CLASS 2 PERMIT MODIFICATION REQUEST

for the MATERIALS AND FUELS
COMPLEX HWMA/RCRA PERMIT

at the

Idaho National Laboratory
[EPA ID No. ID4890008952]

Book 1 of 2
and
Book 2 of 2

October 2016

CLASS 2 PERMIT MODIFICATION REQUEST
for the
Materials and Fuels Complex HWMA/RCRA Partial Permit
Idaho National Laboratory (EPA ID No. ID4890008952)

MFC-PMR-02, Rev. 0

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OCTOBER 2016 CLASS 2 PERMIT MODIFICATION REQUEST

This document is a Class 2 Permit Modification Request (PMR) for the Materials and Fuels Complex (MFC or Site) Hazardous Waste Management Act/Resource Conservation and Recovery Act (HWMA/RCRA) Partial Permit at the Idaho National Laboratory (INL), (Environmental Protection Agency [EPA] Identification Number ID4890008952), hereafter referred to as "the Permit." The Department of Energy Idaho Operations Office (DOE-Idaho) and Battelle Energy Alliance, LLC (BEA) are submitting a PMR for the MFC HWMA/RCRA Permit.

The PMR addresses the inspection frequency for the empty (surrogate) liner pulls at the Radioactive Scrap and Waste Facility (RSWF). In accordance with Permit Condition V.M.1., the permittee is required to remove a surrogate liner from the RSWF and employ an independent corrosion engineer to supervise the inspections and measurements of the liner to assess if corrosion of the liner has occurred. Results of the evaluation are to be used to determine the effectiveness of the corrosion control system and to assess the adequacy of the liner pull inspection schedule. Because all liners removed to date have been in like-new condition it is being proposed to extend the retrieval interval from four to six years without jeopardizing the integrity of the inspection program. The initial surrogate liner pull and evaluation was completed in 1997. To date, five of the ten surrogate liners have been removed and assessed, and five surrogate liners remain in place for future pulls. An independent corrosion engineer suggested that BEA extend the surrogate liner retrieval interval from four years to six years. From his two inspections in 2009 and 2013, the liners demonstrated "like-new" conditions. Previous independent inspections found similar conditions of the retrieved liners. With these results the permittee proposes that the liner retrieval period be extended from four years to six years. Also, five additional surrogate liners have been identified for proposed retrievals. This will extend the time that surrogate liners will be available for retrieval and inspection. In addition, equipment would be removed from the emergency equipment list, an inconsistency with permit language regarding stacking of containers would be corrected, and information updates and clarification changes associated with facility and process descriptions and EAM information is being provided. This Class 2 PMR is in accordance with Idaho Administrative Procedures Act (IDAPA) 58.01.05.012 [Title 40 of the Code of Federal Regulations (CFR) 270.42, Appendix I, B.4. and B.6.c.], changes in the frequency or content of inspection schedules and removal of equipment from emergency equipment list.

The following information specifically addresses how compliance with Permit Condition I.D.3 and IDAPA 58.01.05.012 (40 CFR 270.42) for submission of a Class 2 PMR has been satisfied.

I. IDAPA 58.01.05.012 [40 CFR 270.42(b)(1)(i) and (b)(1)(iii)] - Describes the exact changes to be made to the permit conditions and supporting documents referenced by the permit and explains why the modifications are needed.

Unless otherwise specified below, the attachments, to the MFC HWMA/RCRA Partial Permit included in this PMR (as shown in the Table of Contents) have been revised/rewritten in order to incorporate the modifications mentioned earlier. Specific changes made to the MFC HWMA/RCRA Partial Permit are included in the following table.

Item No.	Description of Change	Justification of Change	Location of Change
1	Extend the frequency for the empty (surrogate) liner pulls at RSWF from four to six years.	A total of ten surrogate liners were installed in 1993 with the purpose of removing a liner every four years to conduct a visual inspection of its external corrosion. To date, five of the ten liners have been removed. Inspections completed on these liners have not revealed any instances of corrosion related damage. Without approval of this modification request the next liner pull will be in 2017 leaving 4 empty surrogate liners to be retrieved. An independent corrosion engineer suggested that BEA extend the surrogate liner retrieval interval from four years to six years. From the independent inspector's two inspections in 2009 and 2013, the liners demonstrated "like-new" conditions. Previous independent inspections found similar conditions of the retrieved liners. With these results it is proposed to extend the retrieval period from four years to six years.	Module V Attachment 1 Facility Description Process Description Attachment 4 Attach F-3
2	Provide additional designated (empty) surrogate liners.	Five (empty) surrogate liners remain and five additional surrogate liners have been identified for proposed retrievals, which will extend the time that surrogate liners will be available for retrieval and inspection. The designation of the empty surrogate liners is shown on the RSWF liner configuration drawing.	Attachment 1 Attachment D-31
3	Correct inconsistency with permit language regarding stacking of containers.	Stacking of containers only two high is allowed in accordance with Permit Module III.B.1., Hot Fuels Examination Facility,	Attachment 1 Process Description D-2(a)(2)(e) Attachment 1

Item No.	Description of Change	Justification of Change	Location of Change
		III.B.2., Sodium Components Maintenance Shop and III.B.3., Sodium Storage Building. No stacking of containers with liquids. Revise permit language in Attachment 1 Process Description to be consistent with permit conditions.	Facility Description Attach B-5
4	New example inspection form.	A new form for RSWF Annual Radiation Monitoring Tube Inspection was created. Prior to the use of this form the radiation monitoring tube measurements were recorded on a data sheet and placed into the operating record. The new form will formalize the inspection process.	Attachment 4 Attach F-4
5	Removal of equipment from the emergency equipment list.	Remove emergency shower listed in contingency plan and on inspection log for HFEF. An evaluation was performed by MFC Health and Safety and it has been determined that based on the work performed an emergency shower is not required.	Attachment 4 Attach F-4 Attachment 7 Attach G-2
6	Clarification, updates and information changes.	Clarify description information associated with RSWF.	Attachment 1 Facility Description Process Description Attachment 6
		Information associated with the Experimental Fuels Facility (EFF) was removed from the permit in a prior permit modification. However, the EFF waste acceptance checklist (WAC) was inadvertently not removed. Remove the EFF (WAC) from the permit.	Attachment 1 Attach D-3
		Update example inspection forms	Attachment 4 Attach F-4
		Update EAM Information	Attachment 7 Attach G-1

Item No.	Description of Change	Justification of Change	Location of Change
		Update page numbering	List of Attachments
7	Update revision log.	Update revision log summarizing permit modification changes.	Attachment 10

II. IDAPA 58.01.05.012 [40 CFR 270.42(b)(1)(ii); Identifies that the modification is a Class 2 modification]:

All proposed modifications to the MFC HWMA/RCRA Permit that are contained in the PMR are being submitted as a Class 2 PMR. This classification is being submitted in accordance with IDAPA 58.01.05.012 [40 CFR 270.42, Appendix I, Section (B)(4) and (B)(6)(c)], in that changes in the frequency or content of inspection schedules and removal of equipment from emergency equipment list is a Class 2 PMR.

III. IDAPA 58.01.05.012 [40 CFR 270.42(b)(1)(iv)] – Provides the applicable information required by 270.13 through 270.23, 270.62, and 270.63

IDAPA 58.01.05.012 (40 CFR 270.13)	Part A	Not Applicable
IDAPA 58.01.05.012 (40 CFR 270.14)	General	See Attachment A
IDAPA 58.01.05.012 (40 CFR 270.15)	Containers	See Attachment A
IDAPA 58.01.05.012 (40 CFR 270.16)	Tanks	Not Applicable
IDAPA 58.01.05.012 (40 CFR 270.17)	Surface Imp.	Not Applicable
IDAPA 58.01.05.012 (40 CFR 270.18)	Waste Piles	Not Applicable
IDAPA 58.01.05.012 (40 CFR 270.19)	Incinerators	Not Applicable
IDAPA 58.01.05.012 (40 CFR 270.20)	Land Treatment	Not Applicable
IDAPA 58.01.05.012 (40 CFR 270.21)	Landfills	Not Applicable
IDAPA 58.01.05.012 (40 CFR 270.23)	Misc. Units	See Attachment A
IDAPA 58.01.05.012 (40 CFR 270.62)	Incinerators	Not Applicable
IDAPA 58.01.05.012 (40 CFR 270.63)	Land Treat. Demo	Not Applicable

IV. IDAPA 58.01.05.012 [40 CFR 270.42 (b)(2); Notice of modification to all persons on the facility mailing lists]:

The required notification for this Class 2 PMR will be mailed within 7 days of the submittal date of this PMR to the DEQ and to all persons on the Idaho National Laboratory (INL) mailing list. This official mailing list also includes the appropriate units of State and local government, as required by IDAPA 58.01.05.013 [40 CFR 124.10(c)(1)(ix-x)].

A copy of the notification sent to all persons on the official mailing lists and the evidence of mailing will be provided within 7 days of submittal of this PMR, if not included in Attachment C. The evidence of mailing the required notice demonstrates compliance with IDAPA 58.01.05.012 [40 CFR 270.42(b)(2)].

A Legal Notice will be published in the Idaho Falls Post Register, which is a major local newspaper of general circulation, as required by IDAPA 58.01.05.012 [40 CFR 270.42(b)(2)]. The evidence of publication of the Legal Notice in the form of a notarized copy of the required Legal Notice, provided by the Idaho Falls Post Register, thereby demonstrating compliance with IDAPA 58.01.05.012 [40 CFR 270.42(b)(2)], will be provided within 7 days of submittal of the PMR, if not included in Attachment C.

V. IDAPA 58.01.05.012 [40 CFR 270.42 (b)(3); Copy of permit modification and supporting documents in a location accessible to the public]:

A copy of this PMR has been placed in the INL Research Library Digital Repository for viewing 24 hours a day 7 days a week at the following website http://inldigitallibrary.inl.gov. If unable to access the website a hardcopy of the PMR can be reviewed at the Idaho Falls Public Library located in the reference area at 457 Broadway, Idaho Falls, Idaho 83401. This action demonstrates compliance with IDAPA 58.01.05.012 [40 CFR 270.42(b)(3)].

VI. IDAPA 58.01.05.012 [40 CFR 270.42(b)(4); Public meeting]:

The public meeting required by HWMA/RCRA regulations for this PMR will be held in the Idaho Falls Public Library, 457 Broadway, Idaho Falls, Idaho, on Wednesday, November 09, 2016, starting at 6:00 p.m. and ending at 8:00 p.m., or ending at 6:30 p.m. if no members of the public attend the meeting by 6:30 p.m. Specific information addressing this meeting has been included in the notice mailed to all persons on the official mailing lists, and the Legal Notice, in accordance with IDAPA 58.01.05.012 [40 CFR 270.42(b)(2 and 4)].

After the public meeting has been held, information documenting this meeting will be provided, if not included in Attachment D of this PMR.

VII. IDAPA 58.01.05.012 [40 CFR 270.11 (d) and 40 CFR 270.30 (k); Signed certification statements]:

Attachment E of this PMR contains the signed certification statements required by IDAPA 58.01.05.012 [40 CFR 270.11(d) and 40 CFR 270.30(k)]

Attachment A

Modified Permit and Attachments

HWMA/RCRA STORAGE and TREATMENT PERMIT

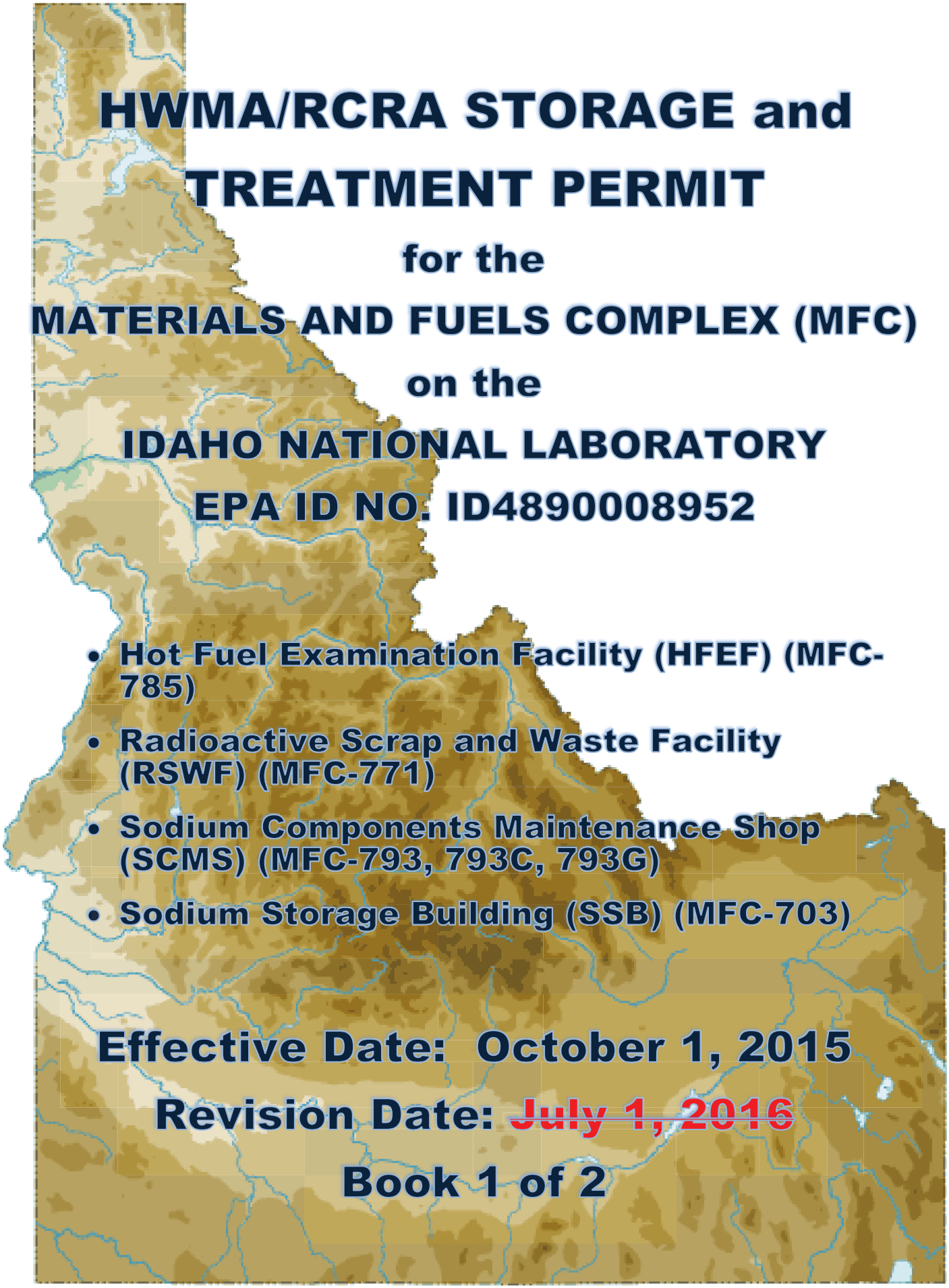
for the

MATERIALS AND FUELS COMPLEX (MFC)

on the

IDAHO NATIONAL LABORATORY

EPA ID NO. ID4890008952



- Hot Fuel Examination Facility (HFEF) (MFC-785)
- Radioactive Scrap and Waste Facility (RSWF) (MFC-771)
- Sodium Components Maintenance Shop (SCMS) (MFC-793, 793C, 793G)
- Sodium Storage Building (SSB) (MFC-703)

Effective Date: October 1, 2015

Revision Date: ~~July 1, 2016~~

Book 1 of 2

LIST OF ATTACHMENTS

The following attachment list includes excerpts from documents that are part of the Permittee's Administrative Record; i.e., HWMA RCRA Storage and Treatment Permit Application for the Material and Fuels Complex, Books 1 and 2: Hot Fuel Examination Facility (HFEF), Radioactive Scrap and Waste Facility (RSWF), Sodium Components Maintenance Shop (SCMS), and Sodium Storage Building (SSB); supplemental reports; and other documents contained in the Department's supporting file for the draft Permit. The Director, as deemed necessary, modified specific language in the Attachments. These modifications are described below or in the permit conditions (Modules I through VI) and, thereby, supersede the language of the original attachment. If the language of the Permit conflicts with either the attachments or the original application, the language in the Permit shall prevail. These incorporated attachments are enforceable conditions of this Permit, as modified by the specific permit condition(s).

ATTACHMENT 1 **FACILITY DESCRIPTION,** consisting of:

INL PART A PERMIT APPLICATION for HFEF, RSWF, SCMS, and SSB; RCRA Subtitle C Site Identification Form, pages 1 through 4; and Hazardous Waste Permit Information, pages 1 through 6

MFC FACILITY DESCRIPTION, Section B, HWMA RCRA Storage and Treatment Permit Application for the Material and Fuels Complex: HFEF, RSWF, SCMS, and SSB, pages B-1 through B-~~20~~19.

Attachments B-1 through B-15

PROCESS DESCRIPTION, Section D, HWMA RCRA Storage and Treatment Permit Application for the Material and Fuels Complex: HFEF, RSWF, SCMS, and SSB, pages D-1 through D-~~89~~90.

Attachments D-1 through D-36

ATTACHMENT 2 WASTE ANALYSIS PLAN

Section C, HWMA RCRA Storage and Treatment Permit Application for the Material and Fuels Complex: HFEF, RSWF, SCMS, and SSB, pages C-1 through C-18,

Attachments C-1 through C-6

ATTACHMENT 3 SECURITY

Section F, HWMA RCRA Storage and Treatment Permit Application for the Material and Fuels Complex: HFEF, RSWF, SCMS, and SSB, Subsection F-1, pages F-1 through F-3;

Attachment F-1

ATTACHMENT 4 INSPECTIONS

Section F, HWMA RCRA Storage and Treatment Permit Application for the Material and Fuels Complex: HFEF, RSWF, SCMS, and SSB, Subsection F-2, pages F-1 through F-~~9~~11,

Attachments F-2 and F-3

ATTACHMENT 5 PERSONNEL TRAINING:

Section H, HWMA RCRA Storage and Treatment Permit Application for the Material and Fuels Complex: HFEF, RSWF, SCMS, and SSB, pages H-1 through H-5,

Attachments H-1 and H-2

ATTACHMENT 6 PROCEDURES TO PREVENT HAZARDS

Section F, HWMA RCRA Storage and Treatment Permit Application for the Material and Fuels Complex: HFEF, RSWF, SCMS, and SSB, Subsections F-3 through F-5, pages F-1 through F-~~8~~10

ATTACHMENT 7 CONTINGENCY PLAN

Section G, HWMA RCRA Storage and Treatment Permit Application for the Material and Fuels Complex: HFEF, RSWF, SCMS, and SSB, Pages G-1 through G-24,

Attachments G-1 through G-4

ATTACHMENT 8 CLOSURE PLAN

Section I, HWMA RCRA Storage and Treatment Permit Application for the Material and Fuels Complex: HFEF, RSWF, SCMS, and SSB, pages I-1 through I-14

ATTACHMENT 9 FEDERAL FACILITY ACT AND CONSENT ORDER

Idaho Department of Health and Welfare, United States Environmental Protection Agency, Region 10, and the United States, Department of Energy, Idaho Field Office, *"Federal Facility Act and Consent Order for the Idaho National Engineering Laboratory,"* December 9, 1991

ATTACHMENT 10 PERMIT REVISION LOG

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V.K. CATHODIC PROTECTION

V.K.1. The Cathodic Protection System shall be maintained in accordance with the design documents and Permit Attachment 1.

V.K.2. Newly installed liners shall be equipped with impressed current cathodic protection within 30 calendar days.

V.K.3. Liners installed after the effective date of this Permit shall be certified and approved, in accordance with Permit Condition I.R.

V.K.4. The Permittee shall annually assess the liner-to-soil potentials of all liners and rectifier wiring integrity in accordance with Permit Attachment 4.

V.K.5. The rectifier system shall be operated inspected and maintained as described in Permit Attachments 1 and 4.

V.L. RADIATION MONITORING TUBES

V.L.1. The 12 radiation monitoring tubes shall be surveyed and monitored in accordance with Permit Attachment 4.

V.L.2. If there is a significant increase in radiation, the Permittee shall implement the remedial measures in Permit Condition V.C.4.

V.L.3. The results of all radiation monitoring inspections and all corrective measures shall be documented in the Operating Record.

V.M. CORROSION SURVEILLANCE LINERS

V.M.1. One of the liners installed to monitor the effectiveness of the impressed current Cathodic Protection System shall be pulled every six (6)~~four (4)~~ years, and inspected in accordance with Permit Attachment 4.

V.M.2. The inspection shall be performed by a corrosion expert, and shall be the basis of a report evaluating the effectiveness of the Cathodic Protection System.

V.M.3. The Permittee shall submit the inspection report to the Director, for approval, within 45 days of receipt of the report from the corrosion expert.

V.N. SEISMIC STANDARDS

V.N.1. The RSWF has demonstrated compliance with the seismic standard, and this is documented in the Safety Analysis Report (SAR-407) for the Radioactive Scrap and Waste Facility.

V.N.2. In the event an earthquake of a magnitude 4.5 or greater (Richter Scale), as measured at the facility, the Cathodic Protection System and liners shall be inspected within 24

HWMA/RCRA STORAGE and TREATMENT PERMIT

for the

MATERIALS AND FUELS COMPLEX (MFC)

ATTACHMENT 1 – FACILITY DESCRIPTION

Section B – MFC Facility Description
Section B Attachments

EFFECTIVE DATE: OCTOBER 1, 2015
REVISION DATE: ~~JULY 1, 2016~~

The location of the RSWF is shown on the MFC plot plan provided in Attachment B-2.

The RSWF, established in 1965 for the storage of RH MW, is outdoors. There are no permanent buildings. The facility is approximately 388 x 448 ft (4 acres) and is entirely enclosed by a fence. Sealed carbon-steel liners are buried vertically in the ground in bored holes such that the tops of the liners protrude approximately 4 in. above ground.

In addition to the RH-MW, the RSWF also stores non-waste items including, spent nuclear fuel and accountable nuclear material, some of which may contain sodium. The RSWF also stores some non-hazardous radioactive waste. These materials are stored in separate liners from the RH-MW.

Prior to placing the liners in the storage area, several feet of gravel and soil were placed over the storage area and graded to slope gently from the centerline to the parallel sides, which were banked with gravel. This grade promotes run-off, reducing percolation, and also serves to prevent run-on into the area.

The RSWF is designed with a grid of approximately 27 rows, spaced approximately 12 ft apart, with approximately 50 storage sites per row. The storage liners are arranged on approximate 6-ft centers in the rows. The volume capacity, based on the size of the waste containers that are placed in storage, is approximately 53,000 gal. This assumes that approximately 1,320 of the liner sites are usable for MW storage.

There are three primary sizes of storage liners containing HW/MW currently located in RSWF. They are 16 in., 24 in., and 26 in. in diameter (ref. schematics of the liner sizes in Attachment B-8). Non-standard liners include 48-in., and 60- in. diameter sizes.

- 16-in. diameter liners: The 16-in. diameter standard liners are constructed of either Schedule-10 carbon steel and 12.33 ft long, or Schedule-40 carbon steel and 10 ft long. They have a 19-in. diameter oversized base plate welded to the liner bottom. They are sealed with a concrete shield plug/lid assembly welded into the top of the liner.

- 24-in. diameter liners: The 24-in. liners are constructed of Schedule-10 carbon steel and are 13.67-ft long, with a 26-in. diameter base plate. The 24-in. liners containing MW have a carbon-steel shield plug assembly welded into the top.

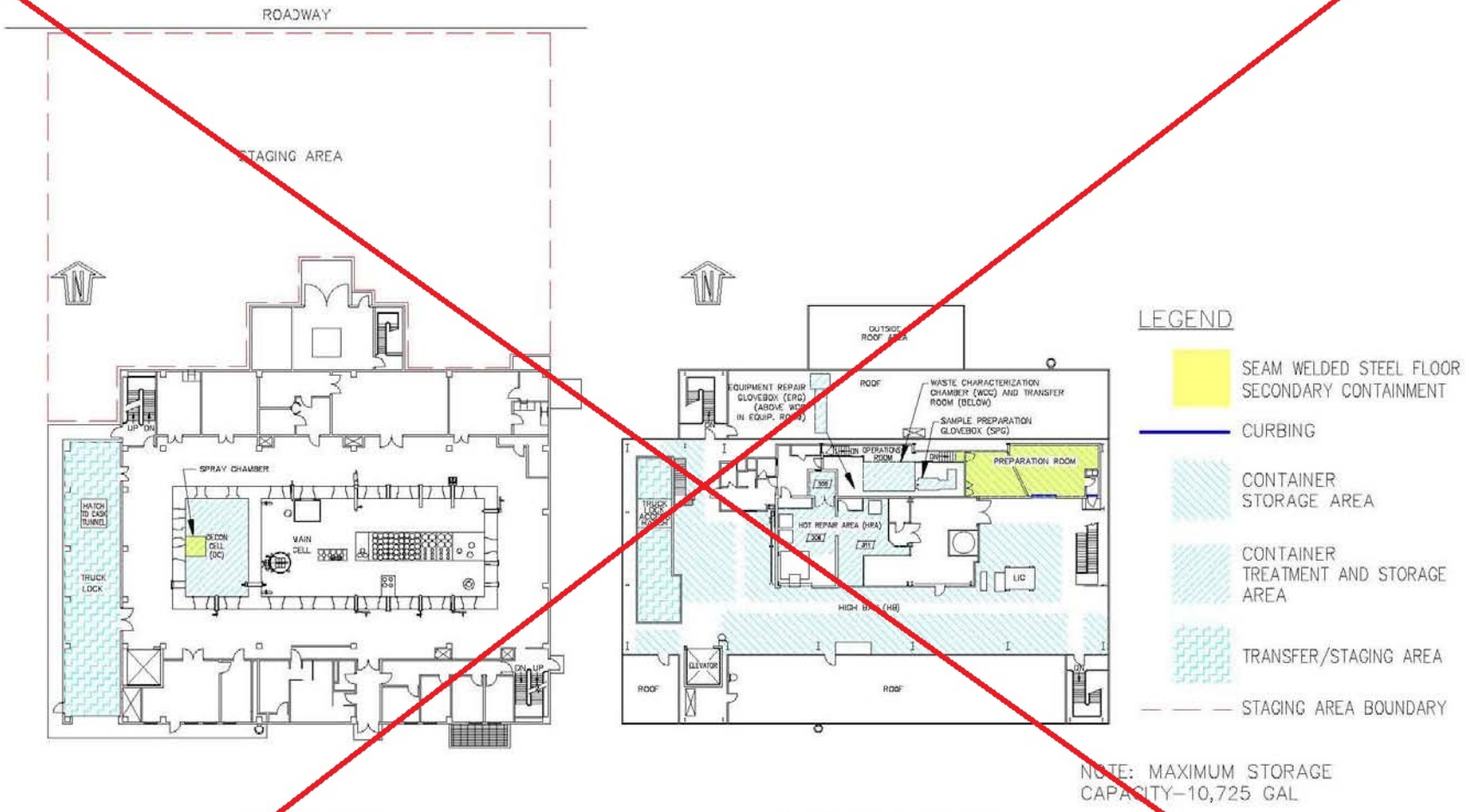
Attachment B-5

Floor Plans Schematic Showing Facility Arrangement and

Maximum Storage Capacity

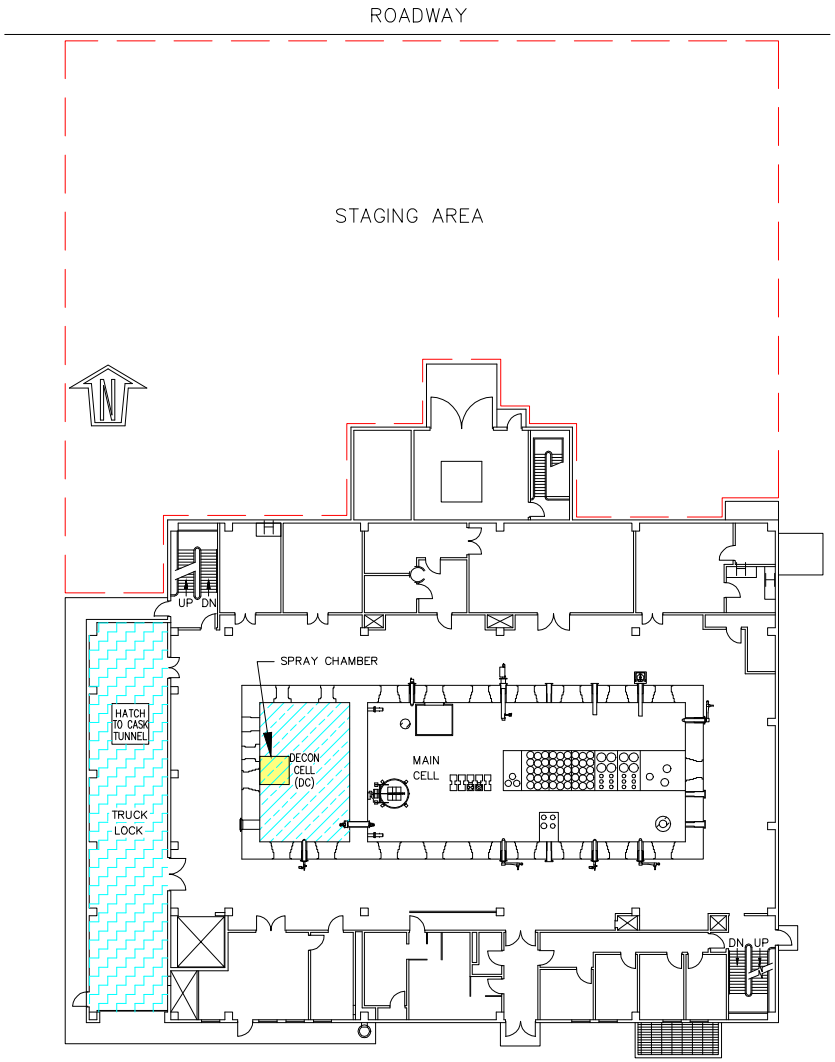
HFEF Building 785

Revised Drawing

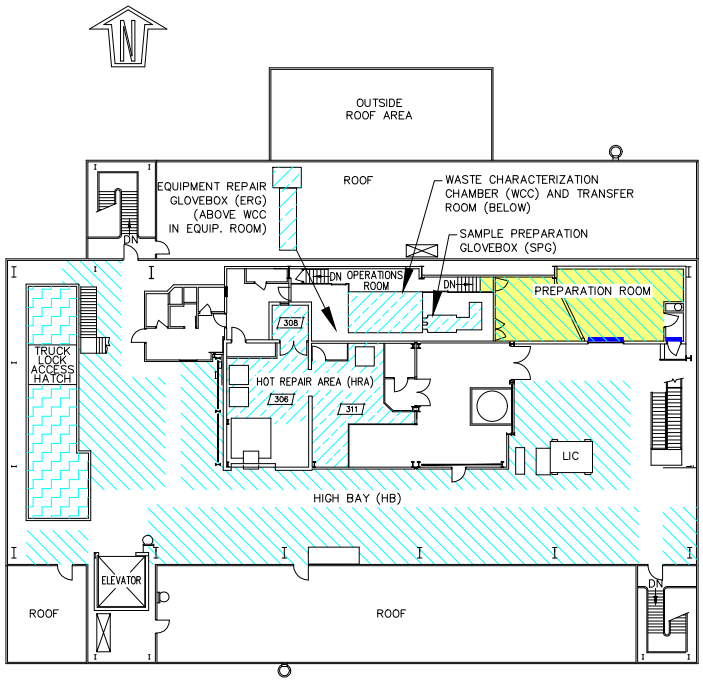


785–353r7
REV 7, 2/16

HFEF BUILDING 785 – 1ST FLOOR & HIGH BAY
FLOOR PLAN SHOWING FACILITY ARRANGEMENT, MAXIMUM STORAGE CAPACITY
AND FIXED SECONDARY CONTAINMENT



1ST FLOOR

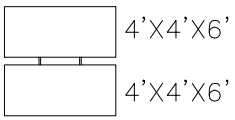


HIGH BAY FLOOR

LEGEND

- SEAM WELDED STEEL FLOOR SECONDARY CONTAINMENT
- CURBING
- CONTAINER STORAGE AREA
- CONTAINER TREATMENT AND STORAGE AREA
- TRANSFER/STAGING AREA
- STAGING AREA BOUNDARY

NOTE: MAXIMUM STORAGE CAPACITY–10,725 GAL



EXAMPLE OF STACKING ELEVATION VIEW

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REV 8, 9/16

HFEF BUILDING 785 – 1ST FLOOR & HIGH BAY
FLOOR PLAN SHOWING FACILITY ARRANGEMENT, MAXIMUM STORAGE CAPACITY AND FIXED SECONDARY CONTAINMENT

HWMA/RCRA STORAGE and TREATMENT PERMIT

for the

MATERIALS AND FUELS COMPLEX (MFC)

ATTACHMENT 1 – FACILITY DESCRIPTION

Section D – Process Description
Section D Attachments

EFFECTIVE DATE: OCTOBER 1, 2015

REVISION DATE: ~~JULY 1, 2016~~

container will be placed in the appropriate HWMA unit storage area (see Attachment D-3 for hazardous waste acceptance checklists). Inspections are documented on the HWMA Unit HW/MW Daily Container Transfer Inspection Form (ref. Attachment 4, Section F, Inspections).

HW/MW movement between buildings within MFC is generally by flatbed semitrailers, truck, or forklift. Container loading and unloading operations are conducted as described in Attachment 6, Section F, Procedures to Prevent Hazards, Section F-4(a).

D-2(a)(2)(e) Waste Placement

In accordance with National Fire Protection Association (NFPA) 101, The Life Safety Code (LSC) for Industrial Occupancies and Occupational Safety and Health Standards (OSHA), a minimum of 3 ft of aisle space is maintained for any means of ingress or egress into a HWMA unit. Placement of containers within the facility in accordance with this minimum aisle spacing requirement ensures unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment to any area of the facility operation in an emergency.

Adequate aisle space is also maintained around containers to facilitate inspections of the containers and the storage, verification, repackaging and/or treatment areas.

As some HW/MW containers are irregular and nonuniform in size and shape, the number of HW/MW containers in an HWMA units storage area depends on the floor space occupied by the particular HW/MW containers and the secondary containment pallets or pans used (if storing liquids) to elevate containers of liquid HW/MW off the floor.

Container storage may involve stacking of containers of no more than two containers high. No stacking of containers with free liquids is allowed. Adequate aisle space will be maintained around containers to facilitate inspections of the containers. Container stacking may be performed at HFEF (MFC-785), SCMS (MFC-793, MFC-793C and MFC-793G), and SSB (MFC-703).

~~SCMS s~~Storage configuration is provided in Attachment 1, Section B, MFC Facility Description, Attachment B-5 for HFEF, Attachment B-1~~03~~ for SCMS, and Attachment B-13 for SSB.

~~SSB storage configuration is provided in Attachment 1, Section B, MFC Facility Description, Attachment B-16.~~

used for shielding in the containers, carries the RCRA code D008 for toxicity. The RCRA codes for cadmium and chromium are D006 and D007 for toxicity.

The majority (by number of liners) of the HW/MW presently stored in the RSWF is hazardous because of the presence of elemental sodium.

The NaK alloys used in the LMFBR program were liquid at ambient temperatures. NaK, a liquid metal, is the only liquid stored in the RSWF. Procedural restrictions on the placing of liquids (other than NaK) in the RSWF containers have been enforced since the facility first began accepting waste. At ambient temperatures, elemental sodium (208°F melting point) and lead are solid. In addition, cadmium and chromium are solid including any of the other potential hazardous constituents listed above.

In addition to the HW/MW, the RSWF also stores non-waste items including, spent nuclear fuel and accountable nuclear material, some of which may contain sodium. ~~and radioactive waste.~~ The RSWF also stores non-hazardous radioactive waste. These materials are ~~also~~ stored in separate liners from the HW/MW. ~~The waste does not contain hazardous constituents or have hazardous characteristics as defined in 40 CFR 261.~~

The hazardous constituents are safely contained by the waste containment system of the RSWF, as long as the integrity of the containers is maintained. The hazardous constituents and the solid waste hardware associated with the constituents are fully compatible with the stainless steel and carbon steel waste containers.

The inner waste containers with Na/NaK were packaged in an inert atmosphere isolating the HW/MW from moisture and oxygen, which reduces the concern for over-pressurization of the containers and generation of gases. In addition, no absorbents are used with Na/NaK. There is a potential for ambient water vapor to be converted to hydrogen when the lid is welded on. To mitigate hydrogen gas production procedures and practices are in place to provide assurance the liners are free of visible moisture prior to use. If moisture is identified a pump or vacuum is used to remove any moisture from the liner or the liner is air dried. If unable to remove visible moisture, the liner is simply not used. Prior to opening a liner an evaluation is performed to determine if a liner contains a hazardous atmosphere. The liner may be purged prior to opening in a controlled manner in accordance with operational procedure RSWF-OI-002.

The potential for migration of waste is addressed in Section D-5(m).

conservatism to the design to account for such things as variable soil conditions, specifying size (e.g., rectifier and wire sizing), and procuring system components.

The adequacy of the cathodic protection system was demonstrated from 1993 to 2001 through the use of 12 4½-in. corrosion surveillance tubes (now known as radiation monitoring tubes) that were inspected by nondestructive methods (i.e., ultrasonic examination, which is no longer required). The results of the wall thickness measurements from the corrosion surveillance tubes indicated that general corrosion is not occurring. This is supported in the 2001 Corrosion Assessment Report for the Cathodic Protection System of the RSWF, dated October 10, 2001, see Attachment D-35. In addition, a 16-in liner is pulled every 46 years for corrosion surveillance (~~beginning in September~~every 4 years from 1997 to 2013). The liner pull examination includes a visual surface inspection and ultrasonic thickness measurements of the entire length of the liner every 1-in. at 45 degree intervals. The results of the liner pulls show that general corrosion is also not occurring. The overall conclusion is that the impressed current cathodic protection system and surrounding sand slurry are effectively protecting the liners from external corrosion. The cathodic protection system is operated and maintained to recommended industry standards.

The collected liner-to-soil potentials are reviewed by engineering to ascertain that each liner meets the cathodic protection action level of -0.85 volt and is therefore protected from corrosion. The liners to soil-potential reading are performed annually to identify wiring failures and to account for voltage potential changes as anodes are used up or as soil-moisture condition change. If a liner exhibits less than -0.85 volt potential (i.e., less negative than -0.85 volt) with respect to the soil, the rectifier output will be increased or necessary repairs made. A liner-to-soil potential greater [i.e., less negative] than -0.85 volts direct-current does not mean that the cathodic protection system is not operating, but does indicate that operational adjustments or preventative maintenance is required.

D-5(e) Site Air Conditions [IDAPA 58.01.05.08 and 012; 40 CFR 264.601(c)(4) and (5), 270.23 (b)]

The characteristics of the near-surface wind regime at the MFC can best be described using a graphical display called a wind rose. A wind rose is an effective method of showing joint wind speed and direction frequency distributions at a glance. The wind rose for MFC is presented in Volume 3 of the HWMA/RCRA Part B Permit for the Idaho National Laboratory, Exhibit B-6, page B-16. The diagram indicates that winds are generally out of the southwest. The climate at MFC is semi-

Attachment D-3

Example of Hazardous Waste Acceptance Checklists

EFF MATERIAL ACCEPTANCE CHECKSHEET

SECTION 1 — GENERATOR-SUPPLIED INFORMATION

General

Staff Specialist:		**Date:**	
Transferring facility:			
Process knowledge contact:			

Waste/Material

Source:			
Type:	❑ MW ❑ HW ❑ LLW ❑ TRU ❑ MTRU ❑ Radioactive Material		
List EPA Hazardous Waste codes:			
Container net volume (units):		Container gross volume (units):	
Transfer maximum gross volume (units):			
Description of characterization method:			

Container

Physical description:			
Content description:			
Radiation levels:	at 1 in.	at 1 meter	
Barcode No(s):			
Container net weight (lb):		Container gross weight (lb):	
Container properly labeled:	❑ Yes ❑ No	Transfer maximum gross weight (lb):	
Fissionable-material quantity (g):		DOE-Standard-1027 sum of the fractions per MCP-1989:	_____ or ❑ NC-DM Attach Form-381
Signature:		**Date:**	

SECTION 2 — RECEIVING FACILITY REVIEW AND APPROVAL

General

The generator's SAP and QAPjP have been reviewed for adequacy; they are acceptable:			❑ Yes ❑ No ❑ N/A
EFF Facility Manager:		**Date:**	
Verify mixed hazardous waste storage volume(s) is not exceeded.	❑ Yes ❑ No	EFF: 12,000 gal	

Verify EPA Hazardous waste codes written down above by generator are the same EPA Hazardous waste codes identified in the IWTS profile(s) provided by the generator or on the containers and that the EPA Hazardous waste codes meet the acceptable EPA Hazardous waste codes documented below for the receiving facility.

Staff Specialist:		**Date:**	
Acceptable EPA Hazardous Waste Codes for HWMA/RCRA Regulated Facilities	Facility	EPA Hazardous Waste Codes	
	EFF	Ignitable waste – D001 Corrosive waste – D002 Reactive waste – D003 Toxic-metal waste – D004 – D011 F-Listed waste – F001, F002, F005 U-Listed waste – U134	
Facility permitted to store/treat waste/material:	❑ Yes ❑ No	Storage duration:	
Waste/material receipt: ❑ Container ❑ Shipment	If shipment, number of containers:		

EFF MATERIAL ACCEPTANCE CHECKSHEET

Material profile No.:		IWTS Shipment Task Number:	
Storage requirements:		Surveillance requirements:	

Characterization

Waste-characterization data has been reviewed; adequate characterization has been performed and the data is complete, accurate, and sufficient to justify approval of the waste for acceptance at the receiving facility.

Staff Specialist:		**Date:**	

Calculations and Verifications

Hazard-Category Radionuclide Threshold Quantities and Sum of the Fractions

Current Sum	Projected Total	Total Exceeds 0.9
		❑ Yes ❑ No

Fissionable-Material Threshold Quantities

Current Inventory (g)	Projected Total (g)	Single Container or Transfer Exceeds 350 g	Inventory Exceeds Equivalent
		❑ Yes ❑ No	❑ Yes ❑ No

Receipt of the proposed transfer will not cause the receiving facility to meet or exceed applicable fissionable-material threshold quantities or hazard-category radionuclide threshold quantities and sum of the fractions.

Staff Specialist:		**Date:**	

For a proposed transfer that exceeds de minimis levels, waste-characterization data has been reviewed; it is in compliance with applicable nuclear and environmental regulations and is acceptable for storage or treatment at the receiving facility.

Peer Reviewer:		**Date:**	

Transfer Approval

The proposed transfer is approved for receipt at EFF.

EFF Facility Manager:		**Date:**	

SECTION 3 — WASTE/MATERIAL RECEIPT

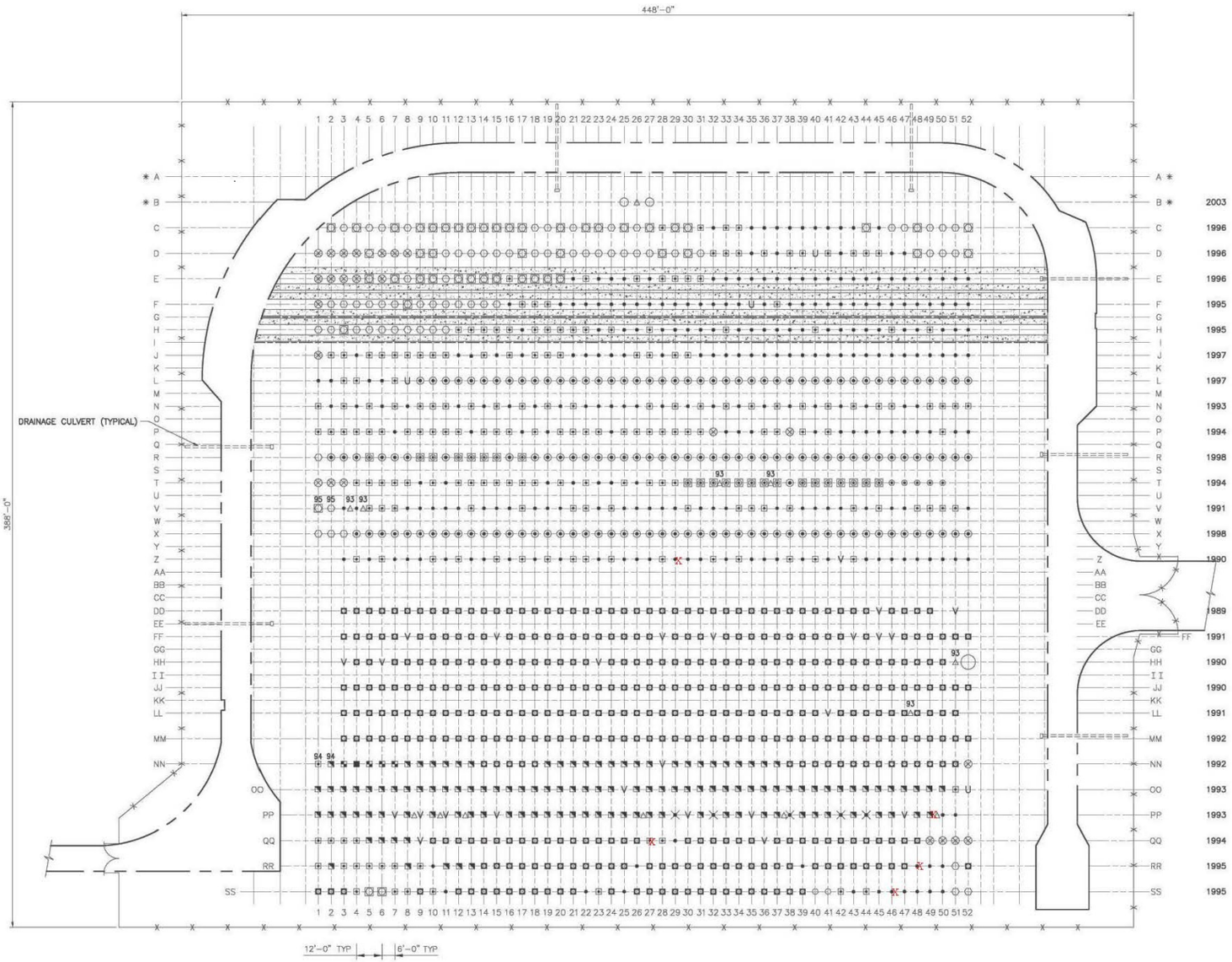
FRM-378, "All Container Storage Facilities Daily Container" Inspection Form has been completed.	❑ Yes ❑ No ❑ N/A
Storage No.:	

Shift Supervisor:		**Date:**	

Attachment D-31

Drawing of Liner Configuration (Example)

REVISIONS		
REV	DESCRIPTION	EFFECTIVE DATE
10	REMOVED PREVIOUS REVISION HISTORY. CHANGED ANL WEST FORMAT TO INL FORMAT. REVISED TITLE, AS-BUILT AS OF 8/12/2008, SEE ECR-562482	8/13/2008
11	AS-BUILT AS OF 10/01/2010, SEE ECR 576118	10/07/2010
12	AS-BUILT AS OF 08/04/2011, SEE ECR 595881	08/30/2011
13	AS-BUILT AS OF 2/2/15, SEE ECR-628817	2/16/15



LEGEND

- △ 4 1/2" OD X 12'-4" RADIATION MONITORING TUBE
- ○ 16" OD X 10'-0" LINER, EMPTY
- ▢ 16" OD X 10'-0" LINER, FULL
- • 16" OD X 12'-4" LINER, EMPTY
- ⊡ 16" OD X 12'-4" LINER, FULL
- ○ 24" OD X 13'-8" LINER UNFLANGED, EMPTY
- ▣ 24" OD X 13'-8" LINER UNFLANGED, FULL
- ◧ 24" OD X 13'-8" LINER FLANGED, EMPTY
- ◪ 24" OD X 13'-8" LINER FLANGED, FULL
- ◉ 26" OD X 13'-0" LINER, EMPTY
- ⊙ 26" OD X 13'-0" LINER, FULL
- ◩ 30" OD X 15'-1 1/4" LINER, EMPTY
- ■ 30" OD X 15'-1 1/4" LINER, FULL
- ○ 48" OD X 3'-9 3/4" LINERS (EBR-II NUCLIDE TRAPS)
- ◯ 60 3/4" OD X 11'-1" LINER (EBR-II PRIMARY COLD TRAP)
- ⊗ 16" OD X 12'-4" CORROSION SURVEILLANCE LINER
- ⊗ LINER NOT INSTALLED DUE TO ROCK INTERFERENCE
- * LINERS GENERALLY NOT INSTALLED IN ROW DUE TO SHALLOW ROCK
- R 1998 YEAR OF INSTALLATION OF LINERS IN ROW, UNLESS OTHERWISE NOTED ABOVE LINER (TYPICAL)
- 94 YEAR LINER INSTALLED, IF DIFFERENT THAN YEAR NOTED FOR ROW (TYPICAL)
- 3'-0" WIDE CONCRETE PADS, FULL LENGTH OF ROWS E, F AND H
- U UNUSABLE
- V VACATED SPACE. ENTIRE LINER REMOVED

RADIOACTIVE SCRAP AND WASTE FACILITY (RSWF) PLAN

SCALE: 1" = 20.0'

REQUESTER:	D. ERICKSON
RESP ENGR:	TOM ZAHN
DESIGN:	TOM ZAHN
DRAWN:	S.L. PALMER
PROJECT NO.	NA
SPCL CODE	AS-BUILT
FOR REVIEW/APPROVAL SIGNATURES	
SEE ECR NO.	NA
EFFECTIVE DATE:	5/25/93

Idaho National Laboratory

RSWF
RADIOACTIVE SCRAP & WASTE FACILITY
771

LINER CONFIGURATION

SIZE	CAGE CODE	INDEX CODE NUMBER (AREA / TYPE / FA / DIST)	DWG NO.	REV
E	01MF3	273 077 65 081	747635	13

SCALE: NONE SHEET 1 OF 1

W7710-0301-FF

HWMA/RCRA STORAGE and TREATMENT PERMIT

for the

MATERIALS AND FUELS COMPLEX (MFC)

ATTACHMENT 4

Section F-2 – Inspection Plan

Attachment F-3

Attachment F-4

Attachment F-5

Attachment F-6

EFFECTIVE DATE: OCTOBER 1, 2015

REVISION DATE: ~~JULY 1, 2016~~

- Fence and Gates – damage is an "unsat" condition
- Cathodic protection rectifier lights – lights off is an "unsat" condition
- Radiation monitoring tubes – elevated radiation reading is an "unsat" condition
- Exposed portion of liners – visible cracks, corrosion is an "unsat" condition
- Empty pulled liner – corrosion is an "unsat" condition.

To perform the empty pulled liner inspection, one corrosion surveillance liner (i.e., one of the designated empty standard 16-in. surrogate liners in Row Z, PP, QQ, RR, or SS) is pulled and inspected at least every six~~four~~ years to monitor the effectiveness of the cathodic protection system. The inspection, performed by an independent corrosion engineer, includes a visual surface inspection and contact ultrasonic thickness measurements every one inch of the entire liner length at 45-degree intervals. Depth measurements are performed at areas of localized corrosion, as required. The evaluation also includes a review of relevant facility documents and monthly and annual surveillance reports. The corrosion assessment report, provided to the Idaho Department of Environmental Quality (DEQ), summarizes the results of the inspection, the overall effectiveness of the cathodic protection system, and a revised liner pull inspection schedule, if warranted. Examples of the statement-of-work document and the most recent corrosion surveillance liner assessment report are included in Attachment F-5.

Operational Checks and Preventative Maintenance. Monthly and annual operational checks and preventative maintenance of the cathodic protection system is performed. Rectifier efficiency is evaluated monthly, and the liner-to-soil potentials of all liners and rectifier wiring integrity are assessed annually. Rectifier efficiency is an indication of operability that is calculated from field readings typically obtained from a watt-hour meter. Engineering assesses the resulting efficiencies and recommends adjustments or maintenance for those rectifiers, as necessary, to maintain adequate impressed current on each liner.

For the annual operational and preventative maintenance testing, qualified electricians collect liner-to-soil potential readings for each liner over a period of several days/weeks. Liners that do not meet the cathodic protection action level liner-to-soil potential of at least -0.85 volts-direct-current are evaluated further by Engineering to determine whether each liner is adequately protected from corrosion [e.g., a liner-to-soil potential greater (i.e., less negative) than -0.85

Attachment F-3

HWMA Unit Inspection Schedule

Materials and Fuels Complex Hazardous Waste Management Area (HWMA) Unit Inspection Schedule					
Item to Inspect	Types of Problems	Inspection Frequency	Inspection Responsibility	Implementing Document	Record Method
Weekly Container Storage and Daily Container Process Area and Transfer Area Inspections					
Telephones	Malfunctioning, damaged	Weekly[1]	Inspector	HWMA Unit Procedure	HWMA Inspection Log
Labels-hazardous/barcode	Missing, damaged, not legible	Weekly[1]	Inspector	HWMA Unit Procedure	HWMA Inspection Log
Container condition	Deterioration, leaking	Weekly[1]	Inspector	HWMA Unit Procedure	HWMA Inspection Log
Container position	Tipped, lid not secure, not elevated	Weekly[1]	Inspector	HWMA Unit Procedure	HWMA Inspection Log
Secondary containment-spill pallets	Cracked, leaking, liquid present	Weekly[1]	Inspector	HWMA Unit Procedure	HWMA Inspection Log
Floor coating-secondary containment	Cracked, chipped, lifting	Weekly[1]	Inspector	HWMA Unit Procedure	HWMA Inspection Log
Aisle space	< 3ft for ingress/egress	Weekly[1]	Inspector	HWMA Unit Procedure	HWMA Inspection Log
Transfer/staging areas	Evidence of releases	Per transfer	Inspector	HWMA Unit Procedure	HWMA Inspection Log
Daily Tank/Tank Area Inspections					
Tank/tank system piping	Leaking, deterioration	Daily[1]	Inspector	HWMA Unit Procedure	HWMA Inspection Log
Tank/tank system containment	Gaps, cracks, leaks, liquids	Daily[1]	Inspector	HWMA Unit Procedure	HWMA Inspection Log
Tank monitoring equipment	Off-normal readings	Daily[1]	Inspector	HWMA Unit Procedure	HWMA Inspection Log
Floor coating-secondary containment	Cracks, chips, lifting	Daily[1]	Inspector	HWMA Unit Procedure	HWMA Inspection Log
Miscellaneous Unit Inspection					
Fence and gates	Damaged	Weekly	Inspector	HWMA Unit Procedure	HWMA Inspection Log
Cathodic protection rectifier lights	Lights off	Weekly	Inspector	HWMA Unit Procedure	HWMA Inspection Log

MFC HWMA Unit Inspection Schedule (continued)					
Item to Inspect	Types of Problems	Inspection Frequency	Inspection Responsibility	Implementing Document	Record Method
Radiation monitoring tubes	Elevated radiation readings	Annually	Inspector	HWMA Unit Procedure	HWMA Inspection Log~~Operating Record~~
Exposed portion of liners	Cracks, corrosion[2], deterioration	Quarterly	Inspector	HWMA Unit Procedure	HWMA Inspection Log~~Operating Record~~
Radiation readings	Elevated radiation readings	Annually	Inspector	HWMA Unit Procedure	HWMA Inspection Log~~Operating Record~~
Empty pulled liner	Corrosion	64 year basis	Inspector	HWMA Unit Procedure	HWMA Operating Record
Monthly Hazard and Emergency Equipment Inspections					
Danger Unauthorized Personnel Keep Out sign(s) on access door(s)/gates	Missing, damaged, not legible	Monthly	Inspector	HWMA Unit Procedure	HWMA Inspection Log
Fire extinguishers	Missing, inaccessible	Monthly	Inspector	HWMA Unit Procedure	HWMA Inspection Log
Fire alarm pullboxes	Inaccessible	Monthly	Inspector	HWMA Unit Procedure	HWMA Inspection Log

MFC HWMA Unit Inspection Schedule (continued)

Item to Inspect	Types of Problems	Inspection Frequency	Inspection Responsibility	Implementing Document	Record Method
Emergency showers/eye wash stations (facility specific)	Missing, inaccessible, inoperable	Monthly	Inspector	HWMA Unit Procedure	HWMA Inspection Logs
Spill control equipment (facility specific)	Missing, inaccessible	Monthly	Inspector	HWMA Unit Procedure	HWMA Inspection Log

1. For containers when waste is present and for tank systems when waste is present or every day the tank is in operation (i.e., storing or treating hazardous waste). If the tank and all associated ancillary equipment are completely emptied by gravity draining, the tank system is considered not in operation, and daily inspections will not be required.
2. Corrosion is defined as visual signs of pitting and/or flaking.

HWMA Unit Operational Checks and Preventative Maintenance Activities					
Item to Test	Types of Problems	Frequency	Responsibility	Implementing Document	Record Method
Fire extinguishers	Malfunctioning	Quarterly	LSS Personnel	LSS Procedure	LSS Data Management
Fire alarm pullboxes	Malfunctioning	Annually	LSS Personnel	LSS Procedure	LSS Data Management
Emergency showers/eye wash stations	Malfunctioning	Annually	Maintenance and Ops Personnel	PM Schedule/HWMA Unit Procedure	Operating record
Site emergency signals/alarms/notifications	Malfunctioning	Annually	Maintenance or Ops Personnel	PM Schedule/HWMA Unit Procedure	Operating record
RSWF Cathodic protection system — Rectifier efficiency	Unsatisfactory per Engineering	Monthly	Maintenance personnel	PM Schedule	Operating record
RSWF Cathodic protection system — Liner-to-soil potentials — Rectifier wiring integrity	Unsatisfactory per Engineering	Annually	Maintenance personnel	PM Schedule	Operating record
Universal Spill control equipment (HFEF, SCMS)	Verify contents have not degraded and are useable	Annually	Ops personnel	HWMA Unit Procedure	Operating record
RSWF Culvert Cleaning	Unsatisfactory per Operations	Semi-Annual	Maintenance personnel	PM Schedule/HWMA Unit Procedure	Operating record
RSWF Erosion Repair	Unsatisfactory per Operations	Annually	Maintenance personnel	PM Schedule/HWMA Unit Procedure	Operating record
LSS – Life Safety Systems					

Attachment F-4

Examples of HWMA Unit Inspection Forms

and Preventative Maintenance Data Sheets

SODIUM STORAGE BUILDING (SSB) (703) WEEKLY INSPECTION FORM
HWMA UNIT INSPECTION OF CONTAINERS & CONTAINER STORAGE AREAS

(Instructions on the reverse side)

COMPLETION					
TSD Technician: (Please Print Full Name)		Date:		Time:	

INSPECTION TYPE
❑ Waste not present, inspection for items 1-4 not required, mark N/A
❑ Weekly (during normal container - storage operations).
❑ Weekly HRA inspection from outside the HRA.
❑ Monthly HRA inspection from within the HRA (if all items listed below are not visible for inspection).

INSPECTION

Item	Results	
	General Area	High Rad Area
1. Hazardous waste and barcode labels are in place, legible, and not damaged.	❑ Sat ❑ Unsat ❑ N/A	❑ Sat ❑ Unsat ❑ N/A
2. Containers position: upright, elevated, and securely closed (unless in process).	❑ Sat ❑ Unsat ❑ N/A	❑ Sat ❑ Unsat ❑ N/A
3. Containers condition: intact with no evidence of leaks or deterioration caused by corrosion, pitting, rusting, dents, or swelling.	❑ Sat ❑ Unsat ❑ N/A	❑ Sat ❑ Unsat ❑ N/A
4. Portable secondary containment: no gaps, cracks, leaks, or liquids	❑ Sat ❑ Unsat ❑ N/A	❑ Sat ❑ Unsat ❑ N/A
5. An aisle maintained of at least 3 ft for ingress and egress.	❑ Sat ❑ Unsat	
6. Radio working.	❑ Sat ❑ Unsat	
7. Spill control material is in place and accessible. • Portable 30-gal can of dry soda, ash, or sand with nonsparking shovel.	❑ Sat ❑ Unsat	

DEFICIENCIES AND CORRECTIVE ACTIONS

Deficiency Description	Corrective Action	
	Description	Completion Date
Previously Identified ❑ Yes ❑ No	Scheduled ❑ Yes ❑ No	

REVIEW

TSD Shift Supervisor (TSD SS)/ Designee:		**Date:**	

SODIUM STORAGE BUILDING (SSB) (703) WEEKLY INSPECTION FORM
HWMA UNIT INSPECTION OF CONTAINERS & CONTAINER STORAGE AREAS

INSTRUCTIONS

[1] TSD Technician—Perform the following:

- **[a]** Prior to performing the inspection, review the RCRA Remedial Description Log (located in the TSD Shift Supervisor's Office).
- **[b]** If open deficiencies are identified on the RCRA Remedial Description Log, record the associated tracking number on this and subsequent inspection logs until the corrective action has been completed.
- **[c]** Prior to performing inspection obtain radio and verify radio works. Document operability on Item #6.
- **[d]** Print your name and record the date and the time.
- **[e]** Perform inspections of the general area and Hot Repair Area (HRA) from outside the HRA weekly during normal on-going container storage operations. Perform an inspection of the HRA monthly if a thorough inspection can not be performed from outside the HRA.
- **[f]** Complete the "Inspection Requirements" checklist for each requirement by marking ✓ Sat=satisfactory, Unsat=unsatisfactory, or N/A=not applicable.
- **[g]** If you are able to take immediate corrective action; record the deficiency, correct the deficiency, mark ☑ Sat; and describe the corrective action taken (e.g., replaced label).
- **[h]** If you are not able to take immediate action, mark ☑ Unsat, describe the deficiency, and immediately contact the TSD SS/Designee or TSD Manager.
- **[i]** Place the completed log in the designated location for the TSD SS/Designee to review.

[2] TSD SS/Designee—Perform the following:

- **[a]** Record that the inspection was performed on the RCRA Inspection Tracking Index.
- **[b]** Review the log, and facility, if necessary, to ensure that the inspection and any immediate corrective actions have been satisfactorily completed. Sign and date the log and file it in the designated area.
- **[c]** Record on the RCRA Inspection Tracking Index if the deficiency was satisfactorily corrected immediately or is still outstanding. Assign a tracking number (for example, TSD-06-001) to the unresolved deficiency and record a detailed description of the deficiency on the RCRA Remedial Description Log.
- **[d]** When deficiencies have been corrected, enter the corrective action taken and completion date on the original inspection form(s) and complete the entries for the deficiencies on the RCRA Inspection Tracking Index and the RCRA Remedial Description Log.

Comments _____

FRM-364
06/21/16
Rev. 5

SODIUM STORAGE BUILDING (SSB) (703) MONTHLY INSPECTION FORM
HWMA UNIT INSPECTION OF CONTAINER STORAGE AREAS

(Instructions on the reverse side)

COMPLETION					
TSD Technician: (Please Print)		Date:		Time:	

SIGNS	
THE FOLLOWING ACCESS DOOR IS POSTED WITH A LEGIBLE SIGN THAT STATES: "DANGER - UNAUTHORIZED PERSONNEL KEEP OUT"	
1. East Door	❑Sat ❑Unsat
2. South west door	❑Sat ❑Unsat
FIRE ALARM PULLBOXES AT THE FOLLOWING LOCATIONS ARE ACCESSIBLE:	
1. Outside east door	❑Sat ❑Unsat
2. Inside east door	❑Sat ❑Unsat
3. Near south door	❑Sat ❑Unsat
FIRE EXTINGUISHERS ARE PRESENT, ACCESSIBLE, AND OPERABLE (see Note)	
1. MLX-350, South of 703 in Tin Shed *	❑Sat ❑Unsat
2. MLX, near east door	❑Sat ❑Unsat
3. ABC, near east door	❑Sat ❑Unsat
4. ABC, near south door	❑Sat ❑Unsat
5. MLX, near south door	❑Sat ❑Unsat
* If snow depth will impede use of this fire extinguisher, mark ☑ Unsat.	

DEFICIENCIES AND CORRECTIVE ACTIONS

Deficiency Description	Previously Identified	Corrective Action		
		Description	Scheduled	Completion Date
	❑Yes ❑No		❑Yes ❑No	
	❑Yes ❑No		❑Yes ❑No	

REVIEW			
TSD Shift Supervisor (TSD/SS)/Designee:		**Date:**	

SODIUM STORAGE BUILDING (SSB) (703) MONTHLY INSPECTION FORM
HWMA UNIT INSPECTION OF CONTAINER STORAGE AREAS

INSTRUCTIONS

[1] TSD Technician—Perform the following:

- **[a]** Prior to performing the inspection, review the RCRA Remedial Description Log (located in the TSD Shift Supervisor's Office).
- **[b]** If open deficiencies are identified on the RCRA Remedial Description Log, record the associated tracking number on the subsequent inspection log until the corrective action has been completed.
- **[c]** Print your name and record the date and the time.
- **[d]** Perform inspections monthly.
- **[e]** Complete the "Inspection Requirements" checklist for each requirement by marking ✓ Sat=satisfactory or Unsat=unsatisfactory.
- **[f]** If you are able to take immediate corrective action; record the deficiency, correct the deficiency, mark ☑ Sat; and describe the corrective action taken (e.g., replaced label).
- **[g]** If you are not able to take immediate action mark ☑ Unsat, describe the deficiency, and immediately contact the TSD SS/Designee or TSD Manager. On backshift, notify the appropriate contacts on the TSDF call-down list (as applicable).
- **[h]** Place the completed log in the designated location for the TSD SS/Designee to review.

[2] TSD SS/Designee—Perform the following:

- **[a]** Record that the inspection was performed on the RCRA Inspection Tracking Index.
- **[b]** Review the log, and facility, if necessary, to ensure that the inspection and any immediate corrective actions have been satisfactorily completed. Sign and date the log and file it in the designated area.
- **[c]** Record on the RCRA Inspection Tracking Index if the deficiency was satisfactorily corrected immediately or is still outstanding. Assign a tracking number (i.e., TSD-06-001) to the unresolved deficiency and record a detailed description of the deficiency on the RCRA Remedial Description Log.
- **[d]** When deficiencies have been corrected, enter the corrective action taken and completion date on the original inspection form(s) and complete the entries for the deficiencies on the RCRA Inspection Tracking Index and the RCRA Remedial Description Log.

Note: Present, accessible, and operable are satisfactorily met when the following criteria have been met:
Present: Means that the fire extinguisher is physically present.
Accessible: Means there is a clear path to the fire extinguisher.
Operable: Means the fire extinguisher is maintained so personnel handling hazardous waste have emergency equipment available that operates to minimize harm to those individuals during an emergency. For the inspector checking fire extinguishers, the following must be met to identify the unit as operable: (1) safety seals and tamper indicators are intact, (2) assembly is intact, (3) there is no evidence of damage, corrosion, or leakage, and (4) if equipped with a pressure gauge, the indicator is in the "green zone," or the "pop-up" indicator in the fill cap is not in the up position.

Comments _____

RADIOACTIVE SCRAP AND WASTE FACILITY (RSWF) (771) WEEKLY INSPECTION FORM
HWMA UNIT INSPECTION OF MISCELLANEOUS UNIT
(Instructions on the reverse side)

COMPLETION					
TSD Technician: (Please Print Full Name)		Date:		Time:	

INSPECTION

❑ All Inspections complete

❑ Inspection numbers 6 and 7 not complete (covered by snow)

Item	Results
1. Telephone is working.	❑Sat ❑Unsat
2. "**Danger-Unauthorized Personnel Keep Out**" signs on gates are present and legible.	❑Sat ❑Unsat
3. Barrier fence in good condition.	❑Sat ❑Unsat
4. Gates are in good condition.	❑Sat ❑Unsat
5. Cathodic protection rectifier lights are on.	❑Sat ❑Unsat
6. Culverts are not obstructed with soil and debris.	❑Sat ❑Unsat
7. Outer facility berm is in good condition (No eroded banks).	❑Sat ❑Unsat

DEFICIENCIES AND CORRECTIVE ACTIONS

Deficiency Description	Corrective Action	
	Description	Completion Date
Previously Identified ❑Yes ❑No	Scheduled ❑Yes ❑No	

REVIEW

TSD Shift Supervisor (TSD SS)/Designee:		**Date:**	

RADIOACTIVE SCRAP AND WASTE FACILITY (RSWF) (771) WEEKLY INSPECTION FORM
HWMA UNIT INSPECTION OF MISCELLANEOUS UNIT

INSTRUCTIONS

[1] **TSD Technician**—Perform the following:

- **[a]** Prior to performing the inspection, review the RCRA Remedial Description Log (located in the TSD Shift Supervisor's Office).
- **[b]** If open deficiencies are identified on the RCRA Remedial Description Log, record the associated tracking number on this and subsequent inspection logs until the corrective action has been completed.
- **[c]** Print your name and record the date and the time.
- **[d]** Perform inspections weekly.
- **[e]** Complete the "Inspection Requirements" checklist for each requirement by marking ✓ **Sat**=satisfactory or **Unsat**=unsatisfactory.
- **[f]** If you are able to take immediate corrective action; record the deficiency, correct the deficiency, mark ☑ **Sat**; and describe the corrective action taken (e.g., replaced sign).
- **[g]** If you are not able to take immediate action, mark ☑ **Unsat**, describe the deficiency, and immediately contact the TSD SS/Designee or TSD Manager.
- **[h]** Place the completed log in the designated location for the TSD SS/Designee to review.

[2] **TSD SS/Designee**—Perform the following:

- **[a]** Record that the inspection was performed on the RCRA Inspection Tracking Index.
- **[b]** Review the log, and facility, if necessary, to ensure that the inspection and any immediate corrective actions have been satisfactorily completed. Sign and date the log and file it in the designated area.
- **[c]** Record on the RCRA Inspection Tracking Index if the deficiency was satisfactorily corrected immediately or is still outstanding. Assign a tracking number (for example, TSD-06-001) to the unresolved deficiency and record a detailed description of the deficiency on the RCRA Remedial Description Log.
- **[d]** When deficiencies have been corrected, enter the corrective action taken and completion date on the original inspection form(s) and complete the entries for the deficiencies on the RCRA Inspection Tracking Index and the RCRA Remedial Description Log.

Comments _____

HOT FUEL EXAMINATION FACILITY (HFEF) (785) MONTHLY INSPECTION FORM
HWMA UNIT INSPECTION OF CONTAINERS & CONTAINER STORAGE/PROCESS AREAS

(Instructions on the reverse side)

COMPLETION					
TSD Inspector: (Please Print Full Name)		Date:		Time:	

MAIN FLOOR	3RD FLOOR
Signage – The following access doors are posted with a legible sign that states: "DANGER – UNAUTHORIZED PERSONNEL KEEP OUT"	**Signage – The following access doors are posted with a legible sign that states: "DANGER – UNAUTHORIZED PERSONNEL KEEP OUT"**
1. Decon cell entry door: ❑ Sat ❑ Unsat	1. Northwest door: ❑ Sat ❑ Unsat
	2. Southeast door: ❑ Sat ❑ Unsat
FIRE ALARM PULLBOXES ARE PRESENT AT THE FOLLOWING LOCATIONS AND ARE ACCESSIBLE.	**FIRE ALARM PULLBOXES ARE PRESENT AT THE FOLLOWING LOCATIONS AND ARE ACCESSIBLE.**
1. Northwest exit: ❑ Sat ❑ Unsat	1. Northwest exit: ❑ Sat ❑ Unsat
2. Southeast exit: ❑ Sat ❑ Unsat	2. Southeast exit: ❑ Sat ❑ Unsat
FIRE EXTINGUISHERS ARE PRESENT, ACCESSIBLE, AND OPERABLE AT THE FOLLOWING LOCATIONS (see Note).	**FIRE EXTINGUISHERS ARE PRESENT, ACCESSIBLE, AND OPERABLE AT THE FOLLOWING LOCATIONS (see Note).**
Northwest corner – ABC: ❑ Sat ❑ Unsat	HRA WALL – CO2: ❑ Sat ❑ Unsat
West wall – CO2: ❑ Sat ❑ Unsat	Room 304 – ABC: ❑ Sat ❑ Unsat
Southeast corner – ABC: ❑ Sat ❑ Unsat	Northeast Corner, Outside Prep Room - ABC: ❑ Sat ❑ Unsat
Truck Trans. Eastwall–2 ABC's: ❑ Sat ❑ Unsat	WCC – ABC: ❑ Sat ❑ Unsat
	WCC – MLX: ❑ Sat ❑ Unsat
	EYE WASH STATION ~~AND EMERGENCY SHOWER ARE~~ IS PRESENT, ACCESSIBLE, AND OPERABLE AT THE FOLLOWING LOCATION~~S~~ (see Note).
	1. Eyewash – Southside: ❑ Sat ❑ Unsat
	~~2. Shower – Room 304: ❑ Sat ❑ Unsat~~
Portable Spill Control Cabinet Seal is Intact and Cabinet is Accessible	**Portable Spill Control Cabinet Seal is Intact and Cabinet is Accessible**
1. Truck Transfer Area: ❑ Sat ❑ Unsat	Northeast Corner Prep Room Door ❑ Sat ❑ Unsat

DEFICIENCIES AND CORRECTIVE ACTIONS

Deficiency Description	Corrective Action	
	Description	Completion Date
Previously Identified ❑Yes ❑No ❑N/A	Scheduled ❑Yes ❑No ❑N/A	

REVIEW

Facility Manager or Designee:		Date:	

INSTRUCTIONS

[1] **TSD Inspector:** Perform the following:

- **[a]** Prior to performing the inspection, review the RCRA Remedial Description Log (located in Record Storage Area).
- **[b]** If open deficiencies are identified on the RCRA Remedial Description Log, record the associated tracking number on this inspection log in the Deficiencies Description section or Comments section until the corrective action has been completed.
- **[c]** Print your name and record the date and time.
- **[d]** Perform inspections monthly (once every 30 days or calendar month) in all container storage/treatment areas.
- **[e]** Complete the "Inspection Requirements" checklist for each requirement by marking ✓ Sat=satisfactory or Unsat=unsatisfactory.
- **[f]** If you are able to take immediate corrective action; record the deficiency, correct the deficiency, mark ☑ Sat; and describe the corrective action taken (e.g., replace sign).
- **[g]** If you are not able to take immediate action mark ☑ Unsat, describe the deficiency, and immediately contact one of the following: Staff Specialist, SS, and/or Facility Manager/Designee. On backshift, notify the appropriate contacts on the TSDF call-down list (as applicable).
- **[h]** Place the completed log in the designated location for the Facility Manager/Designee to review.

[2] **Facility Manager or Designee:** Perform the following:

- **[a]** Record that the inspection was performed on the RCRA Inspection Tracking Index.
- **[b]** Review the log, and facility, if necessary, to ensure that the inspection and any immediate corrective actions have been satisfactorily completed. Sign and date the log and file it in the designated area.
- **[c]** Record on the RCRA Inspection Tracking Index if the deficiency was satisfactorily corrected immediately or is still outstanding. Assign a tracking number (for example, TSD-06-001) to the unresolved deficiency and record a detailed description of the deficiency on the RCRA Remedial Description Log.
- **[d]** When deficiencies have been corrected, enter the corrective action taken and completion date on the original inspection form(s) and complete the entries for the deficiencies on the RCRA Inspection Tracking Index and the RCRA Remedial Description Log.

Note: Present, accessible, and operable are satisfactorily met when the following criteria have been met:

Present: means that the emergency shower, eye wash, or fire extinguisher is physically present.

Accessible: means there is a clear path to the emergency shower, eyewash, or fire extinguisher.

Operable: means the emergency ~~shower,~~ eyewash, or fire extinguisher is maintained so personnel handling hazardous waste have emergency equipment available that operates to minimize harm to those individuals during an emergency. For the inspector checking the emergency ~~shower and~~ eye wash unit~~s~~, the following must be met to identify the unit is operable: (1) The~~se~~ emergency unit~~s have~~ has a supply of water (~~hard-piped or~~ available as part of the self-contained unit) and ~~are~~is not tagged "out-of-service." Note: No discharge of water is required for these monthly inspections. (2) The~~se~~ unit~~s~~ has~~have~~ a current annual inspection tag. (3) The unit~~s~~ is~~are~~ not tagged "out-of-service." For fire extinguishers, the following must be met to identify the unit as operable: (1) safety seals and tamper indicators are intact, and/or indicated pressure is "normal," (2) assembly is intact, (3) there is no evidence of damage, corrosion, or leakage, and (4) if equipped with a pressure gauge, the indicator is in the "green zone," or the "pop-up" indicator in the fill cap is not in the up position.

Comments _____

FRM-371
06/21/16
Rev. 10

SODIUM COMPONENTS MAINTENANCE SHOP (SCMS) (793) DAILY TANK INSPECTION FORM HWMA UNIT INSPECTION OF TANKS AND TANK STORAGE/PROCESS AREAS

(Instructions on the reverse side)

COMPLETION					
TSD Technician: (Please Print Full Name)		Date:		Time:	

INSPECTION REQUIREMENTS

LOW BAY	HIGH BAY
❑ Daily (during normal storage operations).	❑ N/A (Mixed waste not present in the Water Wash System. **Note:** *SCMS-OI-7 verifies no standing water remains in the water wash system after completion of water wash.*) *No inspection is required for Items 1 thru 3 below.*
	❑ Daily (during processing/treatment operations).

Item	Results	Item	Results
1. Tank and piping are intact; no leaking or deterioration.	❑ Sat ❑ Unsat	1. Tank and piping are intact; no leaking or deterioration.	❑ Sat ❑ Unsat
2. Tank secondary containment (i.e., pit floor) has no gaps or cracks.	❑ Sat ❑ Unsat	2. Area floor coating has no cracks, chips, or lifting. (Use colored tape to cover any defects.)	❑ Sat ❑ Unsat
3. Pit floor has no liquids.	❑ Sat ❑ Unsat	3. Area floor coating has no liquid or leaks accumulated on floor.	❑ Sat ❑ Unsat

DEFICIENCIES AND CORRECTIVE ACTIONS

	Corrective Action	
Deficiency Description	Description	Completion Date
Previously Identified ❑ Yes ❑ No	Scheduled ❑ Yes ❑ No	

REVIEW

TSD Shift Supervisor (TSD SS)/Designee:		**Date:**	

SODIUM COMPONENTS MAINTENANCE SHOP (SCMS) (793) DAILY TANK INSPECTION FORM HWMA UNIT INSPECTION OF TANKS AND TANK STORAGE/PROCESS AREAS

INSTRUCTIONS

[1] **TSD Technician** — Perform the following:

- **[a]** Prior to performing the inspection, review the RCRA Remedial Description Log (located in the TSD Shift Supervisor's Office).
- **[b]** If open deficiencies are identified on the RCRA Remedial Description Log, record the associated tracking number on this and subsequent inspection logs until the corrective action has been completed.
- **[c]** Print your name and record the date and the time.
- **[d]** Perform inspections daily.
- **[e]** Complete the "Inspection Requirements" checklist for each requirement by marking ✓ Sat=satisfactory or Unsat=unsatisfactory.
- **[f]** If you are able to take immediate corrective action; record the deficiency, correct the deficiency, mark ☑ Sat; and describe the corrective action taken (e.g., labels). On backshift, ensure that the call down list has been informed of any off-normal condition identified during rounds of SCMS.
- **[g]** If you are not able to take immediate action; mark ☑ Unsat, describe the deficiency, and immediately contact the TSD SS/Designee, Operations Manager, or on backshift the call down list.
- **[h]** Place the completed log in the designated location for the TSD SS/Designee to review.

[2] **TSD SS/Designee** — Perform the following:

- **[a]** Record that the inspection was performed on the RCRA Inspection Tracking Index.
- **[b]** Review the log, and facility, if necessary, to ensure that the inspection and any immediate corrective actions have been satisfactorily completed. Sign and date the log and file it in the designated area.
- **[c]** Record on the RCRA Inspection Tracking Index if the deficiency was satisfactorily corrected immediately or is still outstanding. Assign a tracking number (for example, TSD-06-001) to the unresolved deficiency and record a detailed description of the deficiency on the RCRA Remedial Description Log.
- **[d]** When deficiencies have been corrected, enter the corrective action taken and completion date on the original inspection form(s) and complete the entries for the deficiencies on the RCRA Inspection Tracking Index and the RCRA Remedial Description Log.

Comments _____

SODIUM COMPONENTS MAINTENANCE SHOP (SCMS) (793) MONTHLY INSPECTION FORM
HWMA UNIT INSPECTION OF CONTAINER AND TANK STORAGE AREA
(Instructions on the reverse side)

TSD Technician: (Please Print)		Date:		Time:	

SIGNS				
THE FOLLOWING ACCESS DOORS ARE POSTED WITH A LEGIBLE SIGN THAT STATES: "DANGER - UNAUTHORIZED PERSONNEL KEEP OUT"				
Item	793 Hi-Bay	793 Low Bay	793 C	793 G
1. East door	❑Sat ❑Unsat	❑Sat ❑Unsat	❑Sat ❑Unsat	
2. West door		❑Sat ❑Unsat	❑Sat ❑Unsat	❑Sat ❑Unsat
FIRE ALARM PULLBOXES AT THE FOLLOWING LOCATIONS ARE ACCESSIBLE:				
1. East door	❑Sat ❑Unsat	❑Sat ❑Unsat	❑Sat ❑Unsat	
2. West door		❑Sat ❑Unsat	❑Sat ❑Unsat	
SODIUM BURN KIT IS PRESENT AND ACCESSIBLE. EYEWASH STATION AND EMERGENCY SHOWER ARE PRESENT, ACCESSIBLE, AND OPERABLE (see Note)				
1. Southeast corner	❑Sat ❑Unsat			
FIRE EXTINGUISHERS ARE PRESENT, ACCESSIBLE, AND OPERABLE (see Note)				
1. Two MLX, south wall	❑Sat ❑Unsat			
2. ABC, south wall	❑Sat ❑Unsat			
3. Portable MLX-350	❑Sat ❑Unsat			
4. ABC, northeast corner	❑Sat ❑Unsat			
5. ABC, near east door		❑Sat ❑Unsat	❑Sat ❑Unsat	
6. ABC, solidification area		❑Sat ❑Unsat		
7. MLX, near east door			❑Sat ❑Unsat	

DEFICIENCIES AND CORRECTIVE ACTIONS				
Deficiency Description	Previously Identified	Corrective Action		
		Description	Scheduled	Completion Date
	❑Yes ❑No		❑Yes ❑No	

REVIEW			
TSD Shift Supervisor (TSD SS)/Designee:		**Date:**	

SODIUM COMPONENTS MAINTENANCE SHOP (SCMS) (793) MONTHLY INSPECTION FORM
HWMA UNIT INSPECTION OF CONTAINER AND TANK STORAGE AREA

INSTRUCTIONS

[1] **TSD Technician**—Perform the following:

- **[a]** Prior to performing the inspection, review the RCRA Remedial Description Log (located in the TSD Shift Supervisor's Office).
- **[b]** If open deficiencies are identified on the RCRA Remedial Description Log, record the associated tracking number on the subsequent inspection log until the corrective action has been completed.
- **[c]** Print your name and record the date and the time.
- **[d]** Perform inspections monthly (once every 30 days) in all container and tank storage/treatment areas.
- **[e]** Complete the "Inspection Requirements" checklist for each requirement by marking ✓ Sat=satisfactory or Unsat=unsatisfactory.
- **[f]** If you are able to take immediate corrective action; record the deficiency, correct the deficiency, mark ☑ Sat; and describe the corrective action taken (e.g., replace sign).
- **[g]** If you are not able to take immediate action mark ☑ Unsat, describe the deficiency, and immediately contact the TSD SS/Designee or TSD Manager. On backshift, notify the appropriate contacts on the TSDF call-down list (as applicable).
- **[h]** Place the completed log in the designated location for the TSD SS/Designee to review.

[2] **TSD SS/Designee**—Perform the following:

- **[a]** Record that the inspection was performed on the RCRA Inspection Tracking Index.
- **[b]** Review the log, and facility, if necessary, to ensure that the inspection and any immediate corrective actions have been satisfactorily completed. Sign and date the log and file it in the designated area.
- **[c]** Record on the RCRA Inspection Tracking Index if the deficiency was satisfactorily corrected immediately or is still outstanding. Assign a tracking number (i.e., TSD-06-001) to the unresolved deficiency and record a detailed description of the deficiency on the RCRA Remedial Description Log.
- **[d]** When deficiencies have been corrected, enter the corrective action taken and completion date on the original inspection form(s) and complete the entries for the deficiencies on the RCRA Inspection Tracking Index and the RCRA Remedial Description Log.

Note: Present, accessible, and operable are satisfactorily met when the following criteria have been met:
Present: Means that the emergency shower, eyewash, or fire extinguisher is physically present.
Accessible: Means there is a clear path to the emergency shower, eyewash, or fire extinguisher.
Operable: Means the emergency shower, eyewash, or fire extinguisher is maintained so personnel handling hazardous waste have emergency equipment available that operates to minimize harm to those individuals during an emergency. For the inspector checking emergency shower and eyewash units, the following must be met to identify the unit is operable: (1) These emergency units have a supply of water (hard-piped or available as part of the self-contained unit), are not tagged "out-of-service." Note: No discharge of water is required for these monthly inspections. (2) These units have a current annual inspection tag. For fire extinguishers, the following must be met to identify the unit as operable: (1) safety seals and tamper indicators are intact, (2) assembly is intact, (3) there is no evidence of damage, corrosion, or leakage, and (4) if equipped with a pressure gauge, the indicator is in the "green zone," or the "pop-up" indicator in the fill cap is not in the up position.

Comments _____

ALL CONTAINER STORAGE FACILITIES DAILY CONTAINER TRANSFER INSPECTION FORM

(Instructions on Page 2)

Section I: Facility from:		Facility to:	
TSD Inspector: (Please Print Full Name)		Date:	Time:

CONTAINERS TRANSFERRED

Bar Code No.	Type In	Type Out	Bar Code No.	Type In	Type Out	Bar Code No.	Type In	Type Out

INSPECTION/DOCUMENTATION

Item	Acceptance Criteria	Results
Section II:	INSPECTION/DOCUMENTATION – PRE-TRANSFER	
1. Container(s) structural integrity	No leaks, spills, and/or deterioration caused by corrosion or other factors; no missing or improperly sealed lids or other openings	❑Sat ❑Unsat
2. Container labeling (i.e., hazardous waste label, barcode)	Affixed and legible	❑Sat ❑Unsat
Section III:	ITEM DESCRIPTION/DOCUMENTATION – POST-TRANSFER	
1. Transfer area	Area cleared; no indication of leaks.	❑Sat ❑Unsat ❑N/A
2. Container(s) structural integrity	No leaks, spills, and/or deterioration caused by the transfer.	❑Sat ❑Unsat ❑N/A
3. Container position	Elevated and on/in secondary containment if there is liquid in the container.	❑Sat ❑Unsat ❑N/A
4. Aisle width	Three feet for ingress and egress maintained.	❑Sat ❑Unsat ❑N/A

DEFICIENCIES

Deficiency Description	Corrective Action	
	Description	Completion Date
❑N/A	❑N/A	

REVIEW

TSD Shift Supervisor (TSD SS)/Designee:		**Date:**	

ALL CONTAINER STORAGE FACILITIES DAILY CONTAINER TRANSFER INSPECTION FORM

INSTRUCTIONS

[1] TSD Inspector: Perform the following:

- **[a]** Print your name and record the date and the time.
- **[b]** Record the container(s) bar code number and type of transfer (in or out).
- **[c]** Complete the "Inspection Requirements" checklist for each requirement by marking ✓ **Sat**=satisfactory, **Unsat**=unsatisfactory, or **N/A**=not applicable.
- **[d]** If you are able to take immediate corrective action; record the deficiency, correct the deficiency, mark ☑ **Sat**; and describe the corrective action taken (e.g., replaced label).
- **[e]** If you are not able to take immediate action, mark ☑ **Unsat,** describe the deficiency, and immediately contact the TSD SS/Designee or TSD Manager.
- **[f]** Place the completed log in the designated location for the TSD SS/Designee to review.

[2] TSD SS/Designee: Perform the following:

- **[a]** Record that the inspection was performed on the RCRA Inspection Tracking Index.
- **[b]** Review the log, and facility if necessary, to ensure that the inspection and any immediate corrective actions have been satisfactorily completed. Sign and date the log and file it in the designated area.
- **[c]** Record on the RCRA Inspection Tracking Index if the deficiency was satisfactorily corrected immediately or is still outstanding. Assign a tracking number (such as, TSD-06-001) to the unresolved deficiency and record a detailed description of the deficiency on the RCRA Remedial Description Log.
- **[d]** When deficiencies have been corrected, enter the corrective action taken and completion date on the original inspection form(s) and complete the entries for the deficiencies on the RCRA Inspection Tracking Index and the RCRA Remedial Description Log.

Comments _____

FRM-379
07/07/16
Rev. 7

SODIUM COMPONENTS MAINTENANCE SHOP (SCMS) (793) DAILY/WEEKLY INSPECTION FORM
HWMA UNIT INSPECTION OF CONTAINERS & CONTAINER STORAGE/PROCESS AREAS

(Instructions on the reverse side)

COMPLETION					
TSD Technician: (Please Print Full Name)		Date:		Time:	

INSPECTION TYPE

- ❑ Waste not present, inspection for items 1-4 not required.
- ❑ Daily (during container processing/treatment operations).
- ❑ Weekly (during normal container - storage operations).

INSPECTION

Item	Results			
	793 Hi-Bay	793 Low Bay	793 C	793 G
1. Hazardous waste and barcode labels are in place, legible, and not damaged.	❑Sat ❑Unsat ❑N/A	❑Sat ❑Unsat ❑N/A	❑Sat ❑Unsat ❑N/A	❑Sat ❑Unsat ❑N/A
2. Containers position: upright, elevated, and securely closed (unless in process).	❑Sat ❑Unsat ❑N/A	❑Sat ❑Unsat ❑N/A	❑Sat ❑Unsat ❑N/A	❑Sat ❑Unsat ❑N/A
3. Containers condition: intact with no evidence of leaks or deterioration caused by corrosion, pitting, rusting, dents, or swelling.	❑Sat ❑Unsat ❑N/A	❑Sat ❑Unsat ❑N/A	❑Sat ❑Unsat ❑N/A	❑Sat ❑Unsat ❑N/A
4. Portable secondary containment: no gaps, cracks, leaks, or liquids.	❑Sat ❑Unsat ❑N/A	❑Sat ❑Unsat ❑N/A	❑Sat ❑Unsat ❑N/A	❑Sat ❑Unsat ❑N/A
5. An aisle maintained of at least 3 ft for ingress and egress.	❑Sat ❑Unsat	❑Sat ❑Unsat	❑Sat ❑Unsat	❑Sat ❑Unsat
6. Telephone is working and accessible.		❑Sat ❑Unsat		
7. Spill control materials are in place and accessible. • Portable 30-gal can of dry soda, ash, or sand with nonsparking shovel • One 85-gallon salvage drum • Corrosive spill locker including three 5-gal buckets of SPILL-X-C; three 5-gal buckets (empty); two face shields; two pairs of rubber gloves; two rubber aprons; two universal chemical spill kits.			❑Sat ❑Unsat ❑Sat ❑Unsat ❑Sat ❑Unsat	

DEFICIENCIES AND CORRECTIVE ACTIONS

Deficiency Description	Corrective Action	
	Description	Completion Date
Previously Identified ❑Yes ❑No	Scheduled ❑Yes ❑No	

REVIEW

TSD Shift Supervisor (TSD SS)/Designee:		Date:	

SODIUM COMPONENTS MAINTENANCE SHOP (SCMS) (793) DAILY/WEEKLY INSPECTION FORM
HWMA UNIT INSPECTION OF CONTAINERS & CONTAINER STORAGE/PROCESS AREAS

INSTRUCTIONS

[1] **TSD Technician**—Perform the following:

- **[a]** Prior to performing the inspection, review the RCRA Remedial Description Log (located in the TSD Shift Supervisor's Office).
- **[b]** If open deficiencies are identified on the RCRA Remedial Description Log, record the associated tracking number on this and subsequent inspection logs until the corrective action has been completed.
- **[c]** Print your name and record the date and the time.
- **[d]** Perform inspections weekly during normal on-going container storage operations and daily during container processing/treatment operations.
- **[e]** Complete the "Inspection Requirements" checklist for each requirement by marking ✓ Sat=satisfactory, Unsat=unsatisfactory, or N/A=not applicable.
- **[f]** If you are able to take immediate corrective action; record the deficiency, correct the deficiency, mark ☑ Sat; and describe the corrective action taken (e.g., replaced label).
- **[g]** If you are not able to take immediate action mark ☑ Unsat, describe the deficiency, and immediately contact the TSD SS/Designee or TSD Manager.
- **[h]** Place the completed log in the designated location for the TSD SS/Designee to review.

[2] **TSD SS/Designee**—Perform the following:

- **[a]** Record that the inspection was performed on the RCRA Inspection Tracking Index.
- **[b]** Review the log, and facility, if necessary, to ensure that the inspection and any immediate corrective actions have been satisfactorily completed. Sign and date the log and file it in the designated area.
- **[c]** Record on the RCRA Inspection Tracking Index if the deficiency was satisfactorily corrected immediately or is still outstanding. Assign a tracking number (for example, TSD-06-001) to the unresolved deficiency and record a detailed description of the deficiency on the RCRA Remedial Description Log.
- **[d]** When deficiencies have been corrected, enter the corrective action taken and completion date on the original inspection form(s) and complete the entries for the deficiencies on the RCRA Inspection Tracking Index and the RCRA Remedial Description Log.

Comments _____

FRM-930
07/07/16
Rev. 3

RADIOACTIVE SCRAP AND WASTE FACILITY (RSWF) (771) LINER INSPECTION AND RADIATION READING FORM (HWMA UNIT INSPECTION OF MISCELLANEOUS UNIT)

(Instructions on the reverse side)

COMPLETION					
TSD Technician: (Please Print Full Name)		Date:		Time:	

INSPECTION
❑ Quarterly visual inspection of all HW/MW liners (see FRM-1592)
❑ Quarterly visual inspection of HW/MW liners not performed (all liners covered by snow)
❑ Quarterly visual inspection of some HW/MW liners (see FRM-1592)
❑ Annual radiation readings – 3 ft above each HW/MW liner (see FRM-1592)

Item	Results	Comments Row/Liner No. (if unsatisfactory)
1. Exposed portion of liners: no cracks and no severe corrosion or deterioration.	❑Sat ❑Unsat	
2. Radiation readings above MW liners are less than 5mr/hr increase from previous year.	❑Sat ❑Unsat	

DEFICIENCIES AND CORRECTIVE ACTIONS		
	Corrective Action	
Deficiency Description	Description	Completion Date
Previously Identified ❑Yes ❑No	Scheduled ❑Yes ❑No	

REVIEW			
TSD Shift Supervisor (TSD SS)/Designee:		**Date:**	

RADIOACTIVE SCRAP AND WASTE FACILITY (RSWF) (771) LINER INSPECTION AND RADIATION READING FORM (HWMA UNIT INSPECTION OF MISCELLANEOUS UNIT)

(Instructions on the reverse side)

INSTRUCTIONS

[1] TSD Technician—Perform the following:

- **[a]** Prior to performing the inspection, review the Resource Conservation and Recovery Act (RCRA) Remedial Description Log (located in the TSD Shift Supervisor's Office).
- **[b]** If open deficiencies are identified on the RCRA Remedial Description Log, record the associated tracking number on this and subsequent inspection logs until the corrective action has been completed.
- **[c]** Print your name and record the date and the time.
- **[d]** Perform quarterly visual inspections of liners and arrange for annual HPT radiation readings.
- **[e]** Complete the "Inspection Requirements" checklist for each requirement by marking ✓ **Sat**=Satisfactory, or **Unsat**=Unsatisfactory.
- **[f]** If you are able to take immediate corrective action; record the deficiency, correct the deficiency, mark ☑ **Sat**; and describe the corrective action taken (for example, replaced sign).
- **[g]** If you are not able to take immediate action mark ☑ **Unsat**, describe the deficiency, and immediately contact the TSD SS/Designee or TSD Manager.
- **[h]** Place the completed log in the designated location for the TSD SS/Designee to review.

[2] TSD SS/Designee—Perform the following:

- **[a]** Record that the inspection was performed on the RCRA Inspection Tracking Index.
- **[b]** Review the log, and facility, if necessary, to ensure that the inspection and any immediate corrective actions have been satisfactorily completed. Sign and date the log and file it in the designated area.
- **[c]** Record on the RCRA Inspection Tracking Index if the deficiency was satisfactorily corrected immediately or is still outstanding. Assign a tracking number (for example, TSD-06-001) to the unresolved deficiency and record a detailed description of the deficiency on the RCRA Remedial Description Log.
- **[d]** When deficiencies have been corrected, enter the corrective action taken and completion date on the original inspection form(s) and complete the entries for the deficiencies on the RCRA Inspection Tracking Index and the RCRA Remedial Description Log.

Comments _____

RADIOACTIVE SCRAP AND WASTE FACILITY (RSWF) (771)
ANNUAL RADIATION MONITORING TUBE INSPECTION FORM

(Instructions on the reverse side)

COMPLETION					
TSD Technician: (Please Print Full Name)		Date:		Time:	

INSPECTION

Item	Location	Readings	Instrument Used	Cal Due Date	Results
1. Radiation readings are less than 5mR/hr increase from previous year. **NOTE**: *Probe shall be lowered to the bottom of the tube where the reading must be taken.*	B 26				❑ Sat ❑ Unsat
	V 3.5				
	V 4.5				
	T 32.5				
	T 36.5				
	HH 51				
	LL 47.5				
	PP 8.5				
	PP 10.5				
	PP 12.5				
	PP 26.5				
	PP 37.5				
	PP 49.5				

DEFICIENCIES AND CORRECTIVE ACTIONS

Deficiency Description	Corrective Action	
	Description	Completion Date
Previously Identified: ❑Yes ❑No	Scheduled: ❑ Yes ❑ No	

REVIEW

TSD Shift Supervisor (TSD SS)/Designee:		Date:	

RADIOACTIVE SCRAP AND WASTE FACILITY (RSWF) (771)
ANNUAL RADIATION MONITORING TUBE INSPECTION FORM

INSTRUCTIONS

[1] TSD Technician: Perform the following:

- **[a]** Prior to performing inspection obtain a copy of last year's annual radiation monitoring readings (located in the TSD Shift Supervisor's Office).
- **[b]** Obtain radiation reading/survey of the radiation monitoring tubes to determine if radiation readings are less than 5mr/hr increase from previous year.
- **[c]** Print your name and record the date and the time.
- **[d]** Perform Annual radiation monitoring tube readings with assistance with HPT.
- **[e]** Complete the "Inspection Requirements" checklist for each requirement by marking ✓ **Sat**=Satisfactory, or **Unsat**=Unsatisfactory.
- **[f]** If you are able to take immediate corrective action; record the deficiency, correct the deficiency, mark ☑ **Sat**; and describe the corrective action taken.
- **[g]** If you are not able to take immediate action mark ☑ **Unsat**, describe the deficiency, and immediately contact the TSD SS/Designee or TSD Manager.
- **[h]** Place the completed log in the designated location for the TSD SS/Designee to review.

[2] TSD SS/Designee: Perform the following:

- **[i]** Record that the inspection was performed on the RCRA Inspection Tracking Index.
- **[j]** Review the log, and facility, if necessary, to ensure that the inspection and any immediate corrective actions have been satisfactorily completed. Sign and date the log and file it in the designated area.
- **[k]** Assign a tracking number (for example, Facility-06-001) to the unresolved deficiency and record a detailed description of the deficiency on the RCRA Remedial Description Log.
- **[l]** When deficiencies have been corrected, enter the corrective action taken and completion date on the original inspection form(s) and complete the entries for the deficiencies on the RCRA Remedial Description Log.

Comments

HWMA/RCRA STORAGE and TREATMENT PERMIT

for the

MATERIALS AND FUELS COMPLEX (MFC)

ATTACHMENT 6

Sections F-3 through F-5, Procedures to Prevent Hazards

EFFECTIVE DATE: OCTOBER 1, 2015

REVISION DATE: ~~JULY 1, 2016~~

F-4 Prevention Procedures, Structures, and Equipment

F-4(a) Loading and Unloading Operations [IDAPA 58.01.05.012; 40 CFR 270.14(b)(8)(i)]

HWMA unit container loading and unloading operations include (as applicable to the specific unit) the following:

- Unloading containers of HW/MW from trucks or trailers and casks using forklifts, mobile cranes, or facility cranes
- Moving containers from HWMA storage areas to the HWMA unit process areas and/or to another HWMA unit storage or treatment facility
- Daily inspection following transfer operations.

Hazards that may result from loading and unloading operations are minimized by the use of trained and qualified rigging and hoisting operators, trained material handling personnel, proper handling of containers and inspection of containers as described in Attachment 1, Section D, Process Description.

F-4(b) Run-On and Run-Off [IDAPA 58.01.05.012; 40 CFR 270.14(b)(8)(ii)]

F-4(b)(1) Indoor HWMA Units

Containers of HW/MW are elevated off the floor during storage (e.g., stored on secondary containment pallets or skids or by container design), ensuring that the containers do not come in contact with runoff from HW/MW handling operations or run-on from precipitation. Note: During processing, containers may be staged on the floor as required by the process.

F-4(b)(2) Outdoor HWMA Unit (RSWF)

MW stored in the RSWF is contained within welded ~~or blind-flanged,~~ cathodically protected steel liners with the tops of the liners above (approximately 4 inches) ground level. The RSWF is graded to slope gently from the centerline to the parallel sides. This serves to prevent run-on of precipitation toward the liners and facilitates run-off of precipitation away from the liners

HWMA/RCRA STORAGE and TREATMENT PERMIT

for the

MATERIALS AND FUELS COMPLEX (MFC)

ATTACHMENT 7

Section G – Contingency Plan

EFFECTIVE DATE: OCTOBER 1, 2015

REVISION DATE: ~~JULY 1, 2016~~

Attachment G 1

MFC HWMA Unit Emergency Personnel Contact List

MATERIALS AND FUELS COMPLEX EMERGENCY PERSONNEL CONTACT LIST			
Name	**Address**	**Work Phone**	**Home Phone/Cell**
Emergency Action Managers (EAM)			
M. A. Willmore	3953 E 600 N, Rigby, ID 83442	208-533-7737	208-589-8338
P. K. Kern	2381 U.S. Highway 20, Arco, ID 83213	208-533-7512	208-527-3189
R. B. Belcher	1880 Riviera Circle, Idaho Falls, ID 83404	208-533-7715	208-313-1844
~~J. C. Blankenship~~Kevin Keefe	~~2275 Oak Trail Drive, Idaho Falls, ID 83404~~3735 E. Michelle St. Idaho Falls, ID 83401	~~208-533-7059~~208-533-8892	~~208-521-4839~~208-881-2938
Incident Commander			
INL Fire Station No. 2	MFC Complex	208-533-7233 208-533-7968	NA

Attachment G 2

MFC HWMA Unit Emergency Equipment List

MFC HMWA UNIT EMERGENCY EQUIPMENT LIST[1]				
	HFEF	**RSWF**	**SCMS**	**SSB**
Equipment Available	**785**	**771**	**793/793C**	**703**
Fire Extinguisher	X	—	X	X
Fire Pullbox	X	—	X	X
Telephone	X	X	X	—
Spill Control Cabinet/Material	X	—	X	X
Eye Wash Station	X	—	X	—
Emergency Shower	~~X~~	—	X	—

1. The exact quantities and locations of the HMWA unit emergency equipment are listed on the facility-specific HWMA unit inspection logs. The schedule for inspecting the emergency equipment is provided in , Attachment 4, Section F.

HWMA/RCRA STORAGE and TREATMENT PERMIT

for the

MATERIALS AND FUELS COMPLEX (MFC)

ATTACHMENT 10

Permit Modification/Revision Log

EFFECTIVE DATE: OCTOBER 1, 2015

REVISION DATE: ~~JULY 1, 2016~~

10.0 – PERMIT MODIFICATION/REVISION LOG

This attachment contains information concerning permit modifications

Permit Modification/Revision Log				
Rev. No.	**Date Transmitted to DEQ**	**Date Approved by DEQ**	**PMR Class**	**Summary of Changes**
0	N/A	September 1, 2015	N/A	This is the renewed permit.
1	May 31, 2016	July 1, 2016	1*	Added containment enclosure tent to SCMS (MFC-793C) to allow for container verification, repackaging and/or container treatment. Removed Experimental Fuels Facility (EFF, MFC-794) from the MFC HWMA/RCRA Permit following approval of closure certification report by DEQ. Removed permit language associated with container fill station for the water wash/solidification station at SCMS. Listing only the highest estimated quantity of waste for the EPA Hazardous Waste Numbers shown on the Part A to be consistent with INL Part A information. Adding EPA Hazardous Waste Codes to HFEF, SCMS, and SSB to provide flexibility for receipt of waste from INL generators. Deleting the EPA Hazardous Waste Numbers from the Part A supplement, these are found on the Part A Forms. In addition, editorial and information changes were made, including updating EAM information.
2	October 20, 2016	TBD	2	Extend the inspection frequency for the empty (surrogate) liner pulls at the Radioactive Scrap and Waste Facility (RSWF) from four years to six years. Also, five additional surrogate liners have been identified for retrievals, which will extend the time that surrogate liners will be available for retrieval and inspection. In addition, removed an emergency shower from the

				emergency equipment list for the Hot Fuel Examination Facility, corrected an inconsistency with permit language regarding stacking of containers, and incorporated information updates and clarifications associated with facility and process descriptions and EAM information.

Attachment B

Copies of the Public Notification, Facility Mailing List, and Evidence of Mailing for this Permit Modification Request

October 19, 2016

CCN 239148

Distribution

NOTIFICATION OF SUBMITTAL OF A CLASS 2 PERMIT MODIFICATION REQUEST AND ANNOUNCEMENT OF THE PUBLIC COMMENT PERIOD

Dear Citizen:

Notice is hereby given that Battelle Energy Alliance, LLC (BEA) (i.e., the operator) and the U.S. Department of Energy, Idaho Operations Office (DOE-ID) (i.e., the owner), hereinafter collectively referred to as the Permittee, are submitting a Class 2 Permit Modification Request (PMR) to the State of Idaho, Department of Environmental Quality (DEQ) for review and consideration. The PMR proposes modifications to the Hazardous Waste Management Act (HWMA)/Resource Conservation and Recovery Act (RCRA) Permit for the Materials and Fuels Complex located on the Idaho National Laboratory (INL), hereinafter referred to as the MFC HWMA/RCRA Permit.

This PMR addresses proposed revisions to the MFC HWMA/RCRA Permit to allow the Permittee to extend the inspection frequency for empty (surrogate) liner pulls at the Radioactive Scrap and Waste Facility (RSWF) from four to six years. Surrogate liner pulls are evaluated by an independent corrosion engineer to determine the effectiveness of the corrosion control system and to assess the adequacy of the liner pull inspection schedule. Since all liners removed to date have been in like-new condition it is being proposed to extend the retrieval interval from four to six years without jeopardizing the integrity of the inspection program. Also, five additional surrogate liners have been identified for proposed retrievals, which will extend the time that surrogate liners will be available for retrieval and inspection. In addition, equipment would be removed from the emergency equipment list, an inconsistency with permit language regarding stacking of containers would be corrected, and information updates and clarifications associated with facility and process descriptions and emergency action manager information are being provided.

The changes proposed in this PMR do not alter the ability of the Permittee to provide continued protection of human health and the environment.

A copy of this PMR has been placed in the INL Research Library Digital Repository for viewing 24 hours a day 7 days a week at the following website; http://inldigitallibrary.inl.gov. If unable to access the website a hardcopy of the PMR can be reviewed at the Idaho Falls Public Library located in the reference area at 457 Broadway, Idaho Falls, Idaho 83401. The Permittee hereby announces the start of a 60-day public comment period published in the Idaho Falls *Post Register* for the proposed modifications to the MFC HWMA/RCRA Permit beginning on October 18, 2016 and will end on December 16, 2016.

A public meeting regarding this PMR will be held in the Idaho Falls Public Library, 457 Broadway, Idaho Falls, Idaho on Wednesday, November 09, 2016, starting at 6:00 p.m. and ending at 8:00 p.m., or ending at 6:30 p.m. if no members of the public attend the meeting by 6:30 p.m.

The DEQ contact person is Mr. Garrett Bright and he may be reached at (208) 373-0163. The contact person for the DOE-ID is Ms. Nicole Hernandez and she may be reached at (208) 526-8949. The contact person for BEA is Mr. Alan Carvo. He may be reached at (208) 533-7363.

The Permittee's compliance history during the life of the permit being modified is available from the Agency contact person.

If you are no longer interested in receiving these notices or if your address has changed, please inform the DEQ contact person so that the mailing list can be updated.

Distribution
DEQ INL Mailing List
B. Bullock, DEQ
G. Bright, DEQ

Attachment C

Copies of the Legal Notice, Newspaper Article, and Notarized Affidavit from the Idaho Falls Post Register Documenting the Publication of the Legal Notice for this Permit Modification Request

LEGAL NOTICE

Notice is hereby given that Battelle Energy Alliance, LLC (BEA) (i.e., the operator) and the U.S. Department of Energy, Idaho Operations Office (DOE-ID) (i.e., the owner), hereinafter collectively referred to as the Permittee, will formally submit to the State of Idaho, Department of Environmental Quality (DEQ) a Class 2 Permit Modification Request (PMR) on or about October 20, 2016. The PMR addresses proposed modifications to the Hazardous Waste Management Act (HWMA)/Resource Conservation and Recovery Act (RCRA) Permit for the Materials and Fuels Complex at the Idaho National Laboratory (INL) [Environmental Protection Agency (EPA) Identification Number ID4890008952], hereinafter referred to as the MFC HWMA/RCRA Permit. This PMR is being submitted in accordance with the MFC HWMA/RCRA Permit, Permit Condition I.D.4 and the Idaho Administrative Procedures Act (IDAPA) 58.01.05.012 [Title 40 of the Code of Federal Regulations (CFR) Part 270.42].

This PMR addresses proposed revisions to the MFC HWMA/RCRA Permit to allow the Permittee to extend the inspection frequency for empty (surrogate) liner pulls at the Radioactive Scrap and Waste Facility (RSWF) from four to six years. Surrogate liner pulls are evaluated by an independent corrosion engineer to determine the effectiveness of the corrosion control system and to assess the adequacy of the liner pull inspection schedule. Since all liners removed to date have been in like-new condition it is being proposed to extend the retrieval interval from four to six years without jeopardizing the integrity of the inspection program. Also, five additional surrogate liners have been identified for proposed retrievals, which will extend the time that surrogate liners will be available for retrieval and inspection. In addition, equipment would be removed from the emergency equipment list, an inconsistency with permit language regarding stacking of containers would be corrected and information updates and clarifications associated with facility and process descriptions and Emergency Action Manager information are being provided. The changes proposed in this PMR do not reduce the capacity of the Permittee to provide continued protection of human health and the environment.

A copy of this PMR has been placed in the INL Research Library Digital Repository for viewing 24 hours a day 7 days a week at the following website http://inldigitallibrary.inl.gov. If unable to access the website a hardcopy of the PMR can be reviewed at the Idaho Falls Public Library located in the reference area at 457 Broadway, Idaho Falls, Idaho 83401. The required 60-day public comment period published in the Idaho Falls *Post Register* for the PMR will begin on October 18, 2016 and will end on December 16, 2016. All comments should be addressed to:

State of Idaho, Department of Environmental Quality
1410 North Hilton Street
Boise, Idaho 83706-1255
Attention: Garrett Bright

A public meeting regarding the PMR will be held in the Idaho Falls Public Library, 457 Broadway, Idaho Falls, Idaho, on Wednesday, November 09, 2016, starting at 6:00 p.m. and ending at 8:00 p.m., or ending at 6:30 p.m. if no members of the public attend the meeting by 6:30 p.m. Persons who want to attend this meeting and who have special access requirements are encouraged to contact the Permittee at least 72 hours before the meeting to facilitate arrangements.

The DEQ contact person for the PMR is Garrett Bright (208-373-0163) and the Permittee's contact person is Nicole Hernandez (208-526-8949). The contact person for BEA is Mr. Alan Carvo. He may be reached at (208) 533-7363.

The Permittee's compliance history during the life of the Permit being modified is available from the DEQ contact person.

Publication Date: October 18, 2016

Attachment D

Minutes for the Public Meeting for this Permit Modification Request

PUBLIC MEETING MINUTES
(MFC-PMR-02, Rev 0)

The public meeting minutes will be submitted at a later date, upon completion of the public meeting. The public meeting will be held in the Idaho Falls Public Library, 457 Broadway, Idaho Falls, Idaho, on Wednesday, November 09, 2016, starting at 6:00 p.m. and ending at 8:00 p.m., or ending at 6:30 p.m. if no members of the public attend the meeting by 6:30 p.m.

Attachment E

Signed Certification Statements

CERTIFICATION STATEMENT
BATTELLE ENERGY ALLIANCE, LLC
AS
OPERATOR

REGULATORY CERTIFICATION
[IDAPA 58.01.05.012; 40 CFR 270.11(d) and 270.30(k)]

Class 2 Permit Modification Request
for the Materials and Fuels Complex Hazardous Waste Management Act
Resource Conservation and Recovery Act Storage and Treatment Permit,
Environmental Protection Agency Number ID4890008952

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

Operator Signature:

Carolyn S. Mascareñas 9-20-16

Carolyn S. Mascareñas, Director of ESH&Q — Date
Battelle Energy Alliance, LLC

CERTIFICATION STATEMENT
DEPARTMENT OF ENERGY IDAHO OPERATIONS OFFICE
AS
OWNER

REGULATORY CERTIFICATION
[IDAPA 58.01.05.012; 40 CFR 270.11(d) and 270.30(k)]

Class 2 Permit Modification Request
for the Materials and Fuels Complex Hazardous Waste Management Act
Resource Conservation and Recovery Act Storage and Treatment Permit,
Environmental Protection Agency Number ID4890008952

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

Owner Signature:

10/12/16
Date

Richard B. Provencher, Deputy Assistant Secretary
for Idaho Site Operations and Contractor Assurance
Office of Nuclear Energy