

## DOE Memorandum

Date: March 31, 2004  
From: Frank C. Holmes  
To: INEEL CERCLA Administrative Record  
Subject: Approval to Proceed with Preparation of an Engineering Evaluation/Cost Analysis (EE/CA) for the Decommission and Dismantlement of CPP-627, Idaho Nuclear Technology and Engineering Center, Idaho National Engineering and Environmental Laboratory

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**Background:**

The CPP-627 Remote Analytical Facility was part of a larger group of buildings called the Fuel Reprocessing Complex at INTEC. It was built to house experimental and decontamination facilities in support of fuel reprocessing operations that took place in near by building CPP-601. Active use of the building ceased in 1997, and the building is known to contain radiological and chemically hazardous substances. It contains several glove box lines and other equipment used for experiments and spent nuclear fuel reprocessing sample analysis.

No contamination is known to have been released from the building. However, removal and proper disposal of the building and the contaminants it contains will reduce the risk of contamination reaching the environment.

DOE is now ready to consider a non-time critical removal action (NTCRA) to decommission and dismantle CPP-627. Active use of the building ceased in 1997 and the building is not managed as a permitted unit. The CERCLA process requires preparation and public review of an engineering evaluation /cost analysis (EE/CA) before preparation of the Action Memorandum. The Action Memorandum documents the official selection of the NTCRA.

**Threat to Public Health, Welfare, or the Environment:**

While active use of the CPP-627 building ceased in 1997, the building still contains unknown quantities of various radiological and chemically hazardous substances; and the structure is aging and continues to degrade more rapidly each year. These hazardous substances include various radionuclides, lead, mercury, used oils, asbestos, cadmium, chromium, and other chemical residues. These hazardous wastes and chemicals pose a risk to the workers and environment, if current engineering and administrative controls cease or if structural integrity deteriorates to the point where contamination is no longer contained a possible release to the underlying soils could occur.

If no action was taken, failure to continue surveillance and maintenance activities at the CPP-627 could result in deterioration of the facility and potential release of radionuclides and hazardous chemicals to the environment.

**Enforcement Acrtions:**

The CPP-627 has been identified as a facility over two CERCLA sites, CPP-80 and CPP-86 under the INEEL Federal Facility Agreement and Consent Order (FFA/CO). If RCRA constituents are encountered appropriated ARARs will be applied to process such wastes. Removal actions are to be consistent with the remedial action objectives established in the Final Record of Decision Idaho Nuclear Technology and Engineering Center, Operable Unit 3-13, (DOE-ID 1999). As such, the removal action will be consistent with and will contribute to the overall remediation of the INTEC under CERCLA.

**Proposed Project and Cost:**

A NTCRA, under CERCLA, is being considered to remove the threat of release. The National Contingency Plan (40 CFR 300.415 [b][2][iii] lists non-time critical removal of contaminated facilities that pose a threat of release. In addition, DOE policy supports the use of NTCRA for D&D. The action being considered will comprise of the decommissioning, dismantlement and debris removal of CPP-627. The alternatives being considered for D&D of the CPP-627:

- No Action
- Total D&D of CPP-627 to include debris removal and slab evaluation for environmental compliance including corrective actions associated with slab compliance.

These two alternatives, and possibly others, will be evaluated in the EE/CA.


Preliminary cost estimates range from \$4.5M to \$5.5M for the dismantlement and debris removal. The removal action is planned for completion by January 2005.

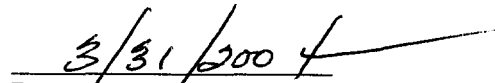
**Approval to Conduct EE/CA:**

Approval is hereby given by DOE to conduct an EE/CA for the CPP-627 D&D. James R. Cooper is designated as the spokesperson. The completed EE/CA shall be made available for public review and comment.

Approved:

U.S. Department of Energy  
Idaho Operations Office

  
Frank C. Holmes, NE-ID

  
Date