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Department of Energy

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

AUG 11 1995

Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Blvd., Suite 5
Richland, Washington 99352

Mr. Roger E. Stanley
Tri-Party Agreement Implementation
Stat of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600

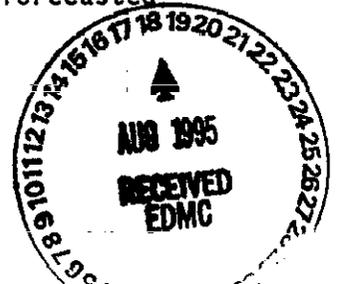
Dear Messrs. Sherwood and Stanley:

**RESPONSE TO NOTIFICATION OF FAILURE TO MEET TRI-PARTY AGREEMENT (TPA)
MILESTONE M-20-36**

On July 20, 1995, the U.S. Department of Energy, Richland Operations Office (RL) operable unit (OU) manager, Mr. Bryan Foley, received formal notification from the State of Washington Department of Ecology (Ecology) unit manager, Mr. Norman Hepner of the Ecology Unit Manager's position that RL had failed to meet TPA milestone M-20-36 because the implementation schedule in Draft B needed to be updated to reflect the rebaselining of the 200-BP-11 OU. RL disagrees with the Ecology Unit Manager's position regarding the interpretation of the requirements for completion of Milestone M-20-36. It is RL's interpretation of the TPA requirements regarding submittals of CMS Work/Closure Plans that a schedule reflecting work priorities and budget projections at the time of submittal is fully satisfactory. The submittal on April 3, 1995, (2 months ahead of milestone due date) correctly reflected the understandings and agreements of our staffs at the time. If Ecology wishes to take issue with RL's recent budget reallocations necessitating adjustments to the schedule, RL feels that the TPA issue resolution process provides the appropriate mechanism.

Attached is the revised schedule for Volume 1 of the 200-BP-11 OU RFI/CMS and 216-B-3 Main Pond, 216-B-63 Trench, and 216-A-29 Ditch Work/Closure Plan (DOE/RL-93-74, Draft B). When the work/closure plan was transmitted to the U.S. Environmental Protection Agency and Ecology in April 1995, the schedule within the document was based on the OU budget at that time. On May 9, 1995, the budget for the 200-BP-11 OU was rebaselined. The attached schedule reflects the 200-BP-11 OU activities based on the current and forecasted budgets.

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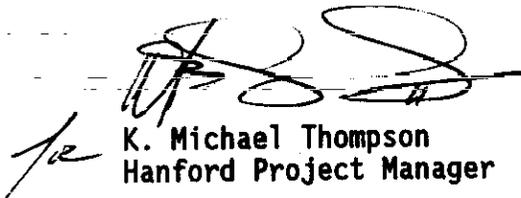
Messrs. Sherwood and Stanley

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AUG 11 1995

If you have any questions, please feel free to contact Mr. Foley on 376-7087.

Sincerely,



K. Michael Thompson
Hanford Project Manager

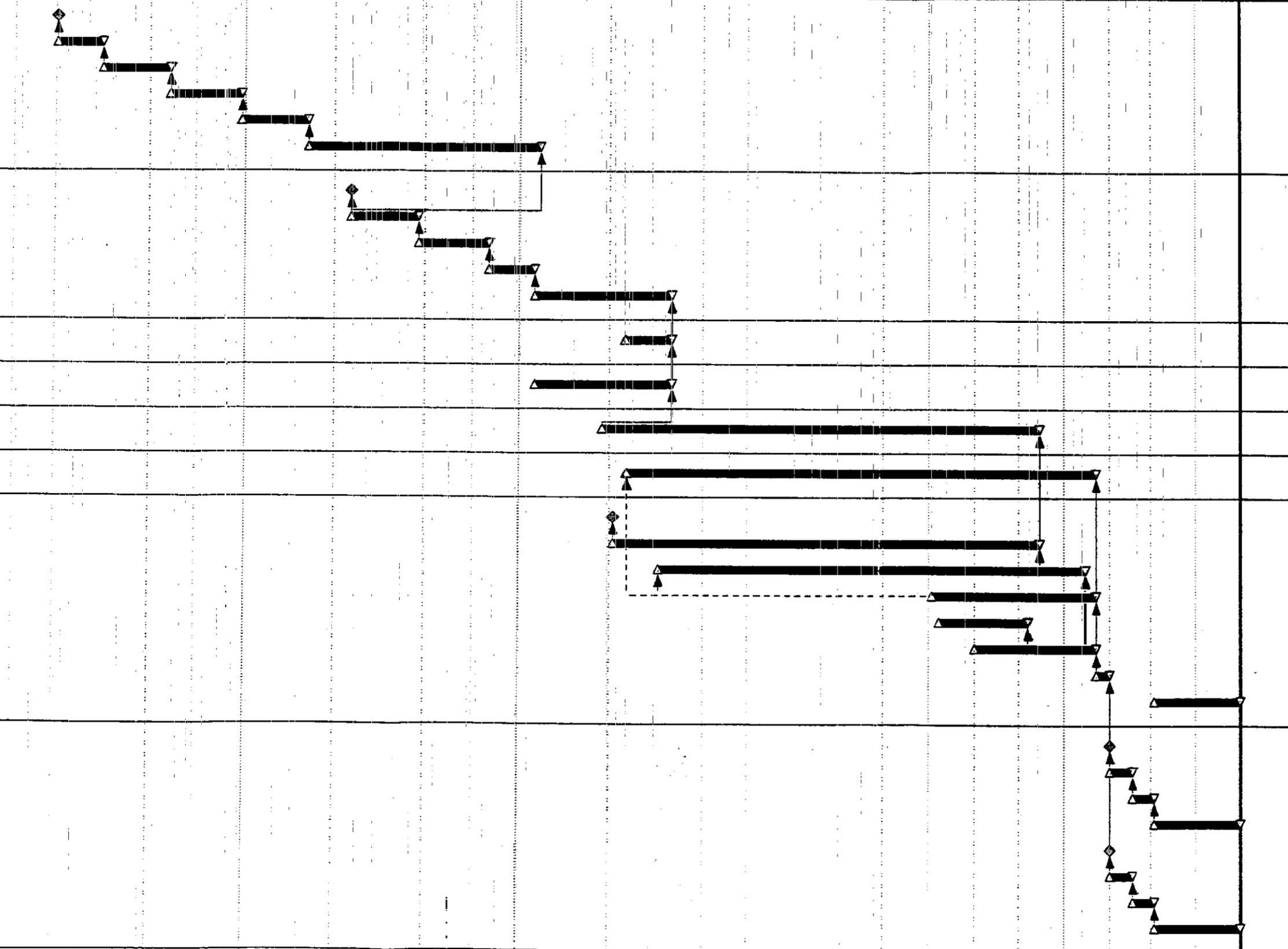
Attachment

cc: D. L. Lundstrom, Ecology

BECHTEL HANFORD, INC.
 200-BP-11 WORKCLOSURE PLAN
 POST WORK PLAN APPROVAL WORK SCOPE

Sheet: 01 of 01

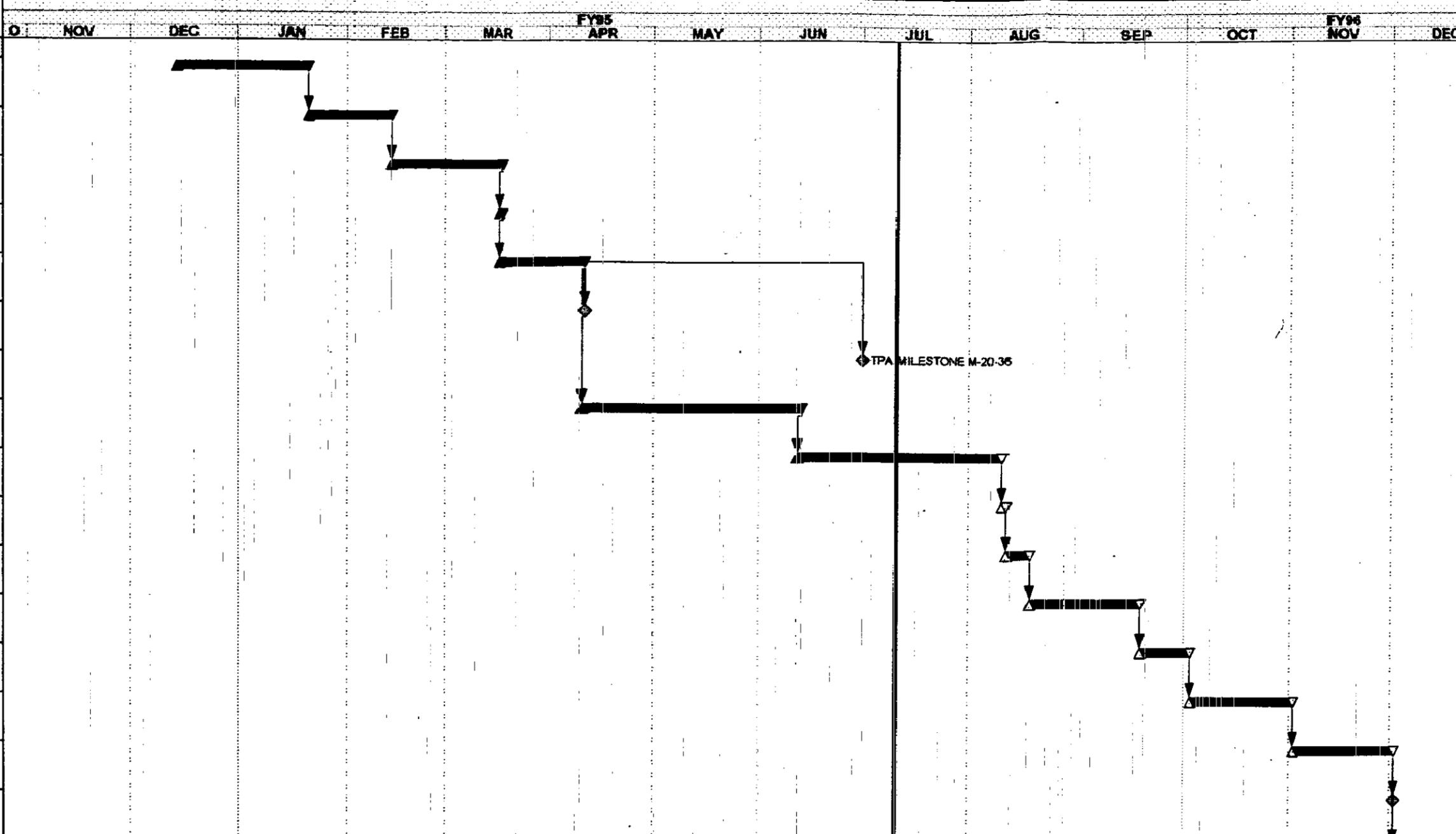
0	DOW PREPARATION
60	PREPARE TEST PIT EXCAVATION DOW
15	REGULATOR REVIEW AND COMMENT OF DOW
15	INCORPORATE COMMENTS AND REVISE DOW
0	DOW APPROVED
60	PREPARE VADOSE ZONE BOREHOLE DRILLING DOW
15	REGULATOR REVIEW AND COMMENT OF DOW
15	INCORPORATE COMMENTS AND REVISE DOW
0	DOW APPROVED
60	NON-ATTIUVATIVE ACTIVITIES
10	MOBILIZATION
82	15 TEST PIT EXCAVATIONS/SAMPLING
60	PIPELINE INTEGRITY ASSESSMENT
110	8 BOREHOLE DRILLINGS/SAMPLING
280	LABORATORY ANALYSIS
265	DATA VALIDATION
0	SUBMIT VALIDATED DATA TO REGULATORS
318	AIR SAMPLING
298	DATA EVALUATION
80	RISK-BASED CLEAN-UP STANDARDS EVALUATION
50	CORRECTIVE MEASURE IMPLEMENTATION EVAL.
50	TABLE 2.3 AND 2.4
60	PREPARE FACILITY INVESTIGATION REPORT
30	ERC REVIEW AND COMMENT
45	45-DAY DOE-RL REVIEW AND COMMENT
60	DISPOSITION OF DOE-RL COMMENT/DOCUMENT REVISION
80	FACILITY INVESTIGATION REPORT TO REGULATORS
100	CORRECTIVE MEASURE STUDY (TABLE 2.5)
114	PERFORM CORRECTIVE MEASURE STUDY (CMS)
45	PREP CMS RPT/CORRECTIVE MEASURES PROVIDED
45	ERC REVIEW, DISPOSITION AND COMMENT PROVIDED
45	45-DAY DOE-RL REVIEW AND COMMENT DISPOSITION
30	INCORPORATION OF DOE-RL COMMENT/DOCUMENT REV.
0	CMS REPORT & PROPOSED PLAN TO THE REGULATORS



Months

DUR

Activity Description	DUR
WORKCLOSURE PLAN PREPARATION	
BH/DOE CONCURRENT REVIEW OF REVISED WORK PLAN	38
DISPOSITION/INCORPORATION OF BH/DOE COMMENTS	24
PREPARE WORKCLOSURE PLAN, DRAFT B.	147*
TRANSMIT WORKCLOSURE PLAN DRAFT B. TO DOE-RL	1
DOE-RL DOCUMENT PROCESSING/TURN-AROUND	14
DOE-RL SUBMITS DRAFT B. TO REGULATORS FOR REVIEW	0
TPA COMMITMENT: MILESTONE M-20-38	0
60-DAY REGULATOR REVIEW OF DRAFT B.	60
RECEIVE REG. COMNTS. - DISPOSITION - PREP REV. 0	60
TRANSMITTAL OF REV. 0 TO DOE-RL	1
DOE-RL TO SUBMIT REV. 0 TO REGULATORS	7
30-DAY REGULATOR REVIEW OF REV. 0	30
REGULATORS PREPARE REV. 0 FOR PUBLIC REVIEW	18
PUBLIC REVIEW/COMMENT PERIOD	30
RESPONSE BY REGULATORS / FINALIZE WORK PLAN	30
WORK PLAN APPROVAL	0



Project Start	12 DEC 01	Early Bar	SP11
Project Finish	31 JAN 02	Progress Bar	
Date Date	11 JUL 01	Critical Activity	
Plot Date	12 JUL 01		

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BECHTEL HANFORD, INC.
 200-SP-11 WORKCLOSURE PLAN
 STATUSED AS OF JULY 11, 1995