



Department of Energy
 Richland Operations Office
 P.O. Box 550
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04-AMCP-0254

MAR 30 2004

Mr. Michael A. Wilson, Program Manager
 Nuclear Waste Program
 State of Washington
 Department of Ecology
 1315 W. Fourth Avenue
 Kennewick, Washington 99336

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EDMC

Dear Mr. Wilson:

**TRANSMITTAL OF THE TRANSURANIC MIXED WASTE (TRUM) AND MIXED
 LOW-LEVEL WASTE (MLLW) PROJECT MANAGEMENT PLAN**

This is in reference to Ecology letter to K. A. Klein, RL, from F. C. Jamison, "Review of the M-91-03 Mixed Low-Level Waste Project Management Plan (PMP) Pursuant to Hanford Federal Facility Agreement and Consent Order Action Plan Section 9.2," dated February 1, 2004.

Attached is the revised TRUM and MLLW Project Management Plan (PMP) required by Milestone M-91-03. The PMP has been revised to address the comments provided in the referenced letter. This PMP was developed in accordance with the requirements in the Tri-Party Agreement Section 11.5, "Waste/Material Stream Project Management Work Plans Prepared Under Agreement Milestone Series M-90-00, M-91-00, and M-92-00." A matrix that identifies the Tri-Party Agreement Action Plan 11.5 requirements, and the section in the PMP where it is addressed is provided below:

Tri-Party Agreement Section 11.5 Requirements for PMPs	M-91 TRUM and MLLW Waste PMP Section Number
Provide Project goals and objectives	1.0
Provide background information on the Hanford TRUM and MLLW Projects	2.0
Define the Scope of the M-91 TRUM and MLLW Projects	3.0
Identify Project constraints	4.0
Provide a Project schedule and critical path analysis	5.0
Identify key deliverables and products	6.0
Establishes performance measurements	7.0
Define Project controls	8.0
Identify change management controls	9.0

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The PMP content relative to the management of TRUM waste is focused on retrieval of post-1970 retrievably stored suspect TRU. Information is provided on TRUM waste processing capabilities; however, enforceability of milestone schedules for treatment or certification of TRUM waste will be determined through the court decision in Washington vs. Abraham, No. CT-03-5018-AAM, as described in the M-91-03-01 Change Package.

The treatment schedule proposed for Milestones M-91-12 and M-91-12A, which requires thermal treatment of a cumulative volume of 600 m³ of MLLW by December 31, 2005, has been revised to correspond with the schedule in the change package based on your comment. In order to demonstrate a good faith effort at procuring thermal treatment, a Request for Proposal (RFP) has been prepared and is expected to be issued by early April 2004 to solicit proposals for treatment of this waste to meet the mandated schedule. Based on the responses to the RFP and other available information at that time, the ability to meet the milestone dates will be evaluated and a change request submitted if required.

It should be noted that re-baselining of the Waste Disposal Project to meet the proposed M-91 change package requirements is on-going. A baseline change request (BCR) is expected from Fluor Hanford, Inc. (FHI) in the near future. As such, the life-cycle funding profile included in the PMP is the best estimate at this time for the cost of performing the work based on the draft FHI proposal. This funding profile may be revised after RL review of the final BCR submittal. We believe the funding profile provided meets the Tri-Party Agreement Action Plan section 11.5 requirement for "a life-cycle projection of annual funding required to accomplish project scope." The funding profile does not currently include adequate funding to meet the thermal treatment milestone schedule included in the M-91 Change Package. It is not anticipated that capacity would be available to provide treatment on the current schedule, even if funded. This profile may change based on the results of the RFP that should better establish unit costs and available capacity.

If you have questions, please contact me, or your staff may contact Matt McCormick, Assistant Manager for the Central Plateau, on (509) 373-9971.

Sincerely,



Keith A. Klein
Manager

AMCP:GLS

Attachment

cc: See page 3

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cc w/attach:

N. Ceto, EPA

L. J. Cusack, Ecology

L. L. Fritz, FHI

S. Harris, CTUIR

F. C. Jamison, Ecology

R. Jim, YN

T. M. Martin, HAB

D. E. McKenny, FHI

K. Niles, ODOE

P. Sobotta, NPT

R. T. Wilde, FHI

Administrative Record