

Enclosure: Letter, Allison, to Pedde, subject:
Authorization Agreement (AA) for the E-Area TRU
Facilities, dated

WSRC-RP-2002-00557
Revision 5
February 5, 2005

RECORDS ADMINISTRATION



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**U. S. Department of Energy
Savannah River Operations Office
and
Westinghouse Savannah River Company**

**Authorization Agreement
for the
E-Area TRU Pads**

**U. S. Department of Energy Savannah River Operations Office
And
Westinghouse Savannah River Company**

Authorization Agreement for the E-Area TRU Pads

Section 1. Facility Name, Function, and Location

This Authorization Agreement (AA) applies to the E-Area TRU Pads 1-19 and 23-25 located at the Department Of Energy (DOE) Savannah River Site near Aiken, South Carolina. The E-Area TRU Pads are used to store and process transuranic (TRU) waste prior to shipment offsite for disposal. The E-Area TRU Pads, including major functions, subsystems and support facilities, are described in the facility's DOE-SR-approved Safety Basis documentation listed in Attachment 1 to this AA.

Section 2. Authorized Scope of Operations

This AA authorizes the entire scope of E-Area TRU Pad operations described in the DOE-SR-approved Safety Basis documentation listed in Attachment 1, Records of Decision (ROD), Annual Operating Plan (AOP), and Work Control and Change Control documents, with the following restriction. Unvented TRU drums that exhibit visual evidence of pressurization (e.g., lid deformation, bulging) will not be processed through the DVS.

Section 3. Bases

The Department of Energy has determined:

- A. Through a series of comprehensive reviews under the Technical Assessment Program, the facility will be operated in compliance with the Standards/Requirements Identification Document (S/RID), WSRC-RP-94-1268 (as amended), and this AA as specified by Contract DE-AC09-96SR18500 (as amended). The S/RID has a separate review and approval process and may be amended without need to revise and re-approve this AA.
- B. The facility hazards have been adequately analyzed and appropriate operational controls have been employed as properly documented in the DOE-SR-approved Safety Basis documents listed in Attachment 1 of this AA. The basis for this determination is documented in the DOE Safety Evaluation Report (SER), as amended, listed in Attachment 1. Each Safety Basis document has a separate review and approval process, thus each may be amended without need to revise and re-approve this AA. This AA serves to document the complete set of DOE-SR-approved Safety Basis documents tailored for use by the facility and specifically approved by the DOE as the basis for safe operations. Solid Waste Management Facility Safety Basis List WSRC-IM-95-28 (as

amended) identifies the latest revision of the Safety Basis documents applicable to the E-Area TRU Pads.

- C. In accordance with National Environmental Policy Act regulations, the environmental impacts of facility construction and operation have been evaluated and documented in the Savannah River Site Waste Management Environmental Impact Statement (DOE/EIS-0217, as amended). DOE has issued Records of Decision (60 FR 55249, October 30, 1995 and 62 FR 27241, May 19, 1997), and the scope of the activity contained in this AA is consistent with the selected alternative. NEPA documentation has a separate review and approval process and may be amended without necessarily requiring revision and re-approval of this AA. The E-Area TRU Pads are currently operated under Interim Status, and the site RCRA Part A Permit listed in Attachment 1. A Part B permit application was submitted in September 2003. Attachment 1 lists the full set of environmental basis documents.
- D. The E-Area TRU Pads have been continuously operated prior to and since the requirement for Operational Readiness Reviews was established. Further, facility activities have not triggered the criteria to conduct an ORR since the requirement was established. Through DOE authorization of continued operations in January 1998, and ongoing Technical Assessments, there is reasonable assurance that the facility can be operated without endangering the health and safety of the public, workers, or the environment.
- E. Through DOE's adherence to Federal Acquisition Regulations (FAR), Department of Energy Acquisition Regulations (DEARs) regarding selection of competent contractors, and the WSRC contractual commitment to an Integrated Safety Management System (ISMS) and S/RID requirements for personnel selection, training, and qualification, DOE is assured that WSRC is technically qualified to engage in the activities authorized by this AA.
- F. Through DOE's review and approval of the facility Radioactive Waste Management Basis (as amended) listed in Attachment 1 of this AA, DOE is assured that the facility's handling, documentation and control of radioactive waste complies with all federal, state and local radioactive waste management regulatory requirements.
- G. Through DOE's review of an approved and current Emergency Preparedness Basis, primarily the SRS Emergency Plan, WSRC-SCD-7 (latest revision), DOE is assured that the facility's response to and notification of accidents adequately protects workers and the public. DOE review of the facility Emergency Preparedness Hazards Assessment listed in Attachment 1 is sufficient to satisfy the facility-specific aspects of the Emergency Preparedness Basis.
- H. Through DOE's review of the Safeguards and Security Basis, primarily the General Site Security Plan, WSRC-RP-2000-00968 (latest revision), including the facility-specific Appendix applicable to the E-Area TRU Pads, DOE is assured that the facility will maintain an adequate security posture.

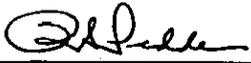
Section 4. Requirements and Conditions

Operation of the E-Area TRU Pads is subject to the following requirements and conditions:

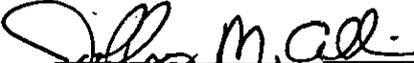
- A. Requirement that WSRC operate the facility in compliance with the S/RID WSRC-RP-94-1268 (latest revision).
- B. Requirement that WSRC operate the facility in accordance with the operational controls specified in the Safety Basis documents (latest revision) listed in Attachment 1.
- C. Requirement that WSRC shall operate the facility in accordance with the Hazardous Waste Permit, Part A, (latest revision).
- D. Requirement that WSRC shall operate the facility in accordance with the DOE-SR-approved Radioactive Waste Management Basis (latest revision) listed in Attachment 1.

Section 5. Contractual Citation, Effective Dates and Approval Signatures

This AA is subject to the conditions specified in Contract Number DE-AC09-96SR18500 (as amended) between DOE and WSRC. DOE and WSRC agree to the conditions and limitations contained herein. The conditions and limitations within this AA are effective on the date both parties have signed this AA, or, if applicable, upon revision of WSRC-IM-95-28 and implementation of this revision, which shall be completed within 5 days from the date both parties have signed this AA. This AA shall expire upon expiration or termination of DE-AC09-96SR18500 (as amended).

 2/7/05

Robert A. Pedde, President Date
Westinghouse Savannah River Company

 2/7/05

Jeffrey M. Allison, Manager Date
Savannah River Site (SRS) Office-Department fo Energy

**Attachment 1
To the
Authorization Agreement for the E-Area TRU Pads**

Safety Basis Documents

Savannah River Site Solid Waste Management Facility Safety Analysis Report, WSRC-SA-22 (latest revision)

Technical Safety Requirements Savannah River Site Solid Waste Management Facility, WSRC-TS-95-16 (latest revision)

Safety Evaluation Report for the Savannah River Site Solid Waste Management Facility, Revision 0 (latest appendix)

Handling and Processing of Flammable Drums on SWMF TRU Waste Pads Justification for Continued Operation, WSRC-TR-2004-00618 (latest revision)

Environmental Regulatory Basis Documents

RCRA Interim Status, RCRA SRS Part A Permit

Savannah River Site Waste Management Final Environmental Impact Statement, DOE-EIS-0217, July, 1995

Record of Decision (60 FR 55249, October 30, 1995)

Record of Decision (62 FR 27241, May 19, 1997)

Radioactive Waste Management Basis Documents

Westinghouse Savannah River Company (WSRC) Solid Waste and Infrastructure (SWI) Radioactive Waste Management Basis (U), WSRC-IM-99-00030 (latest revision)

Emergency Preparedness Basis Documents

Emergency Preparedness Hazards Assessment for Transuranic Waste Pads (U), S-EHA-G-00006 (latest revision)



Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

Mr. Robert A. Pedde, President
Westinghouse Savannah River Company
Aiken, South Carolina 29808

FEB 9 2005

Dear Mr. Pedde:

SUBJECT: Authorization Agreement (AA) for the E-Area TRU Facilities (Your Letter, WSR-2005-00039, 2/7/05)

The Department of Energy Savannah River Operations Office (DOE-SR) has completed its review of Revision 5 to the TRU Facilities AA (WSRC-RP-2002-00557) to implement Justification for Continued Operation (JCO) WSRC-TR-2004-00618, Revision 2, as a safety basis document. The AA authorizes the use of the Drum Venting System (DVS) with non-bulging un-vented TRU drums of mild-steel, meeting Department of Transportation 17-C specifications (or equivalence to protect design input assumption) and prohibits the use of the DVS for processing vented drums. DOE-SR concludes the combination of deflagration calculation results for the main DVS cabinet and the JCO controls provide adequate worker protection and hereby approves Revision 5 to the TRU Facilities AA. The implementation of this approval shall be consistent with restrictions specified in section 2.0 of the enclosed AA for the un-vented flammable TRU drum campaign.

This authorization has been discussed with Keith Stone of your staff.

The action taken herein is considered to be within the scope of the existing contract and does not authorize the Contractor to incur any additional costs (either direct or indirect) or delay delivery to the Government. If the Contractor considers that carrying out this action will increase contract costs or delay any delivery, the Contractor shall promptly notify the Contracting Officer orally, confirming and explaining the notification in writing within five working days. Following submission of the written notice of impacts, the Contractor shall await further direction from the Contracting Officer.

If you have any questions, please contact me or have your staff contact Tam Tran at 208-3525.

Sincerely,

A handwritten signature in black ink that reads "Jeffrey M. Allison".

Jeffrey M. Allison
Manager

WDED-05-27

Enclosure:
TRU Facilities AA, Revision 5

cc w/o Enclosure:
H. T. Conner, Jr., WSRC, 730-1B
W. J. Johnson, WSRC, 730-1B
L. J. Simmons, WSRC, 730-1B
W. S. Shingler, WSRC, 730-1B
J. C. DeVine, WSRC, 766-H
G. T. Wright, WSRC, 773-A
W. S. J. Kelly, BNFL, 705-3C