

INL HWMA/RCRA Final Permit, EPA No. ID4890008952 Experimental Breeder Reactor-II Complex PER-120			
REVISION LOG			
SUBMITTED	APPROVED	PMR CLASS	SUMMARY OF CHANGES
8/13/09 (CCN 308937)	8/26/09 (Effective Date 8/31/09)	1*	<ul style="list-style-type: none"> • Addition of Buildings 793E and 793F HWMA/RCRA Units from the Material and Fuels Complex Consolidated Permit (PER-116) to the Experimental Breeder Reactor-II (EBR-II) Permit (PER-120) • Transfer of Operational Control from Battelle Energy Alliance, LLC (BEA) to CH2M-WG Idaho, LLC (CWI) • Notice of intent to initiate closure activities for Buildings 793E and 793F
03/22/09	04/08/10	1*	<ul style="list-style-type: none"> • Increase of Sodium treatment capacity from 1.5 gallons/day to 785 gallons/day for the Secondary Sodium Drain Tank System, the Primary Sodium Tank, and the Intermediate Heat Exchanger • Allow for the use of water/steam (with additives) in place of moist Carbon Dioxide for the treatment of sodium and/or sodium potassium alloy • Change the use of the cover gas from Carbon Dioxide to Argon or Nitrogen • Allow for tank treatment (deactivation) of piping segments and/or components containing sodium to occur in the Secondary Sodium Drain Tank • Revision the Part A Permit Application to reflect the revised treatment capacity • Removal of all information pertaining to HWMA/RCRA storage units MFC-7993E and MFC-793F as closure certification of these units was approved by the DEQ on October 30, 2009 (CCN 309451)

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3/22/10	04/08/10	1*	<ul style="list-style-type: none"> • Notification of initiation of closure activities within the EBR-II complex was submitted to the DEQ on 01/28/10. Therefore information pertaining to closure of the EBR-II complex has be revised as appropriate • Revision inspection requirements to allow for the use of cameras in limited access areas in building MFC-766 due to asbestos, radiation, or other occupational hazards • Revision the type of required fire extinguishers from ABC to MLX at the HWMA/RCRA units • Revision the required communications equipment to allow for the use of two-way radios and cell phones • Revision of Permit Condition I.U. reporting dates to February 1 and August 1 of each year to align with other CWI I.U. Report Dates • Revision of Section B-2(e) from the Process Description Information as the Annual Report requirement for Removal and Treatment activities will now be reported at the same time as the February Permit Condition I.U. Report • Revision of the Closure Plan to remove the requirement for the Preliminary Review/Site Inspection Report • Editorial Changes – as necessary, for example: revision of incorrect IDAPA citations in the Closure Plan of this permit; facility description information is being revised to reflect closure/D&D activities

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June 29, 2010	Effective Date – June 25, 2010	Class 1 Permit Modification Notification	<ul style="list-style-type: none"> • Allow for the storage and treatment of corrosive waste (D002) in the Secondary Sodium Drain Tank System, which may be a by-product of the already approved treatment.
September 2010	Effective Date – September 14, 2010	Class 1 Permit Modification Notification	<ul style="list-style-type: none"> • Allow for the storage of Chromium (D007) waste in the Secondary Sodium Drain Tank System which may be a by-product of the already approved treatment.
December 2010 NOD Response and Revised Class 1* PMR submitted on January 18, 2011	NOD issued January 5, 2011 NOD Response and Revised Class 1* PMR approved on January 24, 2011	Class 1*	<ul style="list-style-type: none"> • Allow for tank treatment (deactivation) of piping segments and/or components containing sodium and/or sodium potassium alloy to occur in the Primary Sodium System • Allow for the storage and/or treatment of corrosive waste (D002) in the Primary Sodium System and the Intermediate Heat Exchanger • Allow for the storage and/or treatment of chromium waste (D007) in the Primary Sodium System Tank, the Secondary Sodium System Drain Tank, the IHX, and the reactor storage pits and holes • Revise the Part A Permit Application to incorporate the requested changes in storage and treatment • Revision of the Closure Plan – Closure Performance Standards for the Primary Sodium System, the intermediate heat exchanger, and the Secondary Sodium Drain Tank. All internal surfaces of these systems/components will be contacted with treatment solution in either liquid or vapor phase. In lieu of visual inspection,

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			<p>hydrogen gas generation will be monitored and may be used to demonstrate closure standards. Once it has been determined that hydrogen gas is no longer being generated (therefore any sodium has been completely reacted), the systems will have met the clean closure standards and be considered clean closed.</p> <ul style="list-style-type: none"> • Revision of the Table I-2 of Closure Plan to identify that the estimated quantity of sodium in the secondary sodium system is less than 710 gallons • Editorial Changes – as necessary throughout the permit to correct typographical errors and keep the permit language current
February 28, 2012	March 20, 2012	Class 1*	<ul style="list-style-type: none"> • Modification to the closure schedule for the interim closure commitments, found in Attachment 8, Section I-2(f), Table I-4 Closure Schedule.