

0076897



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

08-AMCP-0154

APR 16 2008

Mr. N. Ceto, Program Manager
Office of Environmental Cleanup
Hanford Project Office
U.S. Environmental Protection Agency
309 Bradley Blvd., Suite 115
Richland, Washington 99352

RECEIVED
APR 23 2008
EDMC

Dear Mr. Ceto:

TRI-PARTY AGREEMENT CHANGE REQUEST M-15-08-05, MODIFY THE SCOPE OF INTERIM MILESTONE M-15-49B, FROM A FEASIBILITY STUDY AND A PROPOSED PLAN, TO ENGINEERING EVALUATION/COST ANALYSIS (EE/CA) FOR THE 200-MG-2 OPERABLE UNIT

The purpose of this letter is to submit Tri-Party Agreement Change Request M-15-08-05, Modify the Scope of Interim Milestone M-15-49B, from a Feasibility Study and a Proposed Plan, to an EE/CA for the 200-MG-2 Operable Unit, for your approval.

During the January 14, 2008, regulator briefing meeting, the U.S. Environmental Protection Agency (EPA) stated that it believed that there is insufficient characterization data for the 200-MG-1 and 200-MG-2 Waste Sites, and that adequate risk characterization would be required prior to issuing a final Record of Decision. EPA stated that a preferred regulatory decision document pathway was a non time-critical removal action using an Engineering Evaluation/Cost Analysis (EE/CA) and an Action Memorandum (AM) instead of the planned Feasibility Study, Proposed Plan, and Record of Decision.

A follow-up meeting between EPA, State of Washington Department of Ecology, and U.S. Department of Energy, Richland Operations Office was held on January 24, 2008. That meeting resulted in a new regulatory decision document pathway for the 200-MG-2 Operable Unit that requires rewording of Tri-Party Agreement Milestone M-15-49B. The milestone is proposed to be revised to state that an EE/CA and an AM will be submitted in lieu of the planned Feasibility Study and Proposed Plan. The current M-15-49B Milestone date is not changed. The AM will provide a proposed schedule and target milestones.

Mr. N. Ceto
08-AMCP-0154

-2-

APR 16 2008

If you have any questions, please contact me, or your staff may contact Matt McCormick, Assistant Manager for the Central Plateau, on (509) 373-9971.

Sincerely,

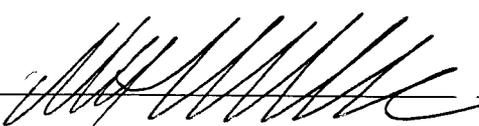

David A. Brockman
Manager

AMCP:FMR

Attachment

cc w/attach:

G. Bohnee, NPT
L. Buck, Wanapum
C. E. Cameron, EPA
R. H. Engelmann, EFSH
B. H. Ford, FHI
S. Harris, CTUIR
R. Jim, YN
S. L. Leckband, HAB
K. Niles, ODOE
R. E. Piippo, FHI
J. G. Vance, FFS
Administrative Record
Environmental Portal

Change Number M-15-08-05	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date April 16, 2008
Originator Briant Charboneau		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 Modify the scope of interim milestone M-15-49B, from a Feasibility Study and a Proposed Plan, to Engineering Evaluation/Cost Analysis (EE/CA) for the 200-MG-2 Operable Unit (OU).		
Description/Justification of Change Approval of this change request will modify the scope of the Hanford Federal Facility Agreement and Consent Order (HFFACO) interim milestone and establish a new target date. This change is being made to expedite cleanup of the 200-MG-2 OU. This change request will redefine HFFACO interim milestone M-15-49B, changing the commitment to submit a Feasibility Study and Proposed Plan for 200-MG-2 OU to submittal of an EE/CA for the 200-MG-2 OU. Completion of the EE/CA will satisfy the requirements of the M-015-00C Milestone for the 200-MG-2 OU. Description/Justification continued on next page.		
Impact of Change The revised regulatory approach for 200-MG-2 is expected to expedite field cleanup activities of the 200-MG-2 OU waste sites.		
Affected Documents The <u>Hanford Federal Facility Agreement and Consent Order</u> , as amended and Hanford Site internal planning management, and budget documents (e.g., USDOE contractor Baseline Change Control documents).		
Approvals DOE  <u>4/16/08</u> <input checked="" type="checkbox"/> Approved _____ Disapproved _____ Date		Page 1 of 2
EPA _____ Date _____ Approved _____ Disapproved _____		

Description/Justification (continued)

The HFFACO interim milestone dates for submittal of the EE/CA will remain the same as those previously established for milestone M-15-49B.

Approval of this change request will add a HFFACO target date as follows:

- M-015-49B-T01. A draft Action Memorandum will be submitted, along with a proposed set of M-016 series of interim milestones, within 30 days of the completion of the public comment period on the EE/CA. This will establish specific schedules, adjusted to site priorities, to complete the remediation field work by 2024. The proposed set of M-016 milestones will include a process to re-evaluate priorities annually.

(Modifications to the existing Tri-Party Agreement Milestone is denoted with ~~strikeout~~; new milestone/text is denoted with shading)

<u>Number</u>	<u>Milestone</u>	<u>Due Date</u>
M-015-49B	SUBMIT A FEASIBILITY STUDY REPORT AND A PROPOSED PLAN AN ENGINEERING EVALUATION/COST ANALYSIS FOR THE 200-MG-2 OU, WHICH INCLUDES MODEL GROUP 1 WASTE SITES, TO EPA (SEE APPENDIX C CHANGE REQUEST C-06-02).	12/31/2008
M-015-49B-T01	A DRAFT ACTION MEMORANDUM FOR THE 200-MG-2 OU WILL BE SUBMITTED WITH A PROPOSED SET OF M-016 SERIES OF INTERIM MILESTONES TO ESTABLISH SPECIFIC SCHEDULES, ADJUSTED TO SITE PRIORITIES, TO COMPLETE THE REMEDIATION FIELD WORK BY 2024. THE PROPOSED SET OF M-016 MILESTONES WILL INCLUDE A PROCESS TO RE-EVALUATE PRIORITIES ANNUALLY.	TBD (WITHIN 30 DAYS OF COMPLETION OF THE EE/CA PUBLIC COMMENT PERIOD)