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SPENT NUCLEAR FUELS PROJECT 100K OPERATIONS SPILL ASSESSMENT

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Abstract:

The Spent Nuclear Fuel (SNF) Spill Assessment (SA) describes measures that are taken to prevent spills to the environment and to minimize the adverse effects of spills that do occur.

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Spent Nuclear Fuels Project

100K Operations Spill Assessment

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June 1999

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Figure 2.3 105 KW Storm Water Inlets

1.0 INTRODUCTION

The Spent Nuclear Fuel (SNF) Project Spill Assessment (SA) describes measures that are taken to prevent spills to the environment and to minimize the adverse effects of spills that may occur. These measures are designed to preclude spills to National Pollutant Discharge Elimination System (NPDES) permitted Outfall 003/004.

This SA includes the information below which is necessary to evaluate the risks and hazards of a spill being released to the environs.

- **Systems Descriptions** – The plan describes locations within the SNF Project facilities where chemical or oil substances are stored. Appendix A lists the facilities where chemicals/oil substances are stored. Appendix B lists the facilities where past spills are located.
- **Spill Destinations** – Included in Appendix A of this plan, are the predicted spill paths to the environment.
- **Spill Prevention Measures** – The plan also documents measures currently being taken to prevent releases of spills. The spill assessment/recommended improvements are in Section 3.0.
- **Upgrading Spill Prevention** – Areas are identified where improvements in spill containment devices are possible. In these areas, the likelihood of the spill is evaluated by considering such items as system size (storage capacity), frequency of use, system surveillance, etc. Based on this evaluation, recommendations for improvement are made in Appendix A and Section 4.2.
- **Spill Response** – Procedures for spill notification at SNF Project facilities are outlined in the plan. Also contained are immediate steps to be taken to minimize the quantity of the spill and exposure of personnel and equipment. The spill responses are in Section 4.0.

1.1 Discussion

The requirements for preparation of a SA are contained in 40 Code of Federal Regulations 112, Oil Pollution Prevention. Based on current inventories, the facility is under the quantity of material that would require a SA. However, an SA has been prepared as a Best Management Practice. This SA has been also written to close a Facility Evaluation Board finding (8/10/98).

2.0 FACILITY DESCRIPTION

The 100 K Area is located on the Hanford Site, approximately 25 miles northwest of Richland, Washington and consists of two identical retired reactors and other support structures. The easternmost reactor is designated 105 K East (KE), and the westernmost, 105 K West (KW).

2.1 Facility Physical Description

The reactors were designed as identical facilities and are located approximately 300 yards apart. The reactor facilities also were supported by numerous facilities, including pumphouses, filtration plants, clearwells, combined outfall, maintenance facilities, warehouses, change trailers, administration trailers, and large water filled basins for storing irradiated reactor fuel. The reactors and their support facilities were constructed between 1952 and 1954, and began operations in 1955. The 105 KW reactor ceased operation in February 1970 and 105 KE reactor closed in February 1971. Following shutdown of KE and KW reactors, the stored irradiated fuel was shipped to the 200 East Area for processing. Following deactivation of the reactors, approximately one year was spent cleaning and modifying the 105 KE and 105 KW fuel storage basins for storage of N Reactor irradiated fuel. Additional modifications and repairs of the fuel storage system included modification of the basin cooling systems to a closed system and repair of leak in the 105 KE Basin. Actual storage of N Reactor irradiated fuel began in 1975 in 105 KE and in 1981 in 105 KW and continues at present.

2.2 Spill Pathways to the Columbia River

There are two liquid discharge pathways from 100 K Area that could transport a spill to the river. Both discharges are permitted NPDES discharges. They are permitted under NPDES Permit WA-0002591-7 as Outfalls 003 and 004. Outfall 004 is also permitted under the NPDES Multi-Section General Storm Water Discharge Permit. A more detailed description of the release point is included in the following sections.

2.2.1 181 KE Outfall 003 - The discharge for the travelling water screen and backwash water, operates intermittently. This water contains only constituents removed from the river water being taken into the intakes of the 181 KE Building. The travelling screens remove debris from the river water brought into the 181 KE Building intakes. This outfall is a 12 inch diameter pipe that discharges at an average rate of 80,000 gallons/day when operational. This pipe comes from the 181 KE pumphouse, enters the ground, and bends to the north before discharging beneath the surface of the Columbia River approximately 575 feet towards the center of the river. When operational, this outfall is grab sampled to ensure NPDES permit compliance. See Figure 2-1. Appendix A is the assessment of active storage areas and their potential for a spill to reach the Columbia River.

2.2.2 1908 KE Outfall 004 - The primary liquid effluent discharge point at the K Area is the 1908 KE Outfall. This discharge is permitted as NPDES Outfall 004. This outfall is a pair of 84 inch-diameter pipes that extend 1,350 feet from the 1908 KE Building and discharge beneath the surface of the Columbia River near the center of the channel. The outfall is covered in rip-rap. The 004 Outfall is used for liquid effluent discharges from 100 K activities as shown in Figure 2.1.

2.2.3 1908 KE Storm Water Discharge at Outfall 004 – Multi-sector General Storm Water Discharge Permit – The U.S. Environmental Protection Agency (EPA) directed facilities to pursue continued storm water permit coverage under the NPDES Storm Water Multi-sector General Permit through submittal of a Notice of Intent by December 29, 1998. See Figure 2.2 for 105 KE storm water inlets and 2.3 for 105 KW storm water inlets for standard run off to the 1908 KE Outfall.

The storm water runoff area that would contribute stormwater effluent to these drains is periodically inspected to verify that there are no potential activities that could cause pollution to reach the river.

2.3 Spill Pathways to Ground

The currently operating 100 K facilities consist of the two indicated fuel storage basins (KE and KW) and related facilities. The SNF Project is responsible for the general area within the fence surrounding the 100 K Area and all physical structures/facilities. Appendix A is the assessment of active storage areas and their potential for a spill to reach the ground.

Figure 2.2: 105 KE Storm Water Inlets

Figure 2.3: 105 KW Storm Water Inlets

3.0 SPILL PREVENTION

3.1 Spill Assessment

Personnel from SNF Project perform a walk-through surveillance of chemical storage areas that identify potential leaky containers, reporting of any spills, and identifying deficiencies in the storage of chemicals.

The most probable locations for an accidental spill are at the facilities that store chemicals. Appendix A is an assessment of those locations. Only 190 KE and 183 KE were identified as having the potential for a spill to reach the environs. It is not anticipated to have more than one drum (55 gallons) be spilled at one time. There are first response spill equipment available at 100K to contain a spill.

Past spills are contained in the deactivated facilities. These spills were evaluated in Appendix B. At this time, these spill areas have been visually inspected by SNF Environmental Protection and determined that they are small and would not effect the environment. Most are dried and have no water to move the spill from its present location. Any water main that would break could cause movement, but the spill areas have been identified and not all would be affected by the water discharge. By review, the picture of the past spills a quantity could be determined and reported if required.

3.2 Recommended Improvement

The chemical storage areas at SNF facilities will continue to store chemicals and in some cases, store more. Most facilities now are manned during daytime hours, but in the future some will be operating on a three shift schedule.

The current spill response procedures and location of spill kits is adequate to meet the future work activities at SNF facilities.

Listed below are enhancements to the 100K Chemical Storage Program:

- To enhance the storage of chemicals in 55 gallon drums, a drum spill pallet with containment may be used. This would provide additional spill protection.
- Old/new drips and splatters that are identified in facilities should be cleaned as part of housekeeping. All past spills should be reviewed by SNF Environmental Protection (EP) and Operations to make sure they are inactive. Also, these inspections will be included in the records given to Demolition and Decommissioning (D&D).

4.0 SPILL RESPONSE ACTIONS

Below is a summary of response actions that should be taken if a spill should occur.

- First Action: Stop the spill if possible.
- Second Action: Contact the shift manager who should implement one of the following instructions:

<u>Document</u>	<u>Title</u>
OP-46-004	Respond to minor hazardous material, dangerous, and/or mixed waste spills.
ER-SNF-003	Emergency Response Hazardous Material/Chemical Release
ER-SNF-002	Emergency Response Radiological Events

- Third Action: Notify SNF EP for the purpose of determining if any remedial action is necessary and develop input data to the Waste Information Data System (WIDS) data base if required.

4.1 Procedures To Be Used to Control Response to Spills

4.1.1 Minor Spills – OP-46-004

This is a procedure to respond to minor wet and dry spills of hazardous substances, dangerous wastes, mixed wastes, radionuclides, PCBs, oil or petroleum products (regardless of the quantity), except for small drips and splatters that can be immediately wiped up. This procedure also performs the necessary notifications required for spills and releases. Spill equipment locations are listed below:

- A spill kit is maintained at the 100K 90 Day Waste Storage Facility.
- First response spill equipment is located at 100K as described in Technical Procedure OP-46-004.

4.1.2 Hazardous Material/Chemical Spills – ER-SNF-003

This is an emergency response procedure to respond to a release that will affect the environment, the safety of the facility and/or personnel.

4.1.3 Radiological Spills – ER-SNF-002

This is a procedure to respond to a radiological event.

4.2 Notification To Environmental Regulator Agencies.

These procedures describe the requirements and notificaiton process for making notifications to external regulatory agencies.

HNF-PRO-453, "Environmental Notification and Reporting"
SNF-AP-5-008, "Notification for Environmental Regulators."

4.3 Waste Information Data System Entries

Tri-Party Agreement Handbook Management Procedures RL-TPA-90-001 describes the requirements and process to update the WIDS data base. When a spill is discovered, which includes spills that represent a potential threat to human health and the environment, it will be evaluated by SNF EP for:

- Reporting to WIDS now – impose an immediate risk to the environment or health of the worker;
- Reporting to WIDS during turnover to D&D. Areas within facilities that have spills/stained floors will be identified in transition documentation to D&D.

Appendix A

Assessment of Active Storage Areas

Assessment of Active Storage Areas

Location	Type of Material Stored	Storage Configuration	Quantity of Material Stored	Hazards (Note O)	Risks	Environmental Consequence If a Release	Current Practices	Recommended Program Enhancements
Maintenance Shop 1717K	T1, T3, T4, T6	S1, S2, S4, S6	MS1, MS5 MS2	Note A	R2	E7	CP1, CP2 CP3, CP5	RE1, RE3, RE4, RE5 RE5
Equipment Shed 1724KA	T7 (ice melt)	S2, S3	MS6	Note B	R3	E7	CP1, CP2, CP3, CP5	RE1, RE3, RE5
Bottle Storage 1724KB	T1, T6	S2, S4	MS5	Note C	R5	E7	CP1, CP2, CP3, CP5	RE1, RE5
White Storage Facilities South of 1717K	T1, T3, T4	S1, S2, S3	MS4	Note D & Note E	R2, R3, R4	E7	CP1, CP2, CP3, CP5	RE1, RE3, RE5
Basin 105KE	T1, T3, T4, T7	S1, S2	MS2, MS6	Note E	R2, R3, R4	E7	CP1, CP2, CP3, CP5	RE1, RE3, RE5
Storage Unit 1713KE	T5	S2	MS3	Note F	Note F	E5	CP1, CP2, CP3, CP5	RE1, RE3, RE5
Storage Unit 1714KE	T7	S2	MS6	Note G	Note G	E7	CP1, CP2, CP3, CP4, CP5	Note G
Basin 105KW	T1, T4	S1, S2	MS1	Note H	R2, R4	E7	CP1, CP2, CP3, CP5	RE1, RE3, RE5
Storage Unit 1713KW	T7	S3	MS1, MS6	Note I	R3	E5	CP1, CP2, CP3, GMP4, CP5	RE1, RE3, RE5
Work Area 165KE	T1, T4, T7	S1, S2, S4	MS2, MS5	Note J	R2, R5	E7	CP1, CP2, CP3, CP4, CP5	RE1, RE3, RE5
Warehouse 190KE (cabinets)	T1, T2, T3, T4, T7	S1, S2	MS4, MS6	Note K	R2, R4	E7	CP1, CP2, CP3, CP4, CP5	RE1, RE3, RE5
Warehouse 190KE (open bay)	T3, T4, T5, T6, T7	S2, S3, S4	MS4, MS5, MS6	Note L	R1, R3, R5	E2, E3, E4, E6	CP1, CP2, CP3 CP4, CP5	R31, RE2, RE3, RE4, RE5
Laboratory/Office 1706KE	T6, T2, T1, T4	S1, S2, S4	MS2, MS5	Note M	R2, R4, R5	E7	CP1, CP2, CP3 CP5	RE1, RE3, RE5
Water Plant 183KE/185K	T1, T2, T3, T4	S1, S2, S3, S5	MS2, MS3, MS6	Note N	R2, R3, R4	E2, E3, E4, E6	CP1, CP2, CP3 CP5	RE1, RE3, RE5

A-2

Notes

- Note A: Material stored in cabinets and a spill would be contained in the cabinet/room.
- Note B: During the winter months, approximately 200, 25-lb. buckets of ice melt are stored/dispensed from this facility.
- Note C: Approximately 50 bottles of compressed gas stored in this facility.
- Note D: Hazardous storage facilities and a spill would be contained in the facility.
- Note E: Material stored in cabinets and a spill would be controlled in the cabinet/building.
- Note F: One 55 gallon drum that could go to ground. There is a spill kit located in 105KE, Room 1.
- Note G: Solid absorbent stored for spill containment 50 lbs.
- Note H: Material stored in cabinets and a spill would be contained in the cabinet/room.
- Note I: Material stored on shelves and a spill could go to ground.
- Note J: Materials stored in cabinets or gas cylinders and a spill would be contained in cabinet/room. Spill kit in 190KE.
- Note K: Material stored in cabinets and a spill would be contained in the cabinet/room.
- Note L: Material stored in open bay warehouse that could go to outfall.
- Note M: Material stored in cabinets and a spill would be contained in the cabinet/room.
- Note N: Material stored in facility could be discharged to the outfall.
- Note O: In general, there are past spills (small in size) that have been identified in several of the facilities list below. These past spill areas have been evaluated and it has been determined that there are no imminent environmental/health hazards associated with these spills. Where appropriate, these spills will be removed/cleaned for housekeeping purposes. The aggregate of the facility spills from past operations, if required, will be identified in WIDS database update.

TYPE OF MATERIAL

- T1: Liquid Flammable
- T2: Liquid Corrosive
- T3: Oils (small quantities)
- T4: Aerosol Cans/Small Cylinders
- T5: Oils (Drum 55 Gallons)
- T6: Gas Bottles (pressurized)
- T7: Other (ice melt, solids, etc)

STORAGE CONFIGURATION

- S1: Chemicals are stored in commercial cabinets
- S2: Chemicals are in commercial containers
- S3: Chemical stored on pallets/shelves
- S4: Chemicals stored cylinders (gas)
- S5: Chemicals stored in tank
- S6: Tool cleaner tank

QUANTITY OF MATERIAL STORED

- MS1: Storage capacity <10 gallons
- MS2: Storage capacity <20 gallons
- MS3: Storage capacity <50 gallons
- MS4: Storage capacity >100 gallons
- MS5: Gas cylinders
- MS6: Solids storage (buckets/bags)

HAZARDS

See table notes

RISKS

- R1: Storage located in a high traffic area that would make the storage susceptible to spillage or leakage (vehicle/forklift)
- R2: Stored in a cabinet (not likely to spill outside of the cabinet)
- R3: Stored on shelves
- R4: Storage has secondary containment (cabinet/berm)
- R5: Cylinder storage

ENVIRONMENTAL CONSEQUENCE

- E1: Spill to septic system (possible cleanup)
- E2: Spill contained in drain system (future flow to river/ground)
- E3: Spill not contained in drain system (flow to river/ground)
- E4: Spill not contained (flow directly to river)
- E5: Spill not contained (flow directly to ground)
- E6: Possible reportable quantity
- E7: No environmental impacts

CURRENT PRACTICES

- CP1: Inventory of chemicals listed in storage area/container
- CP2: Chemical inventories updated monthly
- CP3: MSDS available
- CP4: Spill kit available
- CP5: Spill reporting procedure adequate

RECOMMENDED PRACTICES

- RE1: SNF-CMS implementation
- RE2: Containment (berm)
- RE3: Reduce the amount of chemicals on hand
- RE4: Additional spill kit needed
- RE5: Check storage areas for spills in monthly inventory
- RE6: No recommendations

Appendix B

Assessment of Past Spills

Assessment of Past Spills				
Location of Spill	Type of Spill	Active Spill	Recommendations	Remarks (A) (B)
181KE Intake Structure (1)	oil	No	Housekeeping/clean	Check area for leaks
181KE Intake Structure (2)	oil	No	Housekeeping/clean	Check area for leaks
181KE Intake Structure (3)	asbestos	Ongoing Repairs	If required repair	Do work package when identified
183KE Tunnel (4)	oil	No	Housekeeping	Dry/remove if time permits
183KE Tunnel (5)	condensate from air lines	Yes	System is emptied as required	183KE operators check this area
183KE Tunnel (6)	condensate from air lines	Yes	See item 5	See item 5
183KE Tunnel Cross (6a) Tie	glycol drip bucket	No	Inactive System	Check area for possible leaks
Excess Yard (7)	deicer salt	No	Housekeeping/clean	Keep buckets closed
1706KE Valve Leak (8)	service water leak running on floor	No	Stopped	Check area for possible leaks
1706KE Oil Drip Pan (9)	oil	No	Identify for cleanup during D&D	Check area for leaks
1706KE Oil Drip Pan to Drain (10)	oil	No	Identify for cleanup during D&D	Check area for leaks
1706KE Cleanwell Overflow Valve (11)	service water	No	See Item 8	See Item 8
1706KE (12)	mercury	No Spill	Equipment with possible mercury	No leak/check area
165KE (13)(14)	PCB	No	Cleaned, but residual in concrete	Paint Surface
165KE Oil Drip Pan (15)	oil	No	Identify for cleanup during D&D	Check area for leaks
165KE (16)	mercury	No	Leak from gages, area cleaned and is marked	Check area for leaks
165KE (17)	mercury	No	Housekeeping/clean	Check area for leaks
165KE (18)	glycol drip	No	Inactive System	Check area for leaks
165KE (19)	see item 17	No	Inactive System	Check area for leaks
165KE EPI (20)	oil	No	Inactive System	Check area for possible leaks

Assessment of Past Spills				
Location of Spill	Type of Spill	Active Spill	Recommendations	Remarks (A) (B)
165KE EPI (21)	oil	No	Inactive System	See item 20
165KE EPI (22)	oil	No	Inactive System	See item 20
182KE Oil Drip Pan (23)	oil	No	Housekeeping/clean	Check area for possible leaks
Chlorine Vault (24)	oil	No	Repair door closures/clean area	Check area for possible leaks, Identify in WIDS
190KE Warehouse (25)	oil	No	Housekeeping/clean	Check area for possible leaks
190KE Warehouse (26)	oil	No	See item 25	See item 25
190KE Warehouse (27)	oil	No	See item 25	See item 25
190KE Warehouse (28)	oil	No	See item 25	See item 25
190KE Warehouse (29)	oil	No	See item 25	See item 25
190KE Warehouse (30)	oil	No	See item 25	See item 25
190KE Warehouse (31)	oil	No	See item 25	See item 25
190KE Warehouse (32)	oil	No	See item 25	See item 25
190KE Warehouse (33)	oil	No	See item 25	See item 25
190KE Warehouse (34)	compressor condensate	No	Check system	Check area for possible spills
190KE (35)	none	No	Possible consolidated chemicals	Check area for possible spills
190KE Warehouse (36)	none	No	Cabinets contain spills	Check area for spills
190KE Warehouse (37)	none	No	Satellite area	Check area for spills

(A) All areas assessed do not impose an immediate risk to the environment or health of the worker.

(B) Areas within facilities that have spills/stained floors will be identified in the transition documentation to D&D