



Federal Facility Agreement Appendix K Update

Savannah River Nuclear Solutions, LLC
March 19, 2021

Federal Facility (FFA) Appendix K Update to Structures List

Objective: Reduction of cost and resource allocation to safely decommission Savannah River Site (SRS) structures that do not warrant the rigor of decommissioning per the *Core Team Protocol for Review and Concurrence on Facility Decommissioning Evaluations and Decommissioning Project Final Reports* (SRNS-RP-2021-00120, Revision 0 (corrected), February 2021) (i.e., submittal of Facility Decommissioning Evaluations [FDEs] and Decommissioning Project Final Reports [DPFRs] not warranted).

Background:

- Appendix K.1 lists SRS facilities planned for or undergoing decommissioning.
- The Criteria for SRS Environmental Management Facilities for Gold Metrics were used in part to select the Appendix K.1 facilities list in the early 2000s.
- Decommissioning requires preparation of planning/records documents to be reviewed and approved by the South Carolina Department of Health and Environmental Control (SCDHEC) and U. S. Environmental Protection Agency (EPA) prior to decommissioning.
- SRS reviewed the FFA Revision 1 Appendix K.1 for Fiscal Year (FY) 2020 and identified some structures / facilities that are not process-related and are portable or of very simple construction.

Requested Action:

- The following slides present the structures proposed to be removed from Appendix K.1. Due to timing, any changes will be incorporated into an update to the regulatory approved FFA Revision 0 Appendix K for FY2021.
- SRS requests regulatory review and comment to resolve any questions or concerns.
- Note: Engineering protocols/practices will be used to ensure safe and compliant decommissioning of the facilities. Only the FDEs and DPFRs would be eliminated.

Exterior of Equipment Sheds 614-56G, 614-57G, 614-58G, 614-60G, 614-61G, 614-62G, and 614-66G



614-56G
Equipment Shed
New Ellenton Barricade



614-57G Equipment Shed
Green Pond Road



614-58G Equipment Shed
East Talatha



614-60G Equipment
Shed
Dark Horse



614-61G Equipment
Shed
Barnwell Barricade



614-62G Equipment
Shed
Patterson Mill



614-66G Equipment
Shed
Highway 21 / 167

Interior of Equipment Sheds 614-56G, 614-57G, 614-58G, 614-60G, 614-61G, 614-62G, and 614-66G



614-56G
Equipment Shed
New Ellenton Barricade



614-57G Equipment Shed
Green Pond Road



614-58G Equipment Shed
East Talatha



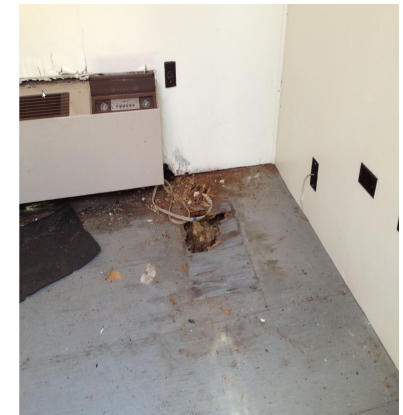
614-60G Equipment
Shed
Dark Horse



614-61G Equipment
Shed
Barnwell Barricade

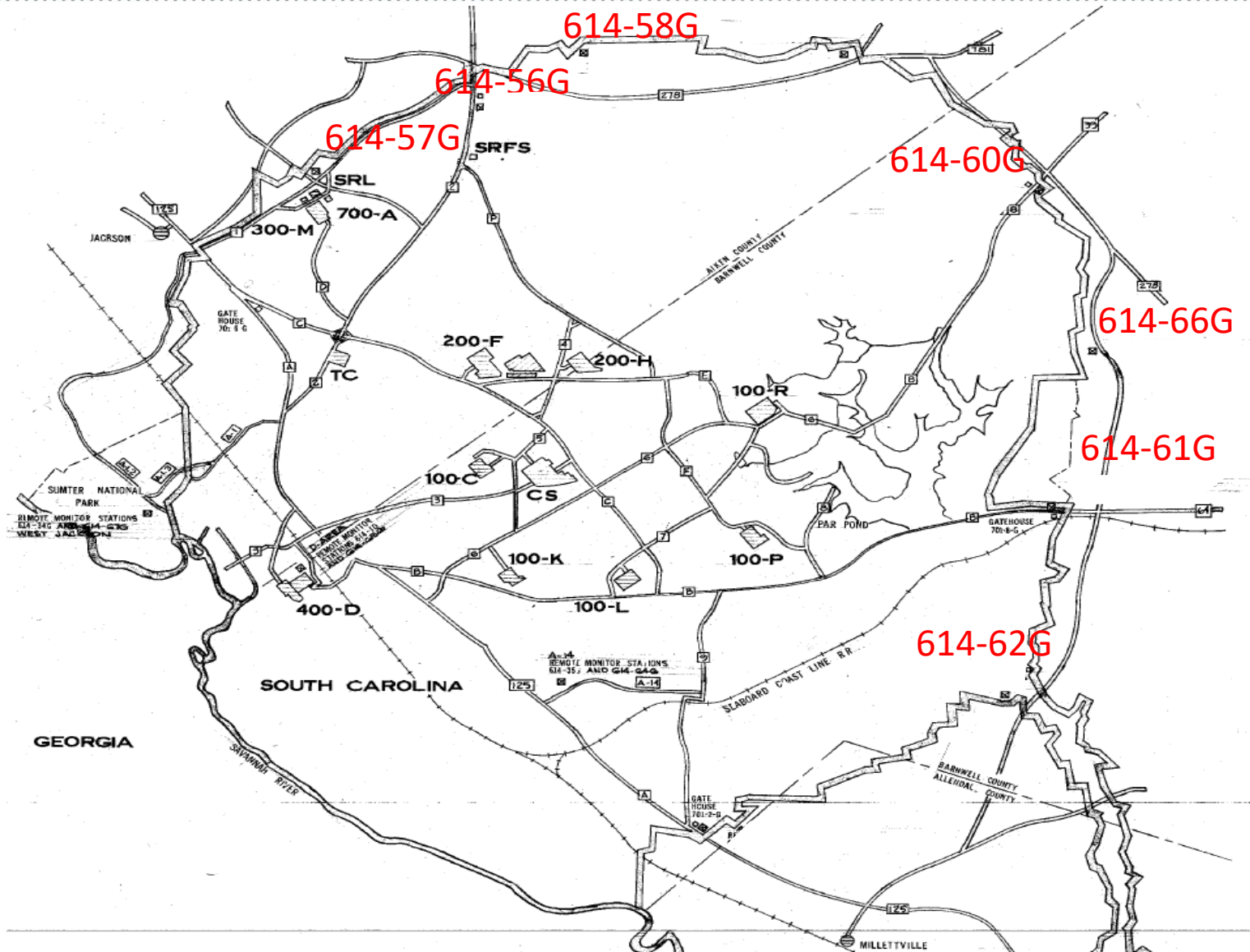


614-62G Equipment
Shed
Patterson Mill



614-66G Equipment
Shed
Highway 21 / 167

Location of Equipment Sheds 614-56G, 614-57G, 614-58G, 614-60G, 614-61G, 614-62G, and 614-66G



Equipment Sheds 614-56G, 614-57G, 614-58G, 614-60G, 614-61G, 614-62G, and 614-66G

Description

- Listed on FFA Appendix K.1: D&D Facilities to be Decommissioned
- Pre-engineered Morgan Buildings
- Portable building, no concrete slab
- Approximately 80 ft²

History/Use

- Equipment Sheds for support of Air Monitoring Stations
- Installed in the mid-1980s
- Not process facility-related
- No chemical or radioactive material storage

Recommendations

- Remove from FFA Appendix K.1
- Decommissioning process
 - DOE assess status
 - Conduct site walkdown
 - Asbestos inspection
 - Cold and dark status
 - Submit request to EPA and SCDHEC to decommission without FDE/DPFR
 - EPA/SCDHEC site visit/additional information if requested
 - Obtain demolition permit (asbestos permit if needed)
 - Demolish structure
 - Submit closed demolition permit to EPA and SCDHEC for their files
 - Records sent to ARF

Exterior of Portable Buildings and Trailers 701-6C, 484-1D, and 484-2D



701-6C Guard House



484-1D Modular Office



484-2D Coal Handler's Change House

Interior of Portable Buildings and Trailers 701-6C, 484-1D, and 484-2D



701-6C Guard House



484-1D Modular Office



484-2D Coal handler's Change House

Portable Buildings and Trailers 701-6C, 484-1D, and 484-2D

Description

- Listed on FFA Appendix K.1: D&D Facilities to be Decommissioned
- 701-6C Guard House
 - Portable Building
 - Not process-facility related
- 484-1D Modular Office Trailer
 - Office Trailer
- 484-2D Coal Handler's Change House
 - Trailer that includes offices, lunchroom, showers

Recommendations

- Remove from FFA Appendix K.1
- Decommissioning process
 - DOE assess status
 - Conduct site walkdown
 - Asbestos inspection
 - Cold and dark status
 - Submit request to EPA and SCDHEC to decommission without FDE/DPFR
 - EPA/SCDHEC site visit/additional information if requested
 - Obtain demolition permit (asbestos permit if needed)
 - Demolish structure
 - Submit closed demolition permit to EPA and SCDHEC for their files
 - Records sent to ARF

Typical Exterior of Wind Data Buildings

- 614-48G – Wind Data Building
(North of A - Area)
- 614-50G – Wind Data Building
(North / Northwest of H – Area)
- 614-51G – Wind Data Building
(East / Southeast of F – Area)
- 614-52G – Wind Data Building
(South / Southeast of C – Area)
- 614-53G – Wind Data Building
(East / Southeast of K – Area)
- 614-54G – Wind Data Building
(Southeast of P – Area)
- 614-55G – Wind Data Building
(East of L – Area)



Typical Interior of Wind Data Buildings

- 614-48G – Wind Data Building
(North of A - Area)
- 614-50G – Wind Data Building
(North / Northwest of H – Area)
- 614-51G – Wind Data Building
(East / Southeast of F – Area)
- 614-52G – Wind Data Building
(South / Southeast of C – Area)
- 614-53G – Wind Data Building
(East / Southeast of K – Area)
- 614-54G – Wind Data Building
(Southeast of P – Area)
- 614-55G – Wind Data Building
(East of L – Area)



Wind Data Buildings

Description

- Listed on FFA Appendix K.1: D&D Facilities to be Decommissioned
- Prefabricated buildings placed on a concrete pad
- Housed equipment to store and process wind data
- Not process-facility related
- All buildings approximately 100 ft² (10 ft x 10 ft)

Recommendations

- Remove from FFA Appendix K.1
- Decommissioning process
 - DOE assess status
 - Conduct site walkdown
 - Asbestos inspection
 - Cold and dark status
 - Submit request to EPA and SCDHEC to decommission without FDE/DPFR
 - EPA/SCDHEC site visit/additional information if requested
 - Obtain demolition permit (asbestos permit if needed)
 - Demolish structure
 - Submit closed demolition permit to EPA and SCDHEC for their files
 - Records sent to ARF

Exterior of Buildings and Sheds 686-1G, 623-27N, 710-12N, and 710-7N



686-1G – Dam Service Building (L Lake)



710-12N Tire Storage Canopy



623-27N SRS Central Climatology Data Station



710-7N Storage Shed

Interior of Buildings and Sheds 686-1G, 623-27N, 710-12N, and 710-7N



686-1G – Dam Service Building (L Lake)



623-27N SRS Central Climatology Data Station
(same as Wind Data Buildings)

Buildings and Sheds 686-1G, 623-27N, 710-12N, and 710-7N

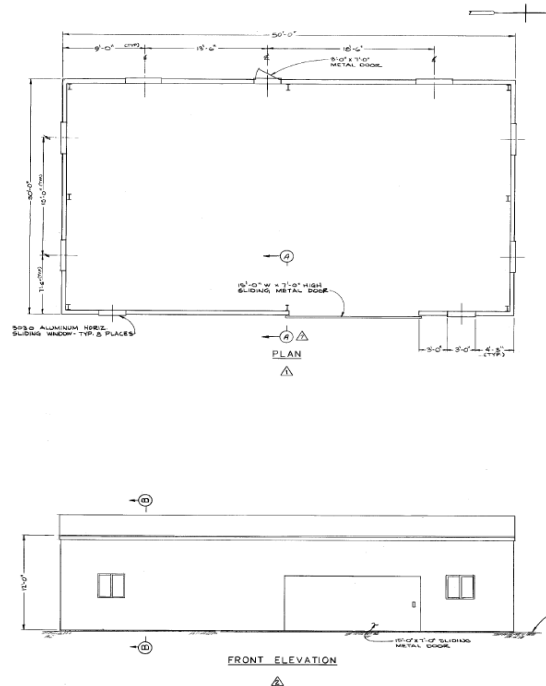
Description

- Listed on FFA Appendix K.1: D&D Facilities to be Decommissioned
- 686-1G – Dam Service Building (L Lake)
 - 64 ft² (8 ft x 8 ft) Building
 - Has a concrete foundation
 - Housed Electronic Equipment for remote control
- 623-27N SRS Central Climatology Data Station
 - 254 ft²
 - Portable Building
- 710-12N Tire Storage Canopy
 - Open Storage Shed (roof only; no walls)
 - SCDHEC Site Visit – 9/23/2020
- 710-7N Storage Shed
 - Open Storage Shed (roof only; no walls)

Recommendations

- Remove from FFA Appendix K.1
- Decommissioning process
 - DOE assess status
 - Conduct site walkdown
 - Asbestos inspection
 - Cold and dark status
 - Submit request to EPA and SCDHEC to decommission without FDE/DPFR
 - EPA/SCDHEC site visit/additional information if requested
 - Obtain demolition permit (asbestos permit if needed)
 - Demolish structure
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Deer Hunt Building 760-12G



Description

- Listed on FFA Appendix K.1: D&D Facilities to be Decommissioned
- 4,000 ft² (50 ft x 80 ft facility on a concrete pad)
- Not Process-facility related
- Workstation for hunt preparation
- Deer hunters and dog handlers' check-in station
- Location for hunt safety briefings

Recommendations

- Remove from FFA Appendix K.1
- Decommissioning process
 - DOE assess status
 - Conduct site walkdown
 - Asbestos inspection
 - Cold and dark status
 - Submit request to EPA and SCDHEC to decommission without FDE/DPFR
 - EPA/SCDHEC site visit/additional information if requested
 - Obtain demolition permit (asbestos permit if needed)
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Exterior and Interior of Deer Hunt Building 760-12G



Backup Information

Selected Email Correspondence for Decommissioning Non-Industrial Structures

From: Richards, Jon M. <Richards.Jon@epa.gov>
Sent: Wednesday, April 15, 2020 4:05 PM
To: HENNESSEY, BRIAN <brian.hennessey@srs.gov>; pope.robert (epa.gov) <pope.robert@epa.gov>; Fulmer, Susan <fulmersb@dhec.sc.gov>; Cathcahe (dhec.sc.gov) <Cathcahe@dhec.sc.gov>
Cc: Mike Griffith <mike.griffith@srs.gov>; Shelia Mcfalls <Shelia.Mcfalls@srs.gov>
Subject: RE: Demolition of Buildings

Ok thanks for the further explanation, and that's fine to do as you've been doing, and since non-FFA, & I'm certainly ok with email correspondence.

Jon Richards

From: brian.hennessey@srs.gov <brian.hennessey@srs.gov>
Sent: Wednesday, April 15, 2020 3:46 PM
To: Richards, Jon M. <Richards.Jon@epa.gov>; Pope, Robert <Pope.Robert@epa.gov>; Fulmer, Susan <fulmersb@dhec.sc.gov>; Cathcahe@dhec.sc.gov
Cc: mike.griffith@srs.gov; Shelia.Mcfalls@srs.gov
Subject: RE: Demolition of Buildings

Jon,
Thanks for sending the Oak Ridge Demolition CERCLA screening form. After discussing this internally a good bit, I don't believe we need a form for Non-Appendix K/Non-Industrial structures because:

- Our D&D Protocol already identifies three decommissioning models—Simple, Integrated Sampling, and CERCLA—based on an evaluation of release potential and hazard and produces a Facility Decommissioning Evaluation Report;
- The point here is that these buildings don't even warrant the records research and time necessary to complete that evaluation; these are not Simple Model buildings—they're beyond simple.

We would prefer for these Non-Appendix K/Non-Industrial structures to just send you, as we have in the past, a request (with a description) to decommission them without an FDE; you or SCDHEC would have an opportunity to inspect the structure or ask for additional information. But since these structures were not listed in the FFA and no section XL documentation of their decommissioning would be required, the email correspondence can be retained in the ARF to show that demolition took place with your cognizance. We will place the emails for the observation towers, the Truck Scale House, and 707-11F in the ARF. Of course, any required state permits for demolition will be obtained.

Let me know if we can proceed in this manner for Non-Appendix K/Non-Industrial structures, or if you want to discuss it further.
Thank you.

Brian T. Hennessey

From: Fulmer, Susan <fulmersb@dhec.sc.gov>
Sent: Thursday, April 09, 2020 4:32 PM
To: HENNESSEY, BRIAN <brian.hennessey@srs.gov>; Jon Richards (richards.jon@epa.gov) <Richards.Jon@epa.gov>; pope.robert (epa.gov) <pope.robert@epa.gov>; Cathcahe (dhec.sc.gov) <Cathcahe@dhec.sc.gov>
Cc: Mike Griffith <mike.griffith@srs.gov>
Subject: [EXTERNAL] Re: Demolition of Buildings

Brian,

We agree that since these structures can be removed without going through the D&D protocol.

Thanks,
Susan

Susan B. Fulmer, P.G.

From: Richards, Jon M. <Richards.Jon@epa.gov>
Sent: Wednesday, April 8, 2020 5:07 PM
To: HENNESSEY, BRIAN <brian.hennessey@srs.gov>; pope.robert (epa.gov) <pope.robert@epa.gov>; Fulmer, Susan <fulmersb@dhec.sc.gov>; Cathcahe (dhec.sc.gov) <Cathcahe@dhec.sc.gov>
Cc: Mike Griffith <mike.griffith@srs.gov>
Subject: RE: Demolition of Buildings

I've enclosed what we do at oak ridge, for these 'non-haz' simple demos, that this looks like example of. So not sure you would consider doing something similar, but it does document this action, and we approve by emails
And we don't see need to inspect this one.

Jon Richards

From: brian.hennessey@srs.gov <brian.hennessey@srs.gov>
Sent: Wednesday, April 8, 2020 4:15 PM
To: Richards, Jon M. <Richards.Jon@epa.gov>; Pope, Robert <Pope.Robert@epa.gov>; Fulmer, Susan <fulmersb@dhec.sc.gov>; Cathcahe@dhec.sc.gov
Cc: mike.griffith@srs.gov
Subject: Demolition of Buildings

Jon and Susan,

The attachment shows two structures that SRS would like to demolish and remove. Similar to the Observation Towers, we don't believe these structures rise to the level of D&D protocol involvement, and we would like for these to be demolished & removed without preparing FDE's and DPFrs. Neither is listed in Appendix K.1. Just wanted to get your read on these if possible.

The Truck Scale House has power, but no plumbing or drains, and no material of any kind was managed in it. Literally a chair, a desk, a light and a scale readout. It's next to Road 1A in A-Area.

707-11F is a simple Handi-House storage shed with no utilities.

Please let me know if you'd like more information on these structures. If you'd like to inspect them, we will wait until a later date. If you can concur with demolishing these without FFA documentation, please let me know.
Thank you.

Brian T. Hennessey