

9513381-2094

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Change Number M-20-94-07	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 1/13/95																														
Originator Moses Jaraysi		Phone (509) 736-3016																														
Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager																																
Change Title Milestone M-20-00 Modification (1994 Facility Transition Negotiations)																																
Description/Justification of Change <u>Justification of Change:</u> The current M-20-00 interim milestones need revision to assure that necessary permitting, closure, or preclosure actions related to transition efforts associated with the Plutonium/Uranium Extraction (PUREX) Plant, Fast Flux Test Facility (FFTF), and Plutonium Finishing Plant (PFP) are incorporated. These transition projects will remove, reduce, and/or stabilize all major radioactive and chemical sources at these plants. Completion of transition activities will result in reduced risk to plant workers, the public, and the environment. After transition is completed, these plants will continue to be routinely monitored throughout the surveillance and maintenance (S&M) period until decommissioning and closure is completed. See attached Description/Justification of Change continued on Page 2.																																
Impact of Change This change request deletes M-20-24, "Submit PUREX Part B Application or Closure Plan to EPA and Ecology by July 31, 1995" and M-20-48, "Submit the 241-Z Treatment and Storage Tanks Part B Permit Application to Ecology and EPA by May 31, 1996". This change request adds revised interim milestones for the PUREX Plant, M-20-24A, and for PFP, M-20-48A. In addition, this change request deletes M-20-29, "Submit MASF Part B to Ecology and EPA (Date TBD)," and adds a revised FFTF Milestone M-20-29A.																																
Affected Documents Hanford Federal Facility Agreement and Consent Order, Appendix D.																																
Approvals This change form approved by Amendment Five to the Hanford Federal Facility Agreement and Consent Order executed by the signatories on July 28, 1995. <table border="0"> <tr> <td>DOE</td> <td>_____</td> <td>Date _____</td> <td>___ Approved</td> <td>___ Disapproved</td> </tr> <tr> <td>J. D. Wagoner</td> <td>_____</td> <td>Date _____</td> <td>___ Approved</td> <td>___ Disapproved</td> </tr> <tr> <td>EPA</td> <td>_____</td> <td>Date _____</td> <td>___ Approved</td> <td>___ Disapproved</td> </tr> <tr> <td>C. Clarke</td> <td>_____</td> <td>Date _____</td> <td>___ Approved</td> <td>___ Disapproved</td> </tr> <tr> <td>Ecology</td> <td>_____</td> <td>Date _____</td> <td>___ Approved</td> <td>___ Disapproved</td> </tr> <tr> <td>M. Riveland</td> <td>_____</td> <td>Date _____</td> <td>___ Approved</td> <td>___ Disapproved</td> </tr> </table>		DOE	_____	Date _____	___ Approved	___ Disapproved	J. D. Wagoner	_____	Date _____	___ Approved	___ Disapproved	EPA	_____	Date _____	___ Approved	___ Disapproved	C. Clarke	_____	Date _____	___ Approved	___ Disapproved	Ecology	_____	Date _____	___ Approved	___ Disapproved	M. Riveland	_____	Date _____	___ Approved	___ Disapproved	
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Ecology	_____	Date _____	___ Approved	___ Disapproved																												
M. Riveland	_____	Date _____	___ Approved	___ Disapproved																												

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Justification of Change (continued):

The decommissioning and closure process for TSD units undergoing transition will be accomplished in three phases: Phase I (Facility Transition to include preclosure actions associated with TSD units), Phase II (Surveillance and Maintenance [S&M]) and Phase III (Final Closure and Disposition). The goal of Phase I is to reduce risks to human health and the environment by removing waste liquids and spent fuel, reducing utilities to the building, and consolidating ventilation systems, etc. Thus, Phase I will remove the need for routine personnel entry into the building and leave the facility in an environmentally sound, safe and stable configuration. At the completion of Phase I, transition is complete, necessary preclosure and transition activities have been completed and/or approved, and the S&M Phase begins.

An environmental impact statement (EIS) is being prepared for the shutdown and cleanout of PFP process areas and stabilization of the facility. The record of decision (ROD) for the EIS will determine if a Part B permit application is needed for the 241-Z TSD units or if closure plan (or preclosure work plan) will be developed. The completion date for this interim milestone will be December 31, 1996 to accommodate the EIS/ROD as discussed in M-83-00. For FFTF, if the sodium use for TWRS is approved, a request for procedural closure as defined in Section 6.3.3 of the Tri-Party Agreement will be submitted for the Sodium Storage Facility and Sodium Reaction Facility units. If the sodium is determined to be a waste, a closure plan will be submitted for the two units.

These transition projects have been developed to ensure that public participation vital to the success of these projects will be achieved.

2. PROPOSED M-20 MODIFICATIONS RELATED TO FACILITY TRANSITION NEGOTIATIONS:

9515501-2095

MILESTONE	DESCRIPTION	DUE DATE
M-20-24A	Submit a PUREX Preclosure Work Plan to EPA and Ecology	July 1996
	A Preclosure Work Plan will be submitted to EPA and Ecology for approval. It will include the proposed PUREX S&M Plan and end point criteria for approval of actions pertaining to TSD units and hazardous substances which will remain in place following transition.	
M-20-48A	Submit a PFP Part B Permit Application or Closure Plan to EPA and Ecology	December 1996
	A Part B Permit Application or Closure Plan for the 241-Z TSD units will be developed and submitted to EPA and Ecology in accordance with their respective authorities. An environmental impact statement (EIS) is being prepared for the shutdown and cleanout of PFP process areas and stabilization of the facility. The record of decision (ROD) for the EIS will determine if a Part B permit application is needed for the 241-Z TSD units or if a closure plan (or preclosure work plan) will be developed.	
M-20-29A	Submit Sodium Storage Facility and Sodium Reaction Facility closure plan or request for procedural closure as defined in Section 6.3.3 of this Tri-Party Agreement to EPA and Ecology.	December 1999
	A potential use for the sodium as feedstock in the TWRS Program has been identified and will be evaluated as discussed pursuant to M-81-02-T01. The sodium will be stored as product material in the Sodium Storage Facility until the final disposition of the material is determined. FFTF is proceeding on the basis of providing RCRA and WAC 173-303 compliant storage for the sodium. The Sodium Reaction Facility is included in the permit request, even though the Sodium Reaction Facility availability and regulatory status will be determined by the 1998 evaluation/decision point. If the sodium use for TWRS is confirmed, a request for procedural closure as defined in Section 6.3.3 of the Tri-Party Agreement will be submitted for the Sodium Storage Facility and Sodium Reaction Facility units. If the sodium is determined to be a waste, a closure plan will be submitted for the two units.	

In addition to the above additions, add the following paragraph under M-20-00:

Preclosure Work Plans will be prepared and submitted for approval for TSD Units which will achieve closure in conjunction with the disposition of the facility in which they are contained.

9513381.2100

IT IS SO AGREED:

Each undersigned representative of a Party certifies that he or she is fully authorized to enter into this Agreement and Action Plan and to legally bind such Party to this Agreement and Action Plan. These change requests and amendments shall be effective upon the date on which this fifth amendment agreement is signed by the Parties. Except as amended herein, the existing provisions of the Agreement shall remain in full force and effect.

FOR THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY:

for Charles Felling 7/26/95
Chuck Clarke Date
Regional Administrator
Region 10
U.S. Environmental Protection Agency

FOR THE UNITED STATES DEPARTMENT OF ENERGY:

John Wagoner 7/25/95
John Wagoner Date
Manager
U.S. Department of Energy
Richland Operations Office

FOR THE WASHINGTON STATE DEPARTMENT OF ECOLOGY:

Mary Riveland 7/27/95
Mary Riveland Date
Director
State of Washington
Department of Ecology