



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

12-AMRP-0156

SEP 12 2012

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State of Washington
Department of Ecology
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Richland, Washington 99354

Mr. D. A. Faulk, Program Manager
Office of Environmental Cleanup
Hanford Project Office
U.S. Environmental Protection Agency
309 Bradley Boulevard, Suite 115
Richland, Washington 99352

Addressees:

NOTIFICATION THAT HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) INTERIM MILESTONE M-015-00D IS AT RISK OF NOT BEING MET

The purpose of this letter is to notify the State of Washington Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) that Tri-Party Agreement Interim Milestone M-015-00D, which requires completion of the RI/FS process through the submittal of a Draft A RI/FS and Proposed Plan for all 100 and 300 Area Operable Units by December 31, 2012, is at risk of not being met and to submit a draft Tri-Party Agreement Change Control Form to modify Interim Milestone M-015-00D to remove the 100-BC and 100-N Operable Units from the scope of this milestone. The Change Control Form includes six proposed new interim milestones for completion of the RI/FS process for 100-BC and 100-N Operable Units.

U.S. Department of Energy Richland Operations Office (RL) proposes the Tri-Party Agreement M-015 Interim Milestone for River Corridor RI/FS documentation be modified to facilitate: (1) analysis of RI data for the 100-BC-5 Operable Unit indicates that additional groundwater monitoring data is necessary before a remedy can be selected to evaluate the impact of recent interim actions for source removal in the area; and (2) the delay of the 100-N RI/FS and Proposed Plan by several months to enable the Tri-Party agencies to focus on finalizing the 300 Area and 200-UP Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) decisions as well as limiting the number of CERCLA Proposed Plans out for public review at one time.

Addressees
12-AMRP-0156

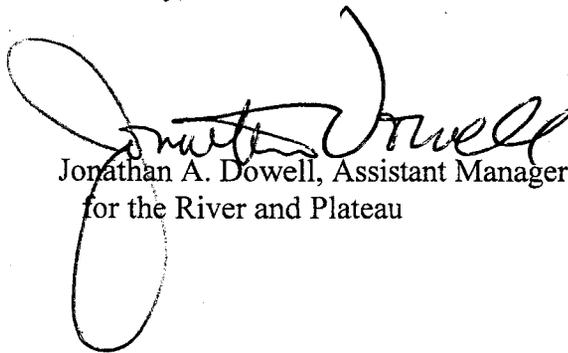
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Attached is a Draft Change Control Form M-15-12-03 to modify the scope of Tri-Party Agreement Interim Milestone M-015-00D to exclude the 100-BC and 100-N Operable Units. Six new interim milestones are proposed to provide additional groundwater monitoring at 100-BC, as well as extending the date to submit Draft A of the 100-N RI/FS.

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

Sincerely,



Jonathan A. Dowell, Assistant Manager
for the River and Plateau

AMRP:MWC

Attachment

cc w/attach:

G. Bohnee, NPT
R. Buck, Wanapum
C. E. Cameron, EPA
L. M. Dittmer, CHPRC
D. E. Dooley, CHPRC
R. H. Engelmann, CHPRC
S. Harris, CTUIR
R. Jim, YN
R. A. Kaldor, MSA
S. L. Leckband, HAB
N. M. Menard, Ecology
K. Niles, ODOE
T. W. Noland, MSA
R. E. Piippo, MSA
D. Rowland, YN
D. G. Singleton, Ecology
Administrative Record
Environmental Portal

D R A F T

Change Number M-15-12-03	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date September 12, 2012
Originator B. L. Charboneau (U.S. Department of Energy, Richland Operations Office)		Phone (509) 373-6137
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Add six new interim milestones and delete two target dates for River Corridor Decision Documents, and revise Interim Milestone M-015-00D		
Description/Justification of Change Milestone M-015-00D requires completion of the Remedial Investigation (RI) and Feasibility Study (FS) process through the submittal of a Proposed Plan (PP) for all 100 and 300 Area operable units (OUs) by December 31, 2012. Based on analysis of RI data, the U.S. Department of Energy Richland Operations Office (RL) and the U.S. Environmental Protection Agency (EPA) have agreed that 2-3 years of additional groundwater monitoring data is necessary in the 100-BC-5 Operable Unit to evaluate the impact of recent interim remedial actions for source removal before a remedy can be selected. As a result, a new milestone for submittal of the Draft A 100-BC-1/2/5 RI/FS and PP will be established. <i>Continued on page 2</i>		
Impact of Change This change revises the scope of the current M-015-00D Milestone to exclude the 100-N and 100-BC documents. The remaining work to be completed for this milestone includes submittal of RI/FS and PP for the 100-D/H and 100-F/IU source and groundwater OUs by December 2012. This change also inserts new interim milestones for the RI/FS and PP for the 100-BC and 100-N integrated source and groundwater OUs.		
Affected Documents The Hanford Federal Facility Agreement and Consent Order (HFFACO), as amended, and Hanford Site internal planning management, and budget documents.		
Approvals _____ Date _____ Approved _____ Disapproved DOE _____ Date _____ Approved _____ Disapproved EPA _____ Date _____ Approved _____ Disapproved Ecology		

D R A F T

Change Control Form M-15-12-03

Description/Justification of Change (continued)

The 100-N RI/FS and PP are being delayed several months to enable the Tri-Party agencies to focus on finalizing the 300 Area and 200-UP CERCLA decisions as well as limiting the number of RI/FS Proposed Plans out for public review at one time.

This change establishes six new interim milestones. Four new interim milestones are proposed to revise the 100-BC Work Plan and Sampling and Analysis Plan(s) (SAPs) and to install and complete additional groundwater monitoring. Two are proposed for submitting Draft A RI/FS and PP documents for the 100-NR-1/2 integrated source and groundwater OUs and the 100-BC-1/2/5 integrated source and groundwater OUs. The existing Milestone M-015-00D is revised to exclude the 100-BC and 100-N RI/FS documents.

With the addition of these interim milestones and the revision of M-015-00D, the Tri-Party Agreement Target dates for submitting the Draft A RI/FS and PP documents for 100-BC and 100-N are deleted.

Modifications are denoted by the use of ~~strikeout~~ to indicate text being deleted and double underline to indicate text being added.

M-015-68-T01	Submit CERCLA RI/FS Report & Proposed Plan for the 100-BC-1, 100-BC-2 and 100-BC-5 Operable Units for groundwater and soil.	11/30/2011
M-015-62-T01	Submit a Feasibility Study Report and Proposed Plan for the 100-NR-1 and 100-NR-2 Operable Units including groundwater and soil. The FS report and Proposed Plan will evaluate the permeable reactive barrier technology and other alternatives and will identify a preferred alternative in accordance with CERCLA requirements.	09/17/2012
M-015-00D <u>Lead Agency:</u> <u>Dual Lead</u> <u>Ecology and</u> <u>EPA</u>	DOE shall complete the RI/FS process through the submittal of a <u>Draft A RI/FS Report and Proposed Plan</u> for all 100 and 300 Area operable units <u>except 100-BC and 100-N.</u>	12/31/2012
M-015-74 <u>Lead Agency:</u> <u>EPA</u>	<u>Revise the 100-BC Work Plan and SAP(s) to include enhanced groundwater well monitoring. These revisions are anticipated to be accomplished through submittal of TPA Change Notices to revise the documents.</u> <u>The completion of milestones M-015-76, M-015-77, M-015-78 and M-015-79 are predicated upon completion of this milestone. A delay in the approval of the Work Plan and SAP change notices after 30 days of submittal revisions will result in a day-for-day slip for the completion of milestones M-015-76, M-015-77, M-015-78 and M-015-79.</u>	<u>01/31/2013</u>

DRAFT

Change Control Form M-15-12-03

<u>M-015-75</u> <u>Lead Agency:</u> <u>Ecology</u>	<u>Submit Draft A CERCLA Remedial Investigation/Feasibility Study Report and Proposed Plan for the 100-NR-1 source operable unit and the 100-NR-2 groundwater operable unit.</u>	<u>06/30/2013</u>
<u>M-015-76</u> <u>Lead Agency:</u> <u>EPA</u>	<u>Install additional well monitoring network as specified in revised 100-BC Work Plan and SAP(s).</u>	<u>09/30/2013</u>
<u>M-015-77</u> <u>Lead Agency:</u> <u>EPA</u>	<u>Install additional aquifer tube network as specified in revised 100-BC Work Plan and SAP(s).</u>	<u>11/30/2013</u>
<u>M-015-78</u> <u>Lead Agency:</u> <u>EPA</u>	<u>Complete two full years of groundwater sampling at the 100-BC expanded monitoring network. Two full years means two cycles of high river monitoring and two cycles of low river monitoring.</u>	<u>11/30/2015</u>
<u>M-015-79</u> <u>Lead Agency:</u> <u>EPA</u>	<u>Submit Draft A CERCLA Remedial Investigation/Feasibility Study Report and Proposed Plan for the 100-BC-1 and 100-BC-2 source operable units and the 100-BC-5 groundwater operable unit.</u>	<u>12/15/2016</u>