

Appendix 17

REV. 3

G-FSP-G-00017

**Functional Service Agreement Between
Savannah River Nuclear Solutions, LLC
and
Savannah River Remediation, LLC
Solid Waste Management**

October 1, 2013

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1.0 INTRODUCTION

This Functional Service Agreement, Appendix 17 of Memorandum of Agreement (G-MOA-G-00002) describes the service exchange between the Savannah River Site (SRS) Site Management and Operations (M&O) contractor, Savannah River Nuclear Solutions, LLC (SRNS) and Savannah River Remediation LLC (SRR). This appendix describes the baseload work to be provided. Included as part of baseload activities may be, programmatic responsibilities for the Site, as well as, certain tasks related to ensuring/interpreting program effectiveness and activities considered to be part of Site Landlord and Site Services. Task-related activities outside of the agreed upon services documented in this FSA will be documented as part of the Service Level Agreements (SLAs). The parties agree to review this FSA at least annually and revise it if changes are needed as determined by the parties.

Unless otherwise noted in this document, the services described do not apply to SWPF/Parsons.

2.0 POLICIES, PROCEDURES, AND MANUALS

The following policies, procedures, and manuals will be maintained for the Site by SRNS and are applicable for services provided:

Manual Number	Manual Title	Applicable Sections
1S	Savannah River Site Waste Acceptance Manual	Entire Manual
3Q	Environmental Compliance Manual	Procedure 6.2, "Sanitary Waste Management and Disposal" Procedure 6.8, "Hazardous Waste Quarterly Reporting" Procedure 6.9, "Hazardous or Mixed Waste Management Satellite Accumulation Areas"

		<p>Procedure 6.10, "Container Usage and Disposal"</p> <p>Procedure 6.11, "Pollution Prevention Program,"</p> <p>Procedure 6.20, "Metallic Lead Management"</p> <p>Procedure 6.21, "Hazardous or Mixed Waste Management at Staging Areas"</p> <p>Procedure 6.22, "Hazardous Waste Minimization Report"</p>
11Q	Facility Safety Document Manual	Procedure 1.09, "Generation, Review, Approval and Control of Radioactive Waste Management Basis"

3.0 CODES AND STANDARDS

SRNS SWM will provide solid waste disposition and associated direct support services for newly generated waste that is forecasted and approved for acceptance per generator waste quality assurance programs (e.g., waste certification) per applicable waste acceptance criteria as defined in the *Savannah River Site Waste Acceptance Criteria Manual (Manual 1S)*, and in Procedure 6.2, "Sanitary Waste Management and Disposal" (*Manual 3Q*).

4.0 SOLID WASTE MANAGEMENT SERVICES

In order to ensure that sufficient capacity for disposal is available for each of the services below SRR must provide a waste forecast, by waste stream in accordance with Manual 1S. Waste generation rate variances should be communicated via a revised waste forecast in accordance with Manual 1S. SRR will support requests to DOE to obtain funding for waste forms not forecasted and planned in existing budgets. If inadequate funding is received, DOE-SR will be asked to work with the affected parties, as needed, to prioritize capacity usage.

Services identified below are typically available Monday through Thursday from 7:00 am to 4:00 pm throughout the year, excluding Site holidays. SRNS reserves the right to suspend service coverage due to planned operational outages and unplanned constraints.

SRNS will respond to service requests from SRR or incidents within reasonable time frames to support work priorities. Likewise, SRR are expected to respond to data and support requests from SRNS within reasonable time frames to support operations, incident reporting, and corrective actions.

4.1 Low-Level Waste

- Low-level Waste (LLW) Disposal Facility – SRNS provides on-site disposal options for LLW, including: low-activity waste vaults, intermediate-level waste vaults, slit trenches, engineered trenches, and Component-in-Grout trenches.
- LLW Off-site Disposal – For LLW that does not meet site acceptance criteria, SRNS maintains contracts and operation support for the packaging and off-site shipment of newly generated waste using off-site treatment and disposal facilities. Off-site disposal options include Energy Solutions Utah, the Nevada Nuclear Security Site (NNSS) and Waste Control Specialists. A NNSS Waste Certification Program is maintained to support the NNSS disposal option.
- Provide for Waste Information Tracking System (WITS) database management supporting generator data input and package and facility limit checks required for waste acceptance approval to SRNS SWM LLW facilities and appropriate waste shipment request and approval software applications.

4.2 Transuranic Waste — Newly Generated

- Transuranic (TRU) Waste Storage Facility – SRNS provides TRU Waste Storage consisting of TRU Waste Storage Pads with and without enclosures. Resource Conservation and Recovery Act (RCRA) TRU waste is stored on South Carolina Department of Health and Environmental Control (SCDHEC) Part B permitted pads.
 - TRU Waste Certification and Shipment for Disposal – SRNS maintains contracts and operations' support for the certification, packaging, and off-site shipment of newly generated waste per Waste Isolation Pilot Plant (WIPP) and TRU-protective action criteria (PAC) requirements.
 - Provide for Waste Information Tracking System (WITS) database management supporting generator data input and package and facility limit checks required for waste acceptance approval of TRU waste and approval software applications.
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4.3 Hazardous, PCB, and Mixed Waste — Newly Generated

- Hazardous, polychlorinated biphenyl (PCB), and Mixed Waste Storage Facilities – SRNS provides RCRA permitted Hazardous Waste Storage Facility (HWSF) consisting of buildings and waste storage pads.
- Hazardous, PCB, and Mixed Waste Disposal – SRNS provides technical and operations support for the shipment of newly generated waste using off-site treatment and disposal facilities’ services. SRR operational support is required for all hazardous and mixed waste direct shipments from their facilities.
- SRNS provides the required DOE-Savannah River (SR) approved program for the certified unconditional release of non-radioactive hazardous waste for off-site disposition.
- SRNS provides for Hazardous/Mixed Waste Tracking (HMW Tracking, previously named E-14) database management supporting generator data input and package and facility limit checks required for waste acceptance approval to SRNS SWM HW/MW storage facilities.

4.4 Sanitary Waste Disposal Operations

SRNS SWM provides for the program oversight, collection, and disposal of sanitary waste generated across the Savannah River Site (SRS). Waste acceptance is per Procedure 6.2, “Sanitary Waste Management and Disposal” (Manual 3Q). Waste collection and transport is provided for routine office and cafeteria waste collected in compactor trucks; other debris waste collection and transport is the generator’s responsibility. SRNS currently maintains the following disposal operations for use by SRS organizations:

- Routine Sanitary Waste (office and cafeteria in compactor trucks) – Collection bins, transportation, recycle services at North Augusta Material Recovery Facility (MRF), and disposal.
 - Construction & Demolition (C&D) Debris – Funding and operational oversight of the on-site C&D Landfill.
 - Non-Routine Debris Waste to Three Rivers – Waste disposal fee funding, technical and operational contract support for SRR waste generators’ use of the Three Rivers Authority commercial landfill. Any special waste handling fees and services or generator-caused corrective actions at the Three Rivers landfill is the generator’s responsibility.
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4.5 SRNS Waste Generator Certification, Support, and Oversight

SRNS SWM provides the following services in support of required waste generator programs to ship waste to on-site and off-site treatment/storage/disposal (T/S/D) facilities:

- Provide for initial generator certification approval and periodic follow-up surveillances and audits.
 - Provide waste certification program maintenance and support, including waste acceptance procedure maintenance, performance indicators, and document control supporting the certification of waste received at SRS T/S/D facilities.
 - Provide waste characterization subject matter expertise to review and approve waste stream characterization forms and certification plans, provide dose-to-curie calculation assistance, and to review and approve the periodic waste stream characterization re-validation.
 - Provide for the Solid Waste Management Committee as a forum for waste generator input into waste program objectives and implementation strategies.
 - Provide for the DOE Order 435.1 Working Group as a forum for waste generator, storage, and disposal input into waste program objectives and implementation strategies.
 - SRNS will provide support for special analysis of onsite TSD facilities in support of required waste generator programs.
 - Manage the program for Generator Certification Official (GCO) qualifications, curriculum and continuing training. Provide subject matter expertise to review and improve the site-level training and awareness for waste management, including training support for the Environmental Compliance Authorities (ECAs) and waste Cognitive Technical Functions (CTFs).
 - Support pre-generation approval requests to DOE-SR for the generation of waste with no identified path for disposal (WWNPD) resulting from priority work scopes. Maintain content and coordinate review of annual review of DOE approval of WWNPD letter.
 - Provide in-field SWM Generator Services Point of Contact (POC) support for generator waste management operations required to meet SRS waste acceptance criteria.
 - Provide oversight and certification for offsite waste shipments.
 - Provide for DOE required forecasting and reporting of newly-generated waste.
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- Maintain site procurement specifications for the procurement and inventory maintenance of site-wide used radioactive solid waste packaging, bags, and required packaging filter vents to be paid by the end users.
 - SRNS will provide SRR access to the WITS for tracking characterization and movement of LLW and TRU waste for disposal.
 - SRNS will provide SRR access to the HMW Tracking (previously named E-14) for tracking characterization and movement of Hazardous/Mixed waste for disposal.
 - If requested by SRR, SRNS will request a certificate of disposal/destruction for hazardous and radioactive waste disposed off-site, and these will be provided to SRR.
 - SRNS will provide support for Site radioactive waste programs' maintenance and compliance with DOE Order 435.1.

4.6 SRR Waste Generator Certification Support

SRR compliance with the applicable waste acceptance criteria is required for access to SRNS solid waste services. All 1S Manual and 3Q Manual requirements applicable to on-site waste generators shall be met. Some key interface requirements are identified below:

- SRR shall provide GCO(s) to certify waste program compliance with SRS 1S Manual requirements. The GCO shall report and provide oversight that is independent of the line management directly responsible for waste generating operations. SRR shall support the GCO(s) function, as needed, with operations and cognitive technical personnel.
 - SRR shall provide for facility access and program support for SWM POC functions, program surveillances and audits to ensure compliance with Manual 1S requirements. SRNS will provide advanced notice, no less than 1 month, prior to any required request for program surveillances and audits.
 - SRR shall provide support required to package and load for transport any waste that will be direct shipped from the generator that is destined for offsite disposal, e.g. – lab packaging.
 - SRR shall provide support for audits/assessments typically consisting of SRNS led surveillances, but may require interface with off-site organizations to support RCRA compliance assessments, Nevada Nuclear Security Site waste program assessments, WIPP certification assessments, etc. SRNS will provide advanced notice, to the extent practical, prior to any required request for assessment support.
 - SRR shall provide and maintain a current and out year forecast of new waste generation in accordance with Manual 1S. SRR shall make revisions to forecasted
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waste in accordance with Manual 1S. Based on forecasted service capacity needs, SRNS will request funding from DOE. SRR will support request to DOE to obtain funding for waste forms not forecasted and planned in existing budgets. If inadequate funding is received, DOE-SR will be asked to work with both parties, as needed, to prioritize capacity usage. NOTE: Out year budgets are developed 1-2 years in advance and forecasts should accommodate this need to the extent practical.

- In accordance with *Manual 1S*, budget-significant corrective actions required of the SRNS due to SRR waste generator non-compliance of waste acceptance and shipping criteria will be reimbursed by the generator, some potential examples include: special radiological performance analysis for T/S/Ds, waste retrieval, repackaging, re-characterization, etc. As required, DOE-SR will arbitrate cost schedules for these corrective actions.
- SRR will provide information and data to SRNS to support DOE and regulatory reporting. Report frequency will be on a periodic basis required to support both SRNS and SRR priorities.
- SRR shall provide for waste characterization services as needed to ensure initial and periodic verification of waste streams.
- SRR shall not generate a solid waste with no identified path to disposal without explicit approval by DOE-SR and concurrence from SRNS.
- SRR agrees to serve on a SRNS/SRR Team to support the on-site electronic shipping and transportation of waste.

4.7 SRS P2 Program

SRNS will provide for a site-level pollution prevention program compliant with applicable regulations and directives as defined per Procedure 6.11, "Pollution Prevention Program" (Manual 3Q). SRNS provides the following services supporting required waste minimization programs and support for the SRS Pollution Prevention Program:

- SRNS maintains the SRS Pollution Prevention (P2) Program that integrates P2 into the SRS Environmental Management System (EMS) and associated Integrated Safety Management Systems (ISMSs) as a primary strategy to operate and meet operations and closure missions in a compliant, cost-effective manner that protects the environment and safety and health of employees and the public. The SRS P2 Program complies with DOE and regulatory reporting, including performance measures, national and local reporting and monitoring.
 - SRNS provides for data collection (P2 activity and accomplishments) and associated reporting consolidation as required to meet DOE-required annual P2 Program performance measurements and reporting.
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- SRNS provides waste avoidance program support in accordance with the SRS Pollution Prevention Program.
- SRNS provides for SWM Generator Services POC support and database application to help identify and document waste avoidance opportunities.
- SRNS supports employee P2 awareness and training programs/events and community outreach to promote P2 concepts.
- SRNS will provide access to recycle services to the extent practical. Funding will be on a case-by-case basis.

SRR shall identify and implement cost-effective waste reduction projects/techniques and shall support documentation of pollution prevention program elements to comply with DOE and regulatory agency reporting requirements.

4.8 Interarea Transfer Line (IAL) and High Point Access

The Interarea Line (IAL) is the high level waste transfer system piping that is located underground between F and H Areas in the 643-E Facility (Old Burial Grounds). A “High Point” area on this transfer line is also located within the 643-7E Facility. The “High Point” and IAL are under the cognizance of SRR; however, access to those areas is gained by entering the Burial Grounds which is the responsibility of SRNS SWMF.

The High Point on the IAL consists of a contamination control facility, flush water tank, and pumps. To clearly define the facility boundaries and responsibility zones, the High Point Facility is marked by delineator posts and chains. Facility identification and custodian signs are hung on the chain, identifying SRR Liquid Waste Operations (LWO) as the facility owner.

SRR LWO personnel are responsible for:

- Contacting the SWMF Shift Manager directly at 507-3289 prior to commencing any transfer. Contacting the SWMF Shift Manager should be done during normal working hours prior to commencing a transfer.
 - Remaining in radio contact with the SWMF Shift Manager when inside the SWMF controlled areas to include the High Point.
 - Maintaining demarcation signs and other facility identification at the High Point, such that facility boundaries and responsibility zones are clearly identified.
 - Providing oversight and response to all emergencies, as addressed in Manual 6Q, occurring at the High Point Facility or IAL. The FTF Shift Manager will act as the FEC for any event occurring at the High Point.
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- Providing immediate notification to the SWMF Shift Manager, during normal working hours of all emergencies at the High Point, regardless of the nature or severity and informing SWMF management of any off-shift emergencies at the High Point.
- Developing and executing drill scenarios for the High Point that may involve SWMF response.
- Providing oversight of ORPS occurrences or issues within the High Point Facility, including critiques, reporting, and investigations. Note: Exceptions are addressed in Manual 9B.
- Providing support for all Radiological work and incidents at the High Point Facility.
- Responding to incidents (i.e., personnel contamination, leaks, spills, etc.) during weekend surveillance during off-shift hours within SWMF (HP/IAL).
- Providing personnel decontamination.
- Providing work permits for all radiological work at the High Point.
- Returning any borrowed equipment, vehicles, tools, etc., to original location, in same condition as received. (i.e., vehicles cleaned out, gassed, etc.).
- Maintaining the cleanliness, appearance, and safety of the High Point Facility.
- Contacting SWMF Shift Manager to add High Point work scope items to SWMF schedules, when necessary to insure interface communications are maintained.
- Providing oversight of work control activities within the High Point Facility, including work package development and approvals. Also upon arrival at SWMF, notifying the Shift Manager or delegate of planned work activities prior to entering the facility.
- Notifying SWMF Shift Manager for emergent issues and providing response as requested. Note: If immediate communications are required for emergent issues, the Shift Managers should speak directly. Per EPIP and 2S ConOps practices, all communications involving facility operations (non-emergent and emergent) should go through the Shift Manager.

SRNS Solid Waste Management Facility personnel are responsible for:

- Notifying SRR LWO Manager prior to commencing any encroaching excavation at the IAL (excavation distance should be 6 feet).
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- Logging the notification of an interarea transfer in the Shift Manager's logbook when notified by LWO.
- Providing initial response to emergencies occurring at the High Point or IAL with appropriate protective actions.
- Providing prompt radio notification to LWO personnel within SWMF or at the High Point, and the LWO F-Area Tank Farm (FTF) Control Room of emergency conditions occurring within the SWMF and required protective actions to be taken.
- Participating in High Point drills, real and simulated, as required.
- Promptly notifying the LWO personnel of any operating impacts that can affect the High Point (i.e., fires, loss of area power, security, etc.).
- Providing initial RCO coverage for incidents at the High Point until relieved by LWO personnel during normal working hours.
- Serving as custodian of all equipment, vehicles, tools, etc., located within the SWMF and outside the High Point demarcation.
- Granting permission to F-Tank Farm personnel, on a case-by-case basis, to use equipment.
- Providing prompt notification to F Tank Farm Manager of any activity; e.g., environmental restoration closure cap work and culvert replacement that may impact High Point Facility or IAL access or operations.
- Providing oversight of work control activities within the SWMF, excluding the High Point Facility.

SWMF Entry/Training Requirements

SRR LWO personnel are responsible for:

- Following SWMF entry and accountability requirements.
 - Scanning into and out of the SWMF accountability system during normal E-Area operating hours. (Note: If the system is down, a sign-in log is available).
 - Meeting all radiological entry and work requirements. A standing or job-specific Radiological Work Permit (RWP) will cover F Tank Farm personnel once inside of the High Point Facility.
 - Obtaining a radio capable of communicating with the SWMF Shift Manager/Communications Center while within SWMF. Note: The primary radio frequency used within the SWMF is Radio Channel 1.
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NOTE: The SWMF perimeter fence is normally locked during off-shift hours. LWO FTF Shift Managers are provided with a key to the perimeter fence. During off-shift hours, the FTF Shift Manager is to ensure all LWO personnel dispatched to SWMF maintain radio communications with the 2F Control Room. The FTF Shift Manager is responsible for the accountability of people dispatched from LWO to SWMF.

SRNS SWMF personnel are responsible for:

- Notifying F Tank Farm personnel regarding any changes pertaining to SWMF entry or exit requirements; i.e., location of personnel monitoring equipment, procedures for access and accountability, etc.

5.0 INTERFACE CONTROL INFORMATION

There are no system boundary interface points (i.e. electrical or liquid systems) for solid waste disposal operations.. However, there are four areas of interface that are addressed below.

SRNS shall not commence any encroaching excavation at the IAL (encroaching excavation distance is 6 feet or less) without approval from SRR LWO. SRR LWO shall only access SRNS E-area facilities per interface controls identified above for IAL operations (section 4.8).

Protocol for communications between SRNS and SRR regarding waste shipments or associated issues should be from the Solid Waste Shift Operations Manager or designee to the LWO Waste Program Manager or designee.

This agreement works in conjunction with G-FSP-G-00010 Project Management & Construction Services (PM&CS) Functional Services for the disposition and recycling of the various waste using on-site facilities operated by Construction Services.

6.0 SERVICE UNIT INFORMATION

For SRR, see the Section 6 and Attachment 1 of the MOA (G-MOA-G-00002).

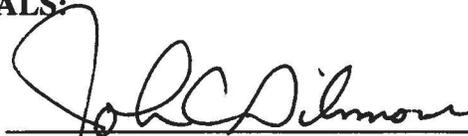
7.0 POINTS OF CONTACT

SRNS: Ed McNamee

SRR: Owen Stevens

8.0 APPROVALS:

SRNS:



John Gilmour

9/24/2013
Date

SRR:



Patricia Allen

9/24/13
Date
