



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950
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December 3, 2013

13-NWP-126

Mr. Ray J. Corey
Assistant Manager for the River and Plateau
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: A5-14
Richland, Washington 99352

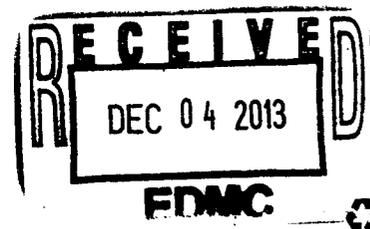
Re: Department of Ecology Disapproval of Request for Extension of Due Date for *Hanford Federal Facility Agreement and Consent Order* (Tri-Party Agreement) Interim Milestones M-015-112 and M-015-113

Dear Mr. Corey:

On November 15, 2013, the United States Department of Energy – Richland Operations Office (RL) submitted two Federal Facility Agreement and Consent Order Change Control Forms. RL requested approval to extend the completion dates for Tri-Party Agreement Milestones M-015-112 and M-015-113 by seven months.

The Department of Ecology is disapproving the milestone extensions because the requests do not provide good cause for the extensions and the length of the extensions sought, as described below:

- The “Description/Justification of Change” Section states that RL is looking at the comprehensive sequence of work for the Central Plateau, implying that most or all of the milestones associated with the 200 Area work scope are at risk for not being met. RL needs to submit change notices for all 200 Area milestones in the M-015 and M-016 milestone series that are at risk of not being met.
- The “Description/Justification of Change” Section states that RL “is evaluating the comprehensive sequence of work,” but does not state when RL will finish its evaluation.
- The “Description/Justification of Change” states that RL desires to “negotiate the M-015 and M-016 milestone series,” but does not state when RL proposes to start negotiations.
- The “Description/Justification of Change” does not state how negotiation of the M-015 and M-016 milestone series is tied to an extension to September 30, 2014, for the two work plans included in these change requests.



Mr. Ray J. Corey
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The signed change control forms disapproving the extended due dates are enclosed.

If you have any questions, please contact John Price, Tri-Party Agreement Section Manager, at John.Price@ecy.wa.gov or (509) 372-7921.

Sincerely,

Jane A. Hedges by EK Skinnarland

Jane A. Hedges
Program Manager
Nuclear Waste Program

Enclosure

cc electronic w/enc:

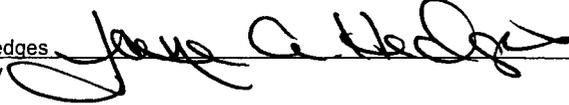
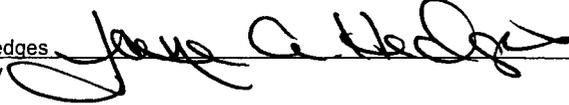
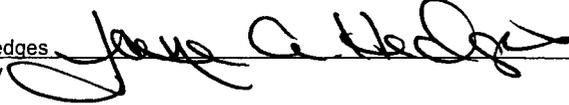
Dennis Faulk, EPA
Emerald Laija, EPA
Briant Charboneau, USDOE
Phil Burke, CHPRC
Lorna Dittmer, CHPRC
Marty Doornbos, CHPRC
Dale McKenney, CHPRC
Bob Popielarczyk, CHPRC
Reed Kaldor, MSA
Terry Noland, MSA
Rob Piippo, MSA
Ken Niles, ODOE
John Price, Ecology
USDOE-RL Correspondence Control

cc w/enc:

Steve Hudson, HAB
Administrative Record: 200-SW, 200-IS1, M-015
Environmental Portal

cc w/o enc:

Stuart Harris, CTUIR
Gabriel Bohnee, NPT
Rex Buck, Wanapum
Russell Jim, YN
David Rowland, YN

Change Number M-15-13-02	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date October 31, 2013									
Originator R. J. Corey		Phone (509) 373-9971									
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager											
Change Title 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."											
Description/Justification of Change 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>											
Impact of Change 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.											
Affected Documents The Hanford Federal Facility Agreement and Consent Order (HFFACO), as amended, and Hanford Site internal planning, management, and budget documents.											
Approvals <table border="0" style="width: 100%;"> <tr> <td style="width: 50%;"> R. J. Corey DOE  </td> <td style="width: 15%;"> 11/15/13 Date </td> <td style="width: 35%; text-align: right;"> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved </td> </tr> <tr> <td> N/A EPA </td> <td> Date </td> <td style="text-align: right;"> <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved </td> </tr> <tr> <td> J. A. Hedges Ecology  </td> <td> 11/21/13 Date </td> <td style="text-align: right;"> <input type="checkbox"/> Approved <input checked="" type="checkbox"/> Disapproved </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 	11/21/13 Date	<input type="checkbox"/> Approved <input checked="" type="checkbox"/> Disapproved
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N/A EPA	Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved									
J. A. Hedges Ecology 	11/21/13 Date	<input type="checkbox"/> Approved <input checked="" 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.

Number	Milestone	Due Date
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.	02/28/2014 <u>09/30/2014</u>

Change Number M-15-13-03	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date October 31, 2013									
Originator R. J. Corey		Phone (509) 373-9971									
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager											
Change Title 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."											
Description/Justification of Change 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>											
Impact of Change 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.											
Affected Documents The Hanford Federal Facility Agreement and Consent Order (HFFACO), as amended, and Hanford Site internal planning, management, and budget documents.											
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J. A. Hedges <i>[Signature]</i> Ecology	11/21/13 Date	<input type="checkbox"/> Approved <input checked="" 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.

Number	Milestone	Due Date
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.	02/28/2014 <u>09/30/2014</u>