



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

12-AMRP-0163

SEP 14 2012

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

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

Addressees:

**NOTICE OF PROPOSED CHANGES TO TRI-PARTY AGREEMENT MILESTONES
M-16-00A, M-16-55, AND M-16-145 (107-DAY NOTICE)**

Tri-Party Agreement Milestones M-16-00A, M-16-55, and M-16-145 call for completion of interim response actions at the 100 Area (all 100 Area, 100-N, and 100-K, respectively) by December 31, 2012. Due to unexpected contamination encountered at waste sites at 100-C, 100-D, and 100-K; and interfering sites at 100-N these milestones will not be completed in support of the December 31, 2012 milestone date. These milestones have been the subject of the recent Tri-Party Agreement milestone renegotiations, and consistent with those negotiations, the U.S. Department of Energy Richland Operations Office (RL) is submitting the attached signed change request as prescribed in the Tri-Party Agreement Articles VIII.F and XVI.I.

If you have questions, please contact me or your staff may contact Mark French, Federal Project Director for the River Corridor Closure Project at (509) 373-9863.

Sincerely,

A handwritten signature in black ink that reads "Jonathan A. Dowell".

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

AMRP:JPN

Attachment

cc w/attach: See Page 2

Addressees
12-AMRP-0163

-2-

SEP 14 2012

cc w/attach:

G. Bohnee, NPT

L. C. Buelow, EPA

S. Harris, CTUIR

R. Jim, YN

C. A. Johnson, WCH

R. A. Kaldor, MSA

S. L. Leckband, HAB

N. M. Menard, Ecology

K. Niles, ODOE

T. W. Noland, MSA

R. E. Piippo, MSA

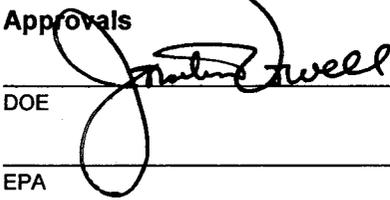
D. A. Plung, WCH

J. B. Price, Ecology

D. M. Yasek, WCH

Administrative Record, H6-08

Environmental Portal, A3-01

Change Number M-16-12-01	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date August 1, 2012
Originator M. S. French (U. S. Department of Energy, Richland Operations Office [DOE])		Phone (509) 373-9863
Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Modifications to Milestones M-16-00A, M-16-55, and M-016-145; and creation of new TPA Milestones.		
Description/Justification of Change <p>The M-16-00A milestone was created to address interim remedial actions for the 100 Area. More than 300 waste sites have been remediated under the 100 Area interim action Records of Decisions. This waste site cleanup has resulted in reducing risk of contamination spreading to the groundwater and Columbia River. In parallel with the interim response actions, the Department of Energy is working with the regulatory agencies to conduct remedial investigations and feasibility studies to develop final Records of Decision for the 100 Area (TPA M-15-00D).</p> <p>The purpose of this change request is to modify the M-16-00A, M-16-55, and M-016-145 TPA Milestones to allow for expanded remediation scope, to integrate overlapping workscope, and to establish completion milestones for each of the 100 Area Operational Unit areas: 100 B/C, 100 K (ex-perimeter fence), 100 N, 100 D/H, and 100 F/IU. A total of 250 waste sites have been added to the 100 Area interim action Records of Decision since 2004. To date, remediation of 96 of these sites has been performed. Of the remaining 154 sites, 17 of the sites are candidate sites and the remaining 137 are determined to require waste site remediation.</p> <p>Description/Justification of Change continued on next page.</p>		
Impact of Change Change results in modifications to the M-016-00A, M-016-55, and M-016-145; and creates new interim TPA milestones for continued waste site remediation of the 100 Area. Impact of Change continued on page 3		
Affected Documents <i>Hanford Federal Facility Agreement and Consent Order, Appendix D;</i> <i>Remedial Design Report/Remedial Action Work Plan for the 100 Area, DOE/RL-1996-17, Rev 6;</i> <i>Remedial Design Report/Remedial Action Work Plan for 100-N Area; DOE/RL-2005-93, Rev 0;</i> <i>100-N Ancillary Facilities Removal Action Work Plan, DOE/RL-2002-70, Rev 3.</i>		
Approvals  DOE _____ <u>9.14.12</u> <input checked="" type="checkbox"/> Approved _____ Disapproved _____ Date EPA _____ _____ Approved _____ Disapproved _____ Date Ecology _____ _____ Approved _____ Disapproved _____ Date		Page 1 of 5

Description/Justification of Change (continued):

M-016-00A completion date is being modified to address all response actions required for the 100 Areas, excluding those sites addressed under M-016-00C inside the 100 K area perimeter fence as well as those actions which may be determined necessary to remediate ground water pending Record of Decision for each 100 area. Additionally completion milestones are being established for each reactor area.

100-B/C:

- The 100-C-7 waste site completion date is being extended by 15-month to allow for the additional remediation of the waste site.

100-D/100-H:

- The change postpones waste site revegetation to allow backfilled areas to be used to support staging of material from remaining waste site remediation,
- Extends 100-D-30 completion to March 31, 2016 to allow for additional remediation of the waste site.
- Establishes a March 2015 milestone for completing the remediation of 25 waste sites not previously addressed in a Tri-Party Agreement Milestone.
- Establishes a March 2016 area completion milestone for the 100-D and 100-H Areas, which includes remediation of an additional 28 waste sites not previously addressed in a Tri-Party Agreement Milestone.

100-K ex-perimeter:

- M-16-145 milestone completion date is extended 15 months completing 13 sites in the 100 K area external to the perimeter fence. This change extends 118-K-1 to address deep tritium contamination encountered beneath the burial ground, to allow for the addition of 7 sites not previously addressed under a milestone, and to enable consolidation of backfill and revegetation campaigns for remediated waste sites. Sampling of 100-K-111 will be also be completed.
- A decision on 100-K-111 candidate waste site will be made after it is sampled and site closure will be completed under milestone M-016-00A.

100-IU:

- Establishes 2 new milestones for 45 waste sites added via Explanation of Significant Difference (ESD) and Fact Sheets not previously addressed in a Tri-Party Agreement Milestone including 13 candidate sites.

100-N:

- Extend M-16-55 three month to complete 31 waste sites as well as completion of all facility demolition activities addressed under the 100-N Area Ancillary Facilities Action Memorandum.
- Establishes a milestone for start of in-situ bioremediation for UPR-100-N-17. Milestone completion for in-situ bioremediation is defined as operation of a system for treatment of the contaminants in the vadose zone.
- Establishes a March 2015 milestone for completing waste site remediation excluding backfill and site revegetation for 58 waste sites. Backfill and revegetation will be performed within the scope of the area completion milestone.

Description/Justification of Change (continued):

100-N: (continued)

- Establishes a March 31, 2017 milestone for completing the remaining 100-N Area remedial actions, which includes remediation of 35 waste sites listed in the 100-NR-1 and 100-NR-2 interim action Record of Decision and the 2011 ESD . Also included is closure of the 100-N Ancillary Facility Area of Contamination that was established in *Removal Action Work Plan for 100-N Area Ancillary Facilities (DOE/RL-2002-70)*.

The following waste sites are not included :

- The waste sites UPR-100-N-42, 100-N-85, and the 1716-N Gas Station Fuel Tanks, will be added to the milestone scope after a closure decision is established.
- Waste site 100-N-35 located inside the Bonneville Power Administration (BPA) Hanford Substation which remains active providing necessary infrastructure to the Hanford Site and the State of Washington. The site will be addressed in the 100-N area final action record of decision.
- UPR-100-N-35, 100-N Fuel Basin Drain Leak, due to the proximity of this site to the 105-N Safe Storage Enclosure it is not possible to complete waste site remediation and verification sampling of this site. Therefore, closure of this waste site will be performed with removal of the 105-N Reactor.

Authorized Changes:

Hanford Federal Facility Agreement and Consent Order Interim Milestone is modified or created as shown below using ~~strikeout~~ to indicate text deletions and underlined to indicate text additions:

Milestone	Description	Completion Date
M-016-00A	Complete all interim response actions for the 100 Area units (except groundwater actions which are covered under Major Milestone M-016-00), with the exception of the 100 K Area, by the specified due date as approved in a Remedial Design/Remedial Action Work Plan. Completion of interim response actions is defined as the completion of the interim ROD or action memorandum requirements in accordance with an approved RD/RA work plan or removal action work plan and obtain EPA and/or Ecology approval of the appropriate project closeout documents.	December 31, 2012 <u>March 31, 2017</u>
<u>M-016-146</u>	<u>Complete 100-B/C Area response actions at the 100-C-7 waste site</u>	<u>March 31, 2014</u>

Authorized Changes: (continued)

M-016-145	<p>Complete the interim response actions for 100-K Area facilities and waste sites not included as Phase 1, Phase 2, or Phase 3 work. <u>Complete 100-K Area response actions for the following sites: 100-K-2; 128-K-2; 100-K-78; 600-29; 100-K-84; 100-K-86, 100-K-89; 100-K-92; 100-K-87; 100-K-91; 100-K-93; 100-K-95, and 118-K-1.</u> <u>Complete confirmatory sampling of the 100-K111 candidate site.</u></p> <p>These are the facilities and waste sites which are outside the 100-K perimeter boundary. Phase 1, Phase 2, and Phase 3 facilities and waste sites are defined in the 100-K Area RD/RL Work Plans <u>and addressed by M-016-00C.</u></p>	<p><u>December 31, 2012</u> <u>March 31, 2014</u></p>
<u>M-016-148</u>	<p><u>Complete response actions for the following 100-IU-2/6 waste sites: 600-306, 600-307, 600-308, 600-311, 600-312, 600-314, 600-324, 600-325</u></p>	<u>March 31, 2013</u>
<u>M-016-149</u>	<p><u>Complete 100-IU-2/6 response actions for the following waste sites: 600-293, 600-294, 600-298, 600-299, 600-300, 600-301, 600-303, 600-305, 600-309, 600-310, 600-313, 600-316, 600-318, 600-319, 600-320, 600-321, 600-328, 600-329, 600-331, 600-332, 600-334, 600-326, 600-349</u> <u>Complete confirmatory sampling of the following candidate sites: 600-358, 600-368, 600-369, 600-370, 600-371, 600-372, 600-373, 600-374, 600-375, 600-376, 600-377, 600-378, 600-379, 600-385.</u></p>	<u>March 31, 2015</u>
<u>M-016-158</u>	<p><u>Complete response actions for the following 100-D and 100-H Area waste sites: 100-D-8, 118-D-2, 118-D-3, 116-H-5, 126-H-2, 128-H-1, 132-H-3 (Revegetation of 118-D-2, 118-D-3, and 132-H-3 will be deferred to M-16-161 to support the remaining waste site remediation activities.)</u></p>	<u>March 31, 2013</u>
<u>M-016-159</u>	<p><u>Complete response actions for the following 100-D and 100-H Area waste sites: 100-D-14, 100-D-56, 100-D-62, 100-D-63, 100-D-65, 100-D-66, 100-D-71, 100-D-73, 100-D-75:2, 100-D-76, 100-D-78, 100-D-80, 100-D-81, 100-D-96, 100-D-101, 100-D-102, 116-DR-3, 118-D6:4, 1607-D1, 1607-D2, 100-H-37, 100-H-43, 100-H-48, 100-H-52, 100-H-57.</u></p>	<u>March 31, 2015</u>
<u>M-016-161</u>	<p><u>Complete 100-D and 100-H Area response actions for the following waste sites: 100-D-30, 100-D-31, 100-D-50 (except 100-D-50:2), 100-D-69, 100-D-72, 100-D-77, 100-D-83, 100-D-84, 100-D-85, 100-D-86, 100-D-97, 100-D-98:2, 100-D-99, 100-D-100, 100-D-103, 100-D-104, 100-D-106, 100-H-28, 100-H-38, 100-H-42, 100-H-44, 100-H-46, 100-H-49, 100-H-51, 100-H-53, 100-H-59. Including revegetation of 118-D-2, 118-D-3, and 132-H-3.</u> <u>Complete confirmatory sampling of the following candidate sites: 100-D-105, 100-H-56.</u></p>	<u>March 31, 2016</u>

Authorized Changes: (continued)

M-016-55	<p><u>Complete the interim response actions for the 100-N Area— Complete response actions of the following 30 waste sites: 100-N-1, 100-N-3, 100-N-4, 100-N-5, 100-N-12, 100-N-13, 100-N-14, 100-N-17, 100-N-18, 100-N-19, 100-N-33, 100-N-34, 100-N-39, 100-N-45, 100-N-46, 100-N-47, 100-N-50, 100-N-51A, 100-N-51B, 116-N-1, 116-N-3, 120-N-1, 120-N-2, 124-N-4, 600-32, 600-35, UPR-100-N-11, UPR-100-N-37, UPR-100-N-40, UPR-100-N-41.</u></p> <p><u>Complete 100-N Area Ancillary Facility removal actions for the following facilities: 13-N, 105-NA, 116-N, 117-N, 117-NVH, 119-N, 119-NA, 163-N, 181-N, 181-NA, 181-NB, 181-NE, 184-N, 184-NA, 184-NB, 184-NF, 185-N, 1300-N, 1304-N, 1310-N, 1312-N, 1313-N, 1314-N, 1315-N, 1316-N, 1316-NA, 1316-NB, 1316-NC, 1322-N, 1322-NA, 1322-NB, 1322-NC, 1327-N, 1605-NE, 1701-NE, 1703-N, 1712-N, 1714-NB, 1716-NE, 1722-N, 1802-N, 105-N & 107-N Pipe Trench 105-NE, 107-N, 108-N, 166-N, 182-N, 1303-N, 1715-N, 1900-N, 1908-N, and 1908-NE</u></p>	<p><u>December 31, 2012</u> <u>March 31, 2013</u></p>
<u>M-016-162</u>	<u>Initiate operations of in-situ bioremediation systems for UPR-100-N-17, as defined in the system plan approved by RL and Ecology.</u>	<u>December 31, 2012</u>
<u>M-016-163</u>	<p><u>Complete response actions (excluding backfill and revegetation) for the following 58 100-N Area waste sites: 100-N-6, 100-N-16, 100-N-22, 100-N-23, 100-N-24, 100-N-25, 100-N-26, 100-N-29, 100-N-30, 100-N-31, 100-N-32, 100-N-36, 100-N-37, 100-N-38, 100-N-57, 100-N-59, 100-N-60, 100-N-61, 100-N-63, 100-N-64, 116-N-2, 116-N-4, 118-N-1, 120-N-3, 120-N-7, 124-N-1, 124-N-2, 124-N-3, 124-N-9, 128-N-1, 1908-N, 1908-NE, UPR-100-N-1, UPR-100-N-2, UPR-100-N-3, UPR-100-N-4, UPR-100-N-5, UPR-100-N-6, UPR-100-N-7, UPR-100-N-8, UPR-100-N-9, UPR-100-N-10, UPR-100-N-12, UPR-100-N-13, UPR-100-N-14, UPR-100-N-19, UPR-100-N-21, UPR-100-N-22, UPR-100-N-23, UPR-100-N-25, UPR-100-N-26, UPR-100-N-29, UPR-100-N-30, UPR-100-N-31, UPR-100-N-32, UPR-100-N-36, UPR-100-N-39, UPR-100-N-43</u></p> <p><u>Initiate operations of in-situ bioremediation systems for UPR-100-N-42, as defined in the system plan approved by RL and Ecology.</u></p>	<u>March 31, 2015</u>
<u>M-016-164</u>	<p><u>Complete 100-N response actions by performing remediation of the following waste sites: 100-N-28, 100-N-53, 100-N-54, 100-N-55, 100-N-62, 100-N-68, 100-N-81, 100-N-82, 100-N-83, 100-N-84, 100-N-86, 100-N-87, 100-N-88, 100-N-89, 100-N-90, 100-N-91, 100-N-92, 100-N-93, 100-N-94, 100-N-95, 100-N-96, 100-N-97, 100-N-98, 100-N-99, 100-N-100, 100-N-101, 100-N-102, 100-N-103, 120-N-4, 130-N-1, 600-340, 628-2, UPR-100-N-18, UPR-100-N-20, UPR-100-N-24, backfill/revegetation of M-016-163 sites, and close out of the 100-N Ancillary Facilities AOC.</u></p>	<u>March 31, 2017</u>