

RCRA PART B PERMIT
FOR THE
IDAHO NATIONAL
ENGINEERING AND ENVIRONMENTAL LABORATORY

Volume 18 – Idaho Nuclear Technology and Engineering Center

ATTACHMENT 3

Debris Treatment Processes
Holdup and Collection Tanks
CPP-659/-1659 Storage
CPP-666 FDP Cell Container Storage Area
Radioactive Mixed Waste Staging Facility (CPP-1617)
Hazardous Chemical and Radioactive Waste Storage Facility (CPP-1619)

Section F - Procedures to Prevent Hazards
and
Section F-1 - Security

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1 **F. PROCEDURES TO PREVENT HAZARDS**

2
3 The waste management units addressed in this permit are designed and operated to minimize
4 exposure of hazardous constituents to the general public, operating personnel, and the environment. This
5 section describes the procedures and equipment/structures used at these units to help prevent, mitigate, or
6 respond to environmental or human health hazards. Also described in this section are the inspection plans
7 and schedules at these units to ensure proper maintenance and operation.

8
9 The waste management units addressed in this permit are debris treatment processes, holdup and
10 collection tanks, storage in CPP-659/-1659, container storage in the CPP-666 Fluorinel Dissolution
11 Process (FDP) Cell, and container storage at the Radioactive Mixed Waste Staging Facility (RMWSF)
12 and the Hazardous Chemical and Radioactive Waste Storage Facility (HCRWSF). The first three of these
13 units are located at the New Waste Calcining Facility (NWCF), and the fourth is located at the Fluorinel
14 Dissolution Process and Fuel Storage (FAST) Facility. The RMWSF and the HCRWSF are located at
15 CPP-1617 and CPP-1619 respectively. These units are all located at the Idaho Nuclear Technology and
16 Engineering Center (INTEC) at the Idaho National Engineering and Environmental Laboratory (INEEL).
17 Attachments 1 and 1a describe the operations of these units.

18
19 **F-1. Security**

20
21 **F-1a. Security Procedures and Equipment [IDAPA 58.01.05.008 and 58.01.05.012;**
22 **40 CFR 264.14 and 270.14(b)(4)]**

23
24 A security system, physical control procedures, and equipment control access to the INTEC. The
25 security system is operated by a security force under a contract with the U. S. Department of Energy,
26 Idaho Operations Office (DOE-ID). The security force's operations are consistent with DOE-ID directives
27 and orders on access control. DOE operates a personnel security clearance program to ensure that
28 employees that are required to have a clearance to perform their duties are evaluated and cleared
29 consistent with DOE-ID security policies.

1 Full double fencing surrounds the INTEC. Guarded gates, uniformed guards with two-way
2 radios, 24-hour camera surveillance, and perimeter lighting are also utilized at the INTEC. There is an
3 internal telephone system in occupied buildings at the INTEC. The same telephone system is used for
4 communication outside of the plant. The INTEC also has a plant-wide voice paging system that is used to
5 announce critical information regarding security and safety.

6
7 **F-1a(1) 24-Hour Surveillance System [IDAPA 58.01.05.008; 40 CFR 264.14(b)(1)]**

8
9 Security at the INTEC is maintained by a staff of trained security guards, who monitor the entry
10 and egress of people and material from the INTEC facility. The main INTEC guard gate at the west side
11 of the INTEC is staffed with guards 24 hours a day, seven days a week. There are two other gates into the
12 INTEC, and they are either locked or staffed with guards. There are surveillance cameras, and good
13 lighting throughout the INTEC. The guards also perform other security functions within the plant
14 premises, including patrolling the perimeter fence and areas throughout the INTEC on a 24-hour basis.

15
16 **F-1a(2) Barrier and Means to Control Entry**

17
18 **F-1a(2)(a) Barrier [IDAPA 58.01.05.008; 40 CFR 264.14(b)(2)(I)]**

19
20 The INTEC facility is located approximately 42 air miles west of the largest nearby population
21 area, Idaho Falls, Idaho. The entire INTEC is enclosed within a double chain-link fence topped with
22 barbed wire. The fence has three guarded or locked gates. Two gates are located on the west side of the
23 INTEC staffed by guards and equipped with cameras; one of these gates is the main entrance to the
24 INTEC.

25
26 There is also an east guard gate used by construction and personnel. The number of guard gates
27 may change as a result of construction or other activities at the INTEC.

28
29 Additionally, all access doors or gates to the units are fitted with locks. All entrances to these
30 units remain locked when not staffed for operation. Keys are issued to a limited number of personnel
31 who have direct responsibility for securing the units and maintaining access control.

1 **F-1a(2)(b) Means to Control Entry [IDAPA 58.01.05.008; 40 CFR 264.14(b)(2)(ii)]**

2

3 Security at the INTEC is maintained by both administrative controls and physical measures. As
4 discussed in Sections F-1a(1) and F-1a(2)(a), the INTEC is provided with a 24-hour surveillance system
5 and the gates remain locked except when vehicles enter or leave the INTEC. Access to the waste
6 management units addressed in this permit application is administratively controlled.

7

8 To enter the INTEC, employees must have a picture identification badge or equivalent as per
9 security procedures requirements, and complete the initial employee training.

10

11 Visitors are escorted when entering restricted areas of the INTEC by trained employees. The
12 employee must have a picture identification badge or equivalent and training for the INTEC. The
13 employee meets the visitor at the guard gate and signs him or her in on the INTEC entrance log, verifying
14 that the visitor will remain at all times with a trained employee. Temporary badges are issued to allow
15 access. These entry procedures into the INTEC prevent access into Resource Conservation and Recovery
16 Act (RCRA)-regulated units by the general public and visitors.

17

18 For accountability reasons, all persons entering the INTEC must either enter through the card
19 reader turnstile as they enter or sign the INTEC entrance log. When personnel leave the INTEC, they exit
20 through the card reader turnstiles or sign out at the guard gate.

21

22 **F-1a(3) Warning Signs [IDAPA 58.01.05.008; 40 CFR 264.14(c)]**

23

24 Warning signs that are visible and legible from at least 25 ft are posted at guard gates and on the
25 fence around the INTEC. Entrances into RCRA storage or treatment areas will have, at a minimum, signs
26 reading “**DANGER--Unauthorized Personnel Keep Out.**”