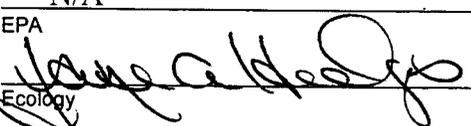
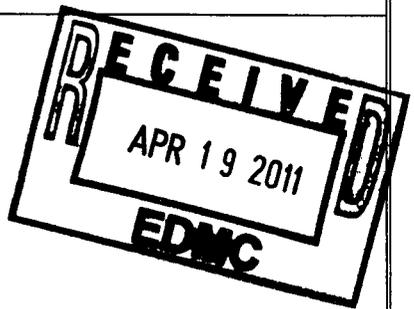


Change Number M-45-11-04	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date April 14, 2011
Originator Thomas W. Fletcher, DOE-ORP		Phone (509) 376-3434
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Modification of Hanford Federal Facility Agreement and Consent Order (HFFACO) Milestone M-45-15		
Description/Justification of Change <u>Background</u> For Single-Shell Tank (SST) S-102, HFFACO Milestone M-45-15 requires that by June 30, 2011: retrieval has been completed; remaining wastes have been adequately characterized and a risk assessment addressing residual waste in the tank has been completed; a Component Closure Plan for the tank has been submitted by DOE; and, if appropriate, DOE has requested an exception to waste retrieval criteria pursuant to Agreement Appendix H. Continued on page 2		
Impact of Change This change modifies milestone M-045-15 by replacing tank 241-S-102 with tank 241-A-103 and changing the retrieval completion date for milestone M-045-15 from 6/30/11 to 9/30/22. This change also moves the governance of the retrieval of Tank 241-S-102 under milestone M-062-40 (to be retrieved with the balance of S-Farm) and the determination of the closure of tank 241-S-102 under milestone M-045-85. Further, closure of tank 241-A-103 will be determined in accordance with milestone M-045-84.		
Affected Documents The HFFACO as amended and Hanford Site internal planning, management, and budget documents (e.g., River Protection Project System Plan, Baseline Control documents, and related work authorizations and directives).		
Approvals		
DOE 	Date <u>4/14/11</u>	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
N/A	Date _____	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved
EPA Ecology 	Date <u>4/19/11</u>	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved



Description/Justification of Change (continued)

On July 26, 2007 retrieval operations at S-102 were suspended when an aboveground waste spill occurred. Retrieval is estimated to be approximately 79% complete with approximately 433,000 gallons of total waste removed. At this time, there is no well understood technology capable of retrieving the S-102 heel because of the rheology of the waste. Therefore, it is technically imprudent to attempt retrieval of S-102, at this time.

Relative to the requirement to submit an updated Component Closure Plan, in a letter dated August 15, 2006, Ecology stated that submittal of Component Closure Activity Plans, for retrieved tanks, should continue to be suspended until June 30, 2009, or within 120 days after the Tank Closure and Waste Management Environmental Impact Statement (TC&WM EIS) Record of Decision is issued, whichever is earlier. In a letter dated November 12, 2009, Ecology extended its suspension until 180 days after the issuance of the final TC&WM EIS. It is anticipated that the final TC&WM EIS will not be issued until the winter of 2011 – 2012. Submittal of the updated Component Closure Plan could not occur, then, until several months after the M-45-15 milestone is due.

On October 21, 2010, ORP received a letter from Ecology notifying ORP of Ecology's decision to require ORP to Interim Stabilize tank 241-S-102 within 18 months of receipt of its notification. On December 9, 2010, ORP transmitted the required documentation to Ecology to demonstrate that tank 241-S-102 meets the requirements for interim stabilization, as set forth in Case Number CT-99-5076, Third Amendment via letter 10-TPD-163.

Basis for the Modification

Without the capability currently available to retrieve the heel-waste from tank 241-S-102, the June 30, 2011, milestone for retrieval of the waste from tank 241-S-102 cannot be met. With anticipated issuance of the TC &WM EIS in the winter of 2011 – 2012, that portion of milestone M-045-15 requiring submittal of a Component Closure Plan for SST 241-S-102 by June 30, 2011, cannot be met.

Replacing 241-S-102 with 241-A-103 would then complete the retrieval of waste from a second SST Farm (A-Farm); allowing A-Farm to be closed, supporting milestone M-045-84 or M-045-85, as appropriate.

Specific changes to Tri-Party Agreement Appendix D are displayed with double underline to indicate addition of text and by ~~strikeout~~ to indicate deletion of text.

<p>M-045-15</p>	<p>INTERIM COMPLETION OF TANK S-102 <u>A-103</u> SST WASTE RETRIEVAL AND- CLOSURE DEMONSTRATION PROJECT.</p> <p>THE S-102 <u>A-103</u> SST WASTE RETRIEVAL AND CLOSURE DEMONSTRATION PROJECT WILL BE CONSIDERED INTERIM COMPLETE WHEN THE FOLLOWING CRITERIA HAVE BEEN MET:</p> <p>1. FULL SCALE WASTE RETRIEVAL HAS BEEN COMPLETED IN ACCORDANCE WITH APPLICABLE REGULATORY REQUIREMENTS INCLUDING WASHINGTON'S HAZARDOUS WASTE MANAGEMENT ACT, REQUIREMENTS SET BY THIS AGREEMENT, AND THE APPROVED 5-102 INITIAL WASTE RETRIEVAL FUNCTIONS AND REQUIREMENTS DOCUMENT <u>A-103 TANK WASTE RETRIEVAL WORK PLAN</u>. (DOE WILL SUBMIT A RETRIEVAL DATA REPORT PURSUANT TO AGREEMENT APPENDIX I). NOTE: THIS CRITERION AND DUE DATE DOES NOT MODIFY MILESTONE M-045-05A.</p> <p>2. REMAINING WASTES HAVE BEEN ADEQUATELY CHARACTERIZED, AND A RISK ASSESSMENT HAS BEEN COMPLETED FOR RESIDUALS THAT REMAIN IN THE TANK.</p> <p>3. AN UPDATE TO THE S-102 COMPONENT CLOSURE ACTIVITY PLAN HAS BEEN SUBMITTED BY DOE.</p> <p>4. IF APPROPRIATE, DOE WILL SUBMIT PER AGREEMENT APPENDIX I, HAS REQUESTED <u>A REQUEST FOR AN EXCEPTION TO</u> WASTE RETRIEVAL CRITERIA PURSUANT TO AGREEMENT APPENDIX H.</p>	<p>06/30/2011 <u>9/30/2022</u></p>
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