

# YANKEE ATOMIC ELECTRIC COMPANY

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November 30, 2005  
BYR 2005-103

Mr. Daniel Hall  
Section Chief  
Solid Waste Management  
Department of Environmental Protection  
436 Dwight Street  
Springfield, Massachusetts 01103

- References:
- 1) D. Hall (DEP) to J. Kay (YAEC), "CAD Plan (Remediation) – Plan Approval – Yankee Nuclear Power Station", dated January 11, 2005
  - 2) BYR 2005-095, J. Lynch (YAEC) to D. Hall (DEP), "SCFA Corrective Action Design Conditions 9 and 15 – Yankee Nuclear Power Station", dated November 1, 2005,

Subject: Modification to SCFA Corrective Action Design Conditions 9 and 15  
Yankee Nuclear Power Station, Rowe, MA  
Yankee Atomic Electric Company

Dear Mr. Hall:

## Background

Yankee Atomic Electric Company (YAEC) is in the process of removing the Southeast Construction Fill Area (SCFA) as part of a site decommissioning project at the Yankee Nuclear Power Station (YNPS) in Rowe, MA. To accomplish this YAEC submitted and received approval of a Corrective Action Design (CAD) for the SCFA on January 11, 2005 (Reference 1).

Under this Approval, Condition 9 stipulates that, "Prior to completion of the SCFA excavation, Yankee shall submit a written proposal to the Department for determining whether SCFA material has been sufficiently removed, including visual observation of the base of the excavation combined with some amount of confirmatory sampling of the remaining soils. Any remaining soils at the SCFA must be included in the Site Wide Risk Assessment (for both non-radiological and radiological parameters) to be completed as part of the site-wide BWSC Phase II Equivalent Report." Condition No. 15 stipulates that, "The SCFA remediation shall be completed by November 1, 2005. The Landfill Closure Certification Report shall be submitted to the Department within 90 days of the completion of the CAD activities for the SCFA."

This correspondence provides YAEC's plan for the completion of the SCFA and for the submittal of the support documentation prior to SCFA closure for DEP review and approval.

## **Discussion**

On November 1, 2005, YAEC provided to DEP, correspondence that discussed completion of the SCFA and the development of a grading plan and supporting documentation (Reference 2). This was based on sampling data collected from remedial areas, test pit observations, as well as discussions held with DEP during an October 4, 2005 site visit. As discussed, although YAEC has made significant progress in remedial efforts at the SCFA, these activities were not completed by November 1, 2005. It was believed that the removal activities would be completed on or before December 31, 2005, however, based on subsequent analytical data and YAEC plans to curtail remedial activities for the season, additional time will be required. The extension is necessary to enable YAEC to perform the following:

- Remove additional PCB-impacted soils identified following removal activities adjacent to previously characterized areas. YAEC has identified additional PCB-impacted soil west of remedial 'Area C', as well as to the south of 'Area C' along the Wheeler Brook Divertment.
- Evaluate issues related to other waste materials (sawdust) identified during recent test pit operations. This area of pre-construction material was identified below 'Area B' following removal of all PCB-impacted soils and construction debris from the area.
- Meet Bureau of Waste Site Cleanup (BWSC) and US Environmental Protection Agency (EPA) TSCA requirements to achieve landfill closure, as specified in permits received from both regulatory agencies.
- Review and modify if necessary permits and plans to achieve final landfill closure concurrent with site grading and planting scheduled for 2006. This would incorporate adjacent waste pile (RSS concrete) management and removal.
- Secure the SCFA during curtailed remedial activities for the period of January through April 2006.

YAEC plans to curtail the majority of decommissioning activities for the period of January through April 2006. This decision was made based on our ability to successfully complete both radiological and non-radiological remediation and surveys in a safe, controlled, and cost-effective manner. Yankee plans to stabilize the site, including the SCFA to ensure that remedial areas are secured until the spring and that no impacts occur to adjacent wetland resources due to the erosion of site soils.

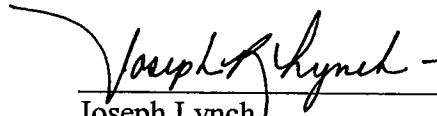
### Condition Modifications

Condition 9 of DEP's CAD Approval stipulates that YAEC shall submit a written proposal to the Department for determining whether SCFA material has been sufficiently removed. Based on YAEC's review of current information, YAEC would like to provide this documentation for DEP's review and approval by July 1, 2006. This will enable currently identified PCB-impacted areas to be remediated and associated confirmation closure samples to be collected and reviewed. It will also allow the adjoining waste to be transported thus allowing SCFA final grades to be established and presented.

Condition 15 of DEP's CAD Approval required that SCFA activities be completed by November 1, 2005. YAEC had requested that this date be changed to December 31, 2005 in our November 1, 2005 correspondence. Based on YAEC's review of current information, YAEC would like to request that this date be changed to August 15, 2005. This will enable DEP review and approval of the documentation submitted under Condition 9, and the completion of all final grades and area stabilization activities.

If you have any questions regarding the above request, or our plans for the proposal to satisfy Condition 9 of the Department's approval, please contact Mr. Kenneth Dow, Environmental Manager, at (413) 424-2245.

Very truly yours,  
YANKEE ATOMIC ELECTRIC COMPANY



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Joseph Lynch  
Yankee Site Closure Director

Cc: D. Howland MADEP  
L. Hanson MADEP