

# **Attachment HH**

## **Puget Sound Naval Shipyard F-2c Schedule for Remedial Action for Problems Revealed:**

## **F-2c        Schedule for Remedial Action for Problems Revealed:**

The majority of the waste stored at the MWSF is in the solid form. Small amounts of liquid wastes would be stored in leak-tight compatible containers within fifty-five gallon drums or metal boxes. The unlikely event of a leak or spill would most probably occur during off-loading and consolidation operations. A spill event of liquid mixed waste would therefore happen in the presence of facility personnel. The contents of the spill could be easily identified by viewing the label on the damaged container or by referring to the documentation that accompanied the waste shipment.

The following discussion of potential problems may not be all-inclusive. Remedies to non-emergent problems not included on this list shall be as directed by the Radiological Control Office, which shall have overall responsibility for ensuring that remedial actions for problems revealed by inspections are carried out. Unless otherwise noted, the MWSF Operator will perform the remedial actions.

### **F-2c(1)        Spill/Leak from Container:**

If the leak is or may immediately migrate to outside the secondary containment (berm) of the MWSF, the leak is considered to be an emergency event. The Contingency plan of attachment G-1 will be used. The time required to remediate this event varies with the magnitude of the emergency, and post emergency clean-up requirements.

Incidental spills of mixed wastes where the substance can be absorbed, neutralized, or otherwise controlled at the time of release by MWSF personnel are not considered to be emergencies if there is no possible release to air, soil, surface water, or groundwater (e.g., incidental spill inside the facility). These spills would be addressed as follows:

- Upon noticing the spill, immediately stop the spill by uprighting the container, or placing absorbents on the waste such that the spill area does not increase.
- During the shift that the leak is discovered, place the damaged or leaking container in a cofferdam or overpack of sufficient size to contain the leaking container.
- During the shift that the leak is discovered, collect and manage potential mixed waste created during the event. Spilled liquids can be collected by absorbent pads, or pumped into containers stored for later analysis, if necessary. The contained liquids may then be consolidated in a similar container or may be stored in a temporary collection container, as appropriate.

Spills shall be documented in the MWSF operating log.

**F-2c(2) Open or Damaged Container:** Close the container if open. If not possible, or if the container is damaged, replace the container with a container in good condition within the shift. If the container is leaking, follow the procedure of **F-2c(1)** above.

**F-2c(3) Floor Coating Damage:** Repairs should be initiated immediately.

**F-2c(4) Liquid Release not from Waste:** Such liquid could include leaking internal plumbing fixtures such as the facility safety shower and eyewash station. Collect the liquid quickly (within the shift) using manual methods of collection (scoop, absorbents), or a portable pump. The liquid shall be sampled for evidence of dangerous waste contamination. Evaluation and disposition of the liquid should occur within one day of collection.

**F-2c(5) Emergency and Warning Signs:** Correct posting/lighting problems within the shift.

**F-2c(6) Equipment** (fire extinguishers, eyewash, and shower, emergency lighting, spill kits (HAZMAT), etc): Repair or replace defective equipment within the shift. The Shipyard fire department (Federal Fire Department) shall be contacted for fire extinguisher replacement. Obtain replacement spill kits or replenish materials within present kits.

**F-2c(7) Utilities** (phone, electricity): If the phone is not functional, obtain a two-way radio. Schedule for repair will depend upon the nature of the problem.

**F-2c(8) Facility structure damage:** Immediate temporary repairs may be required to ensure that the building is secure and that containers are not exposed to the weather. The schedule for permanent repair will depend on the nature of the problem.

**F-2c(9) Building Unlocked when not in use:** Verify that the number of containers present matches the written inventory. Verify that containers are sealed. Inspect containers for evidence of tampering. If there is evidence of tampering, take inventory of container contents. These actions shall be completed within two days.