description of actions contained in the Contingency Plan documentation in Chapter 7.0 and Appendix 7A
7 of this permit application, to be able to effectively respond to emergencies at the WTP.
8

9 Emergency coordinator training: WTP personnel who perform emergency coordinator duties as specified
10 in WAC 173-303-360 (for example, the Building Emergency Director) in the Hanford Incident
11 Command System receive training on implementation of the Contingency Plan and fulfilling the position
12 within the Hanford Incident Command System. These WTP personnel must also become thoroughly
13 familiar with applicable Contingency Plan documentation, operations, activities, location, and properties
14 of waste handled, location of records, and the unit and building layout.
15

16 Operations training: Dangerous waste management operations training (for example, waste designation
17 training, shippers training) will be determined on a unit-by-unit basis, and shall consider the type of waste
18 management unit and the type of activities performed at the waste management unit. For example,
19 training provided for management of dangerous waste in containers will be different than the training
20 provided for management of dangerous waste in a tank system. Common training required for
21 compliance within similar waste management units can be provided in general training, and supplemented
22 at the WTP. Training provided for WTP-specific operations will be identified in the training plan
23 documentation, and will be based on:
24

- 25 • Whether a general training course exists
 - 26 • The training needs to ensure waste management unit compliance with WAC 173-303
 - 27 • Training commitments agreed to with the Washington State Department of Ecology
- 28

29 **8.1.2 Continuing Training**

30 Continuing training meets the requirements for WAC 173-303-330(1)(b) and includes General Hanford
31 Facility training and WTP-specific training.
32

33 General Hanford Facility training: Annual refresher training is provided for General Hanford Facility
34 training. Refer to description in DOE/RL-91-28, Section 8.1.
35

36 Contingency plan training: Annual refresher training is provided for contingency plan training. Refer to
37 description above in Section 8.1.1.
38

39 Emergency coordinator training: Annual refresher training is provided for emergency coordinator
40 training. Refer to description above in Section 8.1.1.
41

42 Operations training: Refresher training occurs on various frequencies for operations training (that is,
43 annual, every other year, every three years). When justified, some training will not contain a refresher
44 course and will be identified as a one-time-only training course. The WTP training plan documentation
45 will specify the frequency for each training course. Refer to description above in Section 8.1.1.
46

47 **8.2 DESCRIPTION OF TRAINING DESIGN**

48 A properly designed training program ensures that personnel who perform duties at the WTP related to
49 WAC 173-303-330(1)(d) are trained to perform their duties in compliance with WAC 173-303. Actual
50 job tasks, referred to as duties, are used to determine training requirements.
51

- 1 • The first step taken to ensure that WTP personnel have received the proper training is to determine
2 and document the waste management duties by job title/position.
- 3 • In the second step, waste management duties are compared to the general waste management unit
4 training curriculum. If the general waste management unit training curriculum does not address the
5 waste management duties, the training curriculum is supplemented and/or on-the-job training is
6 provided.
- 7 • The third step summarizes the content of a training course necessary to ensure that the training
8 addresses the appropriate waste management duties.
- 9 • The fourth and last step is to assign training curriculum to WTP personnel based on their job
10 title/position. The training plan documentation contains this process.

11
12 Waste management duties include those specified in Section 8.1, as well as those contained in
13 WAC 173-303-330(1)(d). Training elements of WAC 173-303-330(1)(d) applicable to WTP operations
14 include the following:

- 15
- 16 • Procedures for using, inspecting, repairing, and replacing emergency equipment and monitoring
17 equipment
- 18 • Key parameters for automatic waste feed cut-off systems
- 19 • Communications or alarm systems
- 20 • Response to fires or explosions
- 21 • Response to groundwater contamination incident
- 22 • Shutdown of operations

23
24 WTP personnel who perform these duties receive training pertaining to their duties. The training plan
25 documentation described in Section 8.3 contains specific information regarding the types of training WTP
26 personnel receive based on the outline in Section 8.1.

27 28 **8.3 DESCRIPTION OF TRAINING PLAN**

29 In accordance with Hanford Facility RCRA Permit (DW portion), Condition II.C.3, the unit-specific
30 portion of the *Hanford Facility Dangerous Waste Permit Application* must contain a description of the
31 training plan. Training plan documentation is maintained outside of the *Hanford Facility Dangerous*
32 *Waste Part B Permit Application* and the Hanford Facility RCRA permit. Therefore, changes made to the
33 training plan documentation are not subject to the Hanford Facility RCRA Permit modification process.
34 However, the training plan documentation is prepared to comply with WAC 173-303-330(2).

35
36 Documentation prepared to meet the training plan consists of hard copy and/or electronic media as
37 provided by Hanford Facility RCRA Permit (DW portion), Condition II.C.1. The training plan
38 documentation consists of one or more documents and/or a training database with the components
39 identified in the core document.

40
41 A description of how training plan documentation meets the three items in WAC 173-303-330(2) is as
42 follows:

- 43
- 44 1 -330(2)(a): "The job title, job description, and name of the employee filling each job. The job
45 description must include requisite skills, education, other qualifications, and duties for each position."
46 **Description:** The specific WTP personnel job title and position is correlated to the waste management
47 duties. Waste management duties relating to WAC 173-303 are correlated to training courses to
48 ensure training is properly assigned.

1 Only names of WTP personnel who perform duties relating to waste management operations at the
2 WTP are required to be maintained. Names are maintained as described in the training plan
3 documentation. A list of personnel assigned to the WTP is available upon request.
4

5 Information on requisite skills, education, and other qualifications for job title and positions are
6 addressed by providing a reference where this information is maintained (for example, Human
7 Resources). Specific information concerning job title, requisite skills, education, and other
8 qualifications for personnel can be provided upon request.
9

10 2 -330(2)(b): "A written description of the type and amount of both introductory and continuing
11 training required for each position."

12 Description: In addition to the outline provided in Section 8.1, training courses developed to comply
13 with the introductory and continuing training programs are identified and described in the training
14 plan documentation. The type and amount of training is specified in the training plan documentation.
15 Table 8-1 is included as an example of a typical Training Matrix that shows typical job/titles and
16 positions matched to a training category.
17

18 3 -330(2)(c): "Records documenting that personnel have received and completed the training required
19 by this section. The Department may require, on a case-by-case basis, that training records include
20 employee initials or signature to verify that training was received."

21 Description: Training records are maintained consistent with DOE/RL-91-28, Section 8.4.
22

Table 8.1. Typical WTP Training Matrix

Training Category ^a								
DOE/RL-96-28 Chapter 8 Training Category	General Hanford Facility Training	Contingency Plan Training	Emergency Coordinator Training	Operations Training				
WTP DWTP Implementing Category	Orientation Program	Emergency Management Plan	Emergency Coordinator Training	General Waste Mgmt	Container Mgmt	Tank System Mgmt	Containment Buildings Mgmt	Misc Unit Mgmt
Typical Job Title/Position								
Operators	X	X		X		X	X	X
Shift Operations Manager	X	X	X	X	X	X	X	X
Hazardous Waste Operations (HWO) Manager	X	X		X	X	X	X	X
Operations Manager	X	X	X	X				
Environmental Compliance Officer	X			X				
Waste Service Provider	X			X	X			
Hazardous Waste Operators	X	X		X	X	X	X	X
Laboratory Technician –Hazardous Waste Operations (HWO)	X	X		X	X			
Laboratory Technician	X	X						
Laboratory Manager	X	X	X		X			

^aRefer to the WTP Dangerous Waste Training Plan for a complete description of coursework in each training category.

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- 1 **Chapter 11.0**
- 2
- 3 **Closure**

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CHAPTER 11.0
CLOSURE

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13

11.0 CLOSURE AND FINANCIAL ASSURANCE (I AND I-1)

This chapter of the Dangerous Waste Permit Application is the closure plan for the River Protection Project Waste Treatment Plant (WTP). This closure plan describes the activities that are necessary to close the WTP. The procedures and estimated times to complete these activities are discussed in this plan.

This closure plan is provided in compliance with the applicable requirements of the *Washington Administrative Code* (WAC) 173-303-610, -620, and -806. The closure plan is specifically required to be included in the permit application by WAC 173-303-806(4)(a)(xiii). This plan is also intended to demonstrate compliance with Conditions ILJ and ILK of the *Dangerous Waste Portion of the Resource Conservation and Recovery Act Permit for the Treatment Storage and Disposal of Dangerous Waste at the Hanford Facility* (Ecology 1994a). The closure plan will be revisited and submitted prior to the start of mixed waste processing.

With several exceptions, this plan follows the format of a typical closure plan as outlined in the *Dangerous Waste Permit Application Requirements for Facilities Which Store and/or Treat Dangerous Wastes in Tank Systems and Containers* (Ecology 1996). The exceptions are the exclusion of sections that do not apply to the WTP (financial assurance, liability, "already closed disposal unit", and post-closure requirements), and the addition of new sections not addressed in the guidance (closure of tank, container storage, and containment building units).

11.1 INTRODUCTION

This closure plan identifies the steps and procedures necessary to completely close the WTP at any point in its active life. This includes the removal of dangerous and mixed waste and the decontamination of the permitted units, ancillary equipment, and containment systems. The closure activities will be consistent with the requirements of the WTP deactivation plan, and the decontamination and decommissioning plan. These plans are to be prepared under separate authorities. They will be revised, or the closure plan will be revised as necessary to maintain consistency between the plans. Deactivation is discussed further in Sections 11.3.2 and 11.7.

Treatment, storage, and disposal (TSD) facilities located at the Hanford Site are exempt from the closure cost estimate requirements of WAC 173-303-620, in accordance with Condition IL.H.3 of the Hanford RCRA Permit. However, Condition IL.H.1 of the Hanford RCRA Permit requires submittal of an annual report updating projections of anticipated costs for closure (see Section 11.9).

11.1.1 Closure Plan Overview

Mixed waste will be handled and stored in the following areas of the WTP:

- Pretreatment plant building (tank systems, container storage areas, and containment buildings)
- Waste transfer lines from the United States Department of Energy (DOE), double-shell tank (DST) system unit, to the WTP pretreatment building (tank system ancillary equipment)
- Intra-facility transfer lines between WTP buildings
- Effluent transfer lines from the WTP pretreatment building, to the Liquid Effluent Retention Facility (LERF) and the Effluent Treatment Facility (ETF) (tank system ancillary equipment)
- Low Activity Waste (LAW) vitrification building (miscellaneous units, tank systems, container storage areas and containment buildings)
- High-Level Waste (HLW) vitrification building (miscellaneous unit, tank systems, container storage areas, and containment buildings)
- Laboratory

- 1 • WTP Central Waste Storage area and two melter storage buildings (container storage areas)

2
3 Dangerous (non-mixed) waste will be stored in the dangerous waste container storage building. This unit
4 is a separate structure located on the west side of the pretreatment building.

5
6 The permitted mixed and dangerous waste management units in the WTP are identified in Chapter 4 of
7 this application. The WTP dangerous and mixed-waste management units, including ancillary equipment,
8 secondary containment areas, supporting structures and underlying soil, are addressed in this closure plan.
9 Closure of the pipelines connecting the WTP with the DST system unit and the LERF/ETF will be
10 integrated with those respective facilities. Closure criteria will be developed jointly by DOE, its
11 contractors, and Ecology prior to initiating closure activities. DOE will be responsible for implementing
12 the clean-up standards.

13
14 The closure plan indicates several potential Hanford treatment, storage, and disposal units that may be
15 used to manage wastes generated during closure of the WTP. These identifications are preliminary, and
16 are subject to change as the Hanford facility is developed, and as the Hanford RCRA Permit is modified
17 in the future.

18
19 The remainder of the closure plan provides the following information:

- 20
21 • Section 11.2 of the closure plan identifies the regulatory standards that apply to closure, and the
22 processes to be used for developing specific cleanup standards that will be achieved during closure.
23 • Section 11.3 describes the overall approach for removing the waste inventory, flushing and
24 decontamination operations, removing and disposing of contaminated equipment and residues, and
25 inspections and sampling to verify clean closure.
26 • Section 11.4 describes other activities, including certification of completion of closure, control of
27 run-on and runoff during closure, and equipment reuse.
28 • Section 11.5 provides the maximum possible waste inventory.
29 • Section 11.6 describes the closure procedures for each type of dangerous waste management unit.
30 • Section 11.7 provides the schedule for closure.
31 • Section 11.8 describes the demonstration required to support a request to extend the standard 90 and
32 180-day waste removal and closure completion time limits, as specified in WAC 173-303-610(4)(a)
33 and (b).
34 • Section 11.9 discusses the annual submittal of updated anticipated costs of closure, as required by
35 Condition II.H.1 of the Hanford RCRA Permit (Ecology 1994a)

36
37 **11.1.2 Closure Plan Revisions**

38 This closure plan will be revised and resubmitted to Ecology for review and approval prior to the start of
39 mixed waste processing. This revision will include any changes to the WTP operating plans or design
40 that may affect the closure of the plant. Any addition of new dangerous wastes or dangerous constituents
41 to the wastes treated or stored at the WTP will also be included in the revision of the closure plan.

42
43 Clean closure is the goal for the WTP. The closure plan will be revised if efforts to achieve the clean
44 closure standards for the WTP structures or soil are unsuccessful. The "modified closure" approach may
45 be followed if feasible, as provided in Condition II.K.3 of the Hanford RCRA Permit. It may also be
46 closed as a landfill, as provided in Condition II.K.4 of the Hanford RCRA Permit, if the clean closure
47 standards are not technically or economically feasible. The revised closure plan will be accompanied by a
48 written request for modification of the permit.
49

1 The design life of the WTP is 40 years after the initiation of waste treatment operations. The actual
2 operating life of the plant may change depending on expansion in treatment capacity, improvements in
3 treatment technology, or many other factors. The closure plan will be revised and submitted for approval
4 under WAC 173-303-830 (Permit Changes) to incorporate future advances in decontamination
5 technology, changes in plant capacity, newly designated dangerous waste, or other factors that may affect
6 the closure of the plant.

7
8 The closure plan will also be revised before the start of closure work, based on relevant information from
9 the operational history of the WTP. The final revised closure plan will provide the necessary final
10 detailed decontamination schedule and procedures, sampling and analysis plan, health and safety plan, the
11 interface with DST system unit and LERF/ETF closure plans, and additional information dependent on
12 future conditions, as indicated in the following pages.

13 11.2 CLOSURE PERFORMANCE STANDARD (I-1A)

14 The WTP will be closed in accordance with the requirements of Conditions II.J and II.K of the
15 Hanford RCRA Permit.

16
17 Clean closure requires decontamination or removal and disposal of dangerous waste, waste residues,
18 contaminated equipment, soil, or other material, in accordance with the clean closure performance
19 standards of WAC 173-303-610(2). Clean closure as described in this closure plan will accomplish the
20 following:

- 21
- 22 • Minimize the need for future maintenance
 - 23 • Control, minimize, or eliminate, to the extent necessary to protect human health and the environment,
24 post-closure escape of dangerous waste, dangerous constituents, leachate, contaminated runoff, or
25 dangerous waste decomposition products, to the ground, surface water, groundwater, or the
26 atmosphere
 - 27 • Return the land to the appearance and use of the surrounding land areas to the degree possible given
28 the nature of the previous dangerous waste activity

29
30 This closure plan proposes to decontaminate structures and equipment to reasonable exposure limits.
31 Activities beyond that point will be decided and documented in the revised plan prior to closure. The
32 WTP buildings will not be used for RCRA-regulated TSD activities following clean closure, unless a new
33 permit is issued.

34
35 The appearance of the land where the WTP buildings are located will be consistent with the appearance
36 and future use of the surrounding processing land areas, after completion of clean closure activities. The
37 WTP buildings will remain at the site until final disposition is determined and implemented. The WTP
38 buildings may be demolished, if the buildings will have no future mission. Future land use decisions will
39 be considered during the WTP decommissioning process. The final decision on building disposition and
40 the appearance and use of the plant area will be integrated with the decisions on disposition of the
41 buildings in the adjacent 200 East Area.

42
43 The long-term future use of the WTP site and the adjacent 200 Areas was addressed in the *Final Hanford*
44 *Comprehensive Land-Use Plan Environmental Impact Statement* (DOE 1999). The Central Plateau as
45 defined in that document includes the United States Ecology commercial waste disposal facility, the DOE
46 ERDF, and the 200 West and 200 East Areas, as well as the WTP site. The land use classification
47 attached to the Central Plateau is "industrial (exclusive)", indicating the expected continuing operation of
48 DOE waste management facilities, and permanent institutional controls.

49
50 Units where mixed or dangerous wastes have been treated or stored will undergo closure activities.
51 Contaminated equipment, debris, and solid decontamination residues generated during the closure of the

1 WTP will be designated and packaged in accordance with the appropriate regulatory requirements
2 (expected to be the Washington Administrative Code Dangerous Waste Regulations in effect at the time
3 of closure). The waste will then be transferred to a permitted treatment, storage, or disposal unit either on
4 or off the Hanford Site. Equipment and debris that are not adequately decontaminated will be treated to
5 comply with land disposal restriction requirements. Radiologically-contaminated liquid decontamination
6 solutions or agents generated during closure activities will be collected, designated, and transferred to an
7 appropriate TSD unit for treatment and/or disposal.

8
9 If a product, residual waste, or decontamination fluid is spilled or released during closure activities, spill
10 response will be initiated as described in Chapter 7 and Appendix 7A (*River Protection Project – Waste
11 Treatment Plant Emergency Response Plan* of this permit application. The residual waste will be
12 collected, designated, and managed appropriately. The waste will be managed in accordance with the
13 appropriate regulatory requirements (expected to be the Washington Administrative Code Dangerous
14 Waste Regulations in effect at the time of closure).

15 Clean Debris Surface

16 This closure plan proposes use of a “clean debris surface”, defined in the following paragraph, as the
17 clean closure performance standard for the metal structures and equipment and concrete structures that
18 will remain after closure, which are able to be visually inspected. Attainment of a clean debris surface
19 can be verified visually in accordance with the standard in WAC 173-303-140(2)(a), incorporating
20 40 CFR 268.45, Table 1, footnote 3, which states:

21
22 *“Clean debris surface” means that the surface, when viewed without magnification, shall*
23 *be free of all visible contaminated soil and hazardous (dangerous) waste except that*
24 *residual staining from soil and waste consisting of light shadows, slight streaks, or minor*
25 *discolorations, and soil and waste in cracks, crevices, and pits may be present provided*
26 *that such staining and waste and soil in cracks, crevices, and pits shall be limited to no*
27 *more than 5 % of each square inch of surface area.”*

28
29 The clean debris surface standard will be achieved by using the physical and chemical extraction
30 techniques identified in 40 CFR 268.45, Table 1. The primary method of decontamination will be water
31 washing, followed by a choice of using chemical decontamination solutions, ultrahigh pressure water
32 technologies, impact technologies such as sand blasting, or CO₂ blasting or other new technologies that
33 may be developed prior to closure. Physical extraction methods that remove up to 0.6 cm of concrete will
34 be used only after the previous technologies have failed to result in a clean-debris surface, or if there has
35 been a failure of the coated concrete surface. Visual verification may be performed by direct worker
36 observation with written inspection documentation (Figure 11-4, Decontamination Checklist), or by other
37 means such as remote-operated closed circuit television and videotape.

38
39 Concrete surfaces may be protected with a contamination-resistant protective coating. Protective coatings
40 in good condition may be decontaminated using one of the technologies described above, then inspected
41 to determine if a clean debris surface is present in the same manner as steel or other metal surfaces. If
42 there is evidence that a release has occurred, such as confirmation of contamination behind a cladding
43 breach or identification of damaged or deteriorated protective coating on a concrete floor where a waste
44 release has occurred, and if the concrete is adjacent to soil, a contamination investigation using visual and
45 radiological surveys will be performed.

46
47 If the concrete protective coating exhibits more damage than hairline cracks and has lost integrity, the
48 concrete surface under the deteriorated coating will be treated with aggressive physical extraction
49 technologies such as high pressure water or scabbling, to remove at least 0.6 cm of material below the
50 original surface. This approach also applies to uncoated concrete behind or beneath cladding breaches.
51 The exposed concrete will again be inspected to verify that the clean debris surface standard is met. The

1 treatment will be repeated until the clean debris surface standard is met. Closure standards for soil
2 underlying the WTP are addressed in Section 11.2.1.

3
4 Designation Limit

5 Some waste handling equipment metal surfaces cannot be visually inspected (for example, internal pipe,
6 pump, and tank surfaces). A component or portions of a component may be flushed with
7 decontamination solutions, if it cannot be decontaminated to meet the clean debris surface standard, or if
8 it cannot be inspected to verify that it meets the standard. The decontamination solution, or rinsate, will
9 be sampled and analyzed using methods complying with *Test Methods for Evaluating Solid Waste,*
10 *Physical Chemical Methods* (EPA 1986) for indicator constituents. Analytical data that meet the criteria
11 defined in WAC 173-303-610(2)(b) will indicate successful decontamination and attainment of the clean
12 closure performance standard. The rinsate analysis criteria is hereafter referred to as the designation limit
13 standard.

14
15 Closure Strategy for Tank Systems

16 The general closure strategy for tank systems is outlined in flowcharts in Figure 11-1 and Figure 11-2.
17 Triple-rinsing followed by visual inspections is an accepted method of decontaminating tanks. However,
18 modification of this technique may be necessary, if determined at a later date.
19 Figure 11-1 shows that internal flushing and decontamination of tanks and ancillary equipment,
20 inspection of the secondary containment area, and sealing of observed cladding breaches will be
21 performed prior to final decontamination efforts. Disposition of solid and liquid treatment residuals is
22 shown only at the initial flushing step (below "flush tanks, piping"), to avoid unnecessary complexity in
23 Figure 11-1. The residuals from the following internal and external decontamination steps are expected to
24 follow the same paths.

25
26 The two "more decon?" decision boxes in Figure 11-1 (following determinations that decontamination
27 efforts so far have been inadequate) are the symbols for the key decisions the future closure managers will
28 have to make:

- 29
30 1 Perform additional decontamination in hopes of attaining the clean closure standard
31 2 Stop decontamination and designate that tank or ancillary equipment as mixed waste to be removed,
32 reduced in size, encapsulated, packaged, and disposed

33
34 Figure 11-1 does not show that additional decontamination of external tank or other surfaces may be
35 required to continue on the disposal path (after "remove, dispose of as mixed waste"), because such
36 additional decontamination, if required, will be due to radiological dose concerns, not dangerous waste
37 requirements. Figure 11-1 also illustrates the assumption that internal surfaces of tanks and ancillary
38 equipment cannot be adequately or efficiently decontaminated and/or inspected to demonstrate that the
39 clean debris surface standard is met, and that the decontamination solution or rinsate designation limit
40 standard will apply to all internal tank system surfaces. Listed waste codes will be managed through use
41 of the debris standard, through a "contained in determination", or other approach described in the
42 Sampling and Analysis Plan identified in Section 11.3.4.

43
44 Closure Strategy for Containment Areas

45 Figure 11-2 shows the strategy for closure of containment areas. These steps illustrate the approach for
46 decontaminating stainless steel liners and coated concrete surfaces. Containment area liner breaches may
47 need to be sealed prior to decontamination or removal of equipment. The general procedure for
48 investigating liner breaches or breaks, and decontaminating the concrete behind or below such breaches,
49 is shown in Figure 11-2.

50
51 The closure strategy for concrete with intact protective coatings is simple. If a release of dangerous or
52 mixed waste in the unit has not been documented in the facility operating record, and no evidence of a

1 release is found during the initial closure inspection, the assumption will be made that the concrete floor
2 surface meets the clean debris surface standard.

3
4 If a release has been documented, and the concrete does not meet the clean debris standard,
5 decontamination technologies, as described in Section 11.2, will be performed until the clean debris
6 standard can be met and documented.

7
8 If evidence is found that a release has occurred on a concrete floor where the protective coating has even
9 minor cracking, physical extraction will be required. Physical extraction of the concrete surface will also
10 be required in areas where the protective coating is substantially damaged or deteriorated; for example, if
11 it is broken or peeling, whether a release is documented or not. The extraction will be followed by an
12 inspection to verify and document the presence of a clean debris surface. The inspection will also
13 determine whether the underlying concrete is significantly deteriorated or cracked and has lost integrity.
14 If so, further physical extraction will be required. If a release is documented at such a location and the
15 concrete at that location is resting on or against soil, a soil investigation may be required. These steps are
16 illustrated in the last two boxes before the final decision box, "Visible Crack or Decomposed Concrete?"
17 in Figure 11-2.

18 19 Closure Strategy for Soil

20 The criteria for determining whether additional soil investigation is required are shown in the final
21 decision box in Figure 11-3. Contaminated soil will be removed to meet risk-based concentration limits,
22 referred to as the soil cleanup limits (see Section 11.2.1). Soil sampling and analyses will be performed
23 after removal to verify compliance with the soil cleanup standard. Figure 11-3 shows the strategy for
24 addressing potential impacts to soil and groundwater.

25
26 Compliance with this plan and attainment of the closure standards will be documented by videotape or
27 written inspection records, such as those shown in the sample checklist in Figure 11-5, the example
28 Closure Certification in Figure 11-6, and other supporting records as discussed in Section 11.4.1.

29 30 **11.2.1 Closure Standards for Soils, Groundwater, Surface Water, and Air (I-1a(1))**

31 The design of the WTP is intended to prevent the release of dangerous waste to the soil, groundwater,
32 surface water, or air. Clean closure of the soil beneath the WTP will be accomplished by demonstrating
33 that the stainless-steel process cell liners, and the coated concrete walls and floors in other units, have not
34 lost integrity and have therefore prevented contaminants from reaching the soil. If loss of containment
35 integrity has occurred, the potential for soil contamination will be investigated. The demonstrations will
36 consist of performing and documenting inspections and decontamination work, and soil investigations
37 and removal, if necessary.

38
39 The need for sampling of soil will be determined on a unit-specific basis, and will take into consideration
40 the unit operating history. Liner (cladding) inspections will be performed by the following methods:
41 remote closed-circuit television (CCTV), if necessary due to radiation levels; gamma camera; and dye
42 penetrant or other nondestructive evaluation techniques. The inspections will look for areas of severe
43 corrosion of the steel, seam weld failure, or accumulations of waste constituents in cracks or beneath
44 cladding.

45
46 Where a dangerous waste release is known or suspected to have occurred, the following conditions
47 indicate probable containment failure and potential soil contamination: the existence of radiological
48 contamination in concrete floors or walls that are in contact with soil; or the observation of potential
49 through-thickness cracks or crumbling concrete at a liner breach location or at a unit with deteriorated
50 concrete floor coating. Potential soil contamination will be investigated through coring and sampling of
51 both the concrete and the soil. Biased sampling will be focused in the vicinity of the liner defect or
52 coating defect, concrete cracks, or in the known or suspected release location. Samples will be analyzed
53 for constituents of concern (COCs). The proposed COCs will be submitted to Ecology with the revised

1 closure plan submitted before the start of closure. The COCs to be used will be developed using process
2 knowledge, the operating record, and waste characterization analyses, whenever possible.

3
4 Industrial exposure assumptions will be incorporated in the calculation of soil concentration limits. These
5 exposure assumptions are justified based on the anticipated long-term use of the WTP site and
6 surrounding land, as addressed in the *Final Hanford Comprehensive Land-Use Plan Environmental*
7 *Impact Statement*, (DOE 1999), as noted in Section 11.2. The appropriate risk-based clean-up standard
8 will be consistent with the future land-use classification. The standard will be reviewed prior to initiating
9 closure to ensure it is still appropriate. Risk assessment principles will be used to establish clean closure
10 concentration limits for soils in accordance with WAC 173-303-610(2)(b)(i). Given the long operating
11 life of the WTP and the current state of flux in risk assessment assumptions, toxicity data, and regulatory
12 guidance, calculation of specific limits is not appropriate at this time.

13
14 In establishing soil clean closure concentration limits, consideration will also be given to "area
15 background", as defined in Ecology's *Guidance on Sampling and Data Analysis Methods* (Ecology 1995).
16 The *TWRS Phase 1 Privatization Site Preconstruction Characterization Report* (HNF 1998) and the
17 *Hanford Site Background Part 1, Soil Background for Nonradioactive Analytes* (DOE/RL 1995), or other
18 site-specific soil background information will be used to assist in determining background levels in the
19 soil. If the closure soil sample data are at or below the calculated soil cleanup levels, or the site-specific
20 background concentrations, whichever is greater for each constituent, the soil will be considered
21 clean-closed.

22
23 Due to the level of containment provided at the WTP, non-permitted releases of wastes to soil,
24 groundwater, surface water, or air are not anticipated.

25
26 Soil sampling will be addressed in a sampling and analysis plan (SAP) that will be included in the revised
27 closure plan. An outline for the SAP is provided in Section 11.3.4 of this plan. The SAP will be
28 consistent with *Guidance for Clean Closure of Dangerous Waste Facilities* (Ecology 1994c).

29
30 Specific soil clean closure levels will be developed in consultation with Ecology, and submitted in a
31 revised closure plan for Ecology review and approval prior to the start of closure.

32 33 **11.2.2 Closure Standards for Decontamination of Structures and Equipment (I-1a(2))**

34 Some of the waste-contaminated structures and ancillary equipment that will undergo decontamination
35 during the closure of the WTP consist of equipment with smooth metal surfaces. Concrete and protective
36 coating surfaces will also be decontaminated as part of closure. The types of structures and associated
37 equipment that may be decontaminated to meet the clean debris surface standard include, but are not
38 limited to:

- 39
- 40 • Interior and exterior tank and pipe surfaces
 - 41 • Containment area stainless steel liners (cladding)
 - 42 • Uncoated concrete floors and walls behind cladding
 - 43 • Coated concrete walls and ceilings above secondary containment cladding
 - 44 • Coated concrete floors

45 Decontamination of interior surfaces of tanks and pipes, and documentation that they meet the clean
46 debris surface standard, may or may not be possible, given the current state of decontamination and
47 inspection technologies. At present, the available miniature equipment may not be adequate to remove
48 hardened waste or contaminated corrosion coatings from relatively inaccessible interior tank and pipe
49 surfaces. Similarly, available video equipment may not provide the inspection capability necessary to
50 demonstrate attainment of the clean debris surface standard on interior surfaces. The criteria for whether
51 or not decontamination is possible will be developed and submitted for approval prior to initiating closure
52 activities.

1 Decontamination of equipment and stainless steel cladding or liners will be conducted by using water
2 washing and spraying or ultrahigh-pressure water jetting, or other technologies listed in Section 11.3.
3 Residues from these extraction operations will be collected, sampled as necessary, designated in
4 accordance with WAC 173-303, and transferred to a TSD facility such as the LERF/ETF or the Central
5 Waste Complex (CWC) for treatment, storage, and/or disposal.

6
7 Decontamination of intact protective coating surfaces on concrete to meet the clean debris surface
8 standard will also be performed primarily through water washing and spraying. Additional technologies
9 that may be used include chemical decontamination solutions, ultrahigh pressure water technologies,
10 impact technologies such as sand blasting, CO₂ blasting, or other new technologies that may be developed
11 prior to closure. The protective coating on concrete is designed and applied to provide a durable,
12 non-porous surface. The exposed surface protective coating is not concrete, although the underlying
13 concrete supports it. If decontamination of the impermeable protective coating surface cannot be
14 completed through chemical extraction, or if the protective coating has broken, cracked, or peeled away
15 from the concrete, then at least 0.6 cm (0.24 inches) of the underlying concrete will be removed using one
16 or more of the physical extraction technologies. The physical extraction performance standard for
17 concrete is removal of 0.6 cm of the surface layer and treatment to a clean debris surface, as noted in the
18 *Guidance for Clean Closure of Dangerous Waste Facilities* (Ecology 1994c), Section 5.8.

19
20 Metal surface areas of equipment that cannot be documented to meet the clean debris surface standard
21 may be decontaminated using water washing, followed by a choice of chemical decontamination
22 solutions, ultrahigh pressure water technologies, impact technologies such as sand blasting or other new
23 technologies that may be developed prior to closure. Rinsate may be sampled and analyzed, using
24 methods complying with *Test Methods for Evaluating Solid Waste, Physical Chemical Methods*
25 (EPA 1986), for Ecology-approved indicator constituents. If other analytical methods are developed and
26 chosen for use, the closure plan will be revised and submitted for approval. Indicators will be determined
27 on the basis of process knowledge, the operating record, and waste characterization analyses, whenever
28 possible.

29
30 Analytical data less than designation limits will indicate successful decontamination and attainment of the
31 clean closure performance standard for the tank, piping, or other metal structures and equipment.
32 Documentation of the representative character of the sample and laboratory quality control and quality
33 assurance data will be entered into the closure record as specified in Sections 11.3.4 and 11.4.1. Concrete
34 and protective coated concrete surfaces will not be addressed using designation limits.

35
36 If the metal structure or equipment cannot be considered decontaminated using the clean debris surface or
37 designation limit criteria, or if further decontamination is determined to be impractical due to high
38 radiation levels, waste minimization, cost considerations, or other reasons, it will be packaged using the
39 debris treatment standard for immobilization by encapsulation. The waste will be designated on the basis
40 of process knowledge, and transported to a permitted dangerous or mixed-waste disposal facility such as
41 Hanford LLBG mixed-waste trenches. Examples of equipment that may undergo encapsulation and
42 disposal include, but are not limited to:

- 43
44
- 45 • Tanks and pipe
 - 46 • Melter off-gas duct work; scrubber, condenser, precipitator, and washout holding vessels
 - 47 • Pumps, agitators, wash rings, and ejectors
 - 48 • Air, steam, and water lines within unit containment areas

49 Contaminated items and solid decontamination residues removed from the WTP will be designated,
50 packaged, and treated as necessary to meet the waste acceptance criteria of the receiving facility.
51 Sampling of items and solid residues known to be contaminated and intended for disposal is not necessary
52 if process knowledge is adequate to accurately designate the wastes with the proper dangerous waste

1 identification codes. The closure plan will be revised prior to closure and will address treatment and
2 disposal plans in more detail.

3 4 **11.2.3 Closure Standards for Tank Systems**

5 At closure of a tank system, the owner or operator is required by WAC 173-303-640(8)(a) to remove or
6 decontaminate waste residues, contaminated containment system components (such as liners),
7 contaminated soils, and structures and equipment contaminated with waste, and manage them as
8 dangerous waste, with few exceptions.

9
10 For the purposes of the WTP closure, the standard is interpreted to mean that each tank and associated
11 ancillary equipment, including the secondary containment area, will meet the clean debris surface
12 standard and/or designation limit criteria for rinsate. Indicator constituents or COCs to be used for rinsate
13 evaluation will be determined using process knowledge, including consideration of the available waste
14 characterization data, and other relevant information in the facility operating record.

15
16 Inspectable surfaces may be declared clean if they meet the definition of a clean debris surface, including
17 concrete containment walls with intact protective coating surfaces, and physically-extracted concrete
18 surfaces behind cladding breaches, or under abraded or loose protective coating that have had at least
19 0.6 cm of material removed from the original surface. Rough or inaccessible metal surfaces such as
20 corroded tank containment area liner surfaces, or tank and pipe interior surfaces, may be declared clean
21 when the decontamination solution sample is analyzed, with appropriate quality control and quality
22 assurance as noted in Section 11.3.4, and the indicator parameter or COC data are determined to be less
23 than or equal to the designation limits.

24
25 If decontaminating a tank system in place is not feasible or is ineffective, an alternative method is to
26 remove the tanks, disassemble them, and decontaminate the tank parts using extraction technologies
27 described under alternative treatment standards for hazardous debris (40 CFR 268.45). With Ecology's
28 concurrence, the decontaminated debris can then be disposed of as non-dangerous (but possibly controlled
29 as radioactive) waste, as indicated in Section 4.3 of *Guidance for Clean Closure of Dangerous Waste*
30 *Facilities* (Ecology 1994c).

31 Tank systems will be inspected for compliance with the clean debris surface standard by observing the
32 external and internal metal surfaces. Portions of a tank system that cannot be fully inspected (such as
33 interior surfaces of tanks and attached piping, pumps, ejectors, and welded pipe connections or
34 penetrations) or that may pose ALARA compliance problems, may be decontaminated with chemical or
35 physical extraction technologies. The decontamination solutions from these portions of the system will
36 be sampled and analyzed for indicator parameters, and the results will be compared to waste designation
37 limits. Solid residues will be removed, containerized, designated, and disposed of at a permitted disposal
38 facility as required. The tank or ancillary equipment, if not decontaminated to meet either clean closure
39 standard, will be removed, treated as necessary, and disposed of in a permitted landfill. Treatment may
40 include macro-encapsulation or micro-encapsulation, or other processes that comply with land disposal
41 restrictions.

42
43 Standards for clean closure of tank system secondary containment are identical to standards for
44 decontamination of containment areas for the container storage, containment building, and miscellaneous
45 units, that is, clean debris surface standard and/or designation limits.

46
47 The proposed COCs will be submitted to Ecology with the revised closure plan to be submitted before the
48 start of operations, and finalized in the revised closure plan to be submitted before the start of closure.

49 50 **11.2.4 Closure Standards for Container Storage Areas**

51 In addition to the requirements of WAC 173-303-610, WAC 173-303-630(10) requires that at closure,
52 dangerous waste and dangerous waste residues will be removed from the containment system. Remaining

1 containers, liners, bases, and soil contaminated with dangerous waste or dangerous waste residues will be
2 decontaminated or removed.

3
4 Standards for clean closure of clad container storage secondary containment are identical to standards for
5 decontamination of containment areas for the tank system, containment building, and miscellaneous units
6 (that is, clean debris surface standard and/or designation limits). Special requirements for clean closure of
7 several units with coated concrete floors were explained in Section 11.2.2.

8 9 **11.2.5 Closure Standards for Containment Buildings**

10 At closure of a containment building system, the owner or operator is required by WAC 173-303-645
11 (incorporating 40 CFR 264.1102(a)) to remove or decontaminate waste residues, contaminated
12 containment system components (such as liners), contaminated soils, and structures and equipment
13 contaminated with waste and leachate, and manage them as dangerous waste, unless
14 WAC 173-303-070(2)(a)(ii) applies.

15
16 Standards for clean closure of containment building units are identical to standards for decontamination of
17 containment areas for the tank system, container storage, and miscellaneous units (that is, clean debris
18 surface standard and/or designation limits).

19 20 **11.2.6 Closure Standards for Miscellaneous Units**

21 The owner or operator is required by WAC 173-303-680 (2) to close miscellaneous units in a manner that
22 will ensure protection of human health and the environment. The LAW and HLW melters will be
23 removed and replaced several times during the operational life of the WTP. Removal and replacement
24 are not considered closure or partial closure activities. Melters may be replaced according to the schedule
25 based on the design life of the melter components, or replaced when unplanned failure of a component
26 occurs. In either case, ancillary equipment will be removed or disconnected from the melter after molten
27 glass has been removed to the maximum practical extent.

28
29 Openings to the LAW locally shielded melter (LSM) units will be mechanically closed, and they will be
30 removed from the LAW vitrification building, after surface decontamination, as single containers.

31
32 Out of service HLW melters will be overpacked in a specially designed shield cover, then removed from
33 the HLW vitrification building and placed in a melter storage building (a permitted container storage
34 unit). During closure of the WTP, the out of service HLW melters will be dispositioned to meet disposal
35 site waste acceptance criteria.

36
37 Out of service LAW and HLW melters may also be stored in the melter storage buildings if necessary to
38 accommodate scheduling of treatment and disposal operations, or for other reasons. The melters will be
39 encapsulated and shipped to permitted disposal facilities. Note that these events will not necessarily
40 occur in this order; for example, encapsulation may occur at a location other than the WTP, after removal
41 from the WTP. The operational standard to be met during these closure activities is to prevent releases of
42 dangerous or mixed wastes to the environment.

43
44 The miscellaneous units will be housed in containment building units, the HLW melter cave, and the
45 LAW LSM gallery.

46
47 Standards for clean closure of the miscellaneous unit secondary containment areas are the standards for
48 decontamination of containment building units (that is, the clean debris surface standard and/or
49 designation limits).

1 **11.3 CLOSURE ACTIVITIES (I-1B)**

2 This section describes closure activities that will be conducted to meet the clean closure performance
3 standards. Details provided here may change, and if necessary, the plan will be revised to reflect those
4 changes. The facility is scheduled to close at the end of its operating life. If the WTP is shut down prior
5 to this time, an updated closure plan will be submitted. Full closure of the facility is planned. If partial
6 closure is necessary, an updated closure plan will be submitted prior to initiating closure activities.

7
8 Section 11.3.1 describes the maximum extent of operations. Section 11.3.2 describes the process for
9 removing dangerous (mixed) wastes from permitted units. Section 11.3.3 identifies several chemical and
10 physical extraction technologies that may be used to achieve the clean debris surface standard.

11 Section 11.6 describes how each of the four types of permitted units will be closed. The goal for closure
12 of the WTP is clean closure, which is contingent on achievement of the clean debris surface standard or
13 verification that indicator constituents in decontamination solutions from the units are not present in
14 concentrations above designation limits. If contaminated soil is found, it will be removed until the
15 remaining concentrations are less than or equal to the risk-based concentration limits based on industrial
16 exposure factors.

17 Partial closure may be considered for the mixed-waste units; that is, one or more treatment processes or
18 tank systems may be closed prior to the start of closure of the entire plant. Closure of a single unit or
19 group of units could be necessary if a process were to be redesigned, eliminating the previous functions of
20 the units. Abnormal occurrences could also force partial closure, such as plugging of a tank or piping.
21 Partial closures of the plant are not planned, but could result from unforeseen circumstances. The closure
22 plan will be revised to address the specific details for the units if partial closure is necessary, and the
23 revised plan submitted to Ecology for review, approval, and incorporation into the permit.

24
25 The following assumptions were made in developing the closure plan:

- 26
- 27 • The maximum inventory will be present approximately nine months or more before the start of the
28 closure period. This is the case because of the batch nature of the entire WTP treatment scheme. The
29 last transfer of waste feed from the DST system unit to the WTP may be as large as 1 million gallons.
30 The treatment systems within the WTP will operate normally until the last portions of this final
31 transfer are treated.
 - 32 • The Pretreatment plant and the HLW melter will treat mixed waste and will be fully operational at the
33 start of the closure period. These portions of the WTP will continue to operate during the closure
34 period until the tank system flush solutions and residues are removed from each system to the
35 maximum practical extent and treated before final decontamination begins.
 - 36 • Operating records documenting the constituents and volumes of the wastes in the storage and
37 treatment areas, and of the wastes previously processed through the facility, will be available. The
38 operating record also will include detailed information on historical releases of wastes into secondary
39 containment areas, previous decontamination work, and equipment that is present in containment
40 areas. This information will be directly relevant to final detailed planning of decontamination steps
41 and procedures, especially treatment and disposal of the decontamination solutions and residues that
42 will be generated.
 - 43 • A release of wastes outside permitted unit secondary containment areas will not occur.
 - 44 • Equipment necessary for waste removal and equipment decontamination will be functional or can be
45 repaired or replaced.
 - 46 • Permitted TSD facilities will be available to receive dangerous and mixed wastes that will be
47 generated during closure.

48
49 Overall Closure Approach

50 After the final waste feed shipment or inventory is processed, the LAW-LSM units will be closed and
51 removed from the site. Tanks and piping will be flushed. The flush solutions will be treated in the

1 Pretreatment building by filtration and evaporation, and concentrated solids will be immobilized in glass
2 produced in the HLW melter. Immobilized waste may or may not be acceptable at the facilities that
3 accepted standard ILAW and IHLW during the operating life of the WTP. Specific disposal plans for this
4 type of waste may not be finalized until submittal of the final revised closure plan.
5

6 The next step in the overall closure approach is to decontaminate WTP unit components to the maximum
7 feasible extent, and remove components that cannot be decontaminated, to meet the clean closure
8 performance standards. Contaminated components will be disposed of, and the residues and
9 decontamination fluids remaining after treatment operations at the WTP have ceased will be transferred to
10 the CWC, LERF/ETF or another Hanford Site permitted TSD facility. Other Hanford Site TSD facilities
11 that may be considered for treatment or disposal of closure wastes in addition to the CWC and LERF/ETF
12 include the LLBG and the Waste Receiving and Processing (WRAP) facility.
13

14 Vitrification treatment will not be available after the last melter is shut down, near the completion of
15 deactivation work. Small quantities of feed waste or flushing residues may remain in tanks after the last
16 melter is shut down, in addition to insoluble adhered coatings in piping and tanks. The remaining
17 aqueous residues may have to be transferred to the LERF/ETF or the CWC for evaporation, precipitation,
18 filtration, solidification or other treatment.
19

20 General Sequence of Closure Activities

21 The general sequence of activities necessary to close dangerous waste management units within the WTP,
22 and the basis for establishing the order of performing these activities, is summarized in the following
23 discussion:
24

25 Deactivation

- 26 • **Dangerous waste removal:** The nonradioactive dangerous waste will be removed from the WTP to
27 minimize the possibility of release. Note: dangerous wastes may be generated at the WTP throughout
28 the closure period from maintenance activities.
- 29 • **Inventory removal:** The mixed-waste inventory present in the WTP at the beginning of the closure
30 (primarily heels in the bottoms of tanks) will be removed and processed (pretreated and vitrified) to
31 the maximum practical extent. This removal will minimize the possibility for release and allow
32 decontamination of the equipment to proceed. Implementation of the deactivation plan will remove
33 the majority of the dangerous wastes from the WTP. Tank systems and equipment will undergo
34 flushing as part of deactivation activities.
35

36 Decontamination

- 37 • **Liner inspection:** After removal of wastes (flushing), but before final decontamination of tanks and
38 other units begins, each containment area will be inspected to identify potential or apparent breaks,
39 cracks, or separation of the liner or protective coating from the concrete floors and walls. These
40 locations (if any) will be mapped and documented, and sealed by welding or by application of
41 patching or protective coating material, to prevent entry of contaminants during decontamination
42 activities.
- 43 • **Decontamination:** Tank systems and other equipment in the permitted units will be decontaminated.
44 Additional chemical or physical extraction may be performed before tank systems, piping, or the
45 equipment and equipment support structures in the permitted units are removed. Extraction will be
46 performed not only to meet clean closure standards detailed in Section 11.2, but also to minimize the
47 amount of mixed-waste constituents that would be readily available for migration or release during
48 equipment removal.
- 49 • **Equipment may be left in place as clean-closed** if it can be successfully decontaminated, and if DOE
50 has determined that the equipment should stay in place.
51

1 Inspection

- 2 • Equipment inspection: Tank systems and ancillary equipment will be inspected to ensure that the
3 clean debris surface standard and/or rinsate analyses designation limits are met. If necessary, the
4 equipment will be identified as requiring removal, encapsulation, and disposal.

5 Removal

- 6 • Equipment removal: If the process equipment cannot be decontaminated to meet the closure
7 performance standard, it will be removed, treated by encapsulation, and disposed at a permitted
8 facility. Size reduction treatment may also be performed.
- 9 • Process Equipment decontamination: After the last batch of waste feed has been fully processed
10 through the waste treatment plant, the LAW LSMs will be shut down and removed. Pretreatment
11 process vessels and lines will be flushed with water or other solutions. Flushing liquids will be
12 determined prior to initiation of closure activities, and if a liquid other than water is identified for use,
13 the closure plan will be revised and submitted for approval prior to initiating closure activities.
14 Flushing wastes will be treated in the Pretreatment evaporation, cesium and technetium removal, and
15 ultrafiltration processes, then the concentrates will be transferred to a HLW melter. Water condensate
16 will be routed to the LERF/ETF. Similarly, the HLW ultrafiltration system will be flushed to the
17 LAW evaporator and ultrafiltration systems. One HLW melter will be operated after shutdown of the
18 LAW LSMs to provide treatment for the solid flushing residues and evaporator concentrates. At the
19 completion of treatment operations, the HLW melter will be emptied, cooled, overpacked, and
20 removed. The HLW melters stored in the out of service melter storage building at the time of closure
21 may be partially decontaminated, and/or reduced in size in the HLW melter cave, to the degree
22 necessary to meet disposal facility waste acceptance criteria (Section 11.3.3). LAW LSMs are not
23 expected to require decontamination or size reduction treatment, other than surface decontamination
24 after the operating equipment openings are closed. Partially decontaminated and/or size-reduced out
25 of service HLW melters will be overpacked, encapsulated, and shipped to a permitted disposal
26 facility.

27
28 Structure Decontamination

- 29 • Building structure decontamination: stainless steel-lined containment areas: Liners in the permitted
30 unit containment areas will be decontaminated using chemical or physical extraction technologies, or
31 both. Most of the secondary containment areas in the process buildings will be lined with stainless
32 steel cladding. Coated concrete walls and ceilings (above cladding) will be decontaminated using
33 only chemical extraction technologies, unless the protective coating is damaged or deteriorated.
34 Damaged protective coating areas, and contaminated concrete under or behind liner breaches, will be
35 decontaminated using physical extraction technologies. Decontamination solutions may be sampled
36 to determine treatment requirements and transferred via existing pipelines to the LERF/ETF if they
37 meet the LERF/ETF acceptance criteria. The level of radioactivity of some waste solutions may be
38 above maximum limits for the LERF/ETF, and the waste may be transferred to another permitted
39 Hanford TSD unit. Structure decontamination activities are described in Section 11.3.3.
- 40 • Building structure decontamination: concrete containment areas: Examples of units that have coated
41 concrete secondary containment without stainless steel cladding include the condensate tank system,
42 the LAW LSM gallery, ILAW container finishing line and ILAW container fixative containment
43 buildings, and several secondary waste container storage areas. Of these, only the dangerous waste
44 container storage area, and possibly the Central Waste Storage Area, are expected to routinely store
45 containers holding liquid wastes. At the time of closure, the facility operating record will be
46 reviewed and each unit will be inspected to determine if releases of wastes from containers have
47 occurred in these areas. If a release of dangerous waste has occurred on a concrete floor where the
48 protective coating is even slightly damaged or deteriorated, the concrete in that area will be physically
49 extracted to remove at least 0.6 cm of concrete from the original surface. This effort will demonstrate
50 compliance with the clean debris surface standard. If a release is not documented or suspected, minor
51 or hairline cracks may still be accepted in determining that the clean debris surface standard is met. If
52 the protective coating is intact, the surface may be decontaminated by chemical extraction. If

1 chemical extraction is unsuccessful, or if the coating is damaged by the chemical extraction, physical
2 extraction will be performed.

- 3 • Building examination to verify decontamination: After each unit in each building has been
4 decontaminated, the units will be inspected and closure documentation will be examined to verify that
5 the clean closure standards have been met.

6 7 Soil Investigation, Removal, and Verification

- 8 • Potentially contaminated soil identification: Areas in which soil could have become contaminated,
9 that is, areas in which liners and/or concrete have lost integrity, will be mapped during the liner or
10 concrete containment area inspection and decontamination process. Soil sampling protocols will be
11 established and implemented if potentially contaminated areas are identified.
- 12 • Soil decontamination: Soil removal will be performed if necessary. A revised closure plan and a
13 post-closure plan will be submitted if removal to the established risk-based standards is not feasible.
- 14 • Soil sampling to verify decontamination for indicator constituents: The soil will be sampled and
15 analyzed for indicator constituents after the contaminated soil has been removed.

16 17 Disposition of Decontamination and Containment Wastes

- 18 • Disposition of decontamination fluids: Wastewater or chemical extraction solutions from
19 decontamination activities will enter an existing collection system for waste characterization and
20 verification against LERF/ETF waste acceptance criteria. At the final stage of closure, when the
21 transfer pipeline to the LERF/ETF is taken out of service, decontamination solutions may be
22 containerized and transported to the LERF/ETF by truck. Characterization of the closure residues in
23 the units will be documented based on process knowledge or analysis of the waste treated in the units.
24 The waste will be transferred to LERF/ETF for treatment if appropriate. If the wastewater cannot be
25 accepted by LERF/ETF, it may be solidified and transferred to the CWC or another available
26 permitted unit.
- 27 • Disposition of air emission control equipment: Air emission control equipment will remain in place
28 until decontamination of other WTP components meets the clean closure performance standards. The
29 air emission control equipment will be decontaminated to meet the clean closure performance
30 standard, or will be removed, designated, and packaged to meet the waste acceptance criteria of a
31 permitted disposal facility.
- 32 • Disposition of decontamination equipment: Equipment or materials used in performing closure
33 activities will be decontaminated or disposed of at a permitted disposal facility. Personal protective
34 equipment will be disposed of at a permitted disposal facility.

35
36 The general order of closure activities was selected to minimize the potential for release of mixed-waste
37 constituents by removing the bulk of the mixed-waste constituents early in the closure process. This
38 order of closure also minimizes waste generation by reducing the possibility that decontaminated areas
39 will become contaminated again by ongoing closure efforts.

40
41 Detailed scheduling of closure activities depends on the necessary facility functions required to be
42 maintained during the closure period, and the degree of contamination in each unit, especially after the
43 waste inventory is removed and decontamination activities start. The large number of tank systems
44 increases the potential for a highly complex schedule. Similar tank systems and other types of units will
45 be grouped for the purpose of minimizing the bulk and complexity of plans for closure activities. The
46 detailed decontamination operations schedule will be included in the revised closure plan to be submitted
47 before the start of closure activities (see Section 11.7)

48
49 Work will be performed in a manner that ensures worker exposure to dangerous and/or mixed waste,
50 radioactivity, hazardous chemicals, or other workplace hazards will be ALARA.

1 Additional detail will be provided describing waste removal, equipment decontamination, and
2 closure-generated waste disposal activities in the revised closure plans to be submitted prior to closure.
3

4 **11.3.1 Maximum Extent of Operations (I-1b(1))**

5 The maximum extent of operations during the active life of the WTP corresponds to the maximum waste
6 inventory with full feed tanks, the melters operating at design capacity, and full storage areas.
7

8 The general arrangement drawings in Chapter 4A of this application show the location of tanks, melters,
9 containment buildings, and storage areas. The dimensions of the dangerous waste management units are
10 shown in tables in Chapter 4 of this application.
11

12 **11.3.2 Removing Dangerous Waste (I-1b(2))**

13 The waste feed inventory present in the WTP after the final receipt of waste feed from the DST system
14 unit will be processed before the start of the first phase of closure. The waste will be removed from tank
15 systems to the maximum practical extent. Removal will be continued by processing the last bulk volumes
16 of waste feed through the applicable pretreatment and vitrification systems, and transferring treated
17 ILAW and IHLW to other TSD units or facilities from the container and canister shipping docks. These
18 activities will follow normal operating procedures.
19

20 The following description of waste removal is intended to provide a brief overview of the deactivation
21 and closure activities.
22

23 At the completion of waste operations, DOE and its contractor will deactivate the waste facilities and
24 their contents. Deactivation, when completed, will leave the facilities in a safe, stable, and passive state
25 that can be monitored with minimal cost and minimal requirements for service support from either
26 personnel or active equipment.
27

28 Deactivation operations will comprise a large portion of the closure activities that will occur between the
29 start of the closure period, as defined in WAC 173-303-610(3)(c)(ii), and the final shutdown of the HLW
30 vitrification system. Deactivation and the first half of the closure period will overlap, and will contribute
31 to completing closure activities in accordance with WAC 173-303-610. Deactivation operations for some
32 units may begin before the completion of treatment of the final batch of waste feed from the DST system
33 unit.
34

35 Overlaps between dangerous waste unit closure and deactivation activities, and the overall treatment,
36 storage, and disposal facility permitting process, as defined in the *Hanford Federal Facility Agreement*
37 *and Consent Order* (Ecology, EPA and DOE 1998) and the implementing attachment known as the
38 *Tri-Party Agreement Action Plan*, Section 6.2, are illustrated in Figure 11-4. The full extent of necessary
39 interfaces, and detailed definition of the intermediate points in this timeline, will not be determined until
40 deactivation and closure planning are finalized before the start of closure.
41

42 Vitrified waste in storage at the WTP at the start of the closure period will be shipped to disposal units on
43 the Hanford Site or to other appropriate facilities. If the inventory of untreated waste feed cannot be
44 treated at the WTP, it will be transferred to a permitted TSD facility. Circumstances under which the
45 waste feed inventory would not be treated through vitrification are not accounted for in this closure plan
46 and would require revision of the plan. Properly completed shipping papers and certifications, as
47 applicable, will accompany waste shipments.
48

49 Once the final batch of waste feed has been processed, residual heels will be flushed from the tank
50 systems in accordance with deactivation procedures. Wastewater from flushing and decontamination
51 solutions will be filtered, evaporated, and further treated as necessary in the WTP Pretreatment building.
52 The removed solids will be sent to the HLW melter. Wastewater will be sent to the LERF/ETF for

1 treatment if acceptance criteria is met, or it will be transported to the CWC or another permitted TSD unit
2 for storage, treatment, and disposal. Treatment in containers could be performed at the WTP if necessary
3 or preferable, and if the resulting waste will meet the CWC or another TSD unit's waste acceptance
4 criteria. The treatment in containers alternative is not likely to be used, due to the relatively large
5 volumes of flush solutions that will be generated.
6

7 If non-mixed dangerous waste is present as inventory at the start of the closure period at the dangerous
8 waste container storage unit, it will be transferred to a permitted off-site facility for treatment or disposal.
9 Non-mixed dangerous waste generated during the closure or deactivation work will be managed similarly.
10

11 The units that the wastes will be sent to cannot be predicted at this time because the specific types of
12 dangerous wastes that may be present cannot be determined. The TSD units available at the time of
13 closure, and their waste acceptance criteria, may be very different than those available today.
14

15 Complete records will be kept as to the date of shipment, waste characterization, waste quantity,
16 destination facility, land disposal restriction certifications and notifications, and other appropriate
17 information for removed waste. Specific documentation requirements are discussed in Appendix 3A of
18 the application. This information will be included in the closure documentation supporting certification,
19 which is described in Section 11.4.1.
20

21 The specific types of off-site treatment and disposal units for dangerous wastes generated during closure
22 will be determined and provided in the revised closure plan to be submitted before closure begins.
23 Interfaces with the DST system unit and LERF/ETF will be specified in the revised plan to be submitted
24 before the start of closure.
25

26 **11.3.3 Decontaminating Structures, Equipment, and Soils (I-1b(3))**

27 The only structures and equipment that are expected to be contaminated at the start of the closure period
28 are within the permitted unit containment areas. Some of the types of waste handling equipment that may
29 be located in each unit can be determined by review of the design drawings and operating plans in this
30 application. Examples include, but are not limited to, cranes, power manipulators, and welding machines.
31 Many other types of hand tools, instruments, lights and cameras, radiation monitors, buckets, and other
32 equipment may be present in one or more unit containment areas.
33

34 Contaminated structures and equipment will be decontaminated, if feasible, using one or more of the
35 following technologies to achieve the clean closure performance standard:
36

- 37 • Ultrahigh-pressure water jet
- 38 • Rotating cavitation water jet
- 39 • Soap scrubbing and wet vacuuming
- 40 • Steam vacuuming
- 41 • Vacuum abrasive blasting
- 42 • Soda blasting
- 43 • Shot blasting
- 44 • Ice blasting
- 45 • Hydroblasting
- 46 • Grit blasting
- 47 • Cryogenic CO₂ pellet blasting
- 48 • Sponge blasting
- 49 • Etching
- 50 • Rotating brushes/honing
- 51

1 More aggressive decontamination methods may be used on concrete if it becomes necessary to remove
2 waste accumulations that extend into the concrete:

- 3
4 • Needle scaler
5 • Paving breaker or chipping hammer
6 • Piston scabbler
7

8 These decontamination technologies were chosen based upon demonstrated effectiveness in a radioactive
9 environment and the ability to successfully achieve the closure performance standard. These technologies
10 are covered under the generic physical or chemical extraction technology categories listed in
11 40 CFR 268.45, Table 1. This approach is consistent with Ecology guidance (Ecology 1994c) to achieve
12 clean closure.

13
14 Specific methods of decontamination (and removal and disposal if required) for the unit components and
15 equipment will be determined at the time of closure. These methods will be based on information in the
16 operating record, existing radiation levels, and DOE plans for future use of the buildings. The feasibility,
17 or practicality, of decontamination depends on many factors that cannot be fully defined until the closure
18 plan is finalized. Decision criteria may include, but are not limited to, radiation hazards, secondary waste
19 volumes, schedule and budget restrictions, and availability of TSD facilities to receive secondary wastes.
20 Equipment and debris that are not decontaminated will be disposed of as mixed waste.

21
22 Decontamination solutions from interiors of tanks, attached piping, and other equipment will be collected
23 in tank drain piping and collection tanks. Decontamination solutions from tank and pipe exterior
24 surfaces, and from decontamination of other free-standing ancillary equipment and secondary
25 containment walls, ceilings, and floors in the four types of units will be collected in containment area
26 sumps, then transferred by pumping or gravity drainage to plant wash collection tanks. Exceptions to this
27 procedure may include decontamination of small surface areas where drainage may be captured in
28 portable collection basins or buckets. Transfers of decontamination solutions to the LERF/ETF, CWC or
29 another on-site TSD unit, or if the waste is non-mixed, to an off-site TSD facility, are addressed in
30 Section 11.3.2.

31
32 The decontamination solutions and residues will be designated on the basis of process knowledge, or
33 sampling and analysis if necessary, and transferred by existing hard piping to the LERF/ETF. The pipe
34 connection to the LERF/ETF will be one of the last WTP components to be taken out of service, after
35 decontamination activities are complete. The last few decontamination activities may require the
36 collection of wastewater in a temporary sump and container, and will be transported by truck to the
37 LERF/ETF.

38
39 Solid residues will be collected into containers by vacuuming or mechanical means (such as sweeping or
40 shoveling), treated, if necessary, at the WTP, CWC, or WRAP to stabilize or solidify the residues, and
41 disposed in the LLBG or a permitted disposal unit on the Hanford Site. Off-site mixed-waste landfill
42 disposal facilities, such as Envirocare of Utah, may be considered if an appropriate Hanford Site unit is
43 not available.

44
45 Contaminated debris and solid decontamination residues removed from the WTP will be designated and
46 packaged to meet the waste acceptance criteria of the receiving facility. Sampling of equipment and solid
47 residues that are known to be contaminated and are intended for disposal is not necessary, if process
48 knowledge is adequate to accurately designate the waste with the proper dangerous waste identification
49 codes. Process knowledge includes the operating record, which should provide adequate waste analyses
50 and waste processing histories for each unit in the WTP.

51

1 An interface team is investigating options for the disposal of out of service melters. Information to
2 support disposal of melters and other debris will be provided in a revised closure plan to be submitted
3 before the start of closure.
4

5 **11.3.3.1 Structures and Associated Equipment**

6 Within most of the process areas, stainless steel liners or cladding supported by steel reinforced concrete
7 structures provide secondary containment for the process tanks, immobilized waste containers, HLW
8 melter, and ancillary equipment. Coated concrete surfaces (the walls and ceilings above the liners) in
9 lined or cladded waste management areas are not part of the required dangerous waste secondary
10 containment structure, although additional containment may be provided for splashes and airborne
11 contamination. Concrete in cladded units, where containment of splashes, washdown sprays, or airborne
12 contamination is necessary, will be coated during construction with a durable chemical-resistant
13 impermeable protective coating. Top edges of the liner plates in these units will be sealed to the concrete
14 surface.
15

16 The container storage areas for secondary wastes are discussed in Section 11.2.2. The LAW LSM gallery
17 containment building, the ILAW container finishing line containment building, the ILAW container
18 fixative containment building, and the Pretreatment plant condensate tank system, are examples of the
19 permitted units at the WTP in which the concrete floors will not be provided with cladding. (The ILAW
20 container finishing line unit will have floor and wall cladding only in the container decontamination
21 portion of the unit.) The floors and portions of some walls in these units will be coated. In the
22 miscellaneous secondary waste container storage units, additional secondary containment is conditional.
23 Most waste containers to be stored in these units will contain no free liquids, and therefore will not
24 require secondary containment for liquids. The waste containers that contain free liquids will be provided
25 with portable, individual, polyethylene containment structures or sumps.
26

27 Steel liners and coated concrete surfaces will be inspected visually and surveyed radiologically before
28 final decontamination (or after, if the pre-decontamination radiation levels are too high, precluding useful
29 gamma camera data). The visual inspection may be conducted remotely using CCTV with a zoom lens.
30 The purpose of the inspections will be twofold: to identify and map cracks that might provide a migration
31 pathway for contaminants; and to identify areas that are potentially contaminated with mixed waste or
32 waste residues. A gamma camera will identify areas where contamination has infiltrated behind the
33 cladding.
34

35 Identified cracks will be sealed to prevent infiltration of decontamination solutions between the stainless
36 steel liner and the concrete, or migration into cracks in concrete. Coated concrete and liner surfaces will
37 be decontaminated to achieve the clean debris surface standard using chemical extraction, or if necessary,
38 through physical extraction as described in Section 11.2.
39

40 Concrete surfaces are eligible for decontamination by chemical extraction only if the protective coating is
41 intact. Minor cracking in the protective coating will not disqualify the concrete surface from being
42 eligible for classification as a clean debris surface, if that surface has not been directly exposed to
43 dangerous waste as a result of a container leak or some other release mechanism. The facility operating
44 record will be consulted before decontamination work begins to identify units where leaks or other waste
45 releases have occurred. These units will also be physically inspected to determine whether the protective
46 coating is intact, and whether undocumented evidence of a waste release is present.
47

48 Intact protective coatings may be decontaminated with water washing if necessary. If additional
49 decontamination is necessary, other technologies will be used, such as chemical decontamination
50 solutions, ultrahigh pressure water technologies, impact technologies such as sand blasting, CO₂ blasting,
51 or other new technologies that may be developed prior to closure. Physical extraction methods that
52 remove up to 0.6 cm of concrete will be necessary on concrete surfaces where the protective coating has
53 peeled, bubbled, or is broken (before or after decontamination), exposing bare concrete. Cladding may

1 also require physical extraction treatment to remove waste residues or corrosion. Inspections of the
2 concrete and liner surfaces for a clean debris surface will be documented in an inspection record. Details
3 of the decontamination methods to be used will be developed and submitted for approval prior to
4 initiating closure activities.

5
6 Concrete and steel grinding, scaling, or scabbling residues will be collected, placed in containers, and
7 sampled and analyzed for indicator parameters; or the residues will be designated based on knowledge of
8 the process or the waste that contaminated the concrete or steel.

9
10 The operating record will be reviewed prior to closure to determine if decontamination procedures should
11 be performed in any areas outside the permitted unit secondary containment areas. These areas may
12 include equipment decontamination bays or containment sumps in transfer tunnels, or other locations
13 where wastes may have been generated or transferred during the operating life of the WTP. A final
14 revised closure plan that includes areas identified as a result of the operating record review will be
15 submitted to Ecology for review and approval before closure starts. Floors and walls in non-process areas
16 of the building (such as offices, lunch rooms, or bulk storage areas for non-hazardous materials) will not
17 undergo decontamination activities unless there is evidence in the operating record that chemical spills or
18 other occurrences may have contaminated interior surfaces of the rooms.

19 20 **11.3.3.2 Air Emission Control Equipment**

21 Air emission control equipment will remain in place and in operation as necessary to facilitate
22 deactivation and decontamination of the WTP. Equipment will be taken out of service in stages as
23 contamination is progressively removed or reduced. Compliance with applicable air emission standards
24 will be maintained. Air permits for operations will be evaluated to determine if they will support closure
25 activities. The permits will be modified if necessary.

26
27 Condition II.W.3 of the Hanford RCRA Permit requires that air emissions from TSD units subject to the
28 permit shall comply with applicable state and federal regulations pertaining to air emission controls. The
29 applicable regulations include but are not limited to the following: WAC 173-400, *General Regulations*
30 *for Air Pollution Sources*; WAC 173-460, *Controls for New Sources of Toxic Air Pollutants*; and
31 WAC 173-480, *Ambient Air Quality Standards and Emission Limits for Radionuclides*.

32
33 Uncontrolled emissions will be prevented by continued operation of the vessel and process cell ventilation
34 systems, and melter off-gas control systems, as necessary throughout the performance of closure activities
35 for those units, and by maintenance of containment structures and procedures. After completion of
36 decontamination operations that may generate fumes, vapors, or dust that will be controlled by the
37 ventilation system, the air emission control equipment will be decontaminated, then dismantled and
38 reduced in size to the extent necessary to facilitate preparation for disposal. DOE may determine that the
39 equipment will remain in place after closure.

40
41 Modifications to air emission standards or other appropriate standards to prevent or minimize the release
42 of dangerous waste or dangerous waste constituents to the air or surrounding environment during closure
43 will be specified in the revised closure plan to be submitted before the start of closure.

44 45 **11.3.3.3 Soil**

46 Discovery of an apparent or potential breach in a cell liner, or in the protective coating in unlined units,
47 on an exterior wall or bottom floor adjacent to soil, will require further investigation. The presence of soil
48 contamination will be a unit-specific determination based on WTP records and direct visual or CCTV
49 inspection and gamma camera survey of the stainless-steel liners and concrete surfaces, as described in
50 Section 11.2. The liner will be removed to allow access for additional investigation and decontamination
51 if this inspection reveals areas of poor liner integrity such as severe corrosion, weld breaks, or other
52 damage to the steel. Coring and soil sampling will be performed if a liner breach or damaged protective

1 coating is found on a wall or floor adjacent to external soil, and if the concrete has lost integrity at that
2 location. If the concrete is not cracked, deteriorated, or porous, and a clean debris surface can be obtained
3 by physical extraction treatment, no further investigation may be necessary. Data from radiation surveys
4 may be useful at such locations to support decisions to continue or terminate further investigations such
5 as coring the concrete and sampling exterior soil. If soil is sampled, it will be analyzed for indicator
6 constituents of concern identified on the basis of the wastes contained in that unit during the operating life
7 of the plant.

8
9 If soil having levels of contamination that exceed the risk-based soil cleanup levels is found, it will be
10 removed and managed as media containing dangerous waste, and will be designated and disposed of
11 accordingly at a permitted disposal facility. Soil at the limits of excavation will be sampled and analyzed
12 after removals are completed to confirm that the concentrations of dangerous waste constituents are below
13 the risk-based industrial exposure limits. The appropriate risk-based clean-up standard will be consistent
14 with the future land-use classification from the *Final Hanford Comprehensive Land-Use Plan*
15 *Environmental Impact Statement* (DOE 1999). The project could propose to revisit the clean-up standard
16 at the time of closure to see if another standard is reasonable. Risk assessment principles will be used to
17 establish clean closure concentration limits for soils in accordance with WAC 173-303-610(2)(b)(i).

18 19 **11.3.4 Sampling and Analysis to Identify Extent of Decontamination/Removal and to Verify** 20 **Achievement of Closure Standard (I-1b(4))**

21 If there are cladding breaches or concrete that has lost integrity, efforts to define the extent of
22 contamination will use a graded approach using field screening and survey with a portable detector
23 followed by verification sampling if needed. This section is an outline for a sampling and analysis plan
24 (SAP) that describes the approach that will be followed for verification sampling. The sampling and
25 analysis plan will also assist in confirming that decontamination and/or removal activities have attained
26 the closure performance standard. Sampling may be employed where the clean debris surface standard
27 cannot be met, such as interior tank and pipe surfaces, or where evidence is found indicating apparent
28 failure of permitted unit secondary containment such as liner cracks. The SAP cannot be finalized at this
29 time because the dangerous waste COCs at each unit, and restrictions on sampling and analysis activities
30 due to high radiation levels, are not adequately defined. Prior to closure, this closure plan will be revised
31 to specify sampling and analysis techniques in a site-specific SAP.

32 33 **11.3.4.1 Sampling to Determine Extent of Contamination (I-1b(4)(a))**

34 The SAP will be prepared to evaluate the extent of soil contamination and the effectiveness of
35 decontamination at specific units in the WTP when needed. This section discusses the design and outline
36 of the sampling program. Subjects addressed in this section will be detailed in the revised closure plan
37 and in the SAP prior to commencement of closure. Additional information concerning investigation tools
38 such as the gamma camera, CCTV, and other analytical or survey equipment will also be included in the
39 final closure plan. The subjects addressed in this section include analytical parameters, sampling
40 activities, and data quality.

41 42 Sampling Objectives

43 Sampling may be conducted to evaluate the extent of contamination and the decontamination
44 effectiveness at the WTP. Media anticipated to be sampled during closure of the WTP include rinsate
45 from tank systems and ancillary equipment that does not meet the clean debris surface standard for
46 inspection (inaccessible areas), and soil at suspected release locations. Concrete may be sampled if
47 necessary for waste designation purposes. Sampling may be conducted following decontamination of the
48 interior surfaces of process cells. If there is required sampling under structures, it will be conducted in a
49 manner that minimizes disturbance of underlying soil.

50
51 If relatively high radiation levels are found in soil or on interior surfaces of equipment, sampling may not
52 be practical due to potential worker exposure or laboratory contamination concerns. In such cases it will

1 be assumed that further decontamination or removal work will be performed to approach the dangerous
2 waste clean closure standard, and sampling will not be performed until radiation levels are reduced. The
3 expected co-contamination of equipment and soil by both radionuclides and dangerous waste constituents
4 is not a proven fact, and the actual ratio between the two types of contaminants will vary widely.
5 However, the proposed approach is conservative in assuming significant dangerous waste contamination
6 wherever radionuclide contamination is found.

7
8 Sampling tasks in areas of suspected contamination (such as cladding breaches) and areas in which
9 clean-closure demonstrations may be needed are as follows:

- 10
- 11 • Select biased or “focused” sample sites, based on review of the unit operating record, cladding breach
12 investigations and underlying concrete decontamination work and evaluations; or based on interior
13 inspection data (for example, from video, CCTV, or radiation surveys) for tanks, pipe, or other
14 ancillary equipment.
 - 15 • Obtain samples from specified areas, focusing on the locations of apparent highest concentrations.
16 For soil, these locations will be immediately adjacent to or below cladding breaches or cracked or
17 deteriorated concrete. The sample locations could theoretically expand extensively, as necessary to
18 determine the limits of the volume of soil contaminated at concentrations above the risk-based limits.
19 For tanks, piping, or other equipment, the locations to be rinsed and sampled will include apparent or
20 likely waste accumulations in crevices, connections, or other rough or restricted flow locations such
21 as inlets or outlets. The rinse sample will be taken from the first rinse, obtained within a reasonably
22 short time after the completion of decontamination efforts, to avoid drying of potentially
23 contaminated surfaces.
 - 24 • Conduct analyses of samples
 - 25 • Evaluate results for closure, and provide feedback to the closure project management team.
26 Documentation of analyses and the resulting decisions (for example, clean closure is complete, or
27 more decontamination or removal work will be done) will be included in the record of closure
28 activities.

29
30 Analytical Parameters

31 Analytical parameters, methods, and specific analytical and sampling procedures will be based on
32 knowledge of the operations and wastes processed (process knowledge) in the WTP.

33
34 A list of indicator constituents will be developed based on potential COCs and the closure performance
35 standard (designation and/or risk-based limits). These indicator constituents and associated analytical
36 methods will be provided in the updated closure plan prior to initiation of closure. The analyses will
37 follow the methods described in *Test Methods for Evaluating Solid Waste, Physical Chemical Methods*
38 (EPA 1986) and/or other approved methods. Target practical quantitative limits will be established at a
39 minimum of one order of magnitude less than the specified decontamination standard.

40
41 Sampling Methods

42 Sampling will be performed in a manner consistent with EPA guidelines in the *Quality Assurance/Quality*
43 *Control Guidance for Removal Activities: Sampling and QA/QC Plan and Data Validation Procedures,*
44 *Interim Final* (EPA 1990), *Sampling and Mobile Laboratories Procedures* (WMFS 1998), *Guidance on*
45 *Sampling and Data Analysis Methods* (Ecology 1995), or other appropriate references. If evidence or
46 knowledge of spills, or if a failure of secondary containment exists, biased sampling will be conducted in
47 accordance with applicable requirements of *Test Methods for Evaluating Solid Waste, Physical Chemical*
48 *Methods* (EPA 1986). Biased samples may be taken, as needed, from equipment or locations that cannot
49 be visually verified to meet the clean debris surface standard. Some area-wide sampling may be
50 conducted in larger areas of suspected contamination. The area-wide sampling will be performed in
51 accordance with *Guidance for Clean Closure of Dangerous Waste Facilities* (Ecology 1994c).

1 Specific sampling methods appropriate to the media to be sampled will be provided when the closure plan
2 is revised and the SAP is prepared prior to closure. Decontamination solutions or water rinsate and soils
3 are examples of the media that may be sampled. Concrete and other materials are not expected to be
4 sampled unless analyses are required for determining the correct waste designation or for
5 cleanup/decontamination confirmation. For waste characterization or designation purposes,
6 representative samples of concrete rubble will be taken after removal from the structure. This approach
7 may be changed if significant volumes of concrete are suspected to be contaminated.

8 9 Sampling Locations

10 Tank and pipe internal surfaces will be visually inspected if feasible, and radiologically surveyed to
11 identify potentially contaminated areas before sample collection. These areas will be identified and
12 documented as part of the closure record, and biased sampling by application of rinse solution will be
13 performed in these areas. Samples of rinsate may be obtained from decontamination of equipment at
14 other locations that cannot be visually verified to meet the clean debris surface standard. Biased soil
15 sample site locations will be determined by previous inspections during or after initial decontamination
16 activities, liner removal and concrete decontamination physical extraction activities at cladding breach
17 locations. Soil sampling could also be necessary at one or more of the container storage buildings that
18 have concrete floors. Soil sampling locations at these units will be at through-thickness cracks or where
19 the concrete has otherwise lost integrity, and a spill, container leak, or other release is known or suspected
20 to have occurred at that location.

21 Sampling Equipment, Containers, and Preservation

22 The sampling equipment used will be appropriate to the different media that may be encountered. The list
23 of criteria used for determining appropriate sampling equipment will be developed using state and federal
24 guidance, and submitted for approval prior to initiating closure activities. Sampling will be performed in
25 a manner consistent with EPA guidelines in the *Quality Assurance/Quality Control Guidance for*
26 *Removal Activities: Sampling and QA/QC Plan and Data Validation Procedures, Interim Final*
27 *(EPA 1990), Sampling and Mobile Laboratories Procedures (WMFS 1998), Guidance on Sampling and*
28 *Data Analysis Methods (Ecology 1995), or other appropriate references. Sample equipment and supplies*
29 *will be procured as required to perform necessary sampling. Specialized sample collection apparatus for*
30 *taking samples of rinsate from equipment will be specified in the SAP in the revised closure plan to be*
31 *submitted to Ecology before the start of closure activities.*

32
33 Sample containers will be selected based on their compatibility with the samples, types of analyses to be
34 performed, resistance to leaking or breakage, ability to seal tightly, and the required volume for an
35 optimum sample, in accordance with protocols in SW-846 (EPA 1986). Deviations from these protocols
36 will be documented and proposed to Ecology in accordance with WAC 173-303-110. Deviations will be
37 proposed only in cases where compliance is impractical or would conflict with other requirements, such
38 as ALARA. Any such anticipated deviations will be proposed in the revised closure plan to be submitted
39 to Ecology before the start of closure of the WTP. Containers for collecting and storing samples will be
40 made of high-density plastic or glass appropriate for the constituents to be analyzed. The containers will
41 have tight, screw-type lids, with Teflon™ cap liners for glass bottles.

42
43 Sample labels will be prepared according to the procedures outlined in SW-846 (EPA 1986). Labels with
44 unique identification will be securely attached to each sample container to prevent misidentification. The
45 labels may be adhesive or tags, and will be affixed to the proper sample containers before or at the time of
46 collection. Information will be completed as close as possible to the time of collection. Each label, or an
47 associated record, will contain at least the following information:

- 48 • Site contractor
- 49 • Collector's name
- 50 • Date and time collected
- 51 • Sample number
- 52 • Sample location

1 • Analyses to be performed

2
3 Samples will be preserved, as appropriate for the analytical method, packaged according to EPA sample
4 handling procedures, and packed in a cooler maintained at $4\text{ C} \pm 2\text{ C}$ ($39\text{ F} \pm 3.6\text{ F}$) immediately
5 after collection unless specified otherwise in the SAP. Samples will not be held in excess of specified
6 holding times in accordance with the SAP.

7
8 Because the samples will be collected from radiation zones, the samples will be checked by a radiation
9 control technician prior to removal from the WTP or shipment to the laboratory. A dose assessment will
10 be conducted for those sampling activities occurring in radiation zones. The dose assessment will be used
11 to develop a plan to keep doses ALARA during sampling activities. This assessment will be performed in
12 a manner that will not compromise the validity of the sample.

13
14 Seals on the sample containers, and on the sample shipment coolers, will be used to prevent or detect
15 tampering with samples between the time of collection and the beginning of analysis. Seals will be
16 applied to the sample containers and coolers before leaving the sample location. The seals will be
17 attached in such a manner that the seal will be broken to open the container.

18
19 Chain-of-Custody Record

20 Ensuring the integrity of the samples, from collection through analysis to final disposition, will be
21 accomplished by utilizing documentation, in the form of a chain-of-custody record, to trace sample
22 possession and handling history of people having custody of the sample.

23
24 The chain-of-custody record will be completed and will accompany samples from collection to analysis.
25 Multiple copies of the record will be required, and the sampling supervisor will maintain at least one
26 copy.

27
28 Samples will be tracked in the chain-of-custody record and will remain under one of the following
29 conditions:

- 30
31 • In a person's physical possession
32 • In view, after being in physical possession
33 • Secured so that it cannot be tampered with, after having been in physical custody
34 • Placed in an area restricted to authorized personnel

35
36 The following information will be included in the chain-of-custody record:

- 37
38 • Sample number
39 • Date and time collected
40 • Medium sampled
41 • Sample type, grab or composite
42 • Analyses to be performed
43 • Number of containers
44 • Contractor's name
45 • Collector's signature
46 • Signature of person receiving possession
47 • Inclusive dates of possession
48 • Condition of samples on receipt
49

50 Sample Quality Control

51 Sample quality control procedures will be followed, including proper implementation of the sample
52 labeling, sample sealing, and chain-of-custody completion described in the preceding paragraphs. Field

1 quality control sampling described in this section will also be followed. Sample quality control
2 procedures will be implemented to adequately control sampling activities.
3 Field quality control will be accomplished through the use of duplicate samples and equipment and field
4 blanks. The quality control samples will be collected once every 20 samples, or a minimum of once a
5 sample event.
6

7 Duplicate samples are two separate samples taken from the same sampling point in the field and placed
8 into separate containers. The duplicates will be used as an indication of the field homogeneity and
9 repeatability of the analytical data. Split samples will be collected along with duplicates. Split samples
10 will be analyzed at a separate, independent laboratory.
11

12 Equipment blanks serve as a check on sampling device cleanliness. An equipment blank consists of a
13 sealed container of distilled water that is transported to the site, opened in the field, poured over or
14 through the sampling collection device that has been decontaminated, and then is collected in a sample
15 container and returned to the laboratory for analysis. The analytical results from the blanks will be used
16 to assess the adequacy of sampling device decontamination procedures. This assessment is made during
17 data validation. Equipment blanks will be collected daily and analyzed for the same analytes as the
18 samples collected that day.
19

20 Field blanks consist of pure deionized water or reagent sand that will be transferred to a sample container
21 at the site and preserved appropriately. Field blanks are used to check for possible contamination with the
22 reagent or the sampling environment, and will be collected daily. Trip blanks will accompany volatile
23 organic analysis samples.
24

25 Data Quality

26 Quality of samples will be ensured through the collection of field quality control samples and through
27 strict adherence to sample labeling, sample sealing, and chain-of-custody procedures. Data quality will
28 be ensured by adherence to the analyte-specific requirements for precision, accuracy, completeness, and
29 representativeness that will be prescribed in the SAP. The laboratory performing the analyses will be
30 required to meet these specific quality assurance objectives in the SAP, in addition to meeting the
31 guidelines of their quality assurance plan. The quality control of records and documentation will be
32 accomplished by following procedures outlined in US EPA SW-846, as amended (EPA 1986). Sampling
33 and analysis records will be kept on file, including the following:
34

- 35 • Field notes
- 36 • Chain-of-custody records
- 37 • Daily memoranda
- 38 • Laboratory results
- 39 • Quality assurance
- 40 • Data validation results
- 41 • Records of meetings
- 42 • Activities concerning the sampling program

43 Evaluation and Reporting of Data

44 Analytical results from the WTP sampling will be compiled, evaluated, and summarized in the following
45 manner:
46

- 47 • Evaluate the quality control of the sample handling and sample analyses to assess the reliability of the
48 data
- 49 • Conduct the statistical evaluation of the analytical data
- 50 • Examine results for comparison with accepted regulatory standards on an indicator
51 constituent-by-indicator constituent basis
52

- 1 • Prepare summary statistics for indicator constituents
- 2 • For each constituent identified, compare the sample results with the established designation limit or
- 3 soil cleanup levels, and, for soil, with the established background levels for soils. Sample
- 4 concentrations below background, but above risk-based closure levels, may be proposed as adequate
- 5 demonstrations of clean closure, pending Ecology approval.
- 6 • Prepare a report that includes data analysis and assessments that evaluate whether the levels of
- 7 various indicator constituents present a health or environmental concern, and whether they meet the
- 8 clean closure performance standard. The report will include sample locations, number of samples,
- 9 specific methods used for collection, data quality assessment, and differences in procedures or sample
- 10 locations from those provided in the revised closure plan and the SAP, as applicable. The report will
- 11 provide clean closure evaluations. Each report may address only a single sample or a large group of
- 12 samples. A single unit at the WTP may require several sampling campaigns and iterative reports,
- 13 while other units may require no sampling.

14 Safety Procedures and Equipment

15 Safety procedures will be detailed in a site-specific health and safety plan that will be included in the
16 revised closure plan to be submitted to Ecology prior to initiation of closure activities. A detailed safety
17 review of the closure tasks and personnel safety will also be conducted prior to beginning the closure
18 activity. Personnel performing closure activities, including sampling, will wear personal protective
19 equipment, as required, to prevent exposure to hazardous materials and dangerous and mixed-waste
20 constituents.
21

22
23 Additional information, as follows, will be provided in the revised closure plan to be submitted prior to
24 closure:

- 25
- 26 • Health and safety plan
- 27 • Details on sampling equipment
- 28 • COC indicator parameters for decontamination solution analyses
- 29 • Analytical methods that deviate from SW-846 (EPA 1986), if any
- 30 • Sampling and analysis plan
- 31

32 **11.3.4.2 Sampling to Confirm Decontamination of Structures and Soil (I-1b(4)(b))**

33 Sampling of decontamination solutions may be conducted for equipment, structures, and debris that do
34 not meet the clean debris surface standard following the decontamination process. This sampling will
35 serve to define the extent of remaining contamination and confirm adequate decontamination of
36 equipment, structures, or debris. The sampling process will be repeated after each subsequent round of
37 decontamination effort until the decontamination effort is either determined to be successful, or is
38 terminated, and the contaminated component is removed and disposed of as dangerous or mixed waste.
39 Soil found to be contaminated will be removed as part of the closure activities, and sampling will be
40 performed to confirm that levels of contamination in the remaining soil do not exceed Ecology-approved
41 risk-based soil cleanup levels.

42 **11.4 OTHER ACTIVITIES (I-1B(5))**

43 This section describes the procedures to be followed in order to comply with closure certification
44 requirements, to control run-on and runoff during closure, and to reuse equipment from the plant.
45

46 **11.4.1 Certification of Closure**

47 WAC 173-303-610(6) requires that within 60 days of completion of closure of the WTP, a closure
48 certification will be submitted to Ecology. Following completion of closure, DOE (or the DOE-selected
49 contractor) and an independent Washington state registered professional engineer will submit

1 certifications that the mixed-waste units have been closed in accordance with the approved closure plan.
2 The certifications will be submitted to the Hanford permit coordinator at the following address:

3
4 Washington State Department of Ecology
5 Kennewick Office
6 Attn: Hanford Permit Coordinator
7 1315 W. 4th Avenue
8 Kennewick, Washington 99336-6018
9

10 The following documentation will be prepared to support the closure certification, and will be provided or
11 accessible to Ecology on request:

- 12
- 13 • Field notes related to closure activities
 - 14 • A description of deviations from the approved closure plan and justification for these deviations
 - 15 • Documentation of the final disposition of dangerous wastes and dangerous waste residues, including
16 contaminated media, debris, and treatment residuals
 - 17 • Laboratory and field data (including quality assurance and quality control data) for samples and
18 measurements, including those taken to determine background conditions or to determine or confirm
19 clean closure
 - 20 • A summary report that itemizes the data reviewed by the independent registered professional engineer
21 and tabulates the analytical results of samples taken to determine or confirm clean closure

22
23 A draft decontamination documentation checklist and an example closure certification statement are
24 provided in Figure 11-5 and Figure 11-6, respectively.

25 26 **11.4.2 Run-on and Run-off Control**

27 No runoff or run-on resulting from precipitation or surface water flows is anticipated in the areas
28 undergoing closure. The WTP dangerous waste management units are enclosed within highly secure
29 reinforced concrete and steel frame buildings, with the exceptions noted below. Wash water or other
30 liquids resulting from decontamination activities will be contained by WTP containment structures -
31 floors, walls, ceilings, sumps, and catch tanks.

32 The only units that may be exposed to direct precipitation are the two process condensate vessels outside
33 the Pretreatment Building. The miscellaneous dangerous waste, central waste, and two melter storage
34 buildings are separate freestanding units, and run-on or runoff control must be assured for these units
35 before and during operation of the WTP, as well as during the closure period. There will be no changes in
36 the containment capacities or runoff control design for these units during closure activities.

37
38 Activities such as groundwater monitoring and run-on and run-off control will be described in a revision
39 to the closure plan prior to closure.

40 41 **11.4.3 Equipment Reuse**

42 Equipment may be decontaminated and reused during or after closure, if practicable. For example,
43 contaminated material and handling equipment such as melter cave containment and shield doors, cranes,
44 and power manipulators may be decontaminated in order to reduce radiation dose rates. This will allow
45 initial or repeated personnel entry to areas where additional decontamination, debris size reduction, or
46 packaging and encapsulation activities will be conducted. Equipment described in Sections 11.3 and 11.6
47 will be decontaminated using methods selected from those specified under 40 CFR 268.45, or equivalent
48 technologies.
49

1 Criteria for determining whether equipment will be reused or disposed of include the following:

- 2 • Degree of contamination
- 3 • The need to minimize potential worker radiation and dangerous waste exposures during
- 4 decontamination; the amount of decontamination residues that would be generated
- 5 • The value of the equipment
- 6 • Compliance with the approved schedule and budget

7
8 Equipment that could be used by DOE in future operations at the WTP site, in other Hanford projects, or
9 at different DOE facilities, may be decontaminated first.

10 **11.5 MAXIMUM WASTE INVENTORY (I-1C)**

11 The estimated maximum mixed-waste inventory for each type of waste management unit is listed in
12 Table 11-1. These are total storage capacity volumes from the WTP Part A form in Chapter 1 of the
13 Dangerous Waste Permit Application.

14
15 The actual volumes present at the start of the closure period will be much less than values shown in the
16 table. For example, the containment buildings and container storage areas may be empty or nearly empty
17 on the date of completion of treatment of the final volume of waste feed, and the tank systems are not
18 likely to contain more than a few percent of the maximum capacity.

19 **11.6 CLOSURE OF TANKS, CONTAINER STORAGE, CONTAINMENT BUILDINGS, AND** 20 **MISCELLANEOUS UNITS (I-1D)**

21 This section of the closure plan identifies specific closure requirements for each type of unit at the WTP,
22 and describes the removal of wastes and equipment, decontamination of the unit, and disposition of
23 decontamination residues. A summary of the closure standards and activities for each type of unit is
24 provided in Table 11-2.

25
26 The performance standards and closure activities for many of the unit components are similar or identical
27 for the four types of units, as indicated in the table. Differences in the detailed closure procedures will be
28 due in part to variations in unit design, and different ancillary equipment present in various units, even in
29 units of the same type. Differences in procedures are also mandated by great variations in radiation dose
30 rates in different units. In the HLW melter cave and most tank secondary containment areas, initial
31 decontamination activities will be performed remotely, while the same types of activities may be
32 performed by personnel in most of the other container storage units.

33
34 An overall estimate of the volume of closure wastes to be generated has not been prepared, due to the
35 uncertainties regarding final disposition of the WTP equipment and structures. The estimate of the
36 volume of closure wastes will be provided in an amended closure plan and submitted for approval prior to
37 initiating closure activities. The volume of wastes that will be generated may be relatively large if most
38 of the tanks, piping and related equipment, and major portions of the concrete and steel structures are
39 removed and disposed of as waste. Volume of wastes may also be large if the same equipment and
40 structures are completely decontaminated, resulting in large amounts of secondary residues, personnel
41 protective equipment, and decontamination solutions. The volume of immobilized waste that will be
42 generated during the closure period depends in part on the composition of the final batch of waste feed,
43 which cannot be predicted at this time.

44 45 **11.6.1 Closure of Tank Systems**

46 Tank systems will be decontaminated using chemical and/or physical extraction technologies. Types of
47 tank systems that will be decontaminated include, but are not limited to:

- 1 • LAW and HLW feed and storage tank systems
- 2 • Evaporators and condensers
- 3 • Waste filtration tanks
- 4 • Ion exchange tanks
- 5 • Condensate tanks

6

7 Types of ancillary equipment which may be decontaminated include, but are not limited to the following:

8

- 9 • Waste transport, rinse, and washdown piping
- 10 • Pumps, agitators, wash rings, and ejectors
- 11 • Air, steam, and water lines in secondary containment areas
- 12 • Intra-facility pipelines

13 Decontamination of tank systems including tanks, piping and other ancillary equipment will be conducted
14 using chemical extraction technology and water washing and spraying. High-pressure steam or other
15 physical extraction technologies identified in Section 11.3.3 will also be used to remove contamination if
16 necessary. The decontamination procedures for closure of tanks will include, but may not be limited to,
17 the following:

18

- 19 • Tank systems will be flushed after the final batch of bulk waste has been processed through that tank
20 system. Large-volume flush solutions will remove as much waste as possible before smaller scale
21 decontamination work begins. Flush water will be transferred to the Pretreatment evaporation and
22 ultrafiltration systems, and the concentrates will be sent to the HLW melter for vitrification, if the
23 HLW vitrification system is operating. (If either or both vitrification systems will not be operating
24 during the first phase of the closure period, this closure plan will be revised to account for changes in
25 treatment and disposal of waste feed and flushing wastes, as necessary.) Water condensate from the
26 evaporator will be routed to the LERF/ETF. The HLW melter will be shut down after flushing wastes
27 are treated. Tank decontamination activities to be performed after completion of flushing may
28 involve any of the chemical or physical extraction technologies identified in Section 11.3.3. Used
29 decontamination solutions will be transferred to the LERF/ETF or another permitted TSD facility.
- 30 • Physical evidence of contamination in the containment systems may be used, in addition to the
31 operating record, to determine whether decontamination of the exterior of a tank system is needed.
32 Before using decontamination solutions on the outside of a tank, the floor and wall liners will be
33 inspected for cracks or other breaches. The cracks will be sealed before beginning decontamination
34 treatment, or other engineered containment devices (such as collection basins) will be used to collect
35 and contain solutions. The outer tank surface then will be cleaned with water or detergents, or other
36 technologies as necessary, and rinsed. Decontamination of secondary containment of these units will
37 be similar or identical to the procedures used for container storage and containment building units.
- 38 • After the tanks are decontaminated, the tank interiors may be inspected using CCTV cameras to
39 determine compliance with the clean debris surface standard. Because of possible radiation exposure,
40 visual inspection of the process cells may be performed remotely using a camera with a zoom lens, or
41 using another device that allows verification that the standard is met. Inspections will be documented
42 in an inspection record.
- 43 • The outside of the tanks also will be inspected for compliance with the clean debris surface standard,
44 and inspections will be documented in an inspection record.
- 45 • If tanks or ancillary equipment cannot be determined by visual inspection to meet the clean debris
46 surface standard, the tanks may undergo further decontamination, or rinsate samples may be obtained
47 to determine if the decontaminated tank meets the designation limit performance standard for clean
48 closure. Before or after decontamination efforts, a tank system may be designated as dangerous
49 waste, removed, reduced in size, packaged, treated by encapsulation, and sent to a permitted disposal
50 facility.

- 1 • Decontamination residues will be collected, designated, and transferred to a permitted disposal
2 facility.

3
4 The decontamination procedures for piping and ancillary equipment will include, but will not be limited
5 to, the following activities:
6

- 7 • The facility design and process information, in combination with operating records, will be used to
8 identify the equipment associated with mixed waste and mixed-waste constituents. Piping that may
9 have carried mixed waste or may have become externally contaminated with mixed or dangerous
10 waste will undergo decontamination. Contaminated piping may include waste transfer piping, sump
11 contents transfer piping, nitric acid transfer piping, and other piping associated with waste treatment
12 and secondary waste transfer.
- 13 • The piping will undergo bulk flushing at the same time the tanks are flushed. Flushing of the pipes
14 and other ancillary equipment will remove the bulk volumes of waste, leaving adhered or attached
15 quantities of waste.
- 16 • Chemical and/or physical extraction technologies may be used to attempt to remove the remaining
17 waste from piping and other ancillary equipment. Where it is not possible to visually verify that the
18 clean debris surface standard has been met, verification may be attempted by rinsate sampling,
19 analysis, and comparison of analyses with designation limits.
- 20 • If it is not possible to meet the clean debris surface standard or designation limits, contaminated
21 portions of the piping and ancillary equipment will be removed, designated as dangerous waste,
22 packaged in waste containers, transferred to the CWC or another permitted unit, encapsulated, and
23 disposed of at a permitted landfill disposal unit on the Hanford Site. Encapsulation may be performed
24 at the CWC or elsewhere.

25 26 **11.6.2 Closure of Container Storage Areas**

27 Each unit will be evaluated for historical spills or other releases of dangerous or mixed wastes, by review
28 of the facility operating record and by visual inspection. If the record review and inspection support the
29 conclusion that no releases of waste to the floor occurred, no further decontamination or sampling work
30 will be required for that unit. If either the inspection or record review indicate that waste releases to the
31 floor of a unit occurred, decontamination will be required. If the protective coating is intact, chemical
32 extraction treatment may be performed. If the coating is cracked or more severely damaged, physical
33 extraction treatment will be required to remove at least 0.6 cm from the original surface. If the extent of
34 the historical releases (the actual location on the floor) cannot be determined, the entire floor surface will
35 be treated. If the resulting surface cannot be documented as a clean debris surface, the treatment may be
36 repeated, or the full thickness of the floor may be removed. The solid residues or rubble produced by
37 treatment or removal will be disposed of as dangerous waste, unless sampling and analyses are performed
38 to support a request for an Ecology determination that the rubble is not dangerous waste.
39

40 The presence of through-thickness cracks or other loss of integrity, if found in concrete floors that rest
41 directly on soil, in units where releases are documented or suspected, may require a soil contamination
42 investigation. Examples of adequate evidence that a release may have occurred include discoloration or
43 staining of the concrete, odor, or elevated radiation readings observed during the initial closure
44 inspection. Soil and possibly concrete samples will be obtained by coring in the vicinity of known or
45 suspected waste releases. Soil contaminated at concentrations above the risk-based soil cleanup levels
46 will be removed, and confirmation samples will be taken at the limits of the excavation to confirm
47 adequate removal. If analyses are less than the Hanford soil background levels but greater than the
48 risk-based soil cleanup concentrations, a request for approval of a clean closure-determination will be
49 submitted to Ecology. The request will be supported with the analytical and other pertinent data for that
50 unit.
51

1 If soil contamination is so extensive that the zone of contamination cannot be practically removed, or if
2 groundwater contamination could result, the closure plan will be revised to provide for additional
3 investigation and measures to address corrective action requirements.

4
5 Decontamination documentation will be prepared as described in Sections 11.3.4 and 11.4.1.

6 7 **11.6.3 Closure of Containment Building Units**

8 One containment building unit, the pretreatment plant containment building unit, will be used for
9 decontamination, size reduction, and packaging operations throughout the operating life of the WTP. It
10 may be used for these same functions during the closure period. The HLW melter (cave) containment
11 building may be used for similar operations during closure, after the normal melter operations have been
12 completed. In particular, the HLW melter containment building may be used to partially decontaminate
13 and overpack failed HLW melters that were stored in the out of service melter storage building during the
14 operating life of the plant.

15
16 After completion of operations to facilitate closure of other units, the melters and associated spent parts,
17 feed apparatus, and off-gas control equipment will be removed. The containment buildings will be closed
18 in the same manner, following the same inspection, decontamination, and documentation requirements
19 identified in Sections 11.6.1 and 11.6.2 for tank system containment areas and container storage units.
20 Several significant differences in design and waste types will result in substantially longer time
21 requirements for closure of the units, as compared to container storage units. For example, most
22 operations in the HLW melter cave will be conducted with remotely operated equipment, until the final
23 decontamination stages are reached. The ILAW container finishing line and container fixative units are
24 also larger and contain more equipment than most of the container storage units. Complex remote
25 operations are necessarily slow, and the full extent of necessary decontamination, size reduction, and
26 packaging work will not be known until the final stages of closure.

27
28 Other containment building units are more similar to container storage units, including coated concrete
29 rather than clad floors and walls. These containment buildings will be closed in the same manner as
30 the container storage units (Section 11.6.2), with the added complications of various types of waste
31 handling equipment such as power manipulators, cranes, and the LAW LSM units.

32 33 **11.6.4 Closure of Miscellaneous Units**

34 The HLW and LAW melters are miscellaneous units. Several times during the life of the WTP, out of
35 service melters will be removed from the HLW melter cave and LAW LSM gallery containment
36 buildings, and may be placed in the melter container storage units. Removal and replacement of out of
37 service melters is not considered closure. One or more of the LAW melters may actually be removed and
38 not replaced, before the start of the closure period. The HLW melter is planned to be operating during the
39 deactivation period (the first part of the closure period). If necessary, the HLW melter may be removed
40 and replaced during the closure period to provide treatment for the residues from tank system flushing
41 operations. Such removal and replacement would not be considered closure, although it may occur
42 during the closure period.

43
44 LAW melter operating equipment openings will be closed and the exterior surfaces decontaminated.
45 Then the melters will be removed from the LAW melter gallery as intact assemblies, encapsulated, and
46 shipped to the LLBG or another permitted disposal unit. Melters may be stored in the melter storage
47 buildings during the closure period, while treatment, transport, and disposal operations are arranged.
48 HLW melters may be partially decontaminated and packaged in an overpack in the HLW melter cave
49 during the final phases of closure activities. HLW melters in a melter storage building may be returned to
50 the HLW melter cave for partial decontamination and packaging. Both types of melters will be treated in
51 accordance with the immobilization treatment standard and disposed of at permitted mixed-waste disposal
52 facilities.

1 Removal of melter components will be accomplished according to standard procedures for the operational
2 period of the plant. Special HLW melter closure activities such as size reduction, decontamination of
3 components, or packaging of components and decontamination residues, may require the development of
4 new procedures or the installation of new equipment. These activities cannot be fully predicted at the
5 current stage of design, and some uncertainties will remain even at the start of the closure period.
6

7 The encapsulation treatment design is still under development. Additional information will be provided
8 in this section, before the start of closure. Information to be provided includes details of encapsulation
9 treatment locations, equipment, and materials.

10 **11.7 SCHEDULE FOR CLOSURE (I-1F)**

11 For the purposes of this dangerous waste permit application, the design life of the WTP is estimated at
12 40 years of operations. The estimated three-year schedule for closure is provided in Figure 11-7.
13

14 Regulations require that Ecology be notified at least 45 days before the start of the closure period. In
15 addition, the closure period must begin within approximately 30 days after completion of treatment of the
16 final waste feed transfer from the DST system unit. Due to the complexity of the WTP operations, these
17 requirements will likely be unable to be met. Additional evaluation of the schedule will be conducted
18 prior to closure.
19

20 The date of receipt of the final volume of bulk waste feed in the melters, and various other specific
21 individual units within the WTP, will be at the end of the processing of that final batch of waste feed.
22 This date will roughly correspond to the date of the start of deactivation operations. The Pretreatment
23 plant and HLW feed preparation and melter systems will continue to operate for several months after the
24 start of the closure period. The plants will be processing the tank system flush solutions and producing
25 immobilized waste glass containing most of the residual waste constituents left in the tanks at the start of
26 the closure period.
27

28 The year the WTP closes will depend on the time required for the initial portion of the tank waste
29 inventory to be processed, the degree of success in this mission, and whether the WTP will be used to
30 continue to process the remaining Hanford tank waste inventory. Other factors that could affect the year
31 of closure include changes in operational requirements, lifetime extension upgrades, a different operating
32 contractor, and other unforeseen factors.
33

34 This estimated three-year closure schedule is necessarily general, and is not meant to be definitive. For
35 example, completion of decontamination of the pretreatment building and residue removal is shown at
36 approximately 13 months after the start of the closure period. However, decontamination of the LAW
37 and HLW vitrification plant tanks and other units is expected to require use of pipelines through the
38 Pretreatment plant to transfer decontamination solutions and rinsates to the LERF/ETF. Therefore, the
39 final decontamination of piping and collection tanks in the Pretreatment building may not be completed
40 until after the LAW and HLW vitrification plant tanks and other units are decontaminated.
41

42 A more specific schedule will be provided in the revision of this closure plan prior to the start of closure
43 activities. The revised schedule will take advantage of final design and operating procedure information
44 that is not available at this time. The schedule for closure will include a breakdown of activities to be
45 performed after the date of completion of vitrification processing of the last batch of waste feed from the
46 DST System unit.

47 **11.8 EXTENSION FOR CLOSURE TIME (I-1G)**

48 The following discussion addresses the extension of the waste removal and closure time periods, as
49 specified in WAC 173-303-610(4)(a) and (b), respectively. The first citation requires that within 90 days

1 after receiving the final volume of dangerous waste (the DST waste), the owner or operator must treat,
2 remove from the unit, or dispose of all dangerous wastes in accordance with the approved closure plan.
3 The second requirement is that all closure activities must be completed within 180 days after receiving the
4 final volume of dangerous waste.

5
6 The need for more than 90 days to remove wastes and more than 180 days to complete closure activities
7 is anticipated. This is due in part to the high radiation fields in many of the waste management units,
8 even after the entire bulk waste inventory has been processed and the residues (the inventory present at
9 the start of the closure period) are removed by flushing. Processing of the final batch of waste feed may
10 require approximately nine months of operation at or near design capacity of the plant, prior to the start of
11 deactivation and closure work. As explained in Section 11.7, these processing operations will be
12 completed, or nearly completed, at the start of the closure period.

13
14 Small volumes of waste residues may still exhibit extreme radioactivity and hazardous radiation dose
15 rates. This fact will require much of the closure work to be performed, of necessity, by remotely operated
16 equipment. The large number of units and extensive integrated ancillary equipment such as piping,
17 valves, filters (mostly welded together), and the need to coordinate closure activities with other TSD units
18 both at Hanford and offsite, means that more time will be required for closure than would be necessary
19 for a typical dangerous waste management facility.

20
21 The decontamination operations described in this closure plan are intended to avoid excessive secondary
22 waste generation and to provide for the recycling of some pieces of equipment. The decontamination
23 operations will include extensive use of chemical and physical decontamination treatment technologies.
24 Incineration is not considered as an option for wastes to be generated during closure. Solidification,
25 encapsulation, and land-filling of dangerous and mixed wastes will be deliberately minimized. The
26 volumes of wastes that will be disposed of will also be minimized to the extent practical by physical size
27 reduction. Size reduction will allow packaging of large tanks, pipe, and support structures in relatively
28 small, densely packed drums or waste boxes. These waste management priorities are emphasized to
29 support this request for extension of the waste removal and closure periods, as suggested in Section 4.1 of
30 the *Ecology Guidance for Clean Closure of Dangerous Waste Facilities* (Ecology 1994c).

31
32 The WTP operator will take the actions necessary to prevent threats to human health and the environment
33 from the unclosed but not operating WTP, including compliance with applicable permit requirements.
34 During the first several months of the closure period, a large portion of the plant will be operating to
35 remove waste residues from the tank systems to the maximum practical extent. Flushing, vitrification,
36 and other deactivation activities will require continued security and monitoring of the other non-operating
37 portions of the plant, and no part of the plant will be unsecured or abandoned during the closure period.

38
39 If necessary, an extension of the three-year closure schedule will be requested and the need for the
40 extension demonstrated in accordance with WAC 173-303-610(4)(a) and (b). The request would be
41 determined prior to initiating closure activities, or during closure activities should closure conditions
42 necessitate. A revised closure plan will be submitted for approval if an extension is necessary.

43
44 Condition ILX.1 of the Hanford Facility RCRA Permit (DW Portion)(Ecology 1994a) requires the
45 Permittees to notify Ecology in writing, as soon as possible, of deviations or expected deviations from the
46 schedules of the Permit. The Permittees shall include with the notification information supporting their
47 claim that they have used best efforts to meet the required schedules. If Ecology determines that the
48 Permittees have made best efforts to meet the schedules of the Permit, Ecology shall notify the Permittees
49 in writing by certified mail that the Permittees have been granted an extension. Such an extension shall
50 not require a permit modification under Condition LC.3. Should Ecology determine that the Permittees
51 have not made best efforts to meet the schedules of the Permit, Ecology may take such action as is
52 deemed necessary. Copies of correspondence regarding schedule extensions shall be kept in the operating
53 record.

1
2 Condition II.X.2 of the Hanford Facility RCRA Permit (DW Portion) provides that any schedule
3 extension granted through the approved change control process identified in the *Hanford Federal Facility*
4 *Agreement and Consent Order* (Ecology, EPA, and DOE 1998) shall be incorporated into the Permit.
5 Such a revision shall not require a permit modification under Condition I.C.3.

6 **11.9 CLOSURE COST ESTIMATE (I-1H)**

7 TSD facilities located at the Hanford Site are exempt from the closure cost estimate requirements of
8 WAC 173-303-620, in accordance with Condition II.H.3 of the Hanford Facility RCRA Permit
9 (DW Portion). However, Condition II.H.1 of the Hanford RCRA Permit (DW Portion) requires submittal
10 of an annual report updating projections of anticipated costs for closure.

11
12 The projection of anticipated costs will be based on the closure activities described in Sections 11.3 and
13 11.4. The projection of anticipated costs will be submitted during the first October following
14 commencement of mixed waste processing. The cost projection will be updated annually, in accordance
15 with Condition II.H.1 of the Hanford Facility RCRA Permit (DW Portion).

Table 11-1 Maximum Waste Inventory

Waste Management Unit	Maximum Inventory ^a
Total container storage	1,840,000 gal
Total tank storage	4,735,000 gal

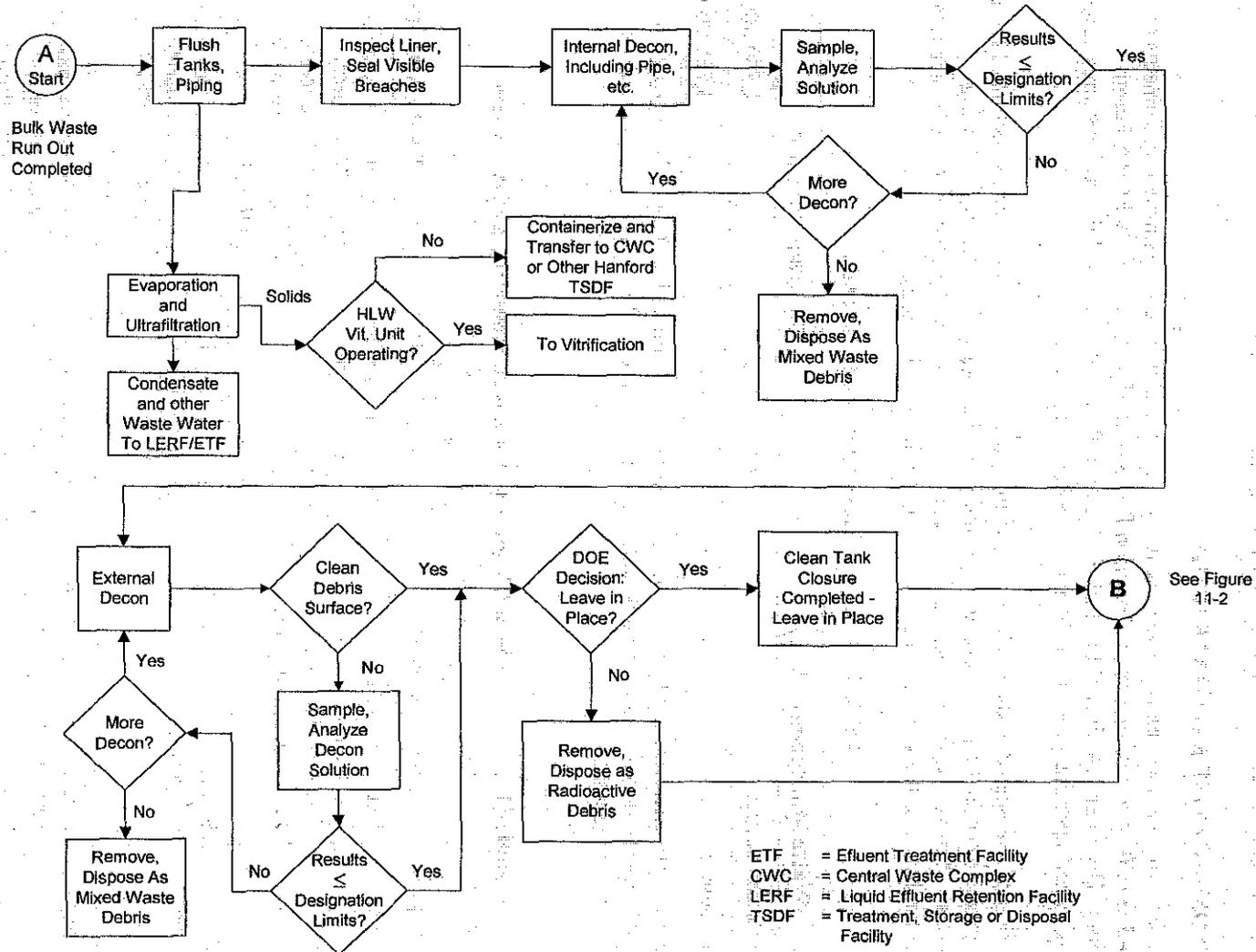
^a Miscellaneous (melter) and containment building units are not counted, as they will be processing the volumes previously stored in tanks, and producing treated and secondary wastes that are included in the container storage total.

Table 11-2 Clean Closure Performance Standards and Activities

Unit Type	Components	Performance Standards	Closure Activities
Tank system	Exterior surfaces Interior surfaces Ancillary equipment Secondary containment	Clean debris surface, designation limits, or removal	Extraction technologies or removal of tanks Liner and concrete decontamination and/or removal
Container storage area	Floor, walls, and ancillary equipment	Clean debris surface, designation limits, or removal	Extraction technologies Liner and concrete decontamination and/or removal
Containment building	Floor, walls, and ancillary equipment	Clean debris surface, designation limits, or removal	Extraction technologies Liner and concrete decontamination and/or removal
Miscellaneous (melter)	Melters and ancillary equipment	Removal	Removal

1

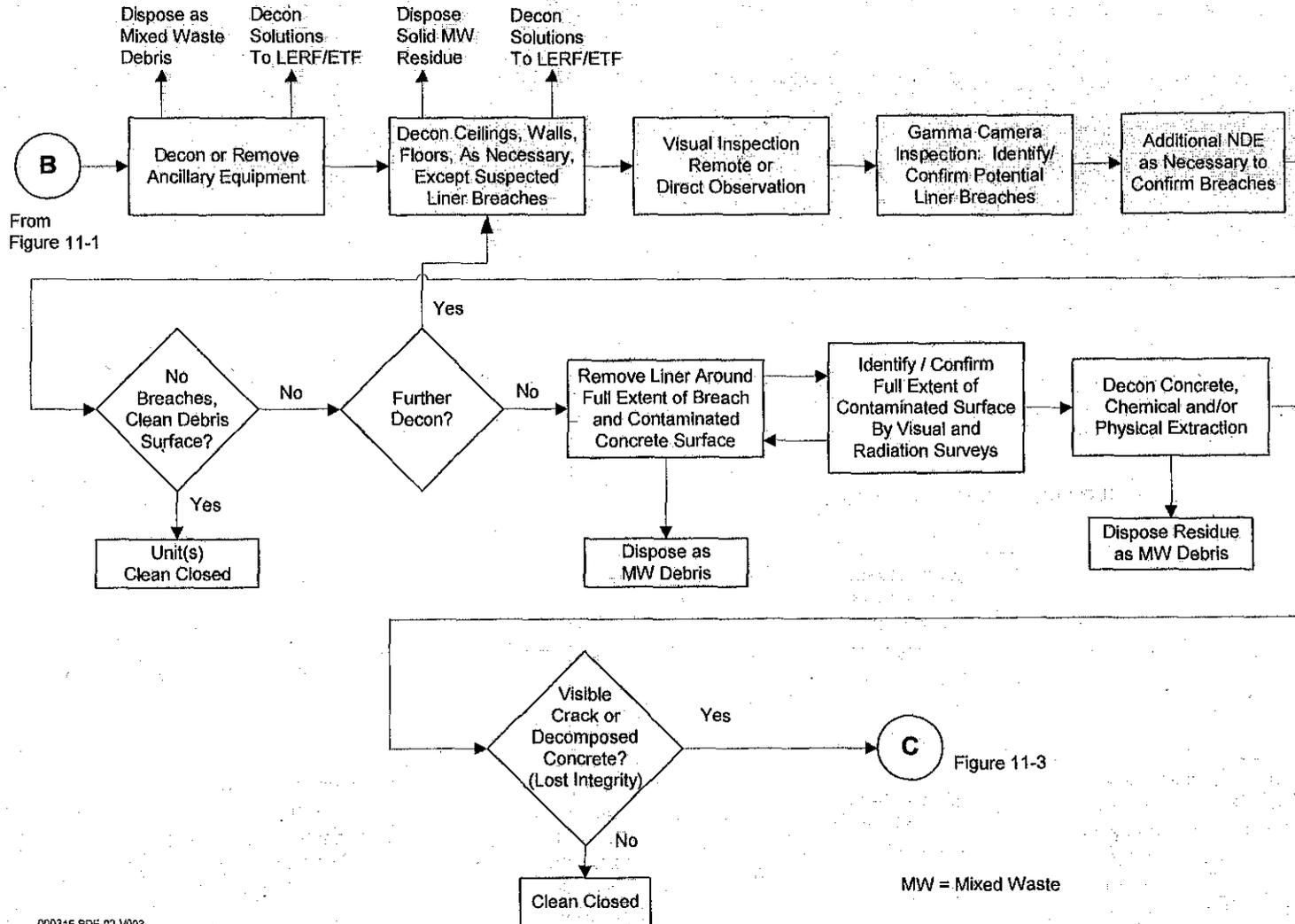
Figure 11-1 Closure Strategy Flowchart for Tank Systems.



See Figure 11-2

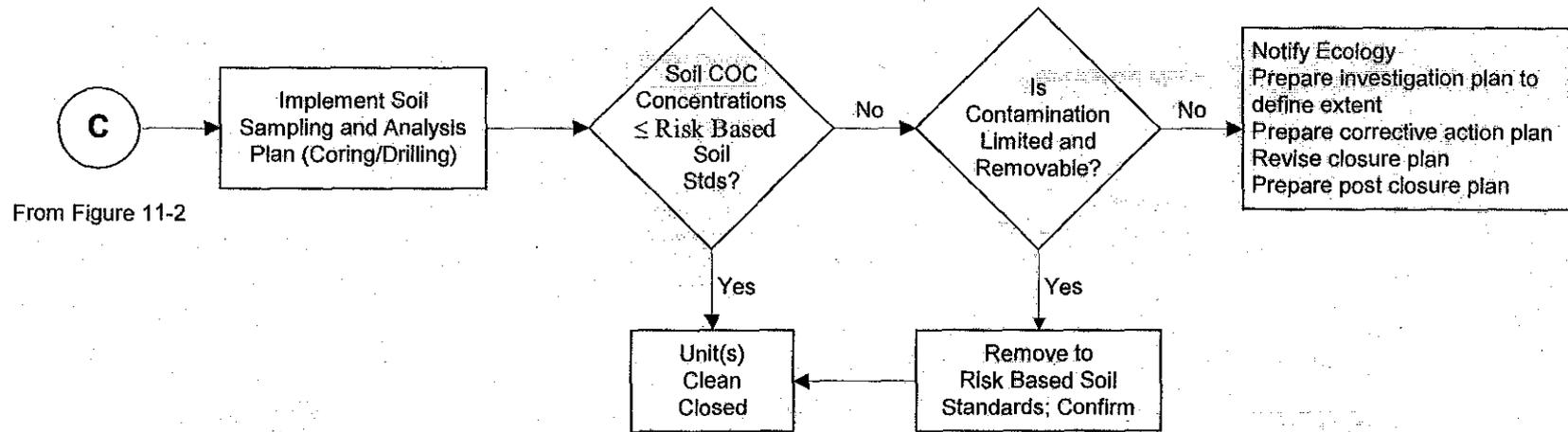
2

1 **Figure 11-2 Closure Strategy for Container Storage, Containment Building, Miscellaneous Unit, and Tank System Containment Areas**



1
2

Figure 11-3 Closure Strategy Flowchart for Soils and Groundwater



From Figure 11-2

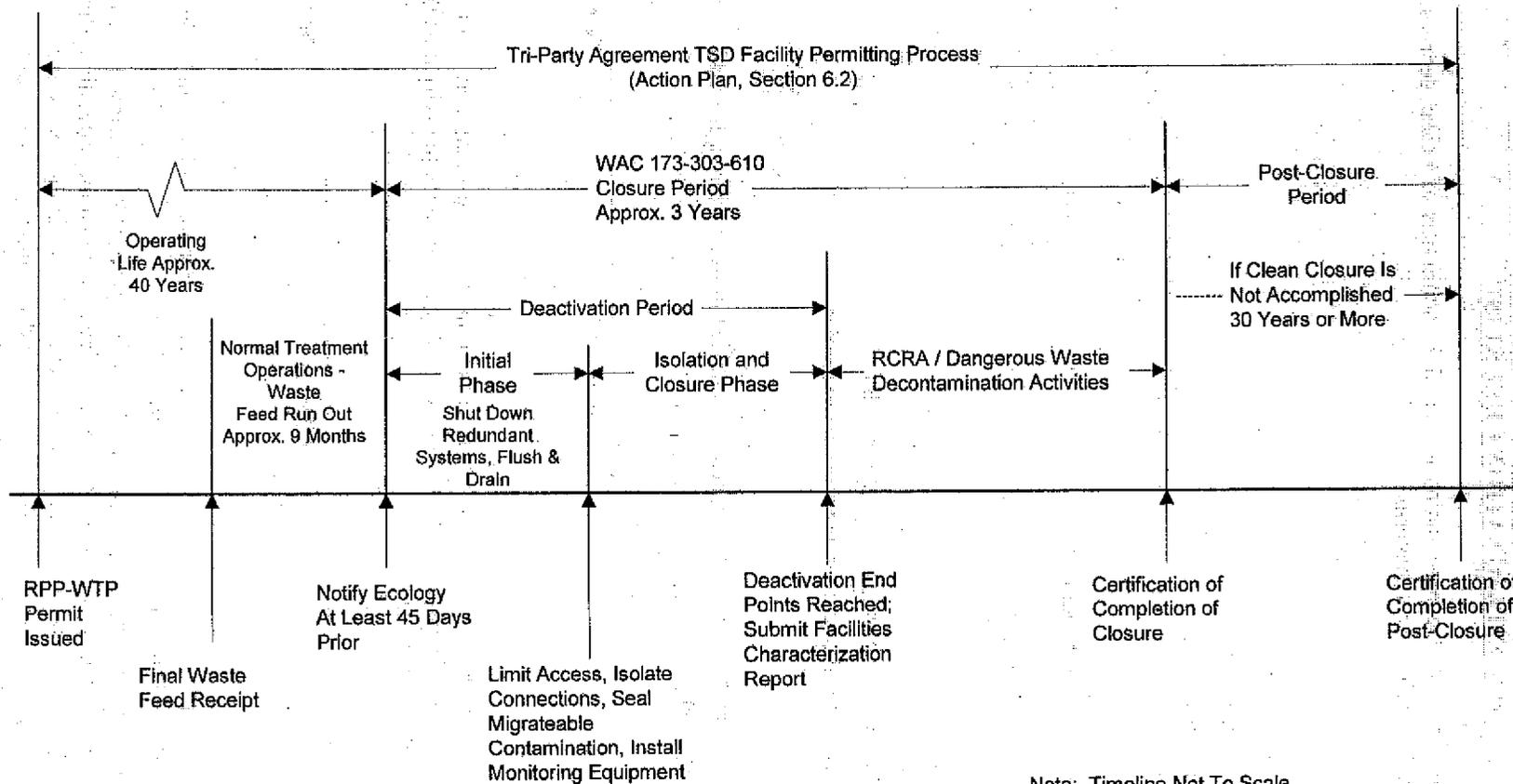
COC = Constituents of Concern

000315-BDF-03-V002

3

1
 2

Figure 11-4 WTP Permitting, Deactivation, and Closure



000222-BDF-01-v003

3
 4

1

Figure 11-5 Sample Clean Debris Surface Checklist

DECONTAMINATION CHECKLIST

This checklist is intended to document decontamination work and the attainment of a clean debris surface for the following components, structures, and materials.

- 1 Building or location:
- 2 Component or Area:
- 3 Material (such as concrete, metal):
- 4 Decontamination treatment method¹:
- 5 Decontamination treatment parameters:
 - Temperature
 - Propellant
 - Solid media (such as shot, grit, beads)
 - Pressure
 - Residence time
 - Surfactants
 - Detergents
 - Grinding or striking media (such as wheels, piston heads)
 - Depth of surface layer removal in cm (in concrete, for example)
 - Other

The decontamination of the building, component, or material identified in steps 1 through 3 was completed as specified at steps 4 and 5.

Title Signature / Date

6 Performance Standard:

I have visually inspected the above-identified material before / after (circle one) decontamination or treatment in accordance with the closure plan. Dangerous waste residues have / have not (circle one) been removed to attain a clean debris surface².

Authorized Representative Signature / Date

Notes:

1 Decontamination treatment will use a chemical or physical extraction method as listed in Table 1, Alternative Treatment Standards for Hazardous Debris (40 CFR 268.45).

2 Clean debris surface as defined in Table 1, Alternative Treatment Standards for Hazardous Debris (40 CFR 268.45): "Clean debris surface' means the surface, when viewed without magnification, shall be free of all visible contaminated soil and hazardous waste except that residual staining from soil and waste consisting of light shadows, slight streaks, or minor discolorations, and soil and waste in cracks, crevices, and pits may be present provided that such staining and waste and soil in cracks, crevices, and pits shall be limited to no more than 5 % of each square inch of surface area."

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Figure 11-6 Example Closure Certification Statement

**CLOSURE CERTIFICATION
FOR**

**River Protection Project – Waste Treatment Plant
Hanford Site
US Department of Energy, Richland Operations Office**

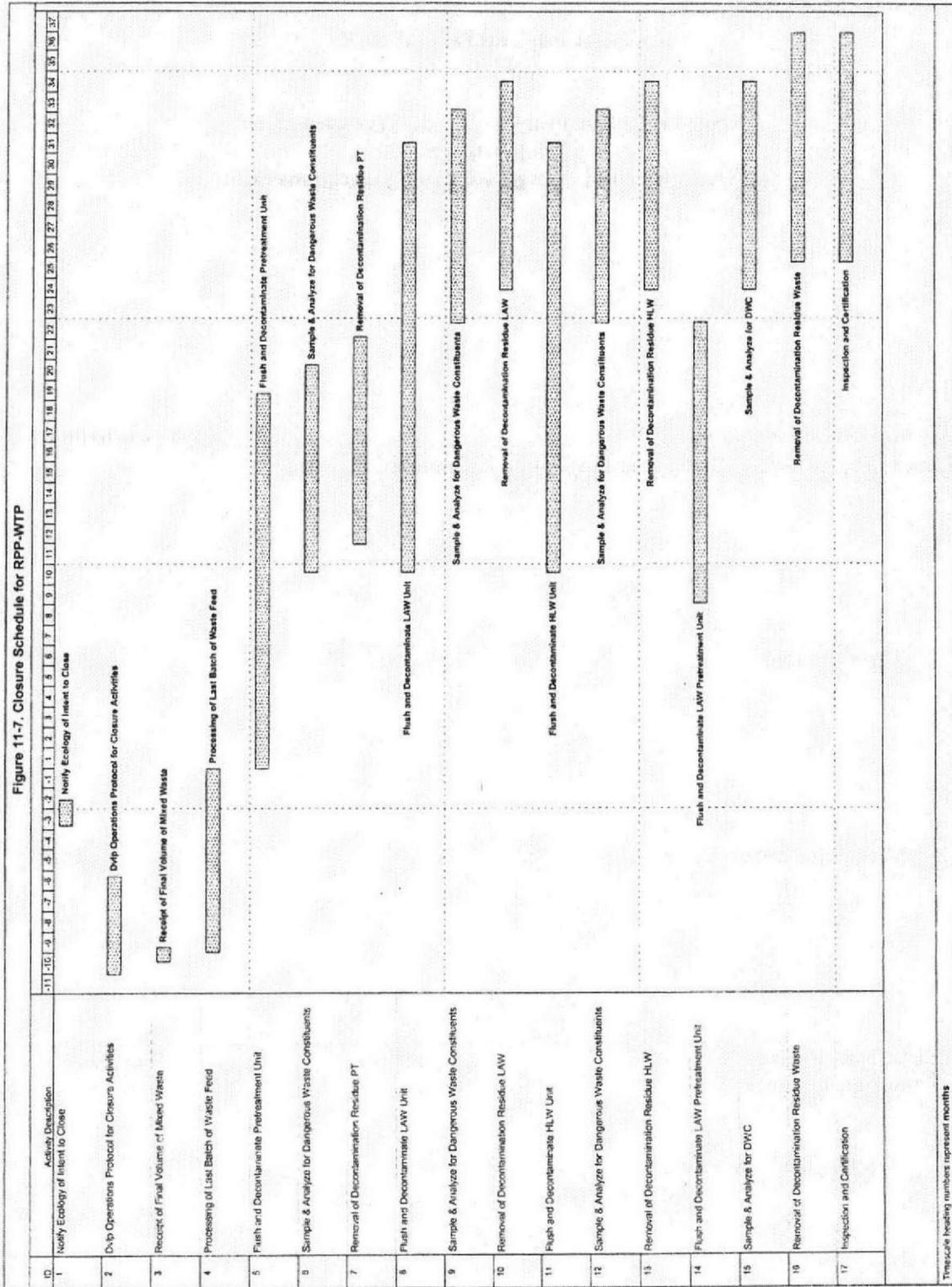
We, the undersigned, hereby certify that _____ closure activities were
Performed in accordance with the specifications in the approved closure plan.

_____ Owner/Operator	_____ Signature	/ _____ Date
_____ Contractor Representative	_____ Signature	/ _____ Date
_____ Independent Registered Professional Engineer	_____ Signature	/ _____ Date

Washington State PE # _____

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Figure 11-7 Closure Schedule for WTP



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1 **Chapter 12.0**

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3 **Reporting and Recordkeeping**

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CHAPTER 12.0
REPORTING AND RECORDKEEPING

Contents

12.0 Reporting and Recordkeeping Att 51-12-1

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12.0 REPORTING AND RECORDKEEPING

The River Protection Project - Waste Treatment Plant (WTP) is subject to the reporting and recordkeeping requirements of *Dangerous Waste Regulations* (WAC 173-303), *Standards for Owners and Operators of Hazardous Waste Treatment, Storage and Disposal Facilities* (40 CFR 264), and *Land Disposal Restrictions* (40 CFR 268).

Descriptions of specific reporting and recordkeeping requirements applicable to treatment, storage, and disposal units are located in the *Hanford Facility Dangerous Waste Permit Application, General Information Portion* (DOE-RL 1998). Not all of the requirements and associated reports and records identified in Chapter 12 of the General Information Portion apply to the WTP. Those that apply are as follows:

Reports and Records	Reports and Records
Quarterly notification of Class 1 modification notification	Closure and postclosure cost estimates
Monitoring and records	Onsite transportation documentation
Certification of construction or modifications	Annual noncompliance report
Anticipated noncompliance	Annual dangerous waste report
Reporting planned changes	Annual LDR report
Immediate reporting	Permit condition compliance evaluation
Release or noncompliance not requiring immediate reporting	Deed notification (reference only)
Written reporting	Inspection records
Waste transfer documentation discrepancy report (equivalent to "Manifest Discrepancy Report")	Closure certification
Other information	Notification of, or request for, permit modification
Permit-related documentation	Closure plan deviation
Notification of permit-related documentation	Engineering change notices and nonconformance reports
Waste location	As-built drawings
Waste analysis	Equivalent materials
Contingency Plan and incident reports	LDR records
Personnel training records	Schedule extensions
Occurrence reports	Waste minimization and pollution prevention
Emergency Response Plan	Other permit compliance documentation

The WTP facility operating record (Hanford Facility Operating Record) will be kept onsite or at the permittee's offices located in Richland, Washington.

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**Attachment 51 - Appendix 1.0
WTP Interim Compliance Schedule**

Interim Compliance Schedule- WTP Facility		
	Compliance Schedule Submittal	Interim Compliance Date
	III.10.C.2	
1.	Submit documentation stating the WTP has been constructed in compliance with the Permit.	03/01/08
2.	Submit updated Site Transportation Report for incorporation into the Administrative Record.	Completed
	III.10.C.3	
3.	Revise and Submit Waste Analysis Plan and associated Quality Assurance Project Plan to Ecology for review and approval	04/01/07
	III.10.C.5.	
4.	Update and submit for approval "Procedures to Prevent Hazards", Chapter 6.0 Sections 6.3, 6.4, 6.5 and the Inspection Schedule.	04/01/07
	III.10.C.6	
5.	Update and submit the Contingency Plan	04/01/07
	III.10.C.7	
6.	Update and resubmit for review and approval Training Program description in Chapter 8 of the Permit.	04/01/07
7.	Submit under separate cover the actual WTP Dangerous Waste Training Plan for incorporation into Administrative Record.	04/01/07
	III.10.C.8	
8.	Update and resubmit the Closure Plan for approval	04/01/07
	III.10.C.11	
9.	Submit Risk Assessment Workplan, revised in consultation with Ecology.	Completed
	CONTAINERS	
10.	Submit detailed information associated with containers and container management areas	03/22/06
11.	Submit descriptions of container management practices	04/01/07
12.	Submit engineering information for each secondary containment and leak detection system for the WTP Tank System to be included in the permit	9/18/04
13.	Submit engineering information for each dangerous waste tank and primary sump to be included in the permit	04/29/06
14.	Submit engineering information for each tank system ancillary equipment to be included in the permit	04/29/06
15.	Submit descriptions of tank management practices	04/01/07
	CONTAINMENT BUILDINGS	
16.	Submit engineering information for each containment building to be included in the permit	12/16/04
17.	Submit descriptions of containment building management practices	04/01/07

Interim Compliance Schedule- WTP Facility		
	Compliance Schedule Submittal	Interim Compliance Date
	PRETREATMENT PLANT MISC. UNITS SYSTEMS	
18.	Submit engineering information for secondary containment and leak detection system for the Pretreatment Plant Miscellaneous Unit Systems	01/31/05
19.	Submit engineering information for Pretreatment Plant Miscellaneous Unit Systems	02/11/06
20.	Submit engineering information for Pretreatment Plant Miscellaneous Unit Systems equipment	01/24/05
21.	Submit descriptions of management practices for the Pretreatment Miscellaneous Treatment System	04/01/07
	LAW SHORT TERM MELTER UNIT	
22.	Submit engineering information for LAW Vitrification Miscellaneous Treatment Unit secondary containment	Completed
23.	Submit engineering information for LAW Vitrification Miscellaneous Treatment Unit sub-system	08/18/05
24.	Submit engineering information for equipment for each LAW Vitrification Miscellaneous Treatment Unit sub-system	06/02/05
25.	Submit descriptions of management practices for the LAW Vitrification Miscellaneous Treatment System	04/01/07
26.	Submit LAW Vitrification Environmental Performance Demonstration Test Plan for Ecology review and approval	10/02/06
	HLW SHORT TERM MELTER UNIT	
27.	Submit engineering information for HLW Vitrification Miscellaneous Treatment Unit secondary containment	01/22/05
28.	Submit engineering information for HLW Vitrification Miscellaneous Treatment Unit sub-system	06/18/05
29.	Submit engineering information for equipment for each HLW Vitrification Miscellaneous Treatment Unit sub-system	06/18/05
30.	Submit descriptions of management practices for the HLW Vitrification Miscellaneous Treatment System	04/01/07
31.	Submit HLW Vitrification Environmental Performance Demonstration Test Plan for Ecology review and approval	10/02/06
32.	Final Compliance Date	02/28/09

**Attachment 51 – Appendix 2.0
Critical Systems for the WTP**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Mnemonic System Locator	System Name
Pretreatment Systems	
PFH	Pretreatment Filter Cave Handling System
PJV	Pulse Jet Ventilation System
FRP	Waste Feed Receipt Process System
FEP	Waste Feed Evaporation Process System
TLP	Treated LAW Evaporation Process System
TCP	Treated LAW Concentrate Storage Process System
HLP	HLW Lag Storage and Feed Blending Process System
UFP	Ultrafiltration Process System
CXP	Cesium Ion Exchange Process System
CNP	Cesium Nitric Acid Recovery Process System
TXP	Technetium Ion Exchange Process System
TEP	Technetium Eluant Recovery Process System
RDP	Spent Resin Collection and Dewatering Process System
PIH	Pretreatment In-Cell Handling System
RWH	Radioactive Solid Waste Handling System
RLD	Radioactive Liquid Waste Disposal System
PVP	Pretreatment Vessel Vent Process System
PWD	Plant Wash and Disposal System
PVV	Process Vessel Vent System
Low-Activity Waste Systems	
RWH	Radioactive Solid Waste Handling System
RLD	Radioactive Liquid Waste Disposal System
LCP	LAW Concentrate Receipt Process System
LFP	LAW Melter Feed Process System
LMP	LAW Melter Process System
LOP	LAW Primary Offgas Process System
LVP	LAW Secondary Offgas/Vessel Vent Process System
LSH	LAW Melter Equipment Support Handling System
LPH	LAW Container Pour Handling System
LFH	LAW Container Finishing Handling System

High-Level Waste Systems	
PJV	Pulse-Jet Ventilation System
HCP	HLW Cave Receipt Process System
HFP	HLW Melter Feed Process System
HMP	HLW Melter Process System
HOP	Melter Offgas Treatment Process System
HSB	HLW Melter Cave Support Handling System
HFH	HLW Filter Cave Handling System
HPH	HLW Canister Pour Handling System
HDH	HLW Canister Decontamination Handling System
HMH	HLW Melter Handling System
RWH	Radioactive Solid Waste Handling System
RLD	Radioactive Liquid Waste Disposal System
Balance of Facilities Systems	
RWH	Radioactive Solid Waste Handling System
RLD	Radioactive Liquid Waste Disposal System

**Attachment 51 – Appendix 3.0
Drawing Categories**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

FACILITY (Civil, Structural, & Architectural)

Detail Drawings
Finish Schedules
Floor Plans, Elevations
Penetration Seals
Circulating Water
Civil Drawings
Concrete Drawings
Embed & Penetration
Liner Plate
Site Plan Civil
Yard/Underground Piping

SYSTEM (Controls)

Computer I/O
Vendor Documents

FACILITY (Controls)

Instrument Location

SYSTEM (Electrical)

Cathodic Protection
Single Line
Diesel Generator Load List

FACILITY (Electrical)

None

SYSTEM (Mechanical)

Equipment List
Flow Diagrams
Energy Balances
Piping & Instrumentation Diagrams
Mechanical Systems Assemblies
Heavy Load Path Drawings

FACILITY (HVAC)

Ventilation & Instrumentation Diagrams
Performance/Installation Specifications
System Description

Vendor Drawings

FACILITY (Plant Design)

Equipment Location
General Arrangement/Plot Plan
Piping Isometrics
Piping Orthographics
Piping Supports (Incl. Steel)
Plumbing and Drains
Pipe Specifications
Piping Class Sheets

SYSTEM (Fire Protection)

Fire Barrier/Zone Drawings
Fire Protection General Layout
Fire Alarm General Layout

SYSTEM (Process)

Hydrotest Diagrams
Line Designation Tables
Material Balance
Process Equipment Datasheets
Process Flow Diagrams
Utility Flow Diagram

FACILITY (Mechanical Handling)

Mechanical Flow Drawings
Mechanical Sequence Diagram
Design Proposal Drawing
Equipment General Arrangement
Equipment Detail Drawings

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**Attachment 51 – Appendix 4.0
Piping Material Index Table**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional appendices will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 4.0
Piping Material Index Table**

The following drawings have been incorporated into Appendix 4.0 and can be viewed at the Ecology Richland Office.

Drawing Number	Description
24590-WTP-PER-PL-02-001, Rev 5	Piping Material Index Table
RESERVED	RESERVED

**Attachment 51 – Appendix 5.0
P&ID Symbols and Legends**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Attachment 51 – Appendix 5.0
WTP Common
P&ID Symbols and Legends

The following drawings have been incorporated into Appendix 7.5 and can be viewed at the Ecology Richland Office.

Drawing/Document Number	Description
24590-WTP-M6-50-P0001, Rev 1	P&ID Symbols and Legend
24590-WTP-M6-50-P0002, Rev 1	P&ID Symbols and Legend
24590-WTP-M6-50-P0003, Rev 1	P&ID Symbols and Legend
24590-WTP-M6-50-P0004, Rev 1	P&ID Symbols and Legend
24590-WTP-M6-50-P0005, Rev 1	P&ID Symbols and Legend
24590-WTP-M6-50-P0006, Rev 1	P&ID Symbols and Legend
RESERVED	RESERVED

**Attachment 51 – Appendix 6.0
Risk Assessment**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

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Attachment 51 – Appendix 7.5
WTP Common
Civil, Structural, and Architectural Criteria and Typical Design Details

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

Attachment 51 – Appendix 7.5
Drawings and Documents
WTP Common
Civil, Structural, and Architectural Criteria and Typical Design Details

The following drawings have been incorporated into Appendix 7.5 and can be viewed at the Ecology Richland Office.

Drawing/Document Number	Description
24590-WTP-PER-PS-02-001, Rev 4	Ancillary Equipment Pipe Support Design
24590-WTP-PER-CSA-02-001, Rev 3	Secondary Containment Design
24590-WTP-PER-J-02-001, Rev 4	Leak Detection – Sump Level Measurement in Secondary Containment Systems
24590-WTP-PER-J-02-002, Rev 1	Leak Detection in Secondary Containment for Buried Transfer Lines
24590-WTP-PER-CSA-02-001, Rev 4	Secondary Containment Design
RESERVED	RESERVED

**Attachment 51 – Appendix 7.7
WTP Common
Specifications**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 7.7
Drawings and Documents
WTP Common
Specifications**

The following drawings have been incorporated into Appendix 7.7 and can be viewed at the Ecology Richland Office.

<i>Drawing/Document Number</i>	<i>Description</i>
24590-WTP-3PS-MV00-TP002, Rev 1	Specifications
24590-WTP-3PS-MV00-TP003, Rev 1	Specifications
24590-WTP-3PS-G000-TP002, Rev 1	Specifications
24590-WTP-3PS-MCE0-TP002, Rev 1	Specifications
24590-WTP-3PS-MPC0-TP002, Rev 1	Specifications
24590-WTP-3PS-MTF5-TP001, Rev 0	Specifications
24590-WTP-3PS-MPC0-TP001, Rev 0	Specifications
24590-WTP-3PS-PX04-TP001, Rev 0	Specifications
24590-WTP-3PS-MV00-TP001, Rev 1	Specifications
24590-WTP-PEN-ENV-03-001	Equivalency Notice for MV00-TP001
24590-WTP-PEN-ENV-03-002	Equivalency Notice for MV00-TP001
24590-WTP-3PS-MKE0-TP001, Rev 0	Specifications
24590-WTP-3PS-AFPS-TP006, Rev 0	Specifications Protective Coatings
24590-WTP-PER-M-02-002, Rev 0	System Logic Description
24590-WTP-3PS-MPVS-TP001, Rev 1	Submersible Centrifugal Sump Pumps
24590-WTP-3PS-MES0-TP001, Rev 1	Specifications
24590-WPT-3PS-MACS-TP004, Rev 0	Engineering Specification for High Pressure Centrifugal Blowers
RESERVED	RESERVED

**Attachment 51 – Appendix 7.9
WTP Common
Material Selection Documentation**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 7.9
Drawings and Documents
WTP Common
Material Selection Documentation**

The following drawings have been incorporated into Appendix 7.9 and can be viewed at the Ecology Richland Office.

<i>Drawing/Document Number</i>	<i>Description</i>
24590-WTP-PER-M-02-001, Rev 3	Secondary Containment/Leak Detection Material Selection
24590-WTP-PER-M-02-002, Rev 0	Ancillary Equipment Material Selection Data Sheet
24590-WTP-3PS-G000-TP002, Rev 2	Specifications for Positive Material Identification
RESERVED	RESERVED

**Attachment 51 – Appendix 7.12
WTP Common
Installation Plans**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 7.12
Drawings and Documents
WTP Common
Installation Plans**

The following drawings have been incorporated into Appendix 7.12 and can be viewed at the Ecology Richland Office.

<i>Drawing/Document Number</i>	<i>Description</i>
24590-WTP-PER-CON-02-001, Rev 2	Installation of Tank Systems
RESERVED	RESERVED

**Attachment 51 – Appendix 7.15
WTP Common
Operating Documents**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 7.15
Drawings and Documents
WTP Common
Operating Documents**

The following drawings/documents have been incorporated into Appendix 7.15 and can be viewed at the Ecology Richland Office.

<i>Drawing/Document Number</i>	<i>Description</i>
24590-WTP-PER-HV-02-001, Rev 1	Fugitive Emissions Control Description
24590-WTP-RPT-PR-02-004, Rev A	Description of Prevention of Toxic Emissions from Tank Systems
24590-WTP-PER-M-02-005, Rev 1	Description for Access for Conducting Integrity Assessments
RESERVED	RESERVED

**Attachment 51 – Appendix 7.18
WTP Common
Operating Documents**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 7.18
Drawings and Documents
WTP Common
Operating Documents**

The following drawings have been incorporated into Appendix 7.18 and can be viewed at the Ecology Richland Office.

<i>Drawing/Document Number</i>	<i>Description</i>
24590-WTP-PER-M-02-005, Rev 1	Description for Access for Conducting Integrity Assessments
RESERVED	RESERVED

**Attachment 51 – Appendix 8.1
Pretreatment Building
Process Flow Diagrams**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 8.1
Drawings and Documents
Pretreatment Building
Process Flow Diagrams**

The following drawings have been incorporated into Appendix 8.1 and can be viewed at the Ecology Richland Office.

Drawing/Document Number	Description
24590-PTF-M5-V17T-P0003, Rev 0	Process Flow Diagram
24590-PTF-M5-V17T-P0006, Rev 0	Process Flow Diagram
24590-PTF-M5-V17T-P0007, Rev 0	Process Flow Diagram
24590-PTF-M5-V17T-P0008, Rev 0	Process Flow Diagram
24590-PTF-M5-V17T-P0009, Rev 0	Process Flow Diagram
24590-PTF-M5-V17T-P0010, Rev 0	Process Flow Diagram
24590-PTF-M5-V17T-P0011, Rev 0	Process Flow Diagram
24590-PTF-PEN-ENV-04-001	Equivalency Notice for V17T-P0008, Rev 0
24590-PTF-M5-V17T-P0004001, Rev 0	Process Flow Diagram
24590-PTF-M5-V17T-P0004002, Rev 0	Process Flow Diagram
24590-PTF-M5-V17T-P0005, Rev 0	Process Flow Diagram
24590-PTF-M5-V17T-P0022003, Rev 0	Process Flow Diagram
24590-PTF-M5-V17T-P0022004, Rev 0	Process Flow Diagram
24590-PTF-M5-V17T-P0022001, Rev 0	Process Flow Diagram
24590-PTF-M5-V17T-P0022002, Rev 2	Process Flow Diagram
RESERVED	RESERVED

**Attachment 51 – Appendix 8.2
Pretreatment Building
Piping and Instrumentation Diagrams**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 8.2
Drawings and Documents
Pretreatment Building
Piping and Instrumentation Diagrams**

The following drawings have been incorporated into Appendix 8.2 and can be viewed at the Ecology Richland Office.

Drawing/Document Number	Description
24590-PTF-M6-PWD-P0002, Rev 2	Piping and Instrumentation Diagram
24590-PTF-M6-PWD-P0012, Rev 1	Piping and Instrumentation Diagram
24590-PTF-M6-PWD-P0041, Rev 1	Piping and Instrumentation Diagram
24590-PTF-M6-PWD-P0043, Rev 1	Piping and Instrumentation Diagram
24590-PTF-M6-FRP-P0001, Rev 0	Piping and Instrumentation Diagram
24590-PTF-M6-FRP-P0002, Rev 0	Piping and Instrumentation Diagram
24590-PTF-M6-FRP-P0003, Rev 0	Piping and Instrumentation Diagram
24590-PTF-M6-FRP-P0005, Rev 0	Piping and Instrumentation Diagram
24590-PTF-M6-FRP-P0006, Rev 0	Piping and Instrumentation Diagram
24590-PTF-M6-FRP-P0007, Rev 0	Piping and Instrumentation Diagram
24590-PTF-M6-FRP-P0008, Rev 0	Piping and Instrumentation Diagram
24590-PTF-M6-FRP-P0009, Rev 0	Piping and Instrumentation Diagram
24590-PTF-M6-FRP-P0010, Rev 0	Piping and Instrumentation Diagram
24590-PTF-M6-PWD-P0057, Rev 0	Piping and Instrumentation Diagrams
24590-PTF-M6-PWD-P0058, Rev 0	Piping and Instrumentation Diagrams
24590-PTF-M6-HLP-P0001, Rev 1	Piping and Instrumentation Diagrams
24590-PTF-M6-HLP-P0002, Rev 1	Piping and Instrumentation Diagrams
24590-PTF-M6-HLP-P0003, Rev 1	Piping and Instrumentation Diagrams
24590-PTF-M6-HLP-P0005, Rev 0	Piping and Instrumentation Diagrams
24590-PTF-M6-HLP-P0006, Rev 0	Piping and Instrumentation Diagrams
24590-PTF-M6-HLP-P0007, Rev 0	Piping and Instrumentation Diagrams
24590-PTF-M6-HLP-P0009, Rev 0	Piping and Instrumentation Diagrams
24590-PTF-M6-HLP-P0010, Rev 0	Piping and Instrumentation Diagrams
24590-PTF-PEN-ENV-04-002	Equivalency Notice for HLP-P0001, Rev 1
24590-PTF-PEN-ENV-04-003	Equivalency Notice for HLP-P0003, Rev 1
24590-PTF-PEN-ENV-04-004	Equivalency Notice for HLP-P0010, Rev 1
24590-PTF-M6-TCP-P0001, Rev 0	Piping and Instrumentation Diagrams
24590-PTF-M6-TCP-P0002, Rev 0	Piping and Instrumentation Diagrams
24590-PTF-M6-UFP-P0001, Rev 1	Piping and Instrumentation Diagrams
24590-PTF-M6-UFP-P0002, Rev 0	Piping and Instrumentation Diagrams
24590-PTF-M6-UFP-P0003, Rev 0	Piping and Instrumentation Diagrams
24590-PTF-M6-UFP-P0004, Rev 1	Piping and Instrumentation Diagrams
24590-PTF-M6-UFP-P0006, Rev 0	Piping and Instrumentation Diagrams
24590-PTF-M6-UFP-P0008, Rev 0	Piping and Instrumentation Diagrams
24590-PTF-M6-UFP-P0009, Rev 0	Piping and Instrumentation Diagrams
24590-PTF-M6-UFP-P0010, Rev 0	Piping and Instrumentation Diagrams
24590-PTF-M6-UFP-P0011, Rev 0	Piping and Instrumentation Diagrams
24590-PTF-M6-UFP-P0013, Rev 0	Piping and Instrumentation Diagrams
24590-PTF-M6-UFP-P0015, Rev 0	Piping and Instrumentation Diagrams
24590-PTF-M6-UFP-P0016, Rev 0	Piping and Instrumentation Diagrams
24590-PTF-M6-UFP-P0017, Rev 0	Piping and Instrumentation Diagrams
24590-PTF-M6-FEP-P0001, Rev 0	Piping & Instrumentation Diagrams

Drawing/Document Number	Description
24590-PTF-M6-FEP-P0002, Rev 0	Piping & Instrumentation Diagrams
24590-PTF-M6-FEP-P0003, Rev 0	Piping & Instrumentation Diagrams
24590-PTF-M6-FEP-P0004, Rev 0	Piping & Instrumentation Diagrams
24590-PTF-M6-FEP-P0005, Rev 0	Piping & Instrumentation Diagrams
24590-PTF-M6-FEP-P0006, Rev 0	Piping & Instrumentation Diagrams
24590-PTF-M6-FEP-P0007, Rev 0	Piping & Instrumentation Diagrams
24590-PTF-M6-FEP-P0008, Rev 0	Piping & Instrumentation Diagrams
24590-PTF-M6-TLP-P0001, Rev 0	Piping & Instrumentation Diagrams
24590-PTF-M6-TLP-P0002, Rev 0	Piping & Instrumentation Diagrams
24590-PTF-M6-TLP-P0003, Rev 0	Piping & Instrumentation Diagrams
24590-PTF-M6-TLP-P0005, Rev 0	Piping & Instrumentation Diagrams
24590-PTF-M6-TLP-P0006, Rev 0	Piping & Instrumentation Diagrams
24590-PTF-M6-TLP-P0007, Rev 0	Piping & Instrumentation Diagrams
24590-PTF-M6-RLD-P0001, Rev 0	Piping & Instrumentation Diagrams
24590-PTF-M6-RLD-P0002, Rev 0	Piping & Instrumentation Diagrams
24590-PTF-M6-RLD-P0003, Rev 0	Piping & Instrumentation Diagrams
24590-PTF-M6-RLD-P0004, Rev 0	Piping & Instrumentation Diagrams
24590-PTF-M6-RLD-P0006, Rev 0	Piping & Instrumentation Diagrams
24590-PTF-M6-PWD-P0001, Rev 0	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0002, Rev 2	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0003, Rev 0	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0005, Rev 0	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0006, Rev 0	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0007, Rev 0	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0008, Rev 0	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0009, Rev 0	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0010, Rev 0	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0011, Rev 0	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0012, Rev 2	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0014, Rev 0	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0018, Rev 0	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0019, Rev 0	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0020, Rev 0	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0021, Rev 0	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0023, Rev 0	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0024, Rev 0	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0025, Rev 0	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0026, Rev 0	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0029, Rev 0	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0033, Rev 0	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0034, Rev 0	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0041, Rev 2	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0043, Rev 2	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0044, Rev 0	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0046, Rev 0	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0050, Rev 0	Piping and Instrumentation Drawings
24590-PTF-M6-PWD-P0051, Rev 0	Piping and Instrumentation Drawings
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**Attachment 51 – Appendix 8.4
Pretreatment Building
General Arrangement Drawings**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 8.4
Drawings and Documents
Pretreatment Building
General Arrangement Drawings**

The following drawings have been incorporated into Appendix 8.4 and can be viewed at the Ecology Richland Office.

Drawing/Document Number	Description
24590-PTF-P1-P01T-P0001, Rev 3	General Arrangement Plans
24590-PTF-P1-P01T-P0002, Rev 2	General Arrangement Plans
24590-PTF-P1-P01T-P0003, Rev 0	General Arrangement Plans
24590-PTF-P1-P01T-P0006, Rev 2	General Arrangement Plans
24590-PTF-P1-P01T-P0007, Rev 4	General Arrangement Sections
24590-PTF-P1-P01T-P0008, Rev 4	General Arrangement Sections
24590-PTF-P1-P01T-P0009, Rev 7	General Arrangement Sections
24590-PTF-P1-P01T-P0010, Rev 4	General Arrangement Sections
24590-PTF-P1-P01T-P0011, Rev 5	General Arrangement Sections
24590-PTF-P1-P01T-P0012, Rev 5	General Arrangement Sections
24590-PTF-P1-P01T-P0013, Rev 4	General Arrangement Sections
24590-PTF-P1-P01T-P0014, Rev 6	General Arrangement Sections
24590-PTF-P1-P01T-P0015, Rev 6	General Arrangement Sections
24590-PTF-P1-P01T-P0016, Rev 4	General Arrangement Sections
24590-PTF-P1-P01T-P0017, Rev 4	General Arrangement Sections
RESERVED	RESERVED

Attachment 51 – Appendix 8.5
Pretreatment Building
Civil, Structural, and Architectural Criteria and Typical Design Details

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

See Appendix 7.5 for civil, structural, and architectural criteria and typical design details common to the Pretreatment, LAW, HLW, and Laboratory buildings.

**Attachment 51 – Appendix 8.5
Drawings and Documents
Pretreatment Building**

Civil, Structural, and Architectural Criteria and Typical Design Details

The following drawings have been incorporated into Appendix 8.5 and can be viewed at the Ecology Richland Office.

Drawing/Document Number	Description
24590-PTF- PER-M-02-006, Rev 5	Sump Data for PTF Facility
24590-PTF- PER-M-03-002, Rev 0	Sump and Drain Data, 28 ft Elev
24590-PTF-PER-M-04-002, Rev 0	Sump & Drain Data at 56 ft. Level for PTF
RESERVED	RESERVED

**Attachment 51 – Appendix 8.6
Pretreatment Building
Mechanical Drawings**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 8.6
Drawings and Documents
Pretreatment Building
Mechanical Drawings**

The following drawings have been incorporated into Appendix 8.6 and can be viewed at the Ecology Richland Office.

Drawing/Document Number	Description
24590-PTF-MV-PWD-P0005, Rev 1	Mechanical Drawings
24590-PTF-MV-PWD-P0001001, Rev 1	Mechanical Drawings
24590-PTF-MV-PWD-P0001002, Rev 1	Mechanical Drawings
24590-PTF-MV-PWD-P0003001, Rev 1	Mechanical Drawings
24590-PTF-MV-PWD-P0003002, Rev 1	Mechanical Drawings
24590-PTF-MVD-PWD-P0001, Rev 1	Mechanical Data Sheets
24590-PTF-MVD-PWD-P0003, Rev 1	Mechanical Data Sheets
24590-PTF-MVD-PWD-P0010, Rev 1	Mechanical Data Sheets
24590-PTF-MV-HLP-P0003, Rev 0	Mechanical Data Sheets
24590-PTF-MV-HLP-P0004, Rev 0	Mechanical Data Sheets
24590-PTF-MV-HLP-P0005, Rev 0	Mechanical Data Sheets
24590-PTF-MV-HLP-P0006, Rev 0	Mechanical Data Sheets
24590-PTF-MVD-HLP-P0006, Rev 1	Mechanical Data Sheets
24590-PTF-MVD-HLP-P0007, Rev 1	Mechanical Data Sheets
24590-PTF-MVD-HLP-P0008, Rev 1	Mechanical Data Sheets
24590-PTF-MVD-HLP-P0009, Rev 1	Mechanical Data Sheets
24590-PTF-MV-TCP-P0002, Rev 0	Mechanical Data Sheets
24590-PTF-MVD-TCP-P0002, Rev 1	Mechanical Data Sheets
24590-PTF-MV-UFP-P0001, Rev 0	Mechanical Data Sheets
24590-PTF-MV-UFP-P0002, Rev 0	Mechanical Data Sheets
24590-PTF-MV-UFP-P0003, Rev 0	Mechanical Data Sheets
24590-PTF-MV-UFP-P0004, Rev 0	Mechanical Data Sheets
24590-PTF-MV-UFP-P0005, Rev 0	Mechanical Data Sheets
24590-PTF-MV-UFP-P0006, Rev 0	Mechanical Data Sheets
24590-PTF-MV-UFP-P0007, Rev 0	Mechanical Data Sheets
24590-PTF-MLD-UFP-P0007, Rev 1	Mechanical Data Sheets
24590-PTF-MVD-UFP-P0001, Rev 0	Mechanical Data Sheets
24590-PTF-MVD-UFP-P0002, Rev 0	Mechanical Data Sheets
24590-PTF-MVD-UFP-P0005, Rev 0	Mechanical Data Sheets
24590-PTF-MVD-UFP-P0006, Rev 0	Mechanical Data Sheets
24590-PTF-MVD-UFP-P0007, Rev 0	Mechanical Data Sheets
24590-PTF-MVD-UFP-P0014, Rev 0	Mechanical Data Sheets
24590-PTF-MVD-UFP-P0015, Rev 0	Mechanical Data Sheets
24590-PTF-MV-FEP-P0001, Rev 0	Equipment Assembly Drawings
24590-PTF-MV-FEP-P0002, Rev 0	Equipment Assembly Drawings
24590-PTF-MV-TLP-P0001, Rev 0	Mechanical Drawings
24590-PTF-MV-TLP-P0002, Rev 0	Mechanical Drawings
24590-PTF-MVD-TLP-P0001, Rev 1	Mechanical Data Sheets
24590-PTF-MVD-TLP-P0002, Rev 1	Mechanical Data Sheets
24590-PTF-MVD-TLP-P0004, Rev 0	Mechanical Data Sheets
24590-PTF-MV-RLD-P0001, Rev 0	Equipment Assembly Drawings
24590-PTF-MV-RLD-P0002, Rev 0	Equipment Assembly Drawings

Drawing/Document Number	Description
24590-PTF-MVD-RLD-P0005, Rev 1	Mechanical Data Sheets
24590-PTF-MVD-RLD-P0006, Rev 1	Mechanical Data Sheets
24590-PTF-MV-PWD-P0006, Rev 1	Equipment Assembly Drawings
24590-PTF-MV-PWD-P0007, Rev 1	Equipment Assembly Drawings
24590-PTF-MV-PWD-P0010, Rev 1	Equipment Assembly Drawings
24590-PTF-MVD-PWD-P0002, Rev 1	Mechanical Data Sheets
24590-PTF-MVD-PWD-P0011, Rev 1	Mechanical Data Sheets
24590-PTF-MVD-PWD-P0012, Rev 1	Mechanical Data Sheets
24590-PTF-MED-FEP-P0003, Rev 0	Mechanical Data Sheets
24590-PTF-MED-FEP-P0004, Rev 0	Mechanical Data Sheets
24590-PTF-MED-FEP-P0005, Rev 0	Mechanical Data Sheets
24590-PTF-MED-FEP-P0006, Rev 0	Mechanical Data Sheets
24590-PTF-MED-FEP-P0007, Rev 0	Mechanical Data Sheets
24590-PTF-MED-FEP-P0008, Rev 0	Mechanical Data Sheets
24590-PTF-MED-FEP-P0009, Rev 0	Mechanical Data Sheets
24590-PTF-MED-FEP-P0010, Rev 0	Mechanical Data Sheets
24590-PTF-MVD-FEP-P0006, Rev 0	Mechanical Data Sheets
24590-PTF-MVD-FEP-P0007, Rev 0	Mechanical Data Sheets
24590-PTF-MED-TLP-P0001, Rev 0	Mechanical Data Sheets
24590-PTF-MED-TLP-P0002, Rev 0	Mechanical Data Sheets
24590-PTF-MED-TLP-P0003, Rev 0	Mechanical Data Sheets
24590-PTF-MED-TLP-P0004, Rev 0	Mechanical Data Sheets
24590-PTF-MVD-TLP-P0005, Rev 0	Mechanical Data Sheets
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**Attachment 51 – Appendix 8.7
Pretreatment Building
Specifications**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 8.7
Drawings and Documents
Pretreatment Building
Specifications**

The following drawings have been incorporated into Appendix 8.7 and can be viewed at the Ecology Richland Office. See Appendix 7.7 for specification documents common to the Pretreatment, LAW, HLW, and Laboratory buildings.

Drawing/Document Number	Description
24590-PTF-3PS-MLFP-TP001, Rev 1	Specifications
24590-PTF-3PS-MEVV-TP001, Rev 1	Specifications
24590-WTP-PEN-ENV-04-0001, Rev N/A	Equivalency Notice
24590-PTF-MVD-FEP-P0001, Rev 1	Specifications
24590-PTF-MVD-FEP-P0002, Rev 1	Specifications
24590-PTF-MVD-FEP-P0003, Rev 1	Specifications
RESERVED	RESERVED

**Attachment 51 – Appendix 8.8
Pretreatment Building
Engineering Calculations**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 8.8
Drawings and Documents
Pretreatment Building
Engineering Calculations**

The following drawings have been incorporated into Appendix 8.8 and can be viewed at the Ecology Richland Office.

Drawing/Document Number	Description
24590-PTF-PER-M-02-005, Rev 7	Flooding Volume Calculations for PTF
24590-QL-SRA-MTF5-00001-01-01, Rev 00D	Tank Structural Support Calculations
24590-QL-SRA-MTF5-00001-01-02, Rev 00D	Tank Structural Support Calculations
24590-QL-SRA-MTF5-00001-06-31, Rev 00D	Tank Structural Support Calculations
24590-QL-SRA-MTF5-00001-06-32, Rev 00A	Tank Structural Support Calculations
24590-QL-SRA-MTF5-00001-30-01, Rev 00C	Tank Structural Support Calculations
24590-QL-SRA-MTF5-00001-30-02, Rev 00C	Tank Structural Support Calculations
24590-QL-SRA-MTF5-00001-30-03, Rev 00C	Tank Structural Support Calculations
24590-QL-SRA-MTF5-00001-30-04, Rev 00C	Tank Structural Support Calculations
24590-QL-SRA-MTF5-00001-30-05, Rev 00C	Tank Structural Support Calculations
24590-QL-SRA-MTF5-00001-30-06, Rev 00C	Tank Structural Support Calculations
24590-QL-SRA-MTF5-00001-30-07, Rev 00C	Tank Structural Support Calculations
24590-QL-SRA-MTF5-00001-31-01, Rev 00C	Tank Structural Support Calculations
24590-PTF-PER-M-03-001 Rev 0	Flooding Volume Calculation 28 ft Elev
24590-PTF-PER-M-04-001, Rev 0	Flooding Volume for 56 ft. Level in PTF
RESERVED	RESERVED

**Attachment 51 – Appendix 8.9
Pretreatment Building
Material Selection Documentation**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

Attachment 51 – Appendix 8.9
Drawings and Documents
Pretreatment Building
Material Selection Documentation

The following drawings have been incorporated into Appendix 8.9 and can be viewed at the Ecology Richland Office. See Appendix 7.9 for operating documents common to the Pretreatment, LAW, HLW, and Laboratory buildings.

Drawing/Document Number	Description
24590-PTF-N1D-FRP-P0001, Rev 0	Vessel/Tank Material Selection Data Sheets
24590-PTF-N1D-PWD-P0002, Rev 1	Vessel/Tank Material Selection Data Sheets
24590-PTF-N1D-PWD-P0005, Rev 1	Vessel/Tank Material Selection Data Sheets
24590-PTF-N1D-PWD-P0006, Rev 1	Vessel/Tank Material Selection Data Sheets
24590-WTP-PER-M-02-001, Rev 2	Secondary Containment/Leak Detection Material Selection
24590-PTF-N1D-HLP-P0001, Rev 0	Vessel/Tank Material Selection Data Sheets
24590-PTF-N1D-HLP-P0003, Rev 0	Vessel/Tank Material Selection Data Sheets
24590-PTF-N1D-HLP-P0007, Rev 1	Vessel/Tank Material Selection Data Sheets
24590-PTF-N1D-HLP-P0010, Rev 1	Vessel/Tank Material Selection Data Sheets
24590-PTF-N1D-TCP-P0001, Rev 0	Vessel/Tank Material Selection Data Sheets
24590-PTF-N1D-UFP-P0001, Rev 0	Vessel/Tank Material Selection Data Sheets
24590-PTF-N1D-UFP-P0002, Rev 0	Vessel/Tank Material Selection Data Sheets
24590-PTF-N1D-UFP-P0003, Rev 0	Vessel/Tank Material Selection Data Sheets
24590-PTF-N1D-UFP-P0004, Rev 1	Vessel/Tank Material Selection Data Sheets
24590-PTF-N1D-UFP-P0005, Rev 0	Vessel/Tank Material Selection Data Sheets
24590-PTF-N1D-UFP-P0008, Rev 0	Vessel/Tank Material Selection Data Sheets
24590-PTF-N1D-FEP-P0002, Rev 0	Material Data Sheet
24590-PTF-N1D-FEP-P0003, Rev 0	Material Data Sheet
24590-PTF-N1D-TLP-P0001, Rev 0	Material Selection Data Sheet
24590-PTF-N1D-TLP-P0006, Rev 0	Material Selection Data Sheet
24590-PTF-N1D-RLD-P0002, Rev 0	Vessel/Tank Material Selection Data Sheet
24590-PTF-N1D-PWD-P0001, Rev 0	Plant Item Material Selection Data Sheet
24590-PTF-N1D-PWD-P0003, Rev 0	Plant Item Material Selection Data Sheet
24590-PTF-N1D-PWD-P0007, Rev 0	Plant Item Material Selection Data Sheet
24590-PTF-N1D-PWD-P0008, Rev 0	Plant Item Material Selection Data Sheet
24590-PTF-N1D-FEP-P0007, Rev 0	Material Selection Data Sheet
24590-PTF-N1D-FEP-P0008, Rev 0	Material Selection Data Sheet
24590-PTF-N1D-FEP-P0009, Rev 0	Material Selection Data Sheet
24590-PTF-N1D-FEP-P0010, Rev 0	Material Selection Data Sheet
24590-PTF-N1D-FEP-P0013, Rev 0	Material Selection Data Sheet
24590-PTF-N1D-TLP-P0002, Rev 0	Material Selection Data Sheet
24590-PTF-N1D-TLP-P0003, Rev 0	Material Selection Data Sheet
24590-PTF-N1D-TLP-P0005, Rev 0	Material Selection Data Sheet
24590-PTF-N1D-TLP-P0011, Rev 0	Material Selection Data Sheet
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**Attachment 51 – Appendix 8.11
Pretreatment Building
IQRPE Reports**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 8.11
Drawings and Documents
Pretreatment Building
IQRPE Reports**

The following drawings have been incorporated into Appendix 8.11 and can be viewed at the Ecology Richland Office.

Drawing/Document Number	Description
24590-CM-HC4-HXYG-00138-01-02, Rev 00C	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-01-07, Rev 00B	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-01-01	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-01-13, Rev 00A	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-01-15, Rev 00A	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-01-18, Rev 00A	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-01A, Rev A	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-02, Rev 00A	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-10, Rev 00A	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-04, Rev 00A	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-06, Rev 00A	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-09, Rev 00A	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-05, Rev 00A	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-00020, Rev 00A	IQRP Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-00023, Rev 00A	IQRP Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-00015, Rev 00A	IQRP Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-00014, Rev A	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-00019, Rev 00A	IQRP Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-00021, Rev 00A	IQRP Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-00017, Rev 00A	IQRP Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-00013, Rev 00A	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-00022, Rev 00A	IQRPE Independent Assessment Report
RESERVED	RESERVED

**Attachment 51 – Appendix 8.13
Pretreatment Building
Instrument Control Logic and Narrative Descriptions**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 8.13
Drawings and Documents
Pretreatment Building
Instrument Control Logic and Narrative Descriptions**

The following drawings have been incorporated into Appendix 8.13 and can be viewed at the Ecology Richland Office.

Drawing/Document Number	Description
24590-PTF-PER-J-02-001, Rev 1	System Logic Description for Plant Wash and Disposal (PWD) System
24590-PTF-PER-J-02-002, Rev 1	System Logic Description for Feed Receipt Process (FRP) System
24590-PTF-PER-J-02-004, Rev 0	System Logic Description for Ultrafiltration (UPF) System
24590-PTF-PER-J-02-006, Rev 0	System Logic Description for Lag Storage/Feed (HLP) System
24590-PTF-PER-J-02-012, Rev 0	System Logic Description for TCP System
24590-PTF-PER-J-02-003, Rev 2	Specifications
24590-PTF-PER-J-02-010, Rev 0	System Logic Description
24590-PTF-PER-J-03-001, Rev 0	System Logic Description
24590-PTF-PER-J-03-004, Rev 0	System Logic Description for PTF – Plant wash & Disposal PWD System
RESERVED	RESERVED

**Attachment 51 – Appendix 9.1
Low Activity Waste Building
Process Flow Diagrams**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 9.1
Drawings and Documents
Low Activity Waste Building
Process Flow Diagrams**

The following drawings have been incorporated into Appendix 9.1 and can be viewed at the Ecology Richland Office.

Drawing/Document Number	Description
24590-LAW-M5-V17T-P0014, Rev 1	Process Flow Diagram
24590-LAW-M5-V17T-P0007, Rev 0	Process Flow Diagram
24590-LAW-M5-V17T-P0008, Rev 0	Process Flow Diagram
24590-LAW-M5-V17T-P0001, Rev 1	Process Flow Diagram
24590-LAW-M5-V17T-P0002, Rev 0	Process Flow Diagram
RESERVED	RESERVED

**Attachment 51 – Appendix 9.2
Low Activity Waste Building
Piping and Instrumentation Diagrams**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 9.2
Drawings and Documents
Low Activity Waste Building
Piping and Instrumentation Diagrams**

The following drawings have been incorporated into Appendix 9.2 and can be viewed at the Ecology Richland Office.

Drawing/Document Number	Description
24590-LAW-M6-RLD-P0002, Rev 2	Piping and Instrumentation Diagram
24590-LAW-M6-LCP-P0001, Rev 1	Piping and Instrumentation Diagram
24590-LAW-M6-RLD-P0001, Rev 1	Piping and Instrumentation Diagram
24590-LAW-M6-RLD-P0003, Rev 0	Piping and Instrumentation Diagram
24590-LAW-M6-LVP-P0002, Rev 0	Piping and Instrumentation Diagram
24590-LAW-M6-LOP-P0001, Rev 0	Piping and Instrumentation Diagram
24590-LAW-M6-LOP-P0002, Rev 0	Piping and Instrumentation Diagram
24590-LAW-M6-LCP-P0002, Rev 0	Piping and Instrumentation Diagram
24590-WTP-PEN-ENV-03-003	Equivalency Notice for P&IDs
24590-LAW-M6-LFP-P0001, Rev 0	Piping and Instrumentation Diagram
24590-LAW-M6-LFP-P0003, Rev 0	Piping and Instrumentation Diagram
RESERVED	RESERVED

**Attachment 51 – Appendix 9.4
Low Activity Waste Building
General Arrangement Drawings**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 9.4
Drawings and Documents
Low Activity Waste Building
General Arrangement Drawings**

The following drawings have been incorporated into Appendix 9.4 and can be viewed at the Ecology Richland Office.

Drawing/Document Number	Description
24590-LAW-P1-P01T-P0001, Rev 2	General Arrangement Plan (EI -21')
24590-LAW-P1-P01T-P0002, Rev 3	General Arrangement Plan (EI 3')
24590-LAW-P1-P01T-P0008, Rev 3	General Arrangement Sections D-D, E-E, F-F
24590-LAW-P1-P01T-P0003, Rev 0	General Arrangement Plans
24590-LAW-P1-P01T-P0004, Rev 0	General Arrangement Plans
24590-LAW-P1-P01T-P0007, Rev 5	General Arrangement Sections
24590-LAW-P1-P01T-P0009, Rev 5	General Arrangement Sections
24590-LAW-P1-P01T-P0010, Rev 5	General Arrangement Sections
24590-LAW-P1-P01T-P0011, Rev 1	General Arrangement Sections
RESERVED	RESERVED

**Attachment 51 – Appendix 9.5
Low Activity Waste Building
Civil, Structural, and Architectural Criteria and Typical Design Details**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 9.5
Drawings and Documents
Low Activity Waste Building
Civil, Structural, and Architectural Criteria and Typical Design Details**

The following drawings have been incorporated into Appendix 9.5 and can be viewed at the Ecology Richland Office.

<i>Drawing /Document Number</i>	<i>Description</i>
24590-LAW-DB-S13T-P0003, Rev 0	Concrete Key Plan (El-21')
24590-LAW-DB-S13T-P0007, Rev 0	Concrete Forming Plan Zone 1 (El -21')
24590-LAW-DD-S13T-P0001, Rev 0	Liner Plate Grillage Details
24590-LAW-DD-S13T-P0002, Rev 0	Concrete Embedment C3/C5 (El -21')
24590-LAW-DD-S13T-P0012, Rev 0	C3/C5 Collection Vessel Embed Assembly
24590-LAW-DD-S13T-P0014, Rev 0	24" and 30" Diameter Sump Detail
24590-LAW-DD-S13T-P0015, Rev 0	C3/C5 Bulge Embed Plate/Sleeve Assembly
24590-LAW-DG-S13T-P0001, Rev 0	Reinforcing Steel Key Plan
24590-LAW-DG-S13T-P0005, Rev 0	Bottom Concrete Reinforcing Plan (El -21')
24590-LAW-DG-S13T-P0012, Rev 0	Top Concrete Reinforcing Plan (El -21')
24590-LAW-DG-S13T-P0093, Rev 0	Concrete Reinforcing Sections and Details
24590-LAW-DO-S13T-P0002, Rev 0	General Concrete Notes
Reserved	Reserved

**Attachment 51 – Appendix 9.6
Low Activity Waste Building
Mechanical Drawings**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 9.6
Drawings and Documents
Low Activity Waste Building
Mechanical Drawings**

The following drawings have been incorporated into Appendix 9.6 and can be viewed at the Ecology Richland Office.

Drawing/Document Number	Description
24590-LAW-MV-RLD-P0001, Rev 2	Mechanical Drawing
24590-LAW-MVD-RLD-P0001, Rev 1	Mechanical Data Sheet
24590-LAW-MV-LOP-P0001, Rev 0	Mechanical Drawing
24590-LAW-MV-LOP-P0002, Rev 0	Mechanical Drawing
24590-LAW-MVD-LOP-P0004, Rev 0	Mechanical Data Sheet
24590-LAW-MVD-LOP-P0005, Rev 0	Mechanical Data Sheet
24590-LAW-MV-RLD-P0002, Rev 1	Mechanical Drawing
24590-LAW-MV-RLD-P0003, Rev 1	Mechanical Drawing
24590-LAW-MVD-RLD-P0006, Rev 1	Mechanical Data Sheet
24590-LAW-MVD-RLD-P0007, Rev 2	Mechanical Data Sheet
24590-LAW-MV-LCP-P0001, Rev 0	Mechanical Drawing
24590-LAW-MV-LCP-P0002, Rev 0	Mechanical Drawing
24590-LAW-MVD-LCP-P0004, Rev 0	Mechanical Data Sheet
24590-LAW-MVD-LCP-P0005, Rev 0	Mechanical Data Sheet
24590-LAW-MV-LFP-P0001, Rev 0	Mechanical Drawing
24590-LAW-MV-LFP-P0002, Rev 0	Mechanical Drawing
24590-LAW-MV-LFP-P0004, Rev 0	Mechanical Drawing
24590-LAW-MV-LFP-P0005, Rev 0	Mechanical Drawing
24590-LAW-MVD-LFP-P0007, Rev 0	Mechanical Data Sheet
24590-LAW-MVD-LFP-P0008, Rev 0	Mechanical Data Sheet
24590-LAW-MVD-LFP-P0010, Rev 0	Mechanical Data Sheet
24590-LAW-MVD-LFP-P0011, Rev 0	Mechanical Data Sheet
24590-LAW-MK-LOP-P0001001, Rev 0	Mechanical Drawing
24590-LAW-MK-LOP-P0001002, Rev 0	Mechanical Drawing
24590-LAW-MK-LOP-P0001003, Rev 0	Mechanical Drawing
24590-LAW-MKD-LOP-P0008, Rev 0	Mechanical Data Sheet
RESERVED	RESERVED

**Attachment 51 – Appendix 10.2
Drawings and Documents
High Level Waste Building
Piping and Instrumentation Diagrams**

The following drawings have been incorporated into Appendix 10.2 and can be viewed at the Ecology Richland Office.

Drawing/Document	Description
24590-HLW-M6-HOP-P0004, Rev 1	Piping and Instrumentation Diagram
24590-HLW-M6-HOP-P0006, Rev 1	Piping and Instrumentation Diagram
24590-HLW-M6-HOP-P20004, Rev 0	Piping and Instrumentation Diagram
24590-HLW-M6-HOP-P20006, Rev 0	Piping and Instrumentation Diagram
24590-HLW-M6-HOP-P0003, Rev 0	Piping and Instrumentation Diagram
24590-HLW-M6-HOP-P0008, Rev 0	Piping and Instrumentation Diagram
24590-HLW-M6-HOP-P20003, Rev 0	Piping and Instrumentation Diagram
24590-HLW-M6-HOP-P20008, Rev 0	Piping and Instrumentation Diagram
24590-HLW-M6-RLD-P0001, Rev 0	Piping and Instrumentation Diagram
24590-HLW-M6-RLD-P0002, Rev 0	Piping and Instrumentation Diagram
24590-HLW-M6-HCP-P0001, Rev 0	Piping and Instrumentation Diagram
24590-HLW-M6-HCP-P0002, Rev 0	Piping and Instrumentation Diagram
24590-HLW-M6-HOP-P0001, Rev 0	Piping & Instrumentation Diagrams
24590-HLW-M6-HOP-P20001, Rev 0	Piping & Instrumentation Diagrams
24590-HLW-M6-HOP-P0009, Rev 0	Piping & Instrumentation Diagrams
24590-HLW-M6-HOP-P20009, Rev 0	Piping & Instrumentation Diagrams
24590-HLW-M6-HOP-P0010, Rev 0	Piping & Instrumentation Diagrams
24590-HLW-M6-HOP-P20010, Rev 0	Piping & Instrumentation Diagrams
24590-HLW-M6-HDH-P0001, Rev 0	Piping & Instrumentation Diagrams
24590-HLW-M6-HDH-P0002, Rev 0	Piping & Instrumentation Diagrams
24590-HLW-M6-HDH-P20001, Rev 0	Piping & Instrumentation Diagrams
RESERVED	RESERVED

**Attachment 51 – Appendix 10.2
High Level Waste Building
Piping and Instrumentation Diagrams**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

Attachment 51 – Appendix 10.1
Drawing and Documents
High Level Waste Building
Process Flow Diagrams

The following drawings have been incorporated into Appendix 10.1 and can be viewed at the Ecology Richland Office.

Drawing/Document	Description
24590-HLW-M5-V17T-P0003, Rev 0	Process Flow Diagram HOP System
24590-HLW-M5-V17T-P20003, Rev 0	Process Flow Diagram HOP System
24590-HLW-M5-V17T-P0004, Rev 1	Process Flow Diagram HOP System
24590-HLW-M5-V17T-P20004, Rev 0	Process Flow Diagram HOP System
RESERVED	RESERVED

**Attachment 51 – Appendix 10.1
High Level Waste Building
Process Flow Diagrams**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

Attachment 51 – Appendix 9.18**Drawings and Documents
Low Activity Waste Building
Operating Documents**

The following drawings have been incorporated into Appendix 9.18 and can be viewed at the Ecology Richland Office. See Appendix 7.18 for operating documentation common to the Pretreatment, LAW, HLW, and Laboratory buildings.

Drawing/Document Number	Description
24590-LAW-PER-PR-03-001, Rev 0	LAW Vit Offgas System Bypass Analysis
RESERVED	RESERVED

**Attachment 51 – Appendix 9.18
Low Activity Waste Building
Operating Documents**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 9.13
Drawings and Documents
Low Activity Waste Building
Instrument Control Logic and Narrative Description**

The following drawings have been incorporated into Appendix 9.13 and can be viewed at the Ecology Richland Office.

Drawing/Document Number	Description
24590-WTP-PER-J-02-001, Rev 0	System Logic Description

**Attachment 51 – Appendix 9.13
Low Activity Waste Building
Instrument Control Logic and Narrative Description**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

Drawings and Documents
Attachment 51 – Appendix 9.11
Low Activity Waste Building
IQRPE Reports

The following drawings have been incorporated into Appendix 9.11 and can be viewed at the Ecology Richland Office.

Drawing/Document Number	Description
24590-CM-HC4-HXYG-00138-01-09, Rev B	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-01-05, Rev D	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-01-06, Rev A	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-01-10, Rev B	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-01-14, Rev A	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-01-19, Rev 00A	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-07, Rev 00A	IQRPE Independent Assessment Report
24590-101-SC-HXYG-0074-03-00001, Rev 00A	IQRPE Independent Assessment Report
24590-101-SC-HXYG-0074-03-00002, Rev 00A	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-00011, Rev 00A	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-00018, Rev 00A	IQRP Independent Assessment Report
RESERVED	RESERVED

**Attachment 51 – Appendix 9.11
Low Activity Waste Building
IQRPE Reports**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 9.9
Drawings and Documents
Low Activity Waste Building
Material Selection Documentation**

The following drawings have been incorporated into Appendix 9.9 and can be viewed at the Ecology Richland Office. See Appendix 7.9 for material selection documentation common to the Pretreatment, LAW, HLW, and Laboratory buildings.

Drawing/Document Number	Description
24590-LAW-N1D-RLD-P0001, Rev 1	Vessel/Tank Material Selection Data Sheet
24590-LAW-N1D-LOP-00002, Rev 0	Material Selection Data Sheet
24590-LAW-N1D-RLD-P0002, Rev 0	Material Selection Data Sheet
24590-LAW-N1D-RLD-P0005, Rev 0	Material Selection Data Sheet
24590-LAW-N1D-LCP-P0001, Rev 0	Material Selection Data Sheet
24590-LAW-N1D-LFP-P0004, Rev 0	Material Selection Data Sheet
24590-LAW-N1D-LOP-P0001, Rev 0	Material Selection Data Sheet
24590-LAW-N1D-LOP-P0003, Rev 0	Material Selection Data Sheet
RESERVED	RESERVED

**Attachment 51 – Appendix 9.9
Low Activity Waste Building
Material Selection Documentation**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 9.8
Drawings and Documents
Low Activity Waste Building
Engineering Calculations**

The following drawings have been incorporated into Appendix 9.8 and can be viewed at the Ecology Richland Office.

Drawing/Document Number	Description
24590-LAW-PER-M-02-001, Rev 3	Sump Data for LAW Facility
24590-LAW-PER-M-02-002, Rev 4	Flooding Volume for LAW Facility
RESERVED	RESERVED

**Attachment 51 – Appendix 9.8
Low Activity Waste Building
Engineering Calculations**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 9.9
Low Activity Waste Building
Material Selection Documentation**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 9.9
Drawings and Documents
Low Activity Waste Building
Material Selection Documentation**

The following drawings have been incorporated into Appendix 9.9 and can be viewed at the Ecology Richland Office. See Appendix 7.9 for material selection documentation common to the Pretreatment, LAW, HLW, and Laboratory buildings.

Drawing/Document Number	Description
24590-LAW-N1D-RLD-P0001, Rev 1	Vessel/Tank Material Selection Data Sheet
24590-LAW-N1D-LOP-00002, Rev 0	Material Selection Data Sheet
24590-LAW-N1D-RLD-P0002, Rev 0	Material Selection Data Sheet
24590-LAW-N1D-RLD-P0005, Rev 0	Material Selection Data Sheet
24590-LAW-N1D-LCP-P0001, Rev 0	Material Selection Data Sheet
24590-LAW-N1D-LFP-P0004, Rev 0	Material Selection Data Sheet
24590-LAW-N1D-LOP-P0001, Rev 0	Material Selection Data Sheet
24590-LAW-N1D-LOP-P0003, Rev 0	Material Selection Data Sheet
Reserved	Reserved

**Attachment 51 – Appendix 9.11
Low Activity Waste Building
IQRPE Reports**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Drawings and Documents
Attachment 51 – Appendix 9.11
Low Activity Waste Building
IQRPE Reports**

The following drawings have been incorporated into Appendix 9.11 and can be viewed at the Ecology Richland Office.

Drawing/Document Number	Description
24590-CM-HC4-HXYG-00138-01-09, Rev B	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-01-05, Rev D	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-01-06, Rev A	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-01-10, Rev B	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-01-14, Rev A	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-01-19, Rev 00A	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-07, Rev 00A	IQRPE Independent Assessment Report
24590-101-SC-HXYG-0074-03-00001, Rev 00A	IQRPE Independent Assessment Report
24590-101-SC-HXYG-0074-03-00002, Rev 00A	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-00011, Rev 00A	IQRPE Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-00018, Rev 00A	IQRPE Independent Assessment Report
Reserved	Reserved

**Attachment 51 – Appendix 9.13
Low Activity Waste Building
Instrument Control Logic and Narrative Description**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 9.13
Drawings and Documents
Low Activity Waste Building
Instrument Control Logic and Narrative Description**

The following drawings have been incorporated into Appendix 9.13 and can be viewed at the Ecology Richland Office.

Drawing/Document Number	Description
24590-WTP-PER-J-02-001, Rev 0	System Logic Description

**Attachment 51 – Appendix 9.18
Low Activity Waste Building
Operating Documents**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 9.18
Drawings and Documents
Low Activity Waste Building
Operating Documents**

The following drawings have been incorporated into Appendix 9.18 and can be viewed at the Ecology Richland Office. See Appendix 7.18 for operating documentation common to the Pretreatment, LAW, HLW, and Laboratory buildings.

Drawing/Document Number	Description
24590-LAW-PER-PR-03-001, Rev 0	LAW Vit Offgas System Bypass Analysis
RESERVED	RESERVED

**Attachment 51 – Appendix 10.1
High Level Waste Building
Process Flow Diagrams**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 10.1
Drawing and Documents
High Level Waste Building
Process Flow Diagrams**

The following drawings have been incorporated into Appendix 10.1 and can be viewed at the Ecology Richland Office.

Drawing/Document	Description
24590-HLW-M5-V17T-P0003, Rev 0	Process Flow Diagram HOP System
24590-HLW-M5-V17T-P20003, Rev 0	Process Flow Diagram HOP System
24590-HLW-M5-V17T-P0004, Rev 1	Process Flow Diagram HOP System
24590-HLW-M5-V17T-P20004, Rev 0	Process Flow Diagram HOP System
Reserved	Reserved

**Attachment 51 – Appendix 10.2
High Level Waste Building
Piping and Instrumentation Diagrams**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 10.2
Drawings and Documents
High Level Waste Building
Piping and Instrumentation Diagrams**

The following drawings have been incorporated into Appendix 10.2 and can be viewed at the Ecology Richland Office.

Drawing/Document	Description
24590-HLW-M6-HOP-P0004, Rev 1	Piping and Instrumentation Diagram
24590-HLW-M6-HOP-P0006, Rev 1	Piping and Instrumentation Diagram
24590-HLW-M6-HOP-P20004, Rev 0	Piping and Instrumentation Diagram
24590-HLW-M6-HOP-P20006, Rev 0	Piping and Instrumentation Diagram
24590-HLW-M6-HOP-P0003, Rev 0	Piping and Instrumentation Diagram
24590-HLW-M6-HOP-P0008, Rev 0	Piping and Instrumentation Diagram
24590-HLW-M6-HOP-P20003, Rev 0	Piping and Instrumentation Diagram
24590-HLW-M6-HOP-P20008, Rev 0	Piping and Instrumentation Diagram
24590-HLW-M6-RLD-P0001, Rev 0	Piping and Instrumentation Diagram
24590-HLW-M6-RLD-P0002, Rev 0	Piping and Instrumentation Diagram
24590-HLW-M6-HCP-P0001, Rev 0	Piping and Instrumentation Diagram
24590-HLW-M6-HCP-P0002, Rev 0	Piping and Instrumentation Diagram
24590-HLW-M6-HOP-P0001, Rev 0	Piping & Instrumentation Diagrams
24590-HLW-M6-HOP-P20001, Rev 0	Piping & Instrumentation Diagrams
24590-HLW-M6-HOP-P0009, Rev 0	Piping & Instrumentation Diagrams
24590-HLW-M6-HOP-P20009, Rev 0	Piping & Instrumentation Diagrams
24590-HLW-M6-HOP-P0010, Rev 0	Piping & Instrumentation Diagrams
24590-HLW-M6-HOP-P20010, Rev 0	Piping & Instrumentation Diagrams
24590-HLW-M6-HDH-P0001, Rev 0	Piping & Instrumentation Diagrams
24590-HLW-M6-HDH-P0002, Rev 0	Piping & Instrumentation Diagrams
24590-HLW-M6-HDH-P20001, Rev 0	Piping & Instrumentation Diagrams
Reserved	Reserved

**Attachment 51 – Appendix 10.4
High Level Waste Building
General Arrangement Drawings**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

Drawings and Documents
Attachment 51 – Appendix 10.4
High Level Waste Building
General Arrangement Drawings

The following drawings have been incorporated into Appendix 10.4 and can be viewed at the Ecology Richland Office.

Drawing/Documents	Description
24590-HLW -P1- P01T-P0001, Rev 5	General Arrangement Plan (EI -21')
24590-HLW -P1- P01T-P0002, Rev 2	General Arrangement Plan (EI 0')
24590-HLW -P1- P01T-P0008, Rev 6	General Arrangement Sections A-A, B-B, C-C
24590-HLW -P1- P01T-P0009, Rev 5	General Arrangement Sections D-D, E-E, F-F
24590-HLW -P1- P01T-P0010, Rev 5	General Arrangement Sections G-G, H-H
24590-HLW -P1- P01T-P0011, Rev 6	General Arrangement Sections J-J, K-K
Reserved	Reserved

**Attachment 51 – Appendix 10.5
High Level Waste Building
Civil, Structural, and Architectural Criteria and Typical Design Details**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 10.5
Drawings and Documents
High Level Waste Building
Civil, Structural, and Architectural Criteria and Typical Design Details**

The following drawings have been incorporated into Appendix 10.5 and can be viewed at the Ecology Richland Office.

Drawing/Documents	Description
24590-HLW-DB-S13T-P0001, Rev 0	General Concrete Arrangement Plan (El-21')
24590-HLW-DB-S13T-P0104, Rev 0	Concrete Reinforcing Sections and Details
24590-HLW-DB-S13T-P0105, Rev 0	Concrete Reinforcing Sections and Details
24590-HLW-DB-S13T-P0107, Rev 0	Sump and Floor Opening Plan and Sections
24590-HLW-DD-S13T-P0002001, Rev 0	Concrete Stainless Steel Liners Plan (El-21') Sheet 1
24590-HLW-DD-S13T-P0002002, Rev 0	Concrete Stainless Steel Liners Plan (El-21') Sheet 2
24590-HLW-DD-S13T-P0002003, Rev 0	Concrete Stainless Steel Liner Sections and Details (El -21')
24590-HLW-DD-S13T-P0002004, Rev 0	Concrete Stainless Steel Liner Sections and Details
24590-HLW-DD-S13T-P0002005, Rev 0	Concrete Equipment Support Details (El -21')
24590-HLW-DD-S13T-P0008, Rev 0	Concrete Embed and Anchorage Details
24590-HLW-DG-S13T-P0001001, Rev 0	Top Concrete Reinforcement Plan (El -21')
24590-HLW-DG-S13T-P0001002, Rev 0	Bottom Concrete Reinforcement Plan (El -21')
24590-HLW-DG-S13T-P0007002, Rev 0	Concrete Reinforcement Partial Plan (El -21'), Sheet 2
24590-HLW-DG-S13T-P0007005, Rev 0	Concrete Reinforcement Partial Plan (El -21'), Sheet 5
24590-HLW-DG-S13T-P0007008, Rev 0	Concrete Reinforcement Partial Plan (El -21'), Sheet 8
24590-HLW-DG-S13T-P0007009, Rev 0	Concrete Reinforcement Partial Plan (El -21'), Sheet 9
24590-HLW-PER-M-02-001, Rev 2	HLW Facility Sump Data
Reserved	Reserved

**Attachment 51 – Appendix 10.6
High Level Waste Building
Mechanical Drawings**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 10.6
Drawings and Documents
High Level Waste Building
Mechanical Drawings**

The following drawings have been incorporated into Appendix 10.6 and can be viewed at the Ecology Richland Office.

Drawing/Document	Description
24590-HLW –MV-HOP-P0001, Rev 1	Mechanical Drawing
24590-HLW –MVD-HOP-P0001, Rev 1	Mechanical Drawing Data Sheet
24590-HLW –MV-HOP-P0003, Rev 0	Mechanical Drawing
24590-HLW –MVD-HOP-P0012, Rev 0	Mechanical Drawing Data Sheet
24590-HLW –MKD-HOP-P0014, Rev 1	Mechanical Drawing Data Sheet
24590-HLW –MKD-HOP-P0017, Rev 0	Mechanical Drawing Data Sheet
24590-HLW-MV-HDH-P0003, Rev 1	Mechanical Drawings
24590-HLW-MV-HDH-P0004, Rev 1	Mechanical Drawings
24590-HLW-MV-HDH-P0005, Rev 1	Mechanical Drawings
24590-HLW-M0-HDH-P0012001, Rev 1	Mechanical Drawings
24590-HLW-M0-HDH-P0012002, Rev 1	Mechanical Drawings
24590-HLW-MV-HDH-P0006, Rev 0	Mechanical Drawings
24590-HLW-MV-HDH-P0007, Rev 0	Mechanical Drawings
24590-HLW-MVD-HDH-P0003, Rev 1	Mechanical System Data Sheets
24590-HLW-MVD-HDH-P0006, Rev 1	Mechanical System Data Sheets
24590-HLW-MVD-HDH-P0009, Rev 0	Mechanical System Data Sheets
24590-HLW-MVD-HDH-P0012, Rev 0	Mechanical System Data Sheets
24590-HLW-MAD-HOP-P0018, Rev 0	Mechanical System Data Sheets
24590-HLW-MAD-HOP-P0019, Rev 0	Mechanical System Data Sheets
24590-HLW-MAD-HOP-P0020, Rev 0	Mechanical System Data Sheets
24590-HLW-MAD-HOP-P0035, Rev 0	Mechanical System Data Sheets
24590-HLW-MAD-HOP-P0036, Rev 0	Mechanical System Data Sheets
24590-HLW-MAD-HOP-P0037, Rev 0	Mechanical System Data Sheets
Reserved	Reserved

**Attachment 51 – Appendix 10.7
High Level Waste Building
Specifications**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 10.7
Drawings and Documents
High Level Waste Building
Specifications**

The following drawings have been incorporated into Appendix 10.7 and can be viewed at the Ecology Richland Office. See Appendix 7.7 for specification documentation common to the Pretreatment, LAW, HLW, and Laboratory buildings.

Drawing/Document Number	Description
24590-HLW-3PS-MBT0-TP001, Rev 1	Specifications
24590-HLW-PEN-ENV-04-002	Maximum Operating Pressure Correction
24590-HLW-3PS-MQR0-TP002, Rev 1	Engineering Specifications For; HLW Technical Specification for System HDH Canister Rise Bogie
Reserved	Reserved

**Attachment 51 – Appendix 10.8
High Level Waste Building
Engineering Calculations**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 10.8
Drawings and Documents
High Level Waste Building
Engineering Calculations**

The following drawings have been incorporated into Appendix 10.8 and can be viewed at the Ecology Richland Office.

Drawing/Document	Description
24590-HLW-PER-M-02-003, Rev 2	Flooding Volume Calculation for the HLW Facility
Reserved	Reserved

**Attachment 51 – Appendix 10.9
High Level Waste Building
Material Selection Documentation**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 10.9
Drawings and Documents
High Level Waste Building
Material Selection Documentation**

The following drawings have been incorporated into Appendix 10.9 and can be viewed at the Ecology Richland Office. See Appendix 7.9 for material selection documentation common to the Pretreatment, LAW, HLW, and Laboratory buildings.

Drawing/Document	Description
24590-HLW-N1D-HOP-P0009, Rev 2	Vessel 903 Material Selection Data Sheet
24590-HLW-N1D-HOP-P0006, Rev 1	Silver Mordenite Material Selection Data sheet
24590-HLW-N1D-HDH-P0003, Rev 0	Vessel/Tank Material Selection Data Sheets
24590-HLW-N1D-HDH-P0005, Rev 0	Vessel/Tank Material Selection Data Sheets
24590-HLW-N1D-HDH-P0007, Rev 0	Vessel/Tank Material Selection Data Sheets
Reserved	Reserved

**Attachment 51 – Appendix 10.11
High Level Waste Building
IQRPE Reports**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 10.11
Drawings and Documents
High Level Waste Building
IQRPE Reports**

The following drawings have been incorporated into Appendix 10.11 and can be viewed at the Ecology Richland Office.

Drawing/Documents	Description
24590-CM-HC4-HXYG-00138-01-08, Rev 00B	IQRPE Assessment Report
24590-CM-HC4-HXYG-00138-01-12, Rev 00A	IQRPE Assessment Report
24590-CM-HC4-HXYG-00138-01-11, Rev 00B	IQRPE Assessment Report
24590-CM-HC4-HXYG-00138-01-17, Rev 00A	IQRPE Assessment Report
24590-CM-HC4-HXYG-00138-02-08, Rev A	IQRPE Assessment Report
24590-101-SC-HXYG-0074-03-00003, Rev A	IQRPE Assessment Report
24590-CM-HC4-HXYG-00138-01-15, Rev B	IQRPE Assessment Report
24590-CM-HC4-HXYG-00138-01-00021, Rev A	IQRP Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-00024, Rev 00A	IQRP Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-00025, Rev A	IQRP Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-08, Rev B	IQRP Independent Assessment Report
Reserved	Reserved

**Attachment 51 – Appendix 10.13
High Level Waste Building
Instrument Control Logic and Narrative Descriptions**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 10.13
Drawings and Documents
High Level Waste Building
Instrument Control Logic and Narrative Descriptions**

The following drawings have been incorporated into Appendix 10.13 and can be viewed at the Ecology Richland Office.

Drawing/Document Number	Description
24590-HLW-PER-J-02-001, Rev 1	System Logic Description for HOP System
24590-HLW-PER-J-02-002, Rev 2	System Logic Description
Reserved	Reserved

**Attachment 51 – Appendix 10.18
High Level Waste Building
Operating Documents**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 10.18
Drawings and Documents
High Level Waste Building
Operating Documents**

The following drawings have been incorporated into Appendix 10.18 and can be viewed at the Ecology Richland Office. See Appendix 7.18 for operating documents common to the Pretreatment, LAW, HLW, and Laboratory buildings.

Drawing/Document Number	Description
24590-LAW-PER-PR-03-001, Rev 0	HLW Vit Offgas System Bypass Analysis
RESERVED	RESERVED

**Attachment 51 – Appendix 11.1
Laboratory Building
Process Flow Diagrams**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 11.1
Drawings and Documents
Laboratory Building
Process Flow Diagrams**

The following drawings have been incorporated into Appendix 11.4 and can be viewed at the Ecology Richland Office.

Drawing/Document	Description
24590-LAB-M5-V171T-P0029, Rev 0	Process Flow Diagrams
Reserved	Reserved

**Attachment 51 – Appendix 11.2
Laboratory Building
Piping and Instrumentation Diagrams**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

Attachment 51 – Appendix 11.2
Drawings and Documents
Laboratory Building
Piping and Instrumentation Diagrams

The following drawings have been incorporated into Appendix 10.2 and can be viewed at the Ecology Richland Office.

Drawing/Document	Description
24590-LAB-M6-RLD-P0001, Rev 0	Piping & Instrument Diagrams
24590-LAB-M6-RLD-P0002, Rev 0	Piping & Instrument Diagrams
24590-LAB-M6-RLD-P0006, Rev 0	Piping & Instrument Diagrams
24590-LAB-M6-RLD-P0007, Rev 0	Piping & Instrument Diagrams
24590-LAB-M6-RLD-P0008, Rev 0	Piping & Instrument Diagrams
Reserved	Reserved

**Attachment 51 – Appendix 11.4
Laboratory Building
General Arrangement Drawings**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 11.4
Drawings and Documents
Laboratory Building
General Arrangement Drawings**

The following drawings have been incorporated into Appendix 11.4 and can be viewed at the Ecology Richland Office.

Drawing/Document	Description
24590-LAB -P1-60-P0007, Rev 0	General Arrangement Plan and Sections
24590-LAB-P1-60-P0007, Rev 1	General Arrangement Plans
24590-LAB-P1-60-P0010, Rev 0	General Arrangement Sections
24590-LAB-P1-60-P0008, Rev 0	General Arrangement Sections
Reserved	Reserved

**Attachment 51 – Appendix 11.5
Laboratory Building
Civil, Structural, and Architectural Criteria and Typical Design Details**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

Attachment 51 – Appendix 11.5
Drawings and Documents
Laboratory Building
Civil, Structural, and Architectural Criteria and Typical Design Details

The following drawings have been incorporated into Appendix 11.5 and can be viewed at the Ecology Richland Office.

Drawing/Document	Description
24590-LAB-PER-M-02-002, Rev 0	Sump Data
24590-LAB-PER-M-02-002, Rev 1	Sump Data for LAB Facility
Reserved	Reserved

Attachment 51 – Appendix 11.6
Laboratory Building
Mechanical Drawings

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 11.6
Drawings and Documents
Laboratory Building
Mechanical Drawings**

The following drawings have been incorporated into Appendix 11.6 and can be viewed at the Ecology Richland Office.

Drawing/Document	Description
24590-LAB-MV-RLD-P0001, Rev 0	Mechanical Drawings
24590-LAB-MV-RLD-P0003, Rev 0	Mechanical Drawings
24590-LAB-MVD-RLD-P0164, Rev 0	Mechanical Data Sheets
24590-LAB-MVD-RLD-P0165, Rev 0	Mechanical Data Sheets
Reserved	Reserved

**Attachment 51 – Appendix 11.8
Laboratory Building
Engineering Calculations**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 11.8
Drawings and Documents
Laboratory Building
Engineering Calculations**

The following drawings have been incorporated into Appendix 11.8 and can be viewed at the Ecology Richland Office.

Drawing/Document	Description
24590-LAB-PER-M-02-001, Rev 0	Flooding Volume Calculations
Reserved	Reserved

**Attachment 51 – Appendix 11.9
Laboratory Building
Material Selection Documentation**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 11.9
Drawings and Documents
Laboratory Building
Material Selection Documentation**

The following drawings have been incorporated into Appendix 9.9 and can be viewed at the Ecology Richland Office. See Appendix 7.9 for material selection documentation common to the Pretreatment, LAW, HLW, and Laboratory buildings.

Drawing/Document Number	Description
24590-LAB-N1D-RLD-P0002, Rev 0	Plant Item Material Selection Data Sheet
24590-LAB-N1D-RLD-P0003, Rev 0	Plant Item Material Selection Data Sheet
Reserved	Reserved

**Attachment 51 – Appendix 11.11
Laboratory Building
IQRPE Reports**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

Attachment 51 – Appendix 11.11
Drawings and Documents
Laboratory Building
IQRPE Reports

The following drawings have been incorporated into Appendix 11.11 and can be viewed at the Ecology Richland Office.

Drawing/Document	Description
24590-CM-HC4-HXYG-00138-01-16, Rev 00A	IQRPE Assessment Report
24590-CM-HC4-HXYG-00138-01-00020, Rev 00A	IQRP Independent Assessment Report
24590-CM-HC4-HXYG-00138-02-00016, Rev 00A	IQRP Independent Assessment Report
24590-CM-HC4-HXYG-00138-01-16, Rev 00B	IQRP Independent Assessment Report
Reserved	Reserved

**Attachment 51 – Appendix 11.13
Laboratory Building
Instrument Control Logic and Narrative Descriptions**

Any procedure, method, data, or information contained in this document that relates solely to radionuclides or to the radioactive source, byproduct material, and/or special nuclear components of mixed waste (as defined by the Atomic Energy Act of 1954, as amended) is not provided for the purpose of regulating the radiation hazards of such components under the authority of this permit and Chapter 70.105 RCW.

Additional documents will be added to this appendix as new information is incorporated into this permit.

**Attachment 51 – Appendix 11.13
Drawings and Documents
Laboratory Building
Instrument Control Logic and Narrative Descriptions**

The following drawings have been incorporated into Appendix 10.13 and can be viewed at the Ecology Richland Office.

Drawing/Document Number	Description
24590-LAB-PER-J-03-001, Rev 0	System Logic Description for Laboratory RLD System
Reserved	Reserved