400 AREA WASTE MANAGEMENT UNIT
CHANGE CONTROL LOG

Change Control Logs ensure that changes to this unit are performed in a methodical, controlled, coordinated, and transparent manner. Each unit addendum will have a "**Last Modification Date**" which represents the last date the portion of the unit has been modified. The "**Modification Number**" represents Ecology's method for tracking the different versions of the permit. This log will serve as an up to date record of modifications and version history of the unit.

Last modification to 400 Area Waste Management Unit **January 27, 2021**

Addenda	Last Modification Date	Modification Number
Unit-Specific Conditions	01/27/2021	PCN-400WMU-2020-01 (8C.2021.Q1)
A. Part A Form	01/27/2021	PCN-400WMU-2020-01 (8C.2021.Q1)
B. Waste Analysis Plan	06/30/2012	
C. Process Information	12/31/2012	
D. Reserved		
E. Procedures to Prevent Hazards	08/25/2016	8C.2016.Q2
F. Preparedness & Prevention	09/30/2012	
G. Personnel Training	06/30/2013	
H. Closure Plan	06/30/2009	
I. Inspection Requirements	09/5/2012	
J. Contingency Plan	06/24/2020	8C.2020.5F

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400 AREA WASTE MANAGEMENT UNIT
PART III, OPERATING UNIT GROUP 16
UNIT-SPECIFIC PERMIT CONDITIONS

CHANGE CONTROL LOG

Change Control Logs ensure that changes to this unit are performed in a methodical, controlled, coordinated, and transparent manner. Each unit addendum will have its own change control log with a modification history table. The "**Modification Number**" represents Ecology's method for tracking the different versions of the permit. This log will serve as an up to date record of modifications and version history of the unit.

Modification History Table

Modification Date	Modification Number
01/27/2021	PCN-400WMU-2020-01 (8C.2021.Q1)
06/24/2020	8C.2020.5F
05/23/2019	PCN-400WMU-2019-01 (8C.2019.Q2)
11/8/2018	PCN-400WMU-2018-01 (8C.2018.Q4)
08/25/2016	8C.2016.Q2

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400 AREA WASTE MANAGEMENT UNIT
PART III, OPERATING UNIT GROUP 16
UNIT-SPECIFIC PERMIT CONDITIONS

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PART III, OPERATING UNIT GROUP 16, UNIT-SPECIFIC PERMIT CONDITIONS
400 AREA WASTE MANAGEMENT UNIT

UNIT DESCRIPTION

The 400 Area Waste Management Unit (WMU) is in the Property Protected Area (PPA) at the Fast Flux Test Facility (FFTF), in Hanford's 400 Area. The 400 Area WMU consists of two container storage units:

- Fuel Storage Facility (FSF, Building 403). The FSF is a large steel-frame, metal-sided, high bay building. Its dimensions are 34 x 27 x 12 meters (112 x 90 x 40 feet). The container storage unit is on the ground-level floor. In it are two large steel boxes that store sodium-contaminated core component pots (CCPs). The Permittees do not plan to store more mixed waste than is currently stored in the facility; however, the FSF is physically capable of storing additional mixed waste. They will store any additional wastes at the 400 Area WMU in the Interim Storage Area.
- Interim Storage Area, 4718 (ISA). The ISA consists of 156 x 247 meters (513 x 247 feet) totally fenced area. This area is for aboveground dry cask storage of spent fuel. A concrete pad in the ISA, which measures 27 x 37 meters (90 x 120 feet), was used for dry cask storage, but will not necessarily be used for mixed waste management. The rest of the ISA surface is gravel. The ISA is generally flat. However, it is graded to drain in accordance with the general drainage plan for the FFTF PPA. Inside the ISA, there is also one building along the west fence line, and open on the side. This building, Building 432A, is not authorized for mixed waste management.

The scale map in Addendum A shows the location of each storage unit. The only mixed waste stored in these two container storage units is elemental sodium, and sodium potassium (D001, D003, and WSC2), sodium hydroxide (D002), and potassium hydroxide (D002) and debris (e.g., piping, equipment, and components) contaminated with elemental sodium, sodium potassium, sodium hydroxide, and potassium hydroxide. The 400 Area WMU will not store, treat, or dispose of bulk metallic sodium or bulk sodium hydroxide.

LIST OF ADDENDA SPECIFIC TO OPERATING UNIT GROUP 16

Addendum A	Part A Form, dated January 27, 2021
Addendum B	Waste Analysis Plan, dated June 30, 2012
Addendum C	Process Information, dated December 31, 2012
Addendum D	Groundwater Monitoring – Reserved
Addendum E	Procedures to Prevent Hazards, dated June 30, 2016
Addendum F	Preparedness and Prevention, dated September 30, 2012
Addendum G	Personnel Training, dated June 30, 2013
Addendum H	Closure Plan, dated June 30, 2009
Addendum I	Inspection Requirements, dated September 5, 2012
Addendum J	Contingency Plan, dated June 24, 2020

DEFINITIONS

The term **"CCP" or Core Component Pot** means one of 109 cylindrical containers, each containing 3.75 gallons of un-reacted sodium totaling 405 gallons, currently stored as mixed waste in the FFTF FSF. The CCPs were previously filled with sodium and used in the FFTF Interim Decay Storage Vessel to store spent FFTF Driver Fuel Assemblies under inert gas.

ACRONYMS

FFTF	Fast Flux Test Facility
CCP	Core Component Pot
PPA	Property Protected Area
ISA	Interim Storage Area
FSF	Fuel Storage Facility
WMU	Waste Management Unit

III.16.A COMPLIANCE WITH UNIT-SPECIFIC PERMIT CONDITIONS

III.16.A.1 The Permittees will comply with all conditions in this Chapter and its addenda with respect to dangerous waste management and dangerous waste management units in the 400 Area WMU, in addition to conditions in Permit Parts I and II.

III.16.B GENERAL WASTE MANAGEMENT

III.16.B.1 The Permittees are authorized to accept, according to the waste acceptance procedure documented in Addendum B, Section B.2, mixed debris generated from demolition and decommissioning of the FFTF reactor system containing or contaminated with residual elemental sodium and sodium hydroxide. The Permittee will store these wastes in the ISA.

III.16.B.2 The Permittees are authorized to store core component pots generated prior to the effective date of this permit in two large metal boxes in the 400 Area WMU, FSF.

III.16.B.3 The Permittees are authorized store mixed waste in the ISA up to a maximum capacity of 19,000 gallons.

III.16.B.4 The Permittees will maintain the physical structure of dangerous waste management units in the 400 Area WMU as documented in the Unit Description above and Addendum C, Figures C.1 and C.2.

III.16.B.5 The Permittees will maintain appropriate administrative controls and work practices to ensure that only wastes specified in Permit Condition III.16.B.1, are received by the ISA for storage, and that no co-mingling or cross-contamination of the waste stream specified in Permit Condition III.16.B.1 with any other waste stream may occur.

III.16.C WASTE ANALYSIS

III.16.C.1 The Permittees will have an accurate and complete waste profile for the waste stream identified in Permit Condition III.16.B.1. This waste profile will be signed and dated upon approval by the 400 Area WMU authorized representative. [Washington Administrative Code (WAC) 173-303-380(1)(a)]

III.16.C.2 The Permittees will make a copy of the waste profile required by Permit Condition III.16.C.1 available upon request. [WAC 173-303-815(2)(b)(ii)]

III.16.D RECORDKEEPING AND REPORTING

III.16.D.1 The Permittees will place the following into the Hanford Facility Operating Record, 400 Area WMU File required by Permit Condition II.I.1. [WAC 173-303-380]

III.16.D.2 Records required by WAC 173-303-380(1)(o), incorporated by reference.

III.16.E SECURITY

III.16.E.1 The Permittees will post warning signs at all entrances to the FSF and the ISA specified in Addendum E, Section E.1.1. [WAC 173-303-310(2)(a)]

III.16.F PREPAREDNESS AND PREVENTION

III.16.F.1 The Permittees will comply with the Addendum F, "Preparedness and Prevention," requirements specific to the 400 Area WMU. [WAC 173-303-340]

III.16.G CONTINGENCY PLAN

III.16.G.1 The Permittees will comply with Addendum J, "Contingency Plan," in addition to the requirements of Permit Condition II.A when applicable. [WAC 173-303-350]

III.16.H INSPECTIONS

III.16.H.1 The Permittees will perform inspections of the 400 Area WMU according to Addendum I, "Inspection Plan," for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that help prevent, detect, or respond to hazards to the public health or the environment pursuant to the requirements of WAC 173-303-320. [WAC 173-303-320(2)]

III.16.I TRAINING PLAN

III.16.I.1 The Permittees will include Addendum G unit-specific training requirements in the written training plan required by Permit Condition II.C. [WAC 173-303-330]

III.16.J OTHER GENERAL REQUIREMENTS

III.16.J.1 The Permittees will comply with the requirements of WAC 173-303-395(1)(a)-(c), incorporated by reference, for prevention of reaction of ignitable, reactive, or incompatible wastes.

III.16.J.2 Land Disposal Restriction Requirements

III.16.J.2.a The Permittees will ensure a schedule of compliance and any applicable associated work requirements are included in the land disposal restrictions report required by the *Hanford Federal Facility Agreement and Consent Order* (HFFACO) Milestone M-26, incorporated by reference by Permit Condition II.O for treatment and/or acquisition of treatment capacity for wastes which are or are expected to be stored in the 400 Area WMU container storage units.

III.16.K CLOSURE

III.16.K.1 The Permittees will close the 400 Area WMU Container Storage Units in accordance with Addendum H, "Closure Plan." [WAC 173-303-610(4)]

III.16.L POST CLOSURE

Reserved

III.16.M CRITICAL SYSTEMS

Reserved

III.16.N **RESERVED**

III.16.O **CONTAINERS**

III.16.O.1 Container Management Standards

III.16.O.1.a The Permittees will ensure that all containers remain in good condition. If a container holding mixed waste is not in good condition (e.g., severe rusting or corrosion, or apparent structural defects), or if it begins to leak, the Permittee must transfer the waste from the container to a container that is in good condition or place the leaking container in an appropriate over-pack container. [WAC 173-303-630(2)]

III.16.O.1.b The Permittees shall ensure that all containers are constructed of carbon steel or stainless steel, or other materials compatible with metallic sodium and sodium hydroxide. [WAC 173-303-630(4)]

III.16.O.1.c The Permittees must remove spilled or leaked waste within secondary containment pursuant to WAC 173-303-630(7)(a)(ii), incorporated by reference.

III.16.O.1.d Requirements for the Fuel Storage Facility

III.16.O.1.e The Permittee will maintain an inert gas (argon or nitrogen) cover within each large metal box to prevent contact of the metallic sodium with the water vapor in the air and the formation of free liquids.

III.16.O.1.f The Permittees will place large boxes stored in the FSF in drip pans to ensure a base free of cracks or gaps, and ensure that the large boxes are elevated or otherwise protected from contact with accumulated liquids.

III.16.O.1.g Requirements for the Interim Storage Area

III.16.O.1.h The Permittee may store wastes in the ISA in standard metal containers (e.g., 208-liter drums), large metal boxes fabricated to accommodate the size and shape of a particular component or debris, or unique components removed from FFTF that when closed in accordance with WAC 173-303-630(5)(a) serve as a primary container.

III.16.O.1.i The Permittees will manage unique components stored in the ISA on the gravel surface with sufficient open space between components and between components and the fence line to accommodate inspections and movement of equipment.

III.16.O.1.j The Permittees will not place wastes in the open-sided structure (Building 432A) within the ISA identified in the Unit Description above.