

Originator Ecology Phone 0051658

Class of Change
 I - Signatories II - Executive Manager III - Project Manager

Change Title
 Deletion of uncompleted milestones and target dates from the Department of Energy's high-level radioactive waste tank interim stabilization program (M-41-00) and interim milestone M-40-07 from the scope of the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement).

Description/Justification of Change
 Following difficulties which have repeatedly delayed the completion of interim stabilization of the Department of Energy's (DOE's) high level radioactive waste (HLW) Single-Shell Tanks (SST), DOE and Ecology have agreed that requirements for completion should be filed as a consent decree with the United States District Court for the Eastern District of Washington (See Ecology/DOE Consent Decree approved by the Director of Ecology on August 6, 1999). Consequently, DOE, Ecology, and EPA have agreed to delete the SST interim stabilization program from the scope of the Tri-Party Agreement. In doing so, the remaining milestones and target dates within TPA major milestone series M-41-00, and TPA interim milestone M-40-07, are hereby deleted. This deletion and other associated TPA modifications are as follows.

This Change Request makes the following Tri-Party Agreement modifications (shown only as either ~~shaded new text~~ or deleted ~~strikeout~~ text):

- Tri-Party Agreement Appendix A (Definition of Terms):

 Interim Stabilization (as pertains to Single-Shell Tanks): Is the removal of pumpable supernatant and interstitial liquid from SST systems into DST systems. As much liquid as practicable will be removed. Supernatant is free standing liquid. Interstitial liquid is that liquid in the waste matrix contained within the pore spaces of the salts and sludges, some of which is capable of gravity drainage while the rest is held by capillary forces.

Impact of Change
 Deletion of uncompleted milestones and target dates within DOE's SST interim stabilization program (M-41-00 series) and Interim Milestone M-40-07 from the scope of the Tri-Party Agreement

Affected Documents
 The Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford site internal planning, work authorization, and budget documents (e.g., Project Management Plans, Baseline Change Control Documents and Multi Year Work Plans).

Approvals

DOE Keith A. Klein, Manager	8/16/99 ✓ Date	Approved _____ Disapproved _____
EPA	10/14/99 ✓ Date	Approved _____ Disapproved _____
Ecology	8-6-99 ✓ Date	Approved _____ Disapproved _____

Description/Justification of Change Cont.

~~Remaining uncompleted milestones and associated target dates for interim stabilization of DOE's Single-Shell Tanks are deleted from the scope of the Tri-Party Agreement. Specific milestones and target dates deleted are listed below in item 3, "Agreement Appendix D: Work Schedule." Regulatory requirements covering the interim stabilization program may be found within the DOE and Ecology Consent Decree approved by the Director of Ecology on August 6, 1999.~~

2. Agreement Action Plan Section 11.8: TANK WASTE REMEDIATION SYSTEM CRITICAL PATH PROCESS

Tank waste remediation milestones will be established using a critical path process as described in this section. The tank waste remediation program will be established and managed as an integrated system and shall include all activities associated with waste characterization, retrieval/closure, ~~tank stabilization,~~ pretreatment, treatment of high-level and low-level tank waste, acquisition of new tanks, and the multi-purpose storage complex. The parties will develop detailed operating procedures and implement the critical path milestone system on a trial basis, in April 1994, with full implementation by September 30, 1994.

3. Agreement Appendix D: WORK SCHEDULE

~~M 41-00 COMPLETE SINGLE SHELL TANK INTERIM STABILIZATION. 9/30/2000~~

~~LEAD AGENCY: COMPLETE INTERIM STABILIZATION ACTIVITIES FOR ALL
ECOLOGY SINGLE SHELL TANKS EXCEPT 241 C 106 (TO BE RETRIEVED IN ACCORDANCE WITH MILESTONE M 45-03). COMPLETE INTRUSION PREVENTION FOR ALL SINGLE SHELL TANKS EXCEPT 241 C 106.~~

~~THIS IS DEPENDENT UPON THE FOLLOWING ASSUMPTIONS:~~

~~(1) SAFETY STUDIES WILL BE COMPLETED WITH THE OBJECTIVE OF ALLOWING PUMPING IN ACCORDANCE WITH INTERIM MILESTONES.~~

~~(2) WORK COMMENCES IN THE TANK FARMS ON OCTOBER 1, 1993, FOR INTERIM STABILIZATION PREPARATIONS, AS REQUIRED BY THE MILESTONE SCHEDULE. DURING THE STAND DOWN IN TANK FARMS, SCHEDULES FOR THE FOLLOWING INTERIM MILESTONES MAY BE AFFECTED: — M 41-01, M 41-02, M 41-10, M 41-15 AND M 41-16. EVERY EFFORT WILL BE MADE TO RECOVER THE ORIGINAL SCHEDULE AS SPECIFIED BELOW.~~

~~INTERIM MILESTONES FOR START OF PUMPING AND TARGET MILESTONES FOR COMPLETION FOR EACH GROUP OF TANKS WILL BE REVIEWED AND AFFIRMED ANNUALLY WITH ECOLOGY AND EPA. UPON START OF PUMPING, EFFORTS TO CONTINUE PUMPING WILL BE CONTINUOUSLY SUPPORTED SO THAT PUMPING IS CONDUCTED AS EXPEDITIOUSLY AS PRACTICAL. IF PUMPING IS INTERRUPTED TO A DEGREE THAT JEOPARDIZES THE TARGET MILESTONE, THE UNIT (PROJECT) MANAGERS SHALL MEET IN AN EFFORT TO AGREE ON A RECOVERY PLAN. IF SUCH~~

Description/Justification of Change Cont.

~~AN AGREEMENT CANNOT BE MADE AT THE UNIT (PROJECT) MANAGER LEVEL, A FORMAL RECOVERY PLAN WILL BE PREPARED AND SUBMITTED TO ECOLOGY AND EPA FOR APPROVAL THAT SUPPORTS THE MAJOR MILESTONE DATE OF SEPTEMBER 2000, IF TECHNICALLY ACHIEVABLE.~~

M-41-22	START INTERIM STABILIZATION OF 6 SINGLE SHELL TANKS.	9/30/1997
M-41-23	START INTERIM STABILIZATION OF 8 SINGLE SHELL TANKS.	3/31/1998
M-41-24	START INTERIM STABILIZATION OF 9 SINGLE SHELL TANKS.	9/30/1998
M-41-25	START INTERIM STABILIZATION OF 3 SINGLE SHELL TANKS.	3/31/1999
M-41-26	START INTERIM STABILIZATION OF 2 SINGLE SHELL TANKS.	9/30/1999
M-41-27	COMPLETE SALT WELL PUMPING OF SINGLE SHELL TANKS.	9/30/2000
M-41-27-T03	COMPLETE SALT WELL PUMPING OF 5 SINGLE SHELL TANKS.	9/30/1998
M-41-27-T04	COMPLETE SALT WELL PUMPING OF 8 SINGLE SHELL TANKS.	9/30/1999
M-41-27-T05	COMPLETE SALT WELL PUMPING OF 16 SINGLE SHELL TANKS.	9/30/2000
M-40-07	COMMENCE OPERATION OF A VAPOR TREATMENT SYSTEM IN TANK 241-C-103.	6/30/1995

~~PROVIDE A REPORT DOCUMENTING OPERATIONAL TEST PROCEDURE RESULTS AND COMMENCE PERMITTED OPERATION OF A VAPOR TREATMENT SYSTEM FOR TANK 241-C-103, UNLESS OTHERWISE AGREED TO BY THE PARTIES FOLLOWING SUBMITTAL OF THE ENGINEERING EVALUATION OF ALTERNATIVES (EEA) FOR TREATMENT OF TANK 241-C-103 VAPOR SPACE. THE EEA WILL DOCUMENT THE NEED AND OPTIONS FOR TREATMENT OF POTENTIALLY HAZARDOUS/TOXIC VAPORS BEING DISCHARGED FROM THE TANK 241-C-103 VAPOR SPACE. ALL PERTINENT CHARACTERIZATION DATA WILL BE CONSIDERED, INCLUDING: METEOROLOGICAL, AREA, SOURCE, PERSONNEL MONITORING, AQUEOUS/ORGANIC LAYER ANALYSIS, VAPOR CHARACTERIZATION, ESTIMATES OF THE VAPOR CHARACTERIZATION AFTER REMOVAL OF THE ORGANIC LAYER, AND THE SCHEDULE FOR THIS REMOVAL. ONCE SELECTED, DESIGN PROCUREMENT, AND PERMITTING WILL BE INITIATED.~~

~~OPERATION OF THIS VAPOR TREATMENT SYSTEM IS ANTICIPATED TO PROVIDE RELIEF FROM WORKER RESTRICTIONS AT TANK 241-C-103 IN REGARD TO NOXIOUS VAPOR EMISSIONS (PROVIDED CHARACTERIZATION OF OTHER C FARM TANKS DOES NOT IDENTIFY OTHER POTENTIAL SOURCES OF NOXIOUS VAPORS).~~