Saxton Nuclear Experimental Corporation Policy and Procedure Manual Number

6575-ADM-4500.40

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Control of Hotwork							
Applicability/Scope			Respon	Responsible Office		Effective Date	
This procedure applies to all Saxton Personnel				6675		04/24/95	
This document is within QA plan scope X Yes				No			
Safety	Reviews Required		X Yes	No			
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Originator	E.A. Curry	4-20-95
Fire Protection Engineer	Moconnor	4.20.95
SNEC Radiation Safety Office (Concurrence)	Augh	4/20/95
SNEC Site Superintendent	FOR PERRY CARMEL PERTELECON C.M. Beniday	4/21/95
SNEC General Manager	/s/ Beverly Good	4/21/95

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1.0 FURPOSE

Title

- 1.1 To provide requirements necessary to assure safe welding, cutting, grinding, brazing and soldering hotwork.
- 1.2 To proceduralize those actions necessary to prevent fire, loss damage, or injuries during performance of various hotwork activities.
- 1.3 To provide a permit system to positively control all welding, cutting, brazing, grinding, soldering and open fiame work in all plant areas.
- 1.4 This procedure provides for permitting salamanders, propane or other types of (combustion) heaters.

2.0 APPLICABILITY/SCOPE

This procedure applies to all welding, cutting, grinding, scidering, and/or open flame work operations conducted at SNEC (Saxton Nuclear Experimental Corporation).

3.0 DEFINITIONS

- 3.1 Permanent Hotwork Area: An area reviewed and approved by the General Manager/SNEC (or designee) (interfaces with Fire Protection Engineer) for performing hotwork within 30' of a plant structure.
- 3.2 R.S.O.: Radiation Safety Officer

4.0 PROCEDURE

- 4.1 Special tools, materials, instructions and qualifications required.
 - 4.1.1 Approved welding, cutting, grinding, soldering, and portable heating equipment.
 - 4.1.2 Noncombustible welding curtains, drapes, and covers as applicable, properly installed so as to totally surround the work area.
 - 4.1.3 Appropriate portable fire extinguishers.
 - 4.1.4 Welding, cutting, grinding and soldering Supervisor (job foreman) and welding, cutting, grinding and soldering personnel trained in the safe operation of cutting and welding equipment, hazardous plant conditions, and appropriate emergency procedures.
 - 4.1.5 Personal protective clothing (example: leathers) as necessary to protect personnel from heat, fiames, sparks or slag.

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4.2 Limits and Precautions

- 4.2.1 Where practicable, all combustibles within a 40 foot radius horizontally shall be relocated from the work site. Where relocation is impracticable, combustibles shall be protected with fiame proofed covers or otherwise shielded with metal fire-resistant guards or curtains. Edges of covers at the floor shall be tight to prevent sparks from going under them. This precaution is also important at overlaps where several covers are used to protect a large pile.
- 4.2.2 Openings in walls and floors within a 40 foot radius horizontally of the site should be covered to prevent the passage of sparks or hot slag to adjacent areas.
- 4.2.3 When performing hotwork on components (pipes, condult, trays, supports, etc.) which penetrate non-fire rated seals such as building construction joints (seismic gaps) or air seals, consideration shall be given to removing the combustible seal material around the penetrating item. This is necessary since the metallic component may conduct enough heat to ignite the seal material. This consideration shall be made based on the distance from the hotwork to the seal and the type of hotwork to be performed. Hemp, caulk (suct seal) fire retardant lumber, Arm-A-Flex, and styrofoam are examples of combustible seal material which may be encountered.
- 4.2.4 Appropriate portable fire extinguishers shall be provided at the immediate job site. Size, type, and number of extinguishers should be obtained to suit the hazard in any individual job area, but shall include a minimum of one 20 lb. ABC dry chemical unit, and shall be in addition to the normal compliment of extinguishers installed in the area. These extinguishers are to be returned to storage location upon completion of the job.

CAUTION

Do not cut any component that may contain or may have contained fiammable or combustible materials, including liquids (which are normally safe) without first evaluating and resolving any potential explosion or fire hazard. Engineering and other support is available to evaluate and disposition this risk prior to work to ensure the operation may be performed safely.

- 4.2.5 All confined areas, hollow spaces, cavities, drums, or other containers shall be ventilated, purged, and tested for the absence of flammable vapors and/or hazardous atmospheres prior to the start of work.
- 4.2.6 All job sites shall be examined to be free of flammable vapor sources within or adjacent to the job area.
- 4.2.7 Fire protection and suppression equipment installed in the job area shall be verified to be in service.
- 4.2.8 All fixed combustibles, machinery, equipment, and cable in trays subject to possible ignition or damage by sparks or slag shall be protected by appropriate noncombustible guards or covers.

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- 4.2.9 Welding, cutting and grinding jobs should be performed in the permanent hotwork areas when practical.
- 4.2.10 A permit system shall be utilized for all welding, cutting, grinding, and open flame work in or adjacent to, any RWP or radioactive material storage area.

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- 4.2.11 A permit system may also apply in areas beyond the plant where fire is likely and/or could cause serious consequence. Determination as to the applicability of the permit system in these areas shall be made by the General Manager/SNEC (or designee), in collaboration with the Fire Protection Engineer.
- 4.2.12 The permit system shall require that all welding, cutting, and grinding job sites receive inspection and approval by appropriate supervisory personnel prior to the start of work per Step 4.3.2.3.
- 4.2.13 A permit system is not required for welding, cutting, and grinding in permanent hotwork areas.
- 4.2.14 The permit system shall apply to temporary welding fabrication areas within plant buildings which are utilized for repeated welding, cutting, and grinding jobs. Permits issued for welding, cutting, and grinding in these areas shall be limited to 1 week duration and new permits must be secured each week.
- 4.2.15 No second person need be assigned as a fire watch for soldering jobs which only involve the use of soldering irons or guns. The person doing the work serves as the fire watch and is responsible for performing the follow-up inspection of the area. This follow-up inspection may be made immediately after the work, therefore the 30 minute follow-up inspecting does not apply. No spare fire extinguisher is required to support these low hazard soldering jobs and the portions of the permit which do not apply are to be marked as not applicable. Any open flame soldering work shall be performed in full compliance with the permit system.
- 4.2.16 An individual shall be designated to perform as "Fire Watch" at each job site. This individual shall be in addition to the welder or cutter performing the job and shall be knowledgeable in the use of fire protection equipment available in the job area and familiar with plant emergency communications and procedures. He/she shall be responsible or being alert for hazards during the job, using fire extinguishing equipment, and making emergency notifications as necessary. He/she shall inspect the job area for fire hazards immediately following completion of welding, cutting or grinding operations. The "Fire Watch" shall remain at the job site for an additional 30 minutes after completion of work to perform a follow-up inspection for fire hazards. He/she shall notify the welding, cutting, and grinding supervisor of any unusual or unsafe conditions. Additional fire watches should be stationed due to unusual circumstances or inability to satisfy other requirements in this procedure, e.g., protection of floor openings.
- 4.2.17 The person assigned as the fire watch is responsible to obtain an appropriate portable fire extinguisher. This extinguisher shall be currently inspected and shall be returned to the storage location following use by the fire watch. If the spare extinguisher has been pressurized, expelled, or both, the Site Superintendent shall be notified to service the extinguisher. The Site Superintendent and the General Manager/SNEC, shall be notified

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immediately if any fire extinguisher is used to extinguish any fire, regardless of the size or severity.

- 4.2.18 For jobs in a radiologically controlled area, the fire watch should adhere to the ALARA requirements identified in the work package as they pertain to the 30 minute follow-up inspection.
- 4.2.19 The permit shall be valid for the duration of a particular job. Permits are valid for one week in temporary welding fabrication areas.

NOTE The Fire Protection Engineer shall determine the site acceptability for establishment of temporary welding fabrication areas.

- 4.2.20 For work evolutions that produce little or no spark/slag, the Job Supervisor shall contact the Fire Protection Engineer who will determine the required area protection. This will be documented in the "Special Precautions To Be Taken" section of the permit.
- 4.2.21 The Site Superintendent (or designee) shall review and approve all welding, cutting, and grinding permits prior to starting each job. Permit approval shall be dependent upon lack of conflict with operations in the proposed job area, and lack of conflict with modifications or temporary processes in progress in the job area.

4.3 Procedure

- 4.3.1 The Supervisor in charge of the work or his designee shall provide the information required on the top portion of Page 1 (i.e.: Date, plant location, work to be done, fire watch, and person performing welding or cutting).
- 4.3.2 The Supervisor in charge of the work shall ensure that the job site has been physically inspected prior to the start of work. If work shall be performed in an RWP or radioactive material area, the SNEC R.S.O. (or designee) shall review the permit prior to start of job site inspection.
 - 4.3.2.1 The person assigned by the Supervisor to inspect the area; initials and signs the rear of the permit.
 - 4.3.2.2 The person returns the permit to the Supervisor in charge of the work.
 - 4.3.2.3 The Supervisor shall physically survey the area where the work is to be performed. The Supervisor shall verify that the actions required to satisfy the items on the rear of the permit have been completed.
 - 4.3.2.4 The Supervisor shall sign on the front of the permit. The signature states that the area was inspected and necessary precautions were taken.

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- 4.3.3 The Site Superintendent (or designee) shall review and approve the welding and cutting permit prior to starting each job. Permit approval shall be dependent upon lack of conflict with operations in the proposed job area and lack of conflict with modifications or temporary processes in progress in the job area.
- 4.3.4 The permit form shall be displayed at the job site.
- 4.3.5 The fire watch shall remain posted in the work area during all hotwork activities.
- 4.3.6 At the conclusion of hotwork activities (including breaks, lunch and end of shift), the fire watch shall be posted in the work area for a 30 minute period.
- 4.3.7 The fire watch shall return the permit to the supervisor in charge of the work when the permit expires or work is complete.
- 4.3.8 The Supervisor shall forward the permit to the Site Superintendent for filing.
- 4.3.9 The General Manager, (or Site Superintendent) shall retain completed permit forms for review by the next inspecting insurance carrier representative and then destroy them following his review.

5.0 RESPONSIBILITIES

5.1 As identified in Section 4.0.

6.0 REFERENCES

- 6.1 NFPA 50 Bulk Oxygen Systems at Consumer Sites
- 6.2 NFPA 51 Oxygen Fuel Gas Systems for Welding, Cutting and Allied Processes
- 6.3 NFPA 51B Fire Prevention in the use of Cutting and Welding Processes
- 6.4 NFPA 58 LPG Storage and Handling
- 6.5 NFPA 241 Building Construction Demolition
- 6.6 ANSI Z49.1 Safety in Welding and Cutting, 1973
- 6.7 29 CFR 1910.252 Welding, Cutting, and Brazing
- 6.8 Procedure 6575-ADM-4500.20, "Radiation Work Permits"
- 6.9 Corporate Procedure 1000-ADM-1100.09, "Non-Radiological Respiratory Protection"
- 6.10 GPU Nuclear Safety and Health Manual

7.0 EXHIBITS

7.1 Exhibit 1 - Welding, Cutting, Grinding, and Open Flame Permit

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8.0 TABLES, FIGURES, AND DATA SHEETS

8.1 None

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Weiding	EXHIBIT 1 (Typical) , Cutting, Grinding, and Open Flame Permit	
(Work is not permitted unless this form the welding or cutting. This permit mu	is filled in and attached to welding equipment b st be reviewed and signed by your supervisor pr	y person who is performing for to work)
DATE (of work):		
PLANT OR BUILDING	Floor, Dept., Area or Location	
SPECIAL PRECAUTIONS TO BE TAKE	N:	
PERSON DESIGNATED FOR FIRE WA	TCH*:	
PERSON PERFORMING WELDING OR	CUTTING:	
SNEC R.S.O. (or Designee)	ection	Date
	utions listed on the reverse side have been comp	
	has been examined by me, the necessary preca	
PERMIT EXPIRES		
SIGNED		
APPROVAL	Supervisor	Title
Sh	e SuperIntendent (or Designee)	
TIME STARTED	TIME COMPLETED	
	FOLLOW-UP INSPECTIONS	
At completion of hot work activities (inc work area for a 30 minute period. Insp extinguisher has been returned to store	cluding breaks, lunch, and end of shift) firewatch ection of area was completed and no fire conditi ige location after completion of work.	has been posted in the ions were noted. Fire
SIGNED		
	"Firewatch"	
Return this permit after work is complet Superintendent.	ted to job supervisor. Supervisor initials and for	wards permit to the Site
		(TYPICAL PERMIT

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EXHIBIT 1 (Cont'd) Danger Prevent Fires

DO NOT CUT, WELD OR USE OTHER OPEN FLAME OR SPARK-PRODUCING EQUIPMENT UNTIL THE FOLLOWING PRECAUTIONS HAVE BEEN TAKEN.

Initial each item.

1.	The location where the work is to be done has been personally examined.
	 Sprinkters, where provided, are in commission and will not be taken out of service until thi work has been completed.
	b. There is no fiammable lint, dust, vapors and liquids or unpurged tanks or equipment previously containing such materials in the area.
NAMES AND ADDRESS OF TAXABLE PARTY.	c. This work will be confined to the area of equipment specified in the permit.
2.	The following safeguards have been provided.
	a. Floors and surroundings have been swept clean. Clean of combustible material.
-	 Ample portable extinguishing equipment, hand hose, extinguishers, water pails, etc., have been provided.
*******	c. All removable combustibles have been located 40 feet from the operation and the remaind protected with flameproof curtains, metal guards or flameproofed covers (not ordinary tarpaulins).
	d. All floor and wall openings within a 40 feet radius of the operations have been covered tightly.
	e. Responsible personnel have been assigned to watch for dangerous sparks in the area, as well as in floors above and below.
	f. Communications are available between the welding/cutting operation and the Control Point
3.	Flame or spark-producing equipment to be used has been inspected and found in good repair.
4.	Arrangements have been made for a posted firewatch of the area, including floors above and belo as required, during any lunch or rest period and for at least one half hour after work has been completed.

Verified By	 -
Date	 -

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Attachment 3 Environmental Report for the Construction of the Decommissioning Support Facilities 5 Pages

ENVIRONMENTAL REPORT

for

CONSTRUCTION OF DECOMMISSIONING SUPPORT FACILITIES SAXTON NUCLEAR EXPERIMENTAL CORPORATION

INTRODUCTION

The purpose of this environmental report is to discuss the environmental impact of the construction of the Saxton Nuclear Experimental Corporation (SNEC) decommissioning support facilities (DSF). This report is intended to satisfy Item No. 5. of the USNRC Request for Additional Information, dated March 25, 1996. It is understood that Item No. 5. specifically requests SNEC to address the environmental impact of DSF construction only. Item No. 5. states that the environmental impact related to the use and operation of the DSF after construction should be included in the Environmental Report of the SNEC Decommissioning Plan.

BACKGROUND

The DSF will consist of three interconnected pre-engineered metal buildings which will be directly connected to the SNEC facility Containment Vessel. The buildings will be constructed at grade on concrete slabs and will be serviced with electricity. There is no water service, wastewater drainage (sanitary or industrial), or air emission sources other than normal building heating and ventilation exhaust included in the design of the three buildings. Stormwater from roof drains and building area runoff will be directed to the existing yard drainage system or to a French drain system to be constructed as part of the DSF construction project. Although the DSF buildings will be constructed to meet industry standards for permanent structures, the DSF buildings are classified as temporary structures and are planned to be dismantled upon completion of SNEC facility decommissioning activities. The DSF building construction and associated SNEC facility site work will be accomplished in accordance with a GPU Nuclear engineering specification (reference no. 1).

CONSTRUCTION ACTIVITIES - ENVIRONMENTAL IMPACT

Building Permits and Certificates of Occupancy

The SNEC facility is located in Liberty Township, Bedford County. The building contractor will be responsible for securing the required Building Permits and Certificates of Occupancy from Liberty Township and the Pennsylvania Department of Labor and Industry (PADOLI). The building design and construction will meet the applicable local and state building codes for the type of construction, building location, designated building uses and anticipated personnel occupancy. PADOLI requirements will be invoked for the DSF project because of the potential for the buildings to be occupied by four or more individuals during the workday. The DSF buildings are classified as temporary structures and are planned to be dismantled upon completion of SNEC facility decommissioning activities. Building demolition would be accomplished in accordance with applicable codes and standards.

PAGE 2. OF 4 SAXTON DSF CONSTRUCTION ENVIRONMENTAL REPORT

Floodplain Management

The DSF buildings will be constructed in an area at the Saxton site which is above the 100 year floodplain. The three buildings will be located at site elevations between 812 feet and 813 feet (reference no. 1). In the 1972 Saxton Decommissioning Plan and Safety Analysis Report (reference no. 2), the maximum observed flood elevation at the Saxton site was reported at 809.5 feet. This maximum observed flood elevation was recorded in March 1936 and corresponded to a river flow of about 80,000 cubic feet per second (cfs). As stated in the 1972 Saxton Decommissioning Plan, the Army Corps of Engineers assigned a 225 year flood frequency to the 80,000 cfs flow at the Saxton site (reference no. 2). In March 1996, the U.S. Geological Survey (USGS) provided data to SNEC that confirmed the observed high flows for the Raystown Branch of the Juniata River at Saxton, PA. occurred in March 1936 (reference no. 3).

In an effort to update the 100 year floodplain information for the Saxton site the USGS, the Federal Emergency Management Agency (FEMA) and the Army Corps of Engineers were contacted in March 1996. The closest USGS river flow gage for the Raystown Branch of the Juniata River is located about 1.5 miles upstream from the Saxton site and is of limited use for direct determination of the 100 year flood frequency river elevation at the Saxton site. Both FEMA and the Army Corps of Engineers indicated that later Saxton site data were not available beyond what was referenced in the 1972 Saxton Decommissioning Plan.

Based upon the available floodplain information, SNEC concludes that the DSF buildings will be constructed above the 100 year floodplain as the 225 year flood elevation is below the planned DSF building elevation. Therefore, the building construction is not subject to PADEP Bureau of Dams and Waterways Management or Army Corps of Engineers permitting.

Given the short duration of the construction period (approximately three months) and the predicted flood frequency at the Saxton site, the likelihood of a flood occurring during the construction period is extremely unlikely. The Raystown dam and reservoir operated by the Army Corps of Engineers located downstream of the SNEC facility site provide additional flood control for the facility. However, should a flood event occur during construction activities, sufficient notice of imminent flooding would be available for the building contractor to implement steps to minimize impact on the public and the environment. For example, loose construction materials as well as equipment containing hazardous substances could be relocated to high ground.

Stormwater Management

Stormwater runoff from the construction area will be directed to the existing site stormwater collection and drainage system. Site stormwater is retained onsite and there is no stormwater point source discharge to local surface waters. Site stormwater intermittently ponds onsite and percolates into local soils and groundwater. The USEPA National Pollutant Discharge Elimination System (NPDES) permit program covers stormwater discharges from certain types of construction activities (reference no. 4). However, the USEPA NPDES permit program regulations as administered by the PADEP exempt construction activities that result in the disturbance of less than five acres and are not part of a larger common plan of development or sale (reference no. 4).

PAGE 3 OF 4 SAXTON DSF CONSTRUCTION ENVIRONMENTAL REPORT

The SNEC facility site covers approximately 1.148 acres (reference no. 2) and the combined area covered by the DSF building footprint and the associated site road work and grading will cover about one acre (reference no. 1). Since the affected area is less than five acres the USEPA stormwater permitting program related to construction activities is not applicable. During earthmoving activities associated with DSF building construction soil erosion from stormwater runoff will be controlled in accordance with applicable PADEP and Soil Conservation District requirements. The following section of this report discusses the soil erosion control plan for the SNEC facility site.

Soil Erosion and Sedimentation Control

The SNEC facility site has a relatively flat topography and is not prone to accelerated stormwater runoff and soil erosion. SNEC facility site soil erosion and sedimentation will be minimized during DSF construction activities by implementation of the SNEC Soil Erosion and Sedimentation Control Plan (reference no. 5). This plan is based upon the PADEP Erosion Control regulations (reference no. 6). The plan requires the use of temporary control measures such as fabric filter fencing, mulching and straw bales during earthmoving activities. The PADEP does not require an erosion control permit for DSF construction activities because less than 25 acres of land will be disturbed.

Air Quality - Fugitive Emissions

The PADEP requires persons involved in construction activities to take reasonable actions to prevent particulate matter from becoming airborne (reference no. 7). Reasonable actions include the use of water to minimize airborne dust from the construction area and the prompt removal of earth or other materials from paved roads in the construction area. Because there will be a limited amount of earthmoving activities and transporting of dirt and other construction materials associated with DSF construction, fugitive emissions are anticipated to be minimal. The building contractor will be required to implement dust control methods to prevent visible airborne dust from crossing the GPU System owned property boundaries which surround the SNEC facility site. Onsite dust control will be implemented by the building contractor if needed to assure a suitable work environment for contractor and other onsite SNEC personnel.

Waste Management

The building construction activities will generate typical construction wastes such as wood, metals, bricks, block, and roofing materials. These wastes are classified as construction/demolition waste under the PADEP Municipal Waste Management regulations (reference no. 8). Construction/demolition wastes generated from the DSF project will be managed, transported and disposed of in accordance with the PADEP's municipal waste regulations. Empty hazardous material containers generated from construction activities will also be managed and disposed of as municipal waste.

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The generation of other wastes that are not classified as construction/ demolition waste will be minimal. The building contractor will be required to minimize the generation of wastes such as paints, solvents, and cleaning liquids that may be used on the project. For example, open containers that contain usable product will be retained by the contractor for use on other projects if applicable. SNEC recognizes that some liquid wastes or other solid wastes may be generated which cannot be properly managed as municipal waste. In this case the waste will be managed and disposed of in accordance with the PADEP Residual Waste Management regulations (reference no. 9) or the PADEP Hazardous Waste Management regulations (reference no. 10) as appropriate. Also, inadvertent spills of hazardous substances will be cleaned-up and the impacted area will be remediated as necessary. Spill residues will be properly disposed of and regulatory agencies will be notified if threshold spill reporting quantities are exceeded.

Other Environmental Features - Historical and Endangered Species

The SNEC facility site is located on property which has been associated with industrial activity since the 1920's. The SNEC facility site is located adjacent to property owned by the Pennsylvania Electric Company, a subsidiary of General Public Utilities Corporation, which was the site of the Saxton Steam Electric Generating Station (SSEGS). The coal-fired SSEGS was operated from 1923 to 1974 and was demolished during the period 1975 to 1977. The area of the SNEC facility site where the DSF buildings will be constructed was previously occupied by the SNEC facility Control and Auxiliary Building. The Control and Auxiliary Building was a support facility for the SNEC power plant which was constructed from 1960 to 1962. The Control and Auxiliary Building was demolished with other SNEC facilities in 1992.

There are no known historical or archaeological areas of interest located at the SNEC facility site or the adjacent Pennsylvania Electric Company property (reference no. 11). There have been no historical or archaeological areas identified during earth disturbances associated with construction and demolition of the SNEC facility and the SSEGS. Also, there are no known endangered or threatened plant or animal species on the SNEC facility site or the adjacent Pennsylvania Electric Company property (reference no. 11).

ENVIRONMENTAL IMPACT - SUMMARY

SNEC does not anticipate any significant environmental impact related to the DSF construction project. The building contractor and SNEC personnel will comply with the applicable environmental regulations and good work practices during construction activities. The building contractor will be responsible for securing all required regulatory permits and approvals for the construction project. Building construction and occupancy permits will be secured from both Liberty Township and PADOLI. Because of the relatively small size of the project and the determination that the building construction is outside of the 100 year floodplain, there are no other environmental permits identified for this project.

REFERENCES

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- Specification for Three Interconnected Pre-Engineered Buildings to Support Decommissioning of Saxton Nuclear Experimental Corporation Facility, Specification No. S1-SP-510000-001, Revision 0, GPU Nuclear Corporation Engineering Specification, March 1996.
- Saxton Decommissioning Plan and Safety Analysis Report, Saxton Nuclear Experimental Corporation, April 1972.
- 3) <u>Annual Peak Flow Frequency Analysis for Raystown Branch of Juniata River</u> at Saxton, Pa. 1889 - 1994, U. S. Geological Survey, March 1996.
- 4) USEPA Administered Permit Programs: The National Pollutant Discharge <u>Elimination System</u>, Title 40 Federal Code of Regulations, Chapter 122, USEPA, July 1993.
- 5) <u>SNEC Soil Erosion and Sedimentation Control Plan</u>, SNEC Procedure No. 6575-PLN-4542.02, Rev. O, Saxton Nuclear Experimental Corporation, November 1994.
- <u>Erosion Control</u>, Title 25 PA Code of Regulations, Chapter 102, PADEP, May 1995.
- 7) <u>Standards for Contaminants Fugitive Emissions</u>, Title 25 PA Code of Regulations, Chapters 123.1 and 123.2, PADEP, May 1995.
- Municipal Waste, Title 25 PA Code of Regulations, Article VIII, PADEP, February 1996.
- 9) <u>Residual Waste Management</u>, Title 25 PA Code of Regulations, Article IX, PADEP, May 1993.
- Hazardous Waste Management, Title 25 PA Code of Regulations, Article VII, February 1996.
- 11) <u>Decommissioning Environmental Report for Saxton Nuclear Experimental</u> Corporation Facility, GPU Nuclear Corporation, April 1996.

Attachment 4 Revised Proposed Technical Specification Page 1a

Replace page 1a provided with the submittal dated February 2, 1996 with the following revised replacement page.

Actions considered to be permitted by this provision would be limited to asbestos removal, removal of defunct plant electrical services and associated components, installation of decommissioning support systems (compressed air, electrical power, heating, ventilation and air conditioning) and construction of decommissioning support facilities. Any action which results in alteration of the Containment Vessel, removal of major radioactive components or results in dismantling components is prohibited.