



**Department of Energy**  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

14-AMRP-0033

**NOV 15 2013**

Ms. J. A. Hedges, Program Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
3100 Port of Benton  
Richland, Washington 99354

Dear Ms. Hedges:

**NOTIFICATION THAT HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) INTERIM MILESTONES M-015-112 AND M-015-113 ARE AT RISK OF NOT BEING MET AND REQUEST FOR EXTENSION OF TRI-PARTY AGREEMENT INTERIM MILESTONES M-015-112, SUBMIT DRAFT B, 200-IS-1 RCRA FACILITY INVESTIGATION/CORRECTIVE MEASURES STUDY/REMEDIATION INVESTIGATION/ FEASIBILITY STUDY (RFI/CMS/RI/FS) WORK PLAN TO ECOLOGY WITH SCHEDULE DATES, AND M-015-113, SUBMIT DRAFT B, 200-SW-2 RADIOACTIVE LANDFILLS GROUP RFI/CMS/RI/FS WORK PLAN TO ECOLOGY WITH SCHEDULE DATES**

The purpose of this letter is to notify the State of Washington Department of Ecology (Ecology) that Tri-Party Agreement Interim Milestones M-015-112, which requires submittal of Draft B of the 200-IS-1 RFI/CMS/RI/FS Work Plan to Ecology, and M-015-113, submittal of Draft B of the 200-SW-2 Radioactive Landfills Group RFI/CMS/RI/FS Work Plan to Ecology by February 28, 2014, are at risk of not being met and to request an extension of the milestone due dates. Ecology was notified by letter 13-AMRP-0136 dated April 24, 2013, that these milestones were in jeopardy of being missed due to sequestration as required by the Budget Control Act of 2011.

The Tri-Party Agreement M-015-112 and M-015-113 Interim Milestones are currently being discussed by the U.S. Department of Energy Richland Operations Office (RL) and Ecology as part of an overall effort to update existing Tri-Party Agreement milestones. Both work plans were completed through Draft A, and require resolution and incorporation of regulator comments into the documents to meet these milestones. Completion of the work plans are essential components of the remedial strategy for cleanup of the Central Plateau of the Hanford Site. Due to limited resources, the sequence of work on the Central Plateau is being evaluated to implement the most efficient strategy to reduce risk and address the Hanford Site priorities that have been established by the Tri-Parties. The completion of these milestones is being evaluated in the context of this strategic approach. Extension of the due date for these milestones to September 30, 2014, allows the Tri-Parties to negotiate the M-015 and M-016 Milestone series and determine the appropriate work scope sequence for the Central Plateau.

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In accordance with Tri-Party Agreement Action Plan, Section 12.0, RL requests approval of the attached Change Control Forms M-15-13-02 and M-15-13-03 to extend the due date for Tri-Party Agreement Interim Milestones M-015-112 and M-015-113 from February 28, 2014, to September 30, 2014. RL believes the ongoing discussions to evaluate the remediation approach on the Central Plateau constitutes a good cause for extension. This change does not affect the Tri-Party Agreement Milestone M-015-00 due December 31, 2016.

The extension of the milestone due dates and draft Change Control Forms have been discussed with Ecology's project staff.

If you have any questions, please contact me or your staff may contact Briant Charboneau, of my staff, on (509) 373-6137.

Sincerely,

A handwritten signature in black ink, appearing to read "Ray J. Corey" with a stylized flourish at the end.

Ray J. Corey, Assistant Manager  
for the River and Plateau

AMRP:RDH

Attachments

cc w/attachs:

G. Bohnee, NPT  
R. Buck, Wanapum  
P. A. Burke, CHPRC  
C. E. Cameron, EPA  
L. M. Dittmer, CHPRC  
M. H. Doombos, CHPRC  
D. A. Faulk, EPA  
S. Harris, CTUIR  
S. Hudson, HAB  
R. Jim, YN  
R. A. Kaldor, MSA

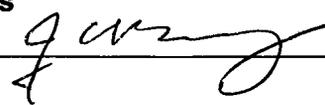
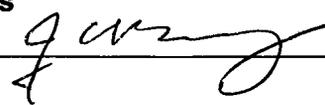
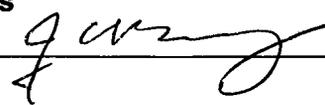
D. E. McKenney, CHPRC  
N. M. Menard, Ecology  
K. Niles, ODOE  
T. W. Noland, MSA  
R. E. Piippo, MSA  
R. S. Popielarczyk, CHPRC  
J. B. Price, Ecology  
D. Rowland, YN  
D. G. Singleton, Ecology  
Administrative Record  
Environmental Portal

<b>Change Number</b> M-15-13-02	<b>Federal Facility Agreement and Consent Order  Change Control Form</b> Do not use blue ink. Type or print using black ink.	<b>Date</b> October 31, 2013															
<b>Originator</b> R. J. Corey		<b>Phone</b> (509) 373-9971															
<b>Class of Change</b> <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager																	
<b>Change Title</b> Extend the due date for TPA interim milestone M-015-112, "Submit Draft B, 200-IS-1 RFI/CMS/RI/FS Work Plan to Ecology, including a schedule of completion dates for major tasks and deliverables."																	
<b>Description/Justification of Change</b> TPA Interim Milestone M-015-112, "Submit Draft B, 200-IS-1 RFI/CMS/RI/FS Work Plan to Ecology, including a schedule of completion dates for major tasks and deliverables" requires revision to incorporate regulator comments on Draft A into Draft B of the Work Plan. This milestone currently has a completion date of February 28, 2014.  Completion of this Work Plan is an essential component to the remedial strategy for the Central Plateau of the Hanford Site. Due to limited resources, the U. S. Department of Energy Richland Operations Office (RL) is evaluating the comprehensive sequence of work for the Central Plateau to efficiently reduce risk and address the Hanford Site priorities that have been established by the Tri-Parties. Extension of the due date for this milestone to September 30, 2014, allows the Tri-Parties to negotiate the M-015 and M-016 milestone series and determine the appropriate work scope sequence for the Central Plateau.  <i>Description/Justification of Change continued on next page.</i>																	
<b>Impact of Change</b> This change will extend the due date to incorporate regulator comments into the 200-IS-1 RFI/CMS/RI/FS Work Plan, and ensure that the revision incorporates key Central Plateau-wide agreements that will establish common principles applicable to remediation decisions for all operable units.																	
<b>Affected Documents</b> The Hanford Federal Facility Agreement and Consent Order (HFFACO), as amended, and Hanford Site internal planning, management, and budget documents.																	
<b>Approvals</b> <table border="0" style="width: 100%;"> <tr> <td style="width: 50%; vertical-align: top;"> R. J. Corey  DOE </td> <td style="width: 20%; vertical-align: top;">   _____ </td> <td style="width: 10%; vertical-align: top;"> 11-15-13  Date </td> <td style="width: 10%; vertical-align: top;"> <input checked="" type="checkbox"/> Approved    <input type="checkbox"/> Disapproved </td> <td style="width: 10%;"></td> </tr> <tr> <td style="vertical-align: top;"> N/A  EPA </td> <td style="vertical-align: top;"> _____ </td> <td style="vertical-align: top;"> Date </td> <td style="vertical-align: top;"> <input type="checkbox"/> Approved    <input type="checkbox"/> Disapproved </td> <td></td> </tr> <tr> <td style="vertical-align: top;"> J. A. Hedges  Ecology </td> <td style="vertical-align: top;"> _____ </td> <td style="vertical-align: top;"> Date </td> <td style="vertical-align: top;"> <input type="checkbox"/> Approved    <input type="checkbox"/> Disapproved </td> <td></td> </tr> </table>			R. J. Corey DOE	 _____	11-15-13 Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved		N/A EPA	_____	Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved		J. A. Hedges Ecology	_____	Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved	
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N/A EPA	_____	Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved														
J. A. Hedges Ecology	_____	Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved														

**Description/Justification of Change (continued)**

Modifications are denoted by using ~~strikeout~~ to indicate text deletions and double underline to indicate text additions.

<b>Number</b>	<b>Milestone</b>	<b>Due Date</b>
M-015-112 Lead Agency: Ecology	Submit Draft B, 200-IS-1 Operable Unit Pipeline System Waste Sites RFI/CMS/RI/FS Work Plan to Ecology, including a schedule of completion dates for major tasks and deliverables.	<del>02/28/2014</del> <u>09/30/2014</u>

<b>Change Number</b> M-15-13-03	<b>Federal Facility Agreement and Consent Order  Change Control Form</b> Do not use blue ink. Type or print using black ink.	<b>Date</b> October 31, 2013																		
<b>Originator</b> R. J. Corey		<b>Phone</b> (509) 373-9971																		
<b>Class of Change</b> <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager																				
<b>Change Title</b> Extend the due date for TPA Interim Milestone M-015-113, "Submit Draft B, 200-SW-2 Radioactive Landfills Group RFI/CMS/RI/FS Work Plan to Ecology, including a schedule of completion dates for major tasks and deliverables."																				
<b>Description/Justification of Change</b> TPA Interim Milestone M-015-113, "Submit Draft B, 200-SW-2 Radioactive Landfills Group RFI/CMS/RI/FS Work Plan to Ecology, including a schedule of completion dates for major tasks and deliverables" requires resolution of regulator comments on Draft A into Draft B of the Work Plan. This milestone currently has a completion date of February 28, 2014.  Completion of this Work Plan is an essential component to the remedial strategy for the Central Plateau of the Hanford Site. Due to limited resources, the U. S. Department of Energy Richland Operations Office (RL) is evaluating the comprehensive sequence of work for the Central Plateau to efficiently reduce risk and address the Hanford Site priorities that have been established by the Tri-Parties. Extension of the due date for this milestone to September 30, 2014, allows the Tri-Parties to negotiate the M-015 and M-016 milestone series and determine the appropriate work scope sequence for the Central Plateau.  <i>Description/Justification of Change continued on next page.</i>																				
<b>Impact of Change</b> This change will extend the due date to incorporate regulator comments into the 200-SW-2 Radioactive Landfills Group RFI/CMS/RI/FS Work Plan, and ensure that the revision incorporates key Central Plateau-wide agreements that will establish common principles applicable to remediation decisions for all operable units.																				
<b>Affected Documents</b> The Hanford Federal Facility Agreement and Consent Order (HFFACO), as amended, and Hanford Site internal planning, management, and budget documents.																				
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**Description/Justification of Change (continued)**

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<b>Number</b>	<b>Milestone</b>	<b>Due Date</b>
M-015-113 Lead Agency: Ecology	Submit Draft B, 200-SW-2 Radioactive Landfills Group RFI/CMS/RI/FS Work Plan to Ecology, including a schedule of completion dates for major tasks and deliverables.	<del>02/28/2014</del> <u>09/30/2014</u>