

STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL
P. O. BOX 43172
OLYMPIA, WASHINGTON 98504-3172

In the Matter of:

COLUMBIA GENERATING STATION

COUNCIL ORDER No. 875

**Order to Manage and Regulate Fugitive
Radionuclide Emissions from the
Decommissioning of the Outfall 002
Stormwater Channel and Pond.**

Regulatory Authority:

Pursuant to the Revised Code of Washington (RCW) 70.94.331, 70.94.422, Chapter 80.50 RCW, Washington Administrative Code (WAC) 463-78-070, and Chapter 246-247 WAC, the Energy Facility Site Evaluation Council (EFSEC) now finds the following:

Findings:

1. Energy Northwest (EN) is the operator of the Columbia Generating Station (CGS), an electric generating plant located on the Hanford Site in Benton County, Washington.
2. CGS has historically discharged onsite stormwater into an unlined channel and pond, but this discharge is now conveyed to a recently constructed evaporative pond treatment system. As part of the decommissioning process for the channel and pond, the requirement for this license was identified in the SEPA checklist.
3. Construction activity to decommission the channel and pond has the potential to emit fugitive radionuclide emissions, and therefore, is required to obtain a Radioactive Air Emissions License in accordance with Chapter 246-247 WAC Radiation Protection-Air Emissions Regulation.
4. Construction activity to decommission the channel and pond has the potential to emit fugitive radionuclides at levels agreed to by EN and EFSEC.

Order:

THEREFORE, IT IS ORDERED by EFSEC in relation to the above that EN's former Outfall 002 stormwater channel and pond decommissioning be implemented subject to the conditions described below.

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Order to Regulate Fugitive Radionuclide Emissions from the
Decommissioning of the former Outfall 002 Stormwater Channel and
Pond*

1.0 GENERAL APPROVAL CONDITIONS

1.1 Effective date

The effective date of this authorization shall be that as signed in Section 3.0. All references to procedures or test methods shall be those in effect as of the effective date of this ORDER.

2.0 OPERATIONAL LIMITATIONS AND ADDITIONAL REQUIREMENTS

2.1 Department of Health Emission Unit Description

Project Title: CGS Stormwater Channel and Pond Decommissioning.

Emission Unit ID: 1424

Notice of Construction (NOC) ID: 980

This emission unit consists of construction activity to decommission an unused stormwater channel and infiltration pond.

This Emission Unit has 1 active NOC.

This is a MINOR, FUGITIVE, non-point source emission unit.

2.2 Abatement Technology

Best available radionuclide control technology (BARCT)
WAC 246-247-040(3), -040(4)

State-only Enforceable: WAC 246-247-010(4), -040(5), -060(5)

Abatement Technology: None

2.3 Monitoring Requirements

2.3.1 State Enforceable: WAC 246-247-040(5), -060(5)

Federal and State Regulatory	Monitoring and Testing Requirements	Radionuclides Requiring Measurement	Sampling Frequency
WAC 246-247-075(5)	WAC 246-247-075(5)	Co-60, Cs-137	Weekly gross beta and quarterly composites for gamma emitting radionuclides.

2.3.2 Sampling Requirements: Air samples are collected and analyzed in accordance with the Radiological Environmental Monitoring Program.

2.3.4 Additional Requirements: Additional monitoring or sampling requirements established by this Order will be listed in the Conditions and Limitations section, if applicable.

2.4 Conditions (state only enforceable): WAC 246-247-040(5), 060(5) if not specified

2.4.1 The total abated emission limit for this Notice of Construction is limited to $1.90E-05$ mrem/year to the Maximally Exposed Individual (WAC 246-247-040(5)). The total limit on the Potential-To-Emit for this Notice of Construction is limited to $1.90E-05$ mrem/year to the Maximally Exposed Individual (WAC 246-247-030(21)).

2.4.2 This emission unit is for the decommissioning of the unused storm drain channel and pond (SDP). Use of the SDP was discontinued in 2014. The decommissioning will include the filling of the channel and pond of the SDP to grade using clean soil. The channel and pond will then be covered with rock. The SDP discharge pipe has been permanently sealed and discharges starting in November 2014 have been diverted to the evaporative ponds.

2.4.4 The Annual Possession Quantity is limited to the following radionuclides (Curies/year):

Parameter	Limit (Curies/year)
Co-60	$3.91E-05$
Cs-137	$3.98E-06$

2.4.5 ABATEMENT CONTROLS: Water will be used as dust control during decommissioning of the SDP. WAC 246-247-040(5).

2.4.6 ABATEMENT CONTROLS: Clean soil will be used to fill the channel and pond to grade. Rock will be applied to the clean soil after the SDP is to grade. WAC 246-247-040(5).

2.4.7 ANNUAL REPORTING: Radionuclide emissions will be determined in accordance with the Offsite Dose Calculation Manual and reported in the annual radioactive air emissions report due June 30th for the previous year. WAC 246-247-075 (5)(a).

2.4.8 MONITORING: Air monitoring for the SDP decommissioning will use air monitors ST-1, 21, 23, and 57. Air samples will be collected and analyzed in accordance with the Radiological Environmental Monitoring Program for CGS. WAC 246-247-075(5), (7), (8). Monitoring required by Order 875 will cease at the completion of construction activity.

3.0 APPROVAL ORDER AND RESTRICTIONS

Any application form, report, or compliance certification submitted pursuant to this Order shall contain certification by a responsible official of truth, accuracy, and completeness.


Nothing in this Order alters the facility's obligation to comply with other laws, including air laws and regulations. Any violation of such rules and regulations or of the terms of this approval, including but not limited to exceedances of emissions limits demonstrated by source testing or emissions calculations, shall be subject to the sanctions provided in Chapter 80.50 RCW.

The provisions of this authorization are severable and, if any provision of this authorization, or application of any provisions of this authorization to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this authorization, shall not be affected thereby.

This Order is subject to judicial review pursuant to the Administrative Procedure Act, Chapter 34.05 RCW, EFSEC rules, EFSEC policies, or as otherwise provided by law. The Administrative Procedure Act can be found on-line at: <http://apps.leg.wa.gov/rcw/default.aspx?cite=34.05>.


DATED at Olympia, Washington this 25th day of 2015, ____.

FOR THE WASHINGTON STATE ENERGY FACILITY SITE EVALUATION COUNCIL.



William Lynch
EFSEC Chairman

ATTEST:



Stephen Posner
EFSEC Manager



John Martell
WDOH

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