

Authorization Agreement

U. S. Department of Energy Idaho Operations Office and Bechtel BWXT, LLC Authorization Agreement for the INTEC-666 Fuel Storage Area (FSA)

Prepared for:
U.S. Department of Energy
Idaho Operations Office
Idaho Falls, Idaho



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INTEC	Authorization Agreement	For Additional Info: http://EDMS
Manual:		Effective Date: 1/15/04
		DAR Number: <u>108164</u>

PREAMBLE

This Authorization Agreement (IAG) documents the agreement between the U.S. Department of Energy Idaho Operations Office (NE-ID) and the Idaho National Engineering and Environmental Laboratory (INEEL) contractor, Bechtel BWXT Idaho, LLC (BBWI), on the overall basis for the safe operation of the INTEC-666 Fuel Storage Area (FSA). DOE has reviewed and approved the Safety Basis, as defined in LST-105, for the defined scope of work. This Authorization Agreement contains key terms and conditions (controls and commitments) under which BBWI is authorized to perform work. Any changes to these terms and conditions require DOE approval. In documenting the overall basis for the safe conduct of work, this Authorization Agreement highlights the scope of the Authorization, the Safety Basis, and the key terms and conditions (controls and commitments). This agreement highlights existing requirements rather than introducing new requirements. However, the agreement does distill and succinctly state the overall basis for the safe conduct of work in support of effective DOE and BBWI integrated safety management of the facility.

AGREEMENT

1. The DOE has determined, based on the completion of the following activities, that implementation of the Authorization Agreement is sufficient to adequately protect the public, the workers, and the environment, and DOE is confident BBWI is capable of meeting the commitments identified in the Authorization Agreement:
 - A. Through the periodic assessment of the contractor's performance, and through the review and approval of the documents that are identified by this Authorization Agreement, DOE ensures that the contractor, BBWI, has identified the basis for safe operation of the INEEL.
 - B. Through review and approval, the INTEC-666 Fuel Storage Area (FSA) Safety Analysis Report (SAR) in conjunction with site-wide SAR-100, adequately documents the analysis of facility hazards, specifies the controls necessary to prevent and mitigate the hazards, and defines a safety management program, which affords an acceptable level of safety to the public, the workers, and the environment. A complete list of applicable safety documents is identified in LST-105.

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- C. Through the completion of a Final Environmental Impact Statement (EIS) on the INTEC-666 Fuel Storage Area (FSA) Facility, (DOE/EIS-0203), and through application of the National Environmental Policy Act (NEPA) process, the potential environmental and safety consequences of operating this facility would be small and in compliance with applicable environmental laws and regulations.
- D. Through the performance of an Operational Readiness Review (ORR)/Readiness Assessment (RA) as listed in LST-105, and through the performance of restart assessments in accordance with DOE Order 425.1A and revisions thereto, as identified in contract DE-AC07-99ID13727, there is assurance the facility is being operated without endangering the health and safety of the public, the workers, or the environment.
- E. Based on Items B, C, and D above and on its institutional and support programs and processes, BBWI has adequate technical and managerial capability to safely operate the INTEC-666 Fuel Storage Area (FSA) Facility.
2. The Authorization Agreement applies to the INTEC-666 Fuel Storage Area (FSA) Facility, located within the INTEC of the INEEL, located 50 miles west of Idaho Falls, Idaho. The facility, major functions, subsystems, and support facilities are described in the safety documents identified in LST-105.
3. The scope of activities authorized in conjunction with the operation of the INTEC-666 Fuel Storage Area (FSA) Facility is defined by: (a) the Work Authorization and Change Control process specified in Contract Number DE-AC07-99ID13727, and (b) the safety documents identified in LST-105. The following activities involving the processing, handling and storage of radioactive material are authorized:
- A. Receipt, handling, and storage of irradiated fuel, including aluminum-, zirconium-, and stainless steel-clad fuels. The operating scope includes a variety of canned and repackaged fuels and fissile scrap materials.
- B. Cask handling operations associated with the above-listed fuel-based operations.
- C. Preparations to support transfers of fuels from this facility to other fuel storage facilities, and eventual execution of the transfers, per applicable planning documents.
- D. Water treatment/management functions.
- E. Generation of radioactive and hazardous solid, liquid, and gaseous waste.
- F. Gaseous effluent filtration.

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- G. Ion exchange resin handling operations, including replacement and in-facility transfers, and resin loadout.
- H. All additional work, which may be required in order for BBWI to meet its contractual obligations under contract number DE-AC07-99ID13727 at the INTEC-666 Fuel Storage Area (FSA) Facility.
4. Operation of the INTEC-666 Fuel Storage Area (FSA) Facility is subject to the following requirements and conditions:
- A. Safety Basis, Environmental Permits, and DOE-approved Operational Readiness Reviews/Readiness Assessments, as applicable, were used to develop this agreement. This agreement forms the basis for operation of the INTEC-666 Fuel Storage Area (FSA) Facility. Authorized deviations shall be documented by BBWI and approved by DOE through Exemption Requests, Compliance Schedule Agreements, Implementation Plans, modifications to the contract, or other means as appropriate.
- B. BBWI shall operate the INTEC-666 Fuel Storage Area (FSA) Facility in accordance with the operational controls specified in the Safety Basis as defined by LST-105.
- C. BBWI shall maintain the Safety Basis, defined in LST-105. As Safety Basis documents are revised, added, or deleted, as approved by DOE, the list shall be updated. Changes to LST-105 do not require separate DOE approval under the following conditions:
- Change in the revision date or number of a listed document if DOE has formally approved the new document revision.
 - Addition of a new Safety Basis document (e.g., Safety Analysis Report/Technical Safety Requirements document, Unreviewed Safety Question (USQ), Hazard Classification) that has been formally approved by DOE.
 - Change in the revision date/number of a listed document if the new document revision has received a USQ screening/evaluation and determined not to involve a USQ.
 - Deletion of a listed document if cancellation of the document has been formally approved by DOE.
 - Editorial changes (e.g., typographical errors).
 - All other changes to the Safety Basis List documents require the approval of both DOE and BBWI management at the level of the Authorization Agreement signatories.

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- D. BBWI shall implement and maintain in effect an INTEC Emergency Preparedness and Planning Program as described in BBWI Manual 16, Emergency Preparedness.
- E. BBWI shall comply with the requirements specified in the active revisions of the following approved permits and compliance agreements:

Permit to Construct #023-00001, Fuel Storage Area – Rack Reconfiguration Project, 4/5/96.

Permit to Construct #023-00001, Idaho Nuclear Technology and Engineering Center, Nitrogen Oxide Sources, 10/18/99.

Idaho Chemical Processing Plant (ICPP) Sewage Treatment Plant – Wastewater Land Application Permit LA-000115-02, 9/20/95. Permit has expired, but was extended by the DEQ, until a new permit is issued.

INTEC New Percolation Ponds – Wastewater Land Application Permit LA-000130-03, 03/28/02.

RCRA Part B Partial Permit, Volume 18, For the Debris Treatment Processes, Holdup and Collection Tanks, CPP-659/1659 Storage, and CPP-666 Fluorinel Dissolution Process (FDP) Cell Container Storage Units on the Idaho National Engineering and Environmental Laboratory (INEEL), EPA ID No. ID 4890008952.

INEEL Storm Water Pollution Prevention Plan for Industrial Activities, DOE/ID-10431.

Federal Facility Agreement and Consent Order, 12/9/91.

Site Treatment Plan Consent Order, 11/1/95.

DOE, Department of Navy, State of Idaho Settlement Agreement and Consent Order, 10/16/95.

Final Record of Decision – Idaho Nuclear Technology and Engineering Center, Operable Unit 3-13-INEEL, October 1999.

Voluntary Consent Order, 6/14/00.

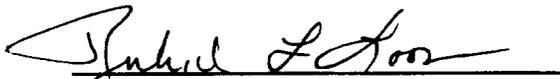
- F. Through the use of a facility Configuration Management Process controlled by PRD-115, Configuration Management, BBWI maintains the INTEC-666 Fuel Storage Area (FSA) Facility hardware, procedures, and organizational integrity.
- G. Through the use of an Integrated Safety Management System detailed by PDD-1004, INEEL Safety Management Program Description Document, BBWI integrates the

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environmental, safety, and health issues into the totality of the work for the INTEC-666 Fuel Storage Area (FSA) Facility.

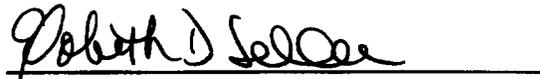
5. This Authorization Agreement is subject to the conditions listed herein. Nonconformance to the components of this agreement will be reported using currently applicable reporting systems, such as the Issues Communications and Resolution Environment System and the Occurrence Reporting and Processing System. DOE and BBWI agree to the conditions and limitations contained in the Authorization Agreement. The conditions and limitations within this Authorization Agreement are effective upon the date identified in the first page header of this document and shall expire upon expiration or termination of Contract Number DE-AC07-99ID13727.
6. This Authorization Agreement is not intended to change or add to the M&O contract, but is intended to implement applicable requirements of the M&O contract. If there is an inconsistency between the M&O contract and this Authorization Agreement, the M&O contract terms will prevail.

Bechtel BWXT Idaho, LLC



Project Director,
Clean/Close INTEC Project
Idaho Completion Project

Department of Energy Idaho Operations
Office



Manager, Idaho Operations