



Federal Facility Agreement Annual Progress Report for Fiscal Year 2017

SRNS-RP-2017-00688

November 2017

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Prepared for

**U.S. Department of Energy
and
Savannah River Nuclear Solutions, LLC
Aiken, South Carolina**

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LIST OF ABBREVIATIONS AND ACRONYMS

BRA	Baseline Risk Assessment
BWRE	Bulk Waste Removal Effort
CA	Corrective Action
CAR	Corrective Action Report
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CMIR	Corrective Measures Implementation Report
CMP	Chemicals, Metals, and Pesticides
CMS/FS	Corrective Measures Study/Feasibility Study
D&D	Deactivation and Decommissioning
DAG	D-Area Groundwater
DOSB	D-Area Oil Seepage Basin
EA	Early Action
EE/CA	Engineering Evaluation/Cost Analysis
ECODS	Early Construction and Operational Disposal Site
EMR	Effectiveness Monitoring Report
ESD	Explanation of Significant Differences
FMB	Fourmile Branch
FFA	Federal Facility Agreement
FY	Fiscal Year
GMR	Groundwater Monitoring Report
GSA	General Separations Area
GSACU	General Separations Area Consolidation Unit
GWM	Groundwater Monitoring
GWMZ	Groundwater Mixing Zone
HWCTR	Heavy Water Components Test Reactor
HWMF	Hazardous Waste Management Facility
IOU	Integrator Operable Unit
LLC	Limited Liability Company
LUC	Land Use Control
LUCAP	Land Use Control Assurance Plan
LUCIP	Land Use Control Implementation Plan
MASB	M-Area Settling Basin
Met Lab	Metallurgical Laboratory
NBN	No Building Number
ORWBG	Old Radioactive Waste Burial Ground
OU	Operable Unit

LIST OF ABBREVIATIONS AND ACRONYMS *(Continued/End)*

PAOU	P-Area Operable Unit
PAR	P and R
PCB	polychlorinated biphenyl
PER	Performance Evaluation Report
POC	Point of Compliance
RACR	Remedial Action Completion Report
RAOU	R-Area Operable Unit
RAR	Removal Action Report
RCRA	Resource Conservation and Recovery Act
RFI	RCRA Facility Investigation
RI	Remedial Investigation
ROD	Record of Decision
RSER	Removal Site Evaluation Report
SCDHEC	South Carolina Department of Health and Environmental Control
SE	Site Evaluation
SEA	Site Evaluation Area
SB/PP	Statement of Basis/Proposed Plan
SRL	Savannah River Laboratory (now SRNL)
SRNL	Savannah River National Laboratory
SRNS	Savannah River Nuclear Solutions, LLC
SRS	Savannah River Site
SWP	Southwest Plume
USDA	United States Department of Agriculture
USDOE	United States Department of Energy
USDOE-SR	United States Department of Energy-Savannah River
USEPA	United States Environmental Protection Agency
VOC	volatile organic compound
WSTS	Western Sector Treatment System

1.0 INTRODUCTION

The Savannah River Site (SRS) Federal Facility Agreement (FFA) was negotiated between the United States Department of Energy (USDOE), the United States Environmental Protection Agency - Region 4 (USEPA), and the South Carolina Department of Health and Environmental Control (SCDHEC), collectively designated as the "Parties." USEPA made the FFA effective on August 16, 1993. The preparation and submittal of this report have been undertaken to meet the terms of Section XXV, Reporting, of the FFA.

This FFA Annual Progress Report summarizes information on activities performed during Fiscal Year (FY) 2017 (October 1, 2016 through September 30, 2017) and activities planned for FY2018 (October 1, 2017 through September 30, 2018) by USEPA, SCDHEC, and USDOE at those units and areas identified for remediation in the FFA.

This report is presented in the sections described below.

1.1 Overview of FY2017

This section contains a brief overview of the actions taken by USEPA, SCDHEC, and USDOE during FY2017 to implement the terms of the FFA.

1.2 Outcome of Extension Notifications and Requests

This section contains information about Extension Notifications and Extension Requests affecting FFA main milestones, presented in tabular form.

1.3 Status of Site Evaluation Areas (SEAs), Resource Conservation and Recovery Act/Comprehensive Environmental Response, Compensation, and Liability Act (RCRA/CERCLA) Units, and Integrator Operable Units (IOUs)

This section contains the information below, presented in tabular form:

- List of planned work for FY2017, including milestones, document submittals, risk assessments, site evaluations, remediation activities, and other field activities
 - List of work accomplished in FY2017, as documented in Appendix D of the FFA
 - List of work accomplished in FY2017, not documented in Appendix D of the FFA
 - List of activities extended by a Three-Party Agreement during FY2017 and a
 - List of work planned for FY2018, as documented in preliminary milestone agreements, including milestones, document submittals, risks assessments, site evaluations, remediation activities, and other field activities.
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1.4 USDOE-Savannah River (SR) Contractors

Table 1 identifies the USDOE-SR contractors and their responsibilities.

2.0 OVERVIEW OF FY2017

The following subsections contain a synopsis of activities and accomplishments achieved by USEPA, SCDHEC, and USDOE throughout FY2017.

2.1 Field Activities

The Environmental Compliance and Area Completion Projects currently has 515 units in the program. Included in the 515 units are RCRA/CERCLA Units, SEAs, and facilities covered under the SRS RCRA permit renewal. At the beginning of FY2017, 417 units were complete or in the remediation phase (405 complete and 12 in the remediation phase). At the end of FY2017, 418 units were complete or in the remediation phase (408 complete and 10 in the remediation phase).

A Remedial Investigation (RI) Field Start was initiated at the following operable unit (OU):

- Fourmile Branch IOU (Including the Un-Named Tributary of Fourmile Branch South of C-Area [No Building Number, NBN]) Fifth Phase II

Interim Remedial Actions were initiated at the following OUs:

- H-Area Tank Farm, Waste Tank 12
- H-Area Tank Farm, Waste Tank 16

During FY2017, USDOE installed hog barrier fences. These fences are not required by any Record of Decision (ROD), Land Use Control Implementation Plan, or any other regulatory requirement. They were installed by USDOE as a cost-saving initiative to prevent damage by feral hogs to caps/covers that USDOE are required to maintain over waste left in place for protection of human health and the environment.

Hog barrier fence installation was completed as a cost-saving maintenance activity to protect soil covers / engineered caps at the following unit:

- Chemicals, Metals, and Pesticides (CMP) Pits (080-170G, -171G, -180G, -181G, -182G, -183G, and -190G) OU
 - General Separations Area Consolidated Unit (GSACU) (specifically, Warner's Pond)
 - K-Area Bingham Pump Outage Pit (643-1G) OU
 - Miscellaneous Chemical Basin (731-4A) OU
-

- Silverton Road Waste Site (731-3A)

In addition, hog barrier fence installation was initiated at the following units:

- GSACU (specifically, HP-52 Outfall)

2.2 RODs and/or Explanation of Significant Differences (ESDs)

An ESD was submitted, approved, and issued for the following unit:

- H-Area Tank Farm, Waste Tank 12

The Fifth Five-Year Remedy Review Report for SRS OUs with Engineered Cover Systems and the Fifth Five-Year Remedy Review Report for SRS OUs with Geosynthetic or Stabilization/Solidification Cover Systems were submitted.

The Fifth Five-Year Remedy Review Report for SRS OUs with Groundwater Remedies was issued.

2.3 Post-ROD Documents

An Interim Corrective Measures Implementation/Remedial Action Implementation Plan was approved for the following OU:

- H-Area Tank Farm, Waste Tank 16

2.4 Annual Update of FFA Appendices

USDOE submits six (6) FFA appendices to USEPA and SCDHEC for their review, comment, and approval each fiscal year:

2.4.1 Appendices C, G, H, and K

In accordance with the terms of the FFA, USDOE submitted Revision 0 of Appendix C, RCRA/CERCLA Units List, Appendix G, SEAs, and Appendix K, Deactivation and Decommissioning (D&D) Facilities for FY2017, on September 29, 2016. The SCDHEC and USEPA approved the Revision 0 Appendices C, G and K on January 25, 2017, and February 6, 2017, respectively.

In accordance with the terms of the FFA, USDOE submitted Revision 0 of Appendix H, Solid Waste Management Units for FY2017, on September 29, 2017. The SCDHEC and USEPA approved the Revision 0 Appendix H on January 25, 2017, and February 6, 2017, respectively.

These four (4) appendices are due by October 1 of each year.

2.4.2 Appendix D, Timetables and Deadlines

Appendix D identifies current fiscal year milestones. After receipt of their annual budget, USDOE develops this list based on the allocated funding. Appendix D is due 30 business days after receipt of the annual budget allotment from USDOE-Headquarters. USDOE submitted the FY2017 Budget Allotment notification and Revision 0 Appendix D for FY2017 on July 6, 2017. The SCDHEC and USEPA approved the Revision 0 Appendix D on July 13, 2017, and July 31, 2017, respectively.

The Revision 0 Appendix D for FY2017, Timetables and Deadlines, lists numerous milestone dates. These include primary documents, annual updates to the FFA Appendices, Site Evaluation Reports, supporting documents, the initiation of RCRA Facility Investigation (RFI) / RI Field Starts and Remedial Action Starts, and the issuance of RODs. All milestones listed in Appendix D (i.e., all enforceable milestones for FY2017) were accomplished on time or ahead of schedule.

2.4.3 Appendix E, Long Term Projections

Appendix E identifies out-year milestones. The Parties use this appendix to develop an understanding of the resource needs that the implementation and oversight of the environmental restoration activities will require. In accordance with the FFA, USDOE submitted Revision 0 of Appendix E, Long Term Projections for FY2017, on November 15, 2016. The SCDHEC and USEPA provided comments on the Revision 0 Appendix E in their respective letters dated December 22, 2016, and February 6, 2017. The Revision 1 Appendix E for FY2017 was submitted on April 24, 2017. The SCDHEC and USEPA approved the Revision 1 Appendix E on May 24, 2017. In the response to the SCDHEC's comments, the USDOE agreed to meet during FY2017 to discuss the ash and cinders along the Beaver Dam Creek and additional ash located downgradient of the 488-1D Ash Basin and 488-2D Ash Basin. A conference call was held on September 27, 2017, to discuss the additional D-Area Cinder/Ash Areas. During the conference call, the USDOE, SCDHEC, and USEPA agreed to incorporate the D-Area Effluent Discharge Canal (NBN) and Ash Area Adjacent to and Easterly of D-Area Ash Basins 488-1D and 488-2D (NBN) into the Savannah River and Floodplain Swamp IOU, with a footnote that a separate schedule may be developed for this area pending the results of the D-Area Groundwater OU RI process.

Appendix E is due by November 15 of each year.

2.5 Disputes

On June 1, 2016, the USDOE submitted an extension request for the completion of bulk waste removal efforts (BWREs) for two tanks by September 30, 2016 (WDPD-16-43). The extension letter stated that the two underground high-level waste storage tanks located in H-Area Tank Farm intended to meet this milestone are Tank 15 and Tank 10. However, as described in the extension request, the USDOE's current schedule for completing BWREs in these tanks extended beyond September 30, 2016. The extension letter requested that the completion of

BWREs for Tank 15 and Tank 10 be extended to August 31, 2017, and August 31, 2018, respectively. The USEPA and SCDHEC responded with letters of non-concurrence dated June 21, 2016 and June 22, 2016, respectively. The USEPA's and SCDHEC's letters advised the USDOE of their respective positions. In accordance with the terms of the FFA, the USDOE invoked the informal dispute resolution process in their letter dated July 12, 2016 (WDPD-16-50). On August 8, 2016, the USDOE also provided additional information regarding the extension request for completion of BWREs for two tanks by September 30, 2016 (WDPD-16-56). During FY2016, the USDOE, USEPA, and SCDHEC met to discuss these milestones as part of the informal dispute resolution process. The USDOE, USEPA, and SCDHEC resolved the information dispute resolution during FY2017. The three Parties agreed to modify the milestone to read "DOE shall complete bulk waste removal efforts for one tank (Tank 15H) by 10/31/17 and bulk waste removal efforts for one tank (Tank 10H) by 8/31/18". USDOE documented completion of the bulk waste removal efforts for Tank 15H on September 21, 2017 (WDPD-17-44).

2.6 Site Evaluation Program

Section X of the FFA requires USDOE to submit to USEPA and SCDHEC Removal Site Evaluation (SE) Reports for those areas with potential or known releases of hazardous substances not identified before the effective date of the agreement. USDOE submitted the C-Area Groundwater Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis (RSER/EE/CA) document during FY2017.

Section X of the FFA also requires USDOE to submit Remedial SE Reports to the USEPA and SCDHEC for those areas listed in Appendix G.1 of the Agreement. USDOE did not submit any Remedial SE Reports during FY2017.

3.0 OUTCOME OF EXTENSION NOTIFICATIONS AND REQUESTS

The FFA provides for two (2) types of extensions for milestones: 1) an Extension Notification or 2) an Extension Request.

An Extension Notification is covered under the terms of Section XXII, Review/Comment on Documents, Subsection G, Review and Comment on Documents. USEPA or SCDHEC may extend their review/comment period up to 30 days, and SRS may extend its revision period up to 30 days. These extensions require the notifying Party to provide written notification of the extension. These extensions do not require the other Party's approval. However, if an Extension Notification impacts a subsequent milestone, it may necessitate the submittal of an Extension Request.

During FY2017, SRS submitted one Extension Request and one Extension Notification. Table 2 documents the outcome of extension notifications and requests for FY2017. The table describes the main milestone affected.

4.0 STATUS OF SEAS, RCRA/CERCLA UNITS AND IOUS

Table 3 documents work planned and work accomplished in FY2017 and work planned for FY2018. Table 3 presents a listing of SEAs, RCRA/CERCLA Units, and IOUs in alphabetical order. The milestones identified in Table 3 are those listed in Appendix D of the FFA. Milestones/Submittals accomplished, not included in Appendix D, are included under the column "FY2017 Work Accomplished (Other)".

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Table 1. USDOE-SR Contractors

Contractor Name	Responsibility
Savannah River Nuclear Solutions, LLC	Management & Operating Contract
Savannah River Remediation LLC	Liquid Waste Contract
Savannah River Ecology Laboratory	Ecological Research
Savannah River Archaeological Research Program	Cultural Resource Management
Centerra - SRS	Security Services
USDA Forest Service – Savannah River	Natural Resource Management
Shaw AREVA MOX Services	MOX Fuel Fabrication Facility
Parsons	Salt Waste Processing Facility
Ameresco Federal Solutions, Inc.	Supply steam and electricity

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Table 2. Extension Notifications and Requests

USDOE Letter Number	Letter Date	Unit Affected	Main Milestone Affected	Request or Notification	Extension (From/To)	Outcome
N/A	10/23/2016	CMP Pits OU	USEPA Thirty Day Extension Notification for the Effectiveness Monitoring Report (EMR) for the Monitored Natural Attenuation at the CMP Pits OU, March 2015 through March 2016	Notification	10/15/2016 to 11/15/2016	N/A
N/A	11/28/2016	D-Area Oil Seepage Basin (DOSB) OU	USEPA Thirty Day Extension Notification for the 2015 Groundwater Mixing Zone Report for the DOSB OU	Notification	11/26/2016 to 12/26/2016	N/A
N/A	11/28/2016	D-Area Groundwater (DAG) OU	USEPA Thirty Day Extension Notification for the 2015 DAG OU Letter Report for Calendar Year 2015 Data	Notification	11/28/2016 to 12/28/2016	N/A
N/A	12/27/2016	Appendix E	USEPA Thirty Day Extension Notification for the FFA Revision 0 Appendix E, Long-Term Projections for FY2017	Notification	12/31/2016 to 01/30/2017	N/A
IACD-17-125	02/27/2017	Appendix E	USDOE Extension Request for the FFA Revision 1 Appendix E, Long-Term Projections for FY2017	Request	03/08/2017 to 04/22/2017	Approved
IACD-17-151	07/20/2017	Fifth Five-Year Remedy Review Report for SRS OUs with Engineered Cover Systems and Fifth Five-Year Remedy Review Report for SRS OUs with Geosynthetic or Stabilization / Solidification Cover Systems	USDOE Thirty Day Extension Notification for the Fifth Five-Year Remedy Review Report for SRS OUs with Engineered Cover Systems (Revision 1) and Fifth Five-Year Remedy Review Report for SRS OUs with Geosynthetic or Stabilization/Solidification Cover Systems (Revision 1)	Notification	07/30/2017 to 08/29/2017	N/A

N/A = not applicable

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Table 3. Status of Site Evaluation Areas, RCRA/CERCLA Units, and Integrator Operable Units (by Name)

RCRA/CERCLA Units or Site Evaluation Areas	FY2017 Work Planned	FY2017 Work Accomplished (Appendix D Milestones)	FY2017 Work Accomplished (Other)	FY2018 Work Planned
A-Area Burning/Rubble Pits (731-A, 731-1A) and A-Area Rubble Pit (731-2A) and Miscellaneous Chemical Basin (741-4A) / Metal Burning Pit (731-5A) [includes the A-Area Ash Pile (788-2A)] OU	<ul style="list-style-type: none"> • Submit Annual Performance Evaluation Report (PER) • Conduct post-closure activities 	<ul style="list-style-type: none"> • Submitted Annual PER 	<ul style="list-style-type: none"> • Conducted post-closure activities 	<ul style="list-style-type: none"> • Submit Annual PER • Conduct post-closure activities
A-Area Miscellaneous Rubble Pile (731-6A) OU	<ul style="list-style-type: none"> • Submit Annual PER • Conduct post-closure activities 	<ul style="list-style-type: none"> • Submitted Annual PER 	<ul style="list-style-type: none"> • Conducted post-closure activities 	<ul style="list-style-type: none"> • Submit Annual PER • Conduct post-closure activities
A-Area Ash Pile (788-0A), A-Area Coal Pile Runoff Basin (788-3A), and Stormwater Outfall A-013 (NBN) OU	<ul style="list-style-type: none"> • Perform berm stability inspection 		<ul style="list-style-type: none"> • Performed berm stability inspection 	<ul style="list-style-type: none"> • Perform berm stability inspection
B-Area Operable Unit ¹	<ul style="list-style-type: none"> • Conduct post-closure activities 		<ul style="list-style-type: none"> • Conducted post-closure activities 	<ul style="list-style-type: none"> • Conduct post-closure activities
C-Area Burning/Rubble Pit and Old C-Area Burning/Rubble Pit OU	<ul style="list-style-type: none"> • Conduct post-closure activities 	<ul style="list-style-type: none"> • Submitted Biennial EMR 	<ul style="list-style-type: none"> • Conducted post-closure activities 	<ul style="list-style-type: none"> • Conduct post-closure activities
C-Area Groundwater OU		<ul style="list-style-type: none"> • Submitted C-Area Groundwater RSER/EE/CA 		<ul style="list-style-type: none"> • Issue Action Memorandum and Responsiveness Summary • Submit Revision 0 Removal Action Design Plan • Submit Revision 0 Effectiveness Monitoring Plan

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Table 3. Status of Site Evaluation Areas, RCRA/CERCLA Units, and Integrator Operable Units (by Name) (Continued)

RCRA/CERCLA Units or Site Evaluation Areas	FY2017 Work Planned	FY2017 Work Accomplished (Appendix D Milestones)	FY2017 Work Accomplished (Other)	FY2018 Work Planned
C-Area Operable Unit ¹	<ul style="list-style-type: none"> • Submit Corrective Measures Implementation Report/Remedial Action Completion Report (CMIR/RACR) (Revision 1) (Certified Clean Copy) • Conduct post-closure activities 		<ul style="list-style-type: none"> • Submitted CMIR/RACR (Revision 1) (Certified Clean Copy) • Conducted post-closure activities 	<ul style="list-style-type: none"> • Conduct post-closure activities
C-Reactor Complex	<ul style="list-style-type: none"> • Conduct post-closure activities (Early Action [EA]) 		<ul style="list-style-type: none"> • Conducted post-closure activities (EA) 	<ul style="list-style-type: none"> • Conduct post-closure activities (EA)
CMP Pits (080-170G, -171G, -180G, -181G, -182G, -183G, -190G) OU	<ul style="list-style-type: none"> • Submit Annual EMR • Conduct post-closure activities 	<ul style="list-style-type: none"> • Submitted Annual EMR 	<ul style="list-style-type: none"> • Conducted post-closure activities 	<ul style="list-style-type: none"> • Submit Annual EMR • Conduct post-closure activities
D-Area Expanded OU	<ul style="list-style-type: none"> • Conduct post-closure activities 		<ul style="list-style-type: none"> • Conducted post-closure activities 	<ul style="list-style-type: none"> • Conduct post-closure activities
DAG OU	<ul style="list-style-type: none"> • Submit Groundwater Monitoring (GWM) Report • Conduct post-closure activities 	<ul style="list-style-type: none"> • Submitted GWM Report 	<ul style="list-style-type: none"> • Conducted post-closure activities 	<ul style="list-style-type: none"> • Submit GWM Letter Report • Conduct post-closure activities
DOSB (631-G) OU	<ul style="list-style-type: none"> • Submit Groundwater Mixing Zone (GWMZ) Letter Report • Conduct post-closure activities 	<ul style="list-style-type: none"> • Submitted GWMZ Letter Report 	<ul style="list-style-type: none"> • Conducted post-closure activities 	<ul style="list-style-type: none"> • Submit GWMZ Report • Conduct post-closure activities

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Table 3. Status of Site Evaluation Areas, RCRA/CERCLA Units, and Integrator Operable Units (by Name) (Continued)

RCRA/CERCLA Units or Site Evaluation Areas	FY2017 Work Planned	FY2017 Work Accomplished (Appendix D Milestones)	FY2017 Work Accomplished (Other)	FY2018 Work Planned
D-Area Operable Unit ¹	<ul style="list-style-type: none"> • Submit D-Area Ash Basin (488-2D) Human Health and Ecological Evaluation for Confirmation Sampling (Revision 1) • Submit D-Area Ash Basin (488-2D) and D-Area Ash Landfill (488-4D) Removal Action Report (RAR) (Revision 0) • Install D-Area Ash Landfill (488-4D) groundwater monitoring wells 		<ul style="list-style-type: none"> • Submitted D-Area Ash Basin (488-2D) and D-Area Ash Landfill (488-4D) RAR (Revision 0 and Revision 1) • Installed D-Area Ash Landfill (488-4D) groundwater monitoring wells 	<ul style="list-style-type: none"> • Submit D-Area Ash Basins (488-1D and 488-2D), D-Area Ash Landfill (488-4D), and D-Area Coal Pile Runoff Basin EA Statement of Basis/Proposed Plan (SB/PP) (Revision 0) • Submit D-Area Ash Basin (488-2D) and D-Area Ash Landfill (488-4D) RAR (Professional Engineer stamped) • Submit D-Area Ash Basin (488-2D) Human Health and Ecological Evaluation for Confirmation Sampling (Revision 1)
E-Area Low Level Waste Facility (643-26E)	<ul style="list-style-type: none"> • Conduct post-construction activities 		<ul style="list-style-type: none"> • Conducted post-construction activities 	<ul style="list-style-type: none"> • Conduct post-construction activities
Early Construction and Operational Disposal Site (ECODS) L-1, N-2, P-2, R-1A, R-1B, & R-1C OU	<ul style="list-style-type: none"> • Conduct post-closure activities 		<ul style="list-style-type: none"> • Conducted post-closure activities 	<ul style="list-style-type: none"> • Conduct post-closure activities

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Table 3. Status of Site Evaluation Areas, RCRA/CERCLA Units, and Integrator Operable Units (by Name) (Continued)

RCRA/CERCLA Units or Site Evaluation Areas	FY2017 Work Planned	FY2017 Work Accomplished (Appendix D Milestones)	FY2017 Work Accomplished (Other)	FY2018 Work Planned
F- and H-Area Hazardous Waste Management Facilities (HWMFs) Groundwater	<ul style="list-style-type: none"> Collect quarterly samples from Fourmile Branch (FMB) and seepine Collect monthly flow measurements and tritium samples from FMB Continue F-Area base injection system operations Submit Annual Corrective Action Report (CAR) Submit proposed Point of Compliance (POC) Wells for Appendix IX sampling 		<ul style="list-style-type: none"> Collected quarterly samples from FMB and seepine Collected monthly flow measurements and tritium samples from FMB Continued F-Area base injection system operations Submitted Annual CAR Submitted proposed POC Wells for Appendix IX sampling Submitted 2000 RCRA Part B Permit Renewal Application, Volumes IV and V (Revision 2) 	<ul style="list-style-type: none"> Collect quarterly samples from FMB and seepine Collect monthly flow measurements and tritium samples from FMB Continue base injection system operations Submit Annual CAR Submit proposed POC Wells for Appendix IX sampling
F-Area Retention Basin (281-3F) OU	<ul style="list-style-type: none"> Conduct groundwater sampling under General Separations Area (GSA) Western Groundwater OU 		<ul style="list-style-type: none"> Conducted groundwater sampling under GSA Western Groundwater OU 	<ul style="list-style-type: none"> Conduct groundwater sampling under GSA Western Groundwater OU
FMB IOU	<ul style="list-style-type: none"> Submit Periodic Report 5 (Revision 1) Initiate Fifth Phase II Field Start 	<ul style="list-style-type: none"> Initiated Fifth Phase II Field Start 	<ul style="list-style-type: none"> Submitted Periodic Report 5 (Revision 1) 	
G-Area Oil Seepage Basin (761-13G) OU	<ul style="list-style-type: none"> Submit RFI/RI Report with Baseline Risk Assessment (BRA) and Corrective Measures Study/Feasibility Study (CMS/FS) (Revision 0) 	<ul style="list-style-type: none"> Submitted RFI/RI Report with BRA and CMS/FS (Revision 0) 		<ul style="list-style-type: none"> Submit RFI/RI Report with BRA and Corrective Measures CMS/FS (Revision 1) Submit SB/PP (Revision 0)

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Table 3. Status of Site Evaluation Areas, RCRA/CERCLA Units, and Integrator Operable Units (by Name) (Continued)

RCRA/CERCLA Units or Site Evaluation Areas	FY2017 Work Planned	FY2017 Work Accomplished (Appendix D Milestones)	FY2017 Work Accomplished (Other)	FY2018 Work Planned
GSACU [combines H-Area Retention Basin (281-3H), HP-52 Ponds (NBN), Old Radioactive Waste Burial Ground (ORWBG) (643-E), and Warner's Pond (685-23G)]	<ul style="list-style-type: none"> • Conduct post-closure activities 		<ul style="list-style-type: none"> • Conducted post-closure activities 	<ul style="list-style-type: none"> • Conduct post-closure activities
GSA Eastern Groundwater OU (NBN) [formerly the H-Area Groundwater OU (NBN)]	<ul style="list-style-type: none"> • Collect annual groundwater samples • Submit annual scoping summary 		<ul style="list-style-type: none"> • Collected annual groundwater samples • Submitted annual scoping summary 	<ul style="list-style-type: none"> • Collect annual groundwater samples • Submit annual scoping summary
GSA Western Groundwater OU (NBN) [formerly the F-Area Tank Farm Groundwater and F-Area Canyon Groundwater OUs (NBN)]	<ul style="list-style-type: none"> • Collect annual groundwater samples • Submit annual scoping summary 		<ul style="list-style-type: none"> • Collected annual groundwater samples • Submitted annual scoping summary 	<ul style="list-style-type: none"> • Collect annual groundwater samples • Submit annual scoping summary
Gunsite 012 OU [consisting of Gunsite 012 Rubble Pile (NBN), Rubble Pile Across from Gunsite 012 (NBN), and ECODS G-3 (NBN)]	<ul style="list-style-type: none"> • Conduct post-closure activities 		<ul style="list-style-type: none"> • Conducted post-closure activities 	<ul style="list-style-type: none"> • Conduct post-closure activities
K-Area Burning/Rubble Pit and Rubble Pile (131-K and 631-20G), L-Area Burning/Rubble Pit and Rubble Pile (131-L, 131-3L, 131-2L) and P-Area Burning/ Rubble Pit (131-P) OUs	<ul style="list-style-type: none"> • Submit Combined Groundwater Monitoring Report (GMR) (Detailed Groundwater Report) • Conduct post-closure activities 	<ul style="list-style-type: none"> • Submitted Combined GMR (Detailed Groundwater Report) 	<ul style="list-style-type: none"> • Conducted post-closure activities 	<ul style="list-style-type: none"> • Submit Combined GMR (Sampling Summary) • Conduct post-closure activities
K-Reactor Complex	<ul style="list-style-type: none"> • Conduct post-closure activities (EA) 		<ul style="list-style-type: none"> • Conducted post-closure activities (EA) 	<ul style="list-style-type: none"> • Conduct post-closure activities (EA)

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RCRA/CERCLA Units or Site Evaluation Areas	FY2017 Work Planned	FY2017 Work Accomplished (Appendix D Milestones)	FY2017 Work Accomplished (Other)	FY2018 Work Planned
L-Area Southern Groundwater OU	<ul style="list-style-type: none"> Conduct groundwater monitoring 		<ul style="list-style-type: none"> Conducted groundwater monitoring 	<ul style="list-style-type: none"> Submit EMR (2-year Data Summary Letter) Conduct groundwater monitoring
L-Reactor Complex	<ul style="list-style-type: none"> Conduct post-closure activities (EA) 		<ul style="list-style-type: none"> Conducted post-closure activities (EA) 	<ul style="list-style-type: none"> Conduct post-closure activities (EA)
Lower Three Runs IOU [including PAR Pond (685G), Pre-Cooler Ponds and Canals, and Old R Area Discharge Canal]	<ul style="list-style-type: none"> Submit RI/BRA Report (Revision 0) Conduct post-closure activities (EA) 	<ul style="list-style-type: none"> Submitted RI/BRA Report (Revision 0) 	<ul style="list-style-type: none"> Conducted post-closure activities (EA) 	<ul style="list-style-type: none"> Conduct post-closure activities (EA) Submit RI/BRA Report (Revision 1) Submit FS Report (Revision 0)
M-Area Operable Unit ¹	<ul style="list-style-type: none"> Conduct post-closure activities 		<ul style="list-style-type: none"> Conducted post-closure activities 	<ul style="list-style-type: none"> Conduct post-closure activities
M-Area HWMF: Vadose Zone (643-28G)	<ul style="list-style-type: none"> Continue characterization of vadose zone Continue operation of M-Area Settling Basin (MASB) Western Sector Treatment System (WSTS) and other vadose zone corrective action (CA) systems Submit annual WSTS polychlorinated biphenyl (PCB) progress report Submit annual CA and GMR 		<ul style="list-style-type: none"> Continued characterization of vadose zone Continued operation of MASB WSTS and other vadose zone CA systems Submitted annual WSTS PCB progress report Submitted annual CA and GMR Submitted 2000 RCRA Part B Permit Renewal Application (Revision 10) (Redline Pages) 	<ul style="list-style-type: none"> Continue characterization of vadose zone Continue operation of MASB WSTS and other vadose zone CA systems Submit annual WSTS PCB progress report Submit annual CA and GMR Submitted 2000 RCRA Part B Permit Renewal Application (Revision 10) (Certified, Clean Copy)

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RCRA/CERCLA Units or Site Evaluation Areas	FY2017 Work Planned	FY2017 Work Accomplished (Appendix D Milestones)	FY2017 Work Accomplished (Other)	FY2018 Work Planned
M-Area HWMF: A/M Area Groundwater Portion (904-110G)	<ul style="list-style-type: none"> • Submit Annual Appendix IX POC Well Sampling Proposal • Continue operation of the WSTS and other CA systems • Continue additional characterization of suspect volatile organic compound (VOC) sources • Continue groundwater monitoring • Submit the annual CA and GMR 		<ul style="list-style-type: none"> • Submitted Annual Appendix IX POC Well Sampling Proposal • Continued operation of WSTS and other CA systems • Continued additional characterization of suspect VOC sources • Continued groundwater monitoring • Submitted annual CA and GMR • Submitted 2000 RCRA Part B Permit Renewal Application (Revision 10) (Redline Pages) • Began operation of the Southern Sector Humate Amendment System 	<ul style="list-style-type: none"> • Submit Annual Appendix IX POC Well Sampling Proposal • Continued operation of the WSTS and other CA systems • Continue additional characterization of suspect VOC sources • Continue groundwater monitoring • Submit the annual CA and GMR • Submit 2000 RCRA Part B Permit Renewal Application (Revision 10) (Certified, Clean Copy) • Submit Underground Injection Control Permit Application for Pilot Testing of Advanced Oxidation Processes in the Western Sector of M Area HWMF • Submit Temporary Authorization Request for the Installation of Recovery Well RWM019

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RCRA/CERCLA Units or Site Evaluation Areas	FY2017 Work Planned	FY2017 Work Accomplished (Appendix D Milestones)	FY2017 Work Accomplished (Other)	FY2018 Work Planned
MASB Inactive Process Sewers to Manhole 1 (081-M) OU	<ul style="list-style-type: none"> • Submit Annual PER • Conduct post-closure activities 	<ul style="list-style-type: none"> • Submitted Annual PER 	<ul style="list-style-type: none"> • Conducted post-closure activities 	<ul style="list-style-type: none"> • Submit Annual PER • Conduct post-closure activities
MASB (904-51G)	<ul style="list-style-type: none"> • Conduct post-closure activities 		<ul style="list-style-type: none"> • Conducted post-closure activities 	<ul style="list-style-type: none"> • Conduct post-closure activities
Metallurgical Laboratory (Met Lab) / Carolina Bay (904-110G)	<ul style="list-style-type: none"> • Submit Annual Appendix IX POC Well Sampling Proposal • Continue groundwater monitoring • Submit annual CA and GMR • Continue operation of the existing Met Lab recovery wells and BaroBall™ wells • Conduct post-closure activities 		<ul style="list-style-type: none"> • Submitted Annual Appendix IX POC Well Sampling Proposal • Continued groundwater monitoring • Submitted annual CA and GMR • Continued operation of the existing Met Lab recovery wells and BaroBall™ wells • Conducted post-closure activities • Submitted 2000 RCRA Part B Permit Renewal Application (Revision 10) (Redline Pages) 	<ul style="list-style-type: none"> • Submit Annual Appendix IX POC Well Sampling Proposal • Continue groundwater monitoring • Submit annual CA and GMR • Continue operation of the existing Met Lab recovery wells and BaroBall™ wells • Conduct post-closure activities • Submit 2000 RCRA Part B Permit Renewal Application (Revision 10) (Certified, Clean Copy)
Mixed Waste Management Facility (Groundwater)	<ul style="list-style-type: none"> • Conduct operation and effectiveness monitoring of the Tritium phytoremediation system at the Southwest Plume (SWP) • Submit Annual CAR 		<ul style="list-style-type: none"> • Conducted operation and effectiveness monitoring of the Tritium phytoremediation system at the SWP • Submitted Annual CAR 	<ul style="list-style-type: none"> • Conduct operation and effectiveness monitoring of the Tritium phytoremediation system at the SWP • Submit Annual CAR

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RCRA/CERCLA Units or Site Evaluation Areas	FY2017 Work Planned	FY2017 Work Accomplished (Appendix D Milestones)	FY2017 Work Accomplished (Other)	FY2018 Work Planned
Mixed Waste Management Facility (Groundwater) <i>(continued/end)</i>	<ul style="list-style-type: none"> Maintain compliance with groundwater monitoring Submit the proposed POC Wells for Appendix IX sampling 		<ul style="list-style-type: none"> Maintained compliance with groundwater monitoring Submitted the proposed POC Wells for Appendix IX sampling 	<ul style="list-style-type: none"> Maintain compliance with groundwater monitoring Submit the proposed POC Wells for Appendix IX sampling
P-Area Operable Unit (PAOU) ¹	<ul style="list-style-type: none"> Conduct post-closure activities 		<ul style="list-style-type: none"> Conducted post-closure activities 	<ul style="list-style-type: none"> Conduct post-closure activities
P-Area Groundwater OU				<ul style="list-style-type: none"> Submit RSER/EE/CA for Trichloroethylene Plume Discharging to Steel Creek in P-Area Groundwater OU
R-Area Operable Unit (RAOU) ¹	<ul style="list-style-type: none"> Submit Groundwater EMR Conduct post-closure activities 	<ul style="list-style-type: none"> Submitted Groundwater EMR 	<ul style="list-style-type: none"> Conducted post-closure activities 	<ul style="list-style-type: none"> Submit Groundwater EMR Conduct post-closure activities
R-Area Burning/Rubble Pits (131-R, -1R) and Rubble Pile (631-25G) OU	<ul style="list-style-type: none"> Conduct post-closure activities 		<ul style="list-style-type: none"> Conducted post-closure activities 	<ul style="list-style-type: none"> Conduct post-closure activities
R-Area Reactor Seepage Basins (904-57G, -58G, -59G, -60G, -103G, -104G) and 108-4R Overflow Basin OU	<ul style="list-style-type: none"> Conduct post-closure monitoring activities 		<ul style="list-style-type: none"> Conducted post-closure monitoring activities 	<ul style="list-style-type: none"> Submit GWMZ Report Conduct post-closure monitoring activities

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RCRA/CERCLA Units or Site Evaluation Areas	FY2017 Work Planned	FY2017 Work Accomplished (Appendix D Milestones)	FY2017 Work Accomplished (Other)	FY2018 Work Planned
Sanitary Landfill (740-G) Groundwater	<ul style="list-style-type: none"> • Submit Annual CA and GMR • Conduct groundwater monitoring 		<ul style="list-style-type: none"> • Submitted Annual CA and GMR • Conducted groundwater monitoring 	<ul style="list-style-type: none"> • Submit Annual CA and GMR • Conduct groundwater monitoring
Sanitary Landfill (740-G)	<ul style="list-style-type: none"> • Conduct post-closure activities 		<ul style="list-style-type: none"> • Conducted post-closure activities 	<ul style="list-style-type: none"> • Conduct post-closure activities
Savannah River and Floodplain Swamp IOU	<ul style="list-style-type: none"> • Submit Periodic Report 4 (Revisions 0 and 1) 	<ul style="list-style-type: none"> • Submitted Periodic Report 4 (Revision 0) 	<ul style="list-style-type: none"> • Submitted Periodic Report 4 (Revision 1) 	<ul style="list-style-type: none"> • Initiate Fourth Phase II Field Start
Silverton Road Waste Site (731-3A)	<ul style="list-style-type: none"> • Conduct post-closure activities 		<ul style="list-style-type: none"> • Conducted post-closure activities 	<ul style="list-style-type: none"> • Conduct post-closure activities
Savannah River Laboratory (SRL) Seepage Basins (904-53G1, 904-53G2, 904-54G, 904-55G) OU	<ul style="list-style-type: none"> • Conduct post-closure activities 		<ul style="list-style-type: none"> • Conducted post-closure activities 	<ul style="list-style-type: none"> • Conduct post-closure activities
Steel Creek IOU				<ul style="list-style-type: none"> • Submit Periodic Report 6 (Revision 0)
T-Area Operable Unit ¹	<ul style="list-style-type: none"> • Conduct post-closure activities 		<ul style="list-style-type: none"> • Conducted post-closure activities 	<ul style="list-style-type: none"> • Conduct post-closure activities
TNX Operable Unit	<ul style="list-style-type: none"> • Submit Comprehensive Annual Groundwater and Remedial Action Effectiveness Interim Report • Submit TNX Groundwater Monitoring Near the Old TNX Seepage Basin (Revision 1) • Conduct post-closure activities 	<ul style="list-style-type: none"> • Submitted Comprehensive Annual Groundwater and Remedial Action Effectiveness Interim Report 	<ul style="list-style-type: none"> • Submitted TNX Groundwater Monitoring Near the Old TNX Seepage Basin (Revision 1) • Conducted post-closure activities 	<ul style="list-style-type: none"> • Submit Comprehensive Annual Groundwater and Remedial Action Effectiveness Interim Report • Conduct post-closure activities
Upper Three Runs IOU				<ul style="list-style-type: none"> • Submit Periodic Report 5 (Revision 0)

¹ FFA Appendix C.5 lists the Units and D&D Facilities (or Remnants) assigned to each Area Operable Unit.

APPENDIX A

Land Use Controls Units

During Fiscal Year (FY) 2000, the Parties approved the Land Use Control Assurance Plan (LUCAP) for Savannah River Site (SRS) and signed its associated Memorandum of Agreement. The LUCAP is updated periodically to include additional approved unit-specific Land Use Control Implementation Plans (LUCIPs). The unit-specific LUCIPs detail how SRS will implement, maintain, and monitor the land use control (LUC) elements of the selected remedy to ensure that the remedy remains protective of human health and the environment.

Record of Decisions (RODs) have been issued for some Resource Conservation and Recovery Act/Comprehensive Environmental Responses, Compensation, and Liability Act (RCRA/CERCLA) Units at the SRS in which the selected alternative is or includes LUCs. To assure the United States Environmental Protection Agency, South Carolina Department of Health and Environmental Control, and the public that United States Department of Energy is maintaining the LUCs as stipulated, the Manager, Savannah River Operations Office, shall annually certify these units. These units are currently being controlled in accordance with the unit-specific RODs, unit-specific LUCIPs, and in accordance with the *Land Use Control Assurance Plan for the Savannah River Site*.

The FY2017 certification is applicable to the following RCRA/CERCLA Units:

Unit Name	SRS Index Number(s)	CERCLIS Number(s)
A-Area Burning/Rubble Pits (731-A, -1A) and Rubble Pit (731-2A) and the Miscellaneous Chemical Basin/Metals Burning Pit (731-4A & -5A) Operable Unit (OU) (includes A-Area Ash Pile, 788-2A)	45, 46, 49, 101, 102, 237	28
A-Area Miscellaneous Rubble Pile (731-6A) OU	48	30
B-Area OU [consisting of Heavy Water Components Test Reactor (HWCTR) (Building 770-U) and Early Construction and Operational Disposal Site (ECODS) B-3 (East of B Area, South of Road C) (NBN) and ECODS B-5 (Adjacent to ECODS B-3) (NBN)]	528, 530, 2003	48
C-, K-, and L-Reactor Complexes Early Action (EA)	577, 583, 584	79, 90, 91
C-Area Burning/Rubble Pit (131-C) and Old C-Area Burning Rubble Pit (NBN) OU	51, 566	31
C-Area OU EA [consisting of C-Area Process Sewer Lines as Abandoned (NBN), C-Area Reactor Area Cask Car Railroad Tracks as Abandoned (NBN), ECODS C-1 (Near C-Area Reactor Discharge Canal (NBN), Potential Release from C-Area Disassembly Basin (NBN), Potential Release from C-Area Reactor Cooling Water System (186/190-C)]	555, 475, 522, 240, 242	79
C-Area Reactor Seepage Basins (904-66G, -67G, & -68G) OU	53, 54, 55	60
Central Shops Burning/Rubble Pits (631-1G & -3G) OU	58, 59	50
Chemicals, Metals, and Pesticides Pits (080-170G, -171G, -180G, -182G, -183G, and -190G) OU	61, 62, 63, 64, 65, 66, 67	24

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Unit Name	SRS Index Number(s)	CERCLIS Number(s)
D-Area Burning/Rubble Pits (431-D & -1D) OU	32, 33	15
D-Area Expanded OU [consisting of D-Area Rubble Pit (431-2D) and D-Area Ash Basin (488-D)]	68, 273	67
D-Area Oil Seepage Basin (631-G) OU	26	27
D-Area OU Early Action [consisting of D-Area Asbestos Pit (080-20G) and D-Area Coal Pile Runoff Basin (489-D) (Northern 25%)]	69, 211	63
ECODS L-1, N-2, P-2, & R-1A, -1B, -1C OU	535, 539, 545, 540	22
F-Area Burning/Rubble Pits (231-F, -1F, & -2F) OU	34, 35, 36	14
F-Area Industrial Solid Waste Landfill (F-Area Railroad Crosstie Pile) (NBN)	279	NA
F-Area Retention Basin (281-3F) OU	73	23
Ford Building Seepage Basin (904-91G) OU	75	58
General Separations Area Consolidation Unit [consisting of Old Radioactive Waste Burial Ground (Including Solvent Tanks) (643-E), HP-52 Ponds, H-Area Retention Basin (281-3H) and Spill on 05/01/1956 of Unknown Amount of Retention Basin Pipe Leak (NBN), Warner's Pond (685-23G) and Spill on 03/08/1978 of Unknown Seepage Basin Pipe Leak in H-Area Seepage Basin (NBN), and Spill on 02/08/78 of Unknown H-Area Process Sewer Line Cave-In (NBN)]	18, 29, 28, 417, 27, 405, 398	32
Gunsite 012 OU [consisting of Gunsite 012 Rubble Pile (NBN), Rubble Pile Across from Gunsite 012 (NBN), and ECODS G-3 (Adjacent to Gunsite 012) (NBN)]	163, 337, 544	78
Heavy Equipment Wash Basin (NBN) OU	502	53
K-Area Bingham Pump Outage Pit (643-1G) OU	83	20
K-Area Burning/Rubble Pit (131-K) and K-Area Rubble Pile (631-20G) OU	84, 88	40
K-Area Reactor Seepage Basin (904-65G) OU	87	55
L- and P-Area Bingham Pump Outage Pits (643-2G, -3G, & -4G) OU	91, 92, 107	26
L-Area Oil and Chemical Basin (904-83G) OU	96	17
L-Area Reactor Seepage Basin (904-64G) OU	306	65
L-Area Rubble Pile (131-3L) OU	169	56
L-Area Southern Groundwater (NBN) OU	487	77
Lower Three Runs IOU Tail Portion (Middle and Lower Subunits)	505	35
M-Area OU [consisting of Potential release of Heavy Metals from 321-M Abandoned Sewer Line (NBN), Salvage Yard (741-A), Underground Sump 321-M #001, and Underground Sump 321-M #002]	585, 326, 340, 465, 466	92
M-Area Settling Basin Inactive Process Sewer Lines OU (081-M)	100, 234	19
Old F-Area Seepage Basin (904-49G) OU	105	16
P-Area Burning/Rubble Pit (131-P) OU	108	59

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Unit Name	SRS Index Number(s)	CERCLIS Number(s)
P-Area Operable Unit [consisting of Spill on 03/15/79 of 500 gallons of Contaminated Water (NBN), P-Area Ash Basin (188-0P), Potential Release from P-Area Disassembly Basin (105-P), Potential Release from the P-Area Reactor Cooling Water System (186/190-P), P-Area Reactor Area Cask Car Railroad Tracks as Abandoned (NBN), P-Area Process Sewer Lines as Abandoned (NBN)]	126, 313, 314, 316, 477, 557, 587	94
P-Area Reactor Seepage Basins (904-61G, -62G, & -63G) OU	317, 318, 319	66
R-Area Bingham Pump Outage Pits (643-8G, -9G, & -10G) and R-Area Unknown Pits #1, #2, #3 (RUNK-1, -2, & -3) OU	113, 114, 115, 550, 551, 552	38
R-Area Burning/Rubble Pits (131-R & 131-1R) and R-Area Rubble Pile (631-25G) OU	117, 116, 118	43
R-Area Operable Unit [[consisting of Area on the North Side of Building 105-R, Laydown Area North of 105-R, and Release from the Decontamination of R-Area Reactor Disassembly Basin (NBN), Combined Spills North of Building 105-R (NBN), Cooling Water Effluent Sump (107-R), Potential Release from R-Area Disassembly Basin (NBN), Potential Release of NaOH/H ₂ SO ₄ from 183-2R (NBN), R-Area Ash Basin (188-0R), R-Area Groundwater, R-Area Process Sewer Lines as Abandoned (NBN), and R-Area Reactor Area Cask Car Railroad Tracks as Abandoned (NBN)]	231, 233, 271, 288, 324, 329, 330, 478, 513, 517, 556, 588	95
R-Area Reactor Seepage Basins (904-57G, -58G, -59G, -60G, -103G, -104G) OU	119, 120, 121, 122, 123, 124	25
Silverton Road Waste Site (731-3A)	41	13
SRL Seepage Basins (904-53G1, -53G2, -54G, & -55G) OU	133, 134, 135, 136	47
T-Area OU [consisting of Neutralization Sump (678-T), TNX Outfall Delta, Lower Discharge Gully, and Swamp (NBN), TNX-Area Process Sewer Lines and Tile Fields as Abandoned (NBN), and X-001 Outfall Drainage Ditch (NBN) (See USDOE Letter SGP-05-128 for list of decommissioned facilities added to T-Area Completion)]	589, 310, 500, 559, 467	96
TNX OU [consisting of TNX Burying Ground (643-5G) (Including Spill on 01/12/53 of 1/2 Ton of Uranyl Nitrate), New TNX Seepage Basin (904-102G), Old TNX Seepage Basin (904-076G), and TNX Groundwater (082-G)]	139, 104, 106, 25, 127	21, 29


Note: The L-Area Hot Shop OU (717-G) was designated as a No Action OU in FY2014 and was removed from this LUC certification list.

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I certify that the Savannah River Site has maintained compliance with all unit-specific Land Use Control Implementation Plans in accordance with the *Land Use Control Assurance Plan for the Savannah River Site*.

Signature: 

Jack R. Craig
Savannah River Site Manager
Savannah River Operations Office
U.S. Department of Energy

Date: 11/15/17