

Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement)

# Proposed Tri-Party Agreement Modifications and Reference Documents for

**100 Area and 300 Area Waste Sites  
and Facilities Cleanup Milestones**

**Environmental Restoration Project  
(M-16-01-05, M-16-01-06,  
M-93-01-02, M-94-01-01)**

**RECEIVED**  
JAN 30 2002  
**EDMC**

**Public Comment Period  
January 28 to March 14, 2002**



***Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement)***  
**Proposed Modifications and Reference Documents for**

**100 Area and 300 Area Waste Sites and Facilities  
Cleanup Milestones  
(M-16-01-05, M-16-01-06, M-93-01-02, M-94-01-01)**

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## AGREEMENT IN PRINCIPLE

October 31, 2001

### Tentative Agreement on the River Corridor Tri-Party Negotiations

On October 5, 2001, the U.S. Department of Energy (USDOE), U.S. Environmental Protection Agency (EPA), and Washington State Department of Ecology (Ecology) agreed to enter into negotiations in accordance with the Hanford Federal Facility Agreement and Consent Order (TPA). The parties agreed to negotiate cleanup schedules consistent with the common objective to achieve remediation of waste sites and facilities in the Hanford Site 100 and 300 Areas. The parties further agreed to confer with the affected Indian Nations, State of Oregon, stakeholder groups, and the public to obtain and respond to their values and concerns. All three parties agreed to complete public review and sign off any agreed to TPA changes by April 30, 2002.

The Hanford Federal Facility Agreement and Consent Order contains commitments for the USDOE to: (1) by December 31, 2001, establish a date for completion of all the 100 Area Remedial Actions (TPA milestone M-16-00F); (2) by June 30, 2002, establish a date for completion of 300 Area Remedial Actions (TPA milestone M-16-03A); and (3) complete disposition of all 100 Area Surplus Production Reactor Buildings by a date to be determined (TPA milestone M-93-00). The focus of these negotiations is the completion dates for the 100 Area and 300 Area remedial actions, the completion of the surplus reactor interim safe storage (included in M-93-00), and the overall framework for the River Corridor cleanup. It should be recognized that the USDOE has been pursuing a strategy to complete major portions of the River Corridor by 2012. This information that has been developed by USDOE and discussed with EPA and Ecology will serve as the framework for the negotiations.

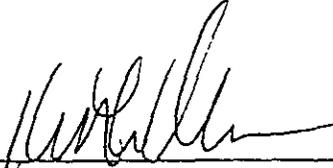
The USDOE is currently executing a procurement to establish a River Corridor Contract. This contract includes the responsibility to perform the majority of the work that is being addressed in this agreement.

The parties have developed this AIP in order to establish the basis for implementing these discussions and, if negotiations are successful, the follow-on preparation of TPA change packages.

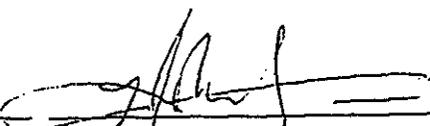
Based on information discussed, the parties have agreed to the following:

- A. Enter into negotiations to determine the scope and to define completion of all 100 Area remedial actions by 2012 including:
  - Remediation of waste sites.
  - Decontamination and decommissioning (D&D) of surplus facilities.
  - Interim safe storage of eight of the nine surplus production reactors.

- B. Enter into negotiations to determine the scope and to define completion of the following elements of the 300 Area remediation:
- Remediation of waste sites "outside the fence," excluding burial grounds 618-10 and 618-11 by 2012.
  - Remediation of waste sites and D&D of surplus facilities "inside the fence" by a date to be negotiated but prior to 2018.
  - Initiation of engineering studies to support completion of the remediation of burial grounds 618-10 and 618-11 by 2018.
- (NOTE: Definition of "outside the fence" and "inside the fence" will be developed and documented in the final Tentative Agreement package.)
- C. Re-evaluate the management and disposition of 300 Area surplus facilities under Section 6, 7, or 8 of the TPA, including certain near-term 324 Building closure plan activities.
- D. Final groundwater remedial action decisions are excluded from these negotiations. Future groundwater decisions shall be required upon completion of source remedial actions and an appropriate period to assess the performance of these actions.
- E. EPA and Ecology share regulatory authority for activities addressed under this AIP.
- F. The negotiated draft milestone change packages, when completed, shall be available to the public in accordance with the TPA and Community Relations Plan
- G. M-16-00F is due on December 31, 2001. On September 17, 2001, USDOE submitted a change request to delay this milestone. Ecology and EPA denied that request on September 30, 2001. USDOE chose not to dispute this denial. Further dispute processes for the M-16-00F milestone are not available. The M-16-00F milestone shall be considered to be completed on schedule if the parties reach tentative agreement by December 31, 2001, and sign the change package for M-16-00A by April 30, 2002.
- H. M-93-12 is due February 28, 2002, and is included for negotiations under this AIP.

  
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Keith A. Klein, Manager  
U.S. Department of Energy  
Richland Operations Office

  
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Tom C. Fitzsimmons, Director  
State of Washington  
Department of Ecology

  
\_\_\_\_\_  
L. John Jani  
Regional Administrator  
U.S. Environmental Protection  
Agency, Region X



**TENTATIVE AGREEMENT ON NEGOTIATIONS  
FOR THE RIVER CORRIDOR**

In accordance with the requirements of the Agreement in Principle dated October 31, 2001, the State of Washington, Department of Ecology (Ecology), the U.S. Environmental Protection Agency (EPA), and the U. S. Department of Energy, Richland Operations Office (RL) (parties) have concluded negotiations on commitments for cleanup schedules for the River Corridor at the Hanford Site. A tentative agreement has been reached and a package of proposed changes to the Hanford Federal Facility Agreement and Consent Order (Agreement) has been developed and found mutually acceptable to the parties. These changes are attached to this negotiations tentative agreement.

It is the parties' intent to submit the proposed changes for a 45-day public comment period to run from January 22, 2002 through March 7, 2002. Final approval of the Agreement changes is expected to occur by April 30, 2002. After successful resolution of any resulting public comments, a comment response document will be issued.

Contingent upon final approval of this Conclusion Agreement by the Signatories, and consideration and resolution of any resulting public comments, it is the parties' intent to approve these changes and incorporate them into the Tri-Party Agreement.

In addition to the attached changes to the Agreement, the parties have agreed that the following commitments will be included in the appropriate Remedial Action/Removal Action Work Plan.

Commitment	Date Required
Complete final configuration determination for B Reactor and submit recommendation to EPA	09/30/2005
Submit the B/C Risk Assessment Pilot Study to EPA and Ecology (Attachment A)	7/31/2005
Submit an engineering evaluation of the final disposition of the river pipelines and outfall structures to EPA and Ecology	7/31/2005
Submit a schedule and establish commitments to complete the Remedial Investigation/Feasibility Studies and Proposed Plans in support of the final Record of Decision for the 100 Area. These commitments will be based on the timely submittal of construction completion reports for source control actions on a area by area basis or appropriate portions thereof to support potential future deletions from the National Priorities List.	TBD
Submit a schedule and establish commitments to complete the Remedial Investigation/Feasibility Studies and Proposed Plans in support of the final Record of Decision for the 300 Area. These commitments will be based on the timely submittal of construction completion reports for source actions for appropriate portions of the 300 Area to support future deletions from the National Priorities List.	TBD

Tentative Agreement on Negotiations  
for River Corridor  
Page 2

Approved this 31<sup>st</sup> day of December 2001.



Keith A. Klein, Manager  
U.S. Department of Energy  
Richland Operations Office



Tom. C. Fitzsimmons, Director  
State of Washington  
Department of Ecology



L. John Iani  
Regional Administrator  
U.S. Environmental  
Protection Agency, Region 10



# **Proposed Agreement Reached on Setting Schedules to Clean Up Waste Sites and Facilities Along the Columbia River**

U.S. Department of Energy • U.S. Environmental Protection Agency • Washington State Department of Ecology



*The Tri Party Agencies need your input on the high-priority work being done in the 100 Area and the 300 Area.*

**The public comment period on the draft change packages will be held from January 28 through March 14, 2002.**

**Currently, a public meeting is scheduled in Hood River, Oregon on March 6 (Hood River Hotel - 7:00 - 9:00 p.m.).**

The U.S. Department of Energy, Richland Operations Office (USDOE), U.S. Environmental Protection Agency (EPA), and Washington State Department of Ecology (Ecology) have reached a tentative agreement on cleanup actions along Hanford's section of the Columbia River. These draft agreements set deadlines or milestones for all near-term cleanup actions in the 100 and 300 Areas (see map) for: reactor interim safe storage in the 100 Area and final disposition of surplus facilities in the 300 Area.

## **What we are proposing**

The four draft change packages have been issued and propose the following:

- Setting December 2012 as the date for completion of all near-term cleanup for the 100 Area. These change packages include cleanup of over 400 soil waste sites contaminated with radioactive and other hazardous chemicals.
- Completing all reactor interim safe storage activities for eight of the nine reactors, currently not including B Reactor, by December 2012.
- Setting September 2018 as the deadline for completion of all near-term cleanup in the 300 Area. These changes include cleanup of 13 structures and 18 soil waste sites by December 2012, and an additional 135 structures and 36 soil waste sites (including the 618-10 and 618-11 burial grounds) by September 2018.

- Completing the final disposition of surplus facilities in the 300 Area by September 2018. Some facilities in the 300 Area are part of the Hanford Site infrastructure and will remain in use after 2018.

These actions will also result in removing source materials that pose a current and long-term threat to the groundwater and the Columbia River. The Tri-Party Agencies will make additional groundwater decisions in the future.

In addition to the proposed changes to the Tri-Party Agreement milestones, the agencies agreed that the following commitments would be included in the 100 Area and 300 Area Remedial/Removal Action Work Plans:

- Making a decision on final configuration of the B Reactor and submitting that recommendation to the EPA by September 2005.
- Submitting the 100 B/C Area risk assessment pilot study to the EPA and Ecology by July 2005. This study will be a multi-year effort and will lay the foundation for risk assessments to support the final Records of Decision for the river corridor.
- Submitting a schedule to complete all analyses that will be used to support final cleanup decisions for the 100 and 300 Areas.

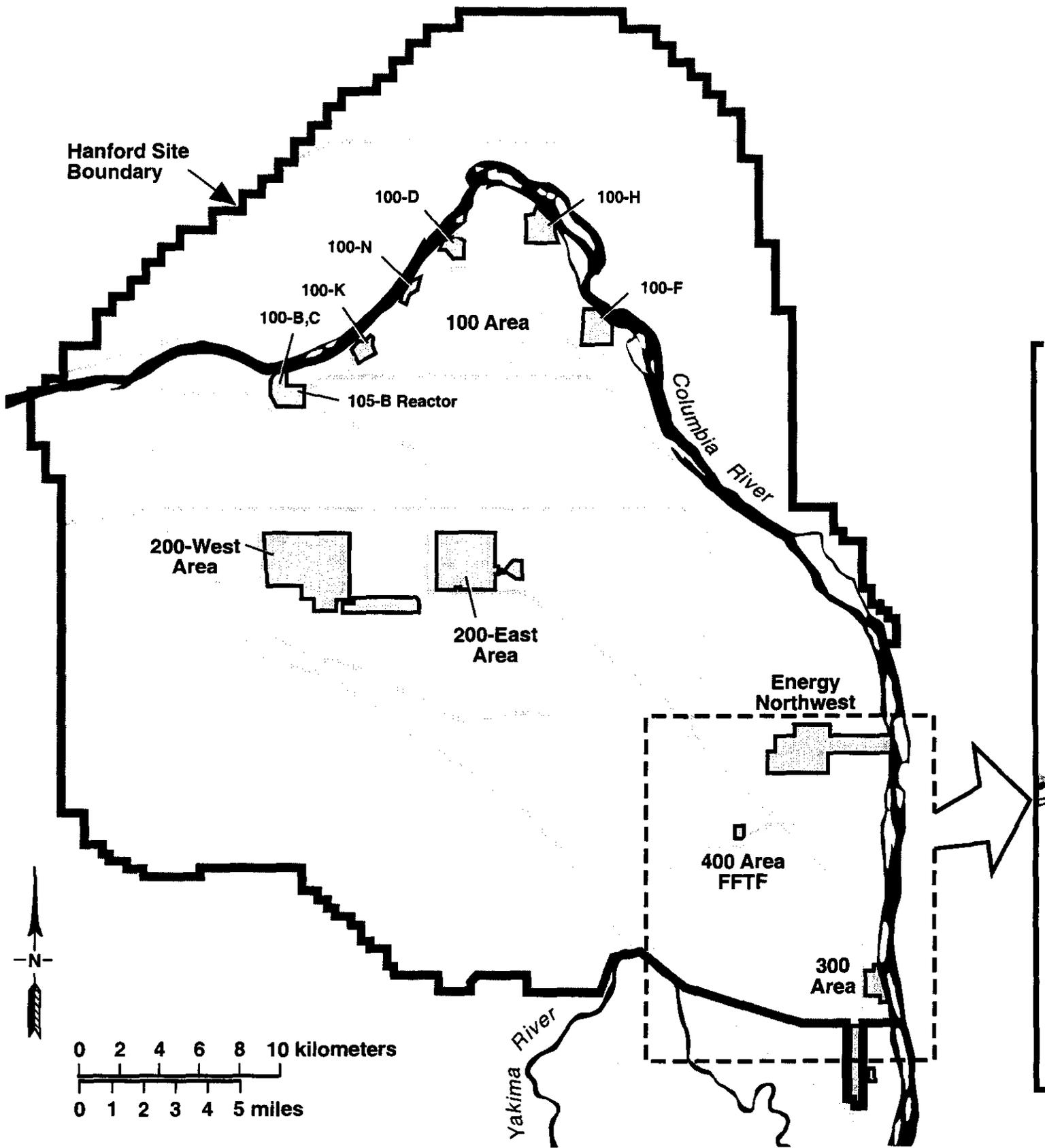


Figure 1. Hanford Site Map.

## How you can become involved

The proposed changes to the Tri-Party Agreement may be reviewed at the Hanford Information Repositories listed below and on the web site at [www.hanford.gov/tpa/changelist.htm](http://www.hanford.gov/tpa/changelist.htm). The Tri-Party Agencies will consider all public comments before the proposed changes are made. The agencies will send a comment and response summary to all individuals who provide comments or request a copy of the summary, and will place it in the Hanford Information Repositories and on the web site.

To request a meeting in your area, contact Dennis Faulk, EPA, at (509) 376-8631. All requests will be considered by the Tri-Party Agencies.

### To submit comments or request a copy of the change packages, please contact:

**Chris Smith**  
U.S. Department of Energy  
Richland Operations Office  
P.O. Box 550 (HO-12)  
Richland, WA 99352  
(509) 372-1544  
e-mail: [douglas\\_c\\_chris\\_smith@rl.gov](mailto:douglas_c_chris_smith@rl.gov)

The change packages are also available on our web site at [www.hanford.gov/tpa/changelist.htm](http://www.hanford.gov/tpa/changelist.htm)

### Hanford Public Information Repository Locations

**Portland**  
Portland State University  
Branford Price and Millar Library  
934 SW Harrison  
Attn: Michael Bowman (503) 725-3690

**Richland**  
U.S. Department of Energy Public Reading Room  
Washington State University, Tri-Cities  
Consolidated Information Center, Room 101-L  
2770 University Drive  
Attn: Terri Traub (509) 372-7443

**Seattle**  
University of Washington  
Suzzallo Library  
Government Publications Division  
Attn: Eleanor Chase (206) 543-4664

**Spokane**  
Gonzaga University Foley Center  
East 502 Boone  
Attn: Sarah Nelson (509) 323-6548

Or call the Hanford Cleanup Line at 1-800-321-2008

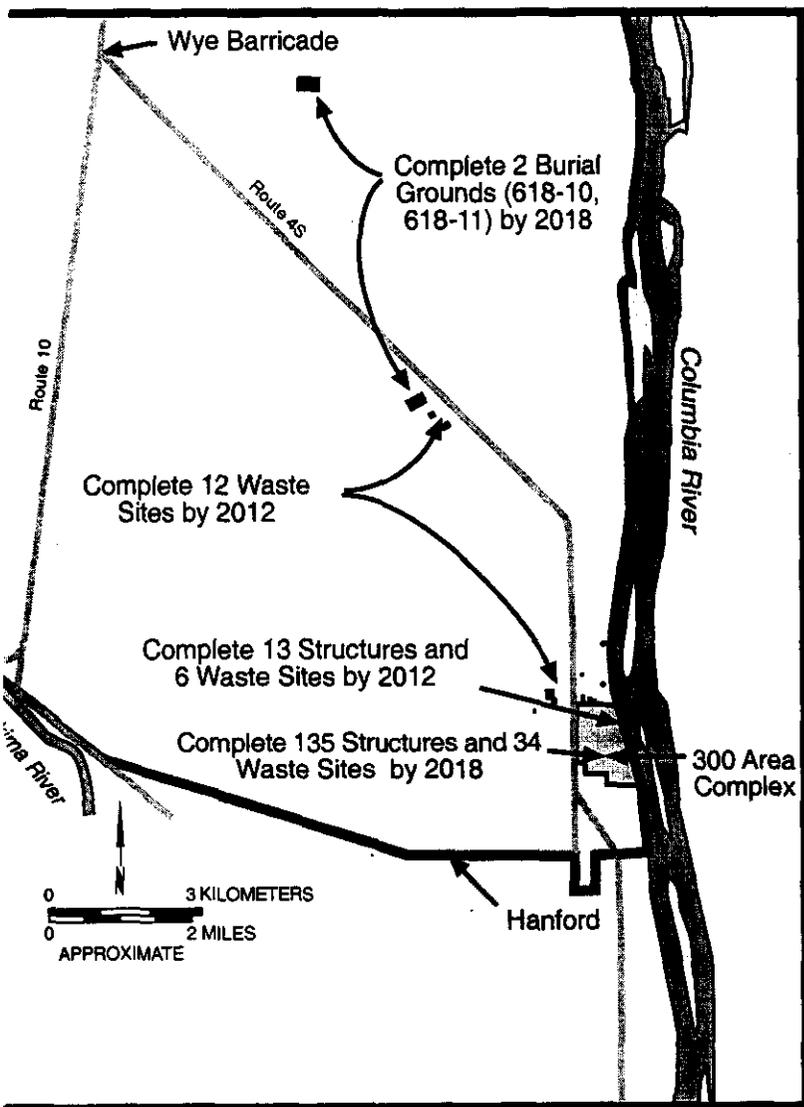


Figure 2. 300 Area Cleanup.



Change Number M-16-01-05	<b>Federal Facility Agreement and Consent Order</b> Change Control Form <b>Do not use blue ink. Type or print using black ink.</b>	Date 12/31/2001																								
<b>Originator</b> H. E. Bilson, RL Assistant Manager River Corridor		<b>Phone</b> 376-6628																								
<b>Class of Change</b> <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager																										
<b>Change Title</b> Establish Date for Completion of all 100 Area Remedial Actions (Tri-Party Agreement Milestone M-016-00F)																										
<b>Description/Justification of Change</b> <p>This change establishes a date for the completion of all 100 Area interim remedial actions as required by M-016-00F and modifies the M-016-00A milestone description. Additionally, it aligns the M-016-00 series milestones for completion of 100 area remedial actions with the objective of completion of the 100 Area remedial actions by 2012.</p> <p>The date established under the M-016-00F is the compliance date for M-016-00A. The completion of the 100 Area remedial actions includes:</p> <ul style="list-style-type: none"> <li>Remediation of all waste sites and EPA/Ecology approval of associated closeout verification packages</li> <li>Backfill and re-vegetation of the waste sites</li> <li>Decontamination and decommissioning of all ancillary facilities</li> </ul> <p>This milestone does not include the following:</p> <ul style="list-style-type: none"> <li>Completion of reactor interim safe storage for 8 of the 9 surplus reactors. This is covered under the M-093 milestone series.</li> <li>Final risk assessment and final Record of Decision for the 100 NPL. This will occur after the completion of M-016-00A.</li> </ul> <p>Note that there are facilities that support the Hanford Site infrastructure that will remain in the 100 Area. Additionally, there may be waste sites that will not be remediated until the final reactor disposition due to their proximity to the reactor or due to other factors. Both facilities and waste sites that will remain will be documented and the anticipated path forward identified.</p> <p>Modifications/deletions of existing milestones are denoted using <del>redline/strikeout</del>; additions are denoted with <b>adding</b>.</p> <p>Continued on pages 2 and 3.</p>																										
<b>Impact of Change</b> Modifies regulatory requirements governing Hanford remediation activities. Administrative action required to incorporate this change into Appendix D.																										
<b>Affected Documents</b> The Tri-Party Agreement Action Plan – Appendix D, as amended and Hanford site internal planning, management, and budget documents (e.g., USDOE and USDOE contractor Baseline Change Control documents; Multi Year Work Plans; Sitewide Systems Engineering Control documents; Project Management Plans; and the Hanford site Integrated Priority List and, if appropriate, LDR requirements should the subject wastes be generated as a result of this modification).																										
<b>Approvals</b> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 35%; border-bottom: 1px solid black;"></td> <td style="width: 15%; border-bottom: 1px solid black;"></td> <td style="width: 15%; text-align: center;">Approved</td> <td style="width: 15%; text-align: center;">Disapproved</td> </tr> <tr> <td>K. A. Klein, RL Manager</td> <td style="text-align: center;">Date</td> <td></td> <td></td> </tr> <tr> <td style="border-bottom: 1px solid black;"></td> <td style="border-bottom: 1px solid black;"></td> <td style="text-align: center;">Approved</td> <td style="text-align: center;">Disapproved</td> </tr> <tr> <td>L. J. Iani, EPA Region 10 Administrator</td> <td style="text-align: center;">Date</td> <td></td> <td></td> </tr> <tr> <td style="border-bottom: 1px solid black;"></td> <td style="border-bottom: 1px solid black;"></td> <td style="text-align: center;">Approved</td> <td style="text-align: center;">Disapproved</td> </tr> <tr> <td>T. C. Fitzsimmons, Ecology Director</td> <td style="text-align: center;">Date</td> <td></td> <td></td> </tr> </table>					Approved	Disapproved	K. A. Klein, RL Manager	Date					Approved	Disapproved	L. J. Iani, EPA Region 10 Administrator	Date					Approved	Disapproved	T. C. Fitzsimmons, Ecology Director	Date		
		Approved	Disapproved																							
K. A. Klein, RL Manager	Date																									
		Approved	Disapproved																							
L. J. Iani, EPA Region 10 Administrator	Date																									
		Approved	Disapproved																							
T. C. Fitzsimmons, Ecology Director	Date																									

**Impact of Change (Continued):**

M-016-00F will establish the compliance date for M-16-00A. The following existing milestones were established previously to support 100 Area cleanup:

<u>Milestone</u>	<u>Description</u>	<u>Date</u>
M-016-01	Complete 100 N Area Decontamination and Decommissioning	TBD
M-016-10A	Initiate remedial actions in the 100KR-1 operable unit	8/1/2003
M-016-13B	Complete remediation and backfill of 16 liquid waste sites and process effluent pipelines in the 100-FR-1 and 100-FR-2 operable units	10/29/2004
M-016-26B	Complete remediation and backfill of 51 liquid waste sites in 100-BC-1, 100-BC-2, 100-DR-1, 100-DR-2, and 100-HR-1 operable units. Complete revegetation of 36 liquid waste sites in 100-BC-1, 100-DR-1, 100-DR-2, and 100-HR-1 operable units.	3/31/2002
M-016-26E	Complete excavation and removal of 100 BC process effluent pipelines	9/30/2004
M-016-26F	Complete backfill of 100 BC process effluent pipelines excavations	2/28/2005
M-016-27C	Complete 100-HR-3 Phase III, ISRM Barrier Emplacement, Planning, Well Installation, and Barrier Emplacement	9/30/2002

Relative to these existing milestones the only change would be the deletion of M-16-01. The remaining existing milestones would not be impacted.

The following are the changes associated with the M-16-00F negotiations:

**Deletions:**

The following milestone will be deleted:

<u>Milestone</u>	<u>Description</u>	<u>Date</u>
<del>M-016-01</del>	<del>Complete 100 N Area Decontamination and Decommissioning</del>	<del>TBD</del>

The completion of the facility D&D is covered within the definition of complete remedial actions. See definitions section.

**Modifications:**

The following milestone series is modified as indicated:

<u>Milestone</u>	<u>Description</u>	<u>Date</u>
M-016-00A	Complete all <del>interim response</del> remedial actions for the 100 Areas	12/31/2012

M-016-45	Complete the interim remedial actions for the 100 Areas See 100 Area D&D Plan, Section 3.1.1, 3.1.2, 3.1.3, 3.1.4, 3.1.5, 3.1.6, 3.1.7, 3.1.8, 3.1.9, 3.1.10, 3.1.11, 3.1.12, 3.1.13, 3.1.14, 3.1.15, 3.1.16, 3.1.17, 3.1.18, 3.1.19, 3.1.20, 3.1.21, 3.1.22, 3.1.23, 3.1.24, 3.1.25, 3.1.26, 3.1.27, 3.1.28, 3.1.29, 3.1.30, 3.1.31, 3.1.32, 3.1.33, 3.1.34, 3.1.35, 3.1.36, 3.1.37, 3.1.38, 3.1.39, 3.1.40, 3.1.41, 3.1.42, 3.1.43, 3.1.44, 3.1.45, 3.1.46, 3.1.47, 3.1.48, 3.1.49, 3.1.50, 3.1.51, 3.1.52, 3.1.53, 3.1.54, 3.1.55, 3.1.56, 3.1.57, 3.1.58, 3.1.59, 3.1.60, 3.1.61, 3.1.62, 3.1.63, 3.1.64, 3.1.65, 3.1.66, 3.1.67, 3.1.68, 3.1.69, 3.1.70, 3.1.71, 3.1.72, 3.1.73, 3.1.74, 3.1.75, 3.1.76, 3.1.77, 3.1.78, 3.1.79, 3.1.80, 3.1.81, 3.1.82, 3.1.83, 3.1.84, 3.1.85, 3.1.86, 3.1.87, 3.1.88, 3.1.89, 3.1.90, 3.1.91, 3.1.92, 3.1.93, 3.1.94, 3.1.95, 3.1.96, 3.1.97, 3.1.98, 3.1.99, 3.1.100	
M-016-46	Initiate remedial actions in the remaining 100 Areas	
M-016-47	Complete the interim remedial actions for the 100 Areas	
M-016-48	Initiate remedial actions in the remaining 100 Areas	
M-016-49	Complete the interim remedial actions for the 100 Areas	
M-016-50	Initiate remedial actions in the remaining 100 Areas	
M-016-51	Complete the interim remedial actions for the 100 Areas	

**Impact of Change (Continued)**



**Definitions for milestones M-016-45 through M-016-56:**

**Initiate Remedial Actions** – This is the initiation of excavation of waste sites.

**Remaining waste sites** – This includes all wastes that have been designated for response actions including liquid disposal sites, solid waste burial grounds, unplanned releases, miscellaneous pipelines and other miscellaneous waste sites.

**Complete Interim Remedial Actions** – This includes the completion of the excavation, EPA/Ecology approval of the closeout verification package (CVP), backfill and re-vegetation for the waste sites and the completion of the D&D of ancillary facilities, and EPA/Ecology approval of the closeout verification package for the ancillary facilities.

## **Attachment A**

### **100 B/C Pilot Risk Assessment Tri-Party Agreement Change Request M-016-01-05**

The 100 B/C Area Pilot will be a multi-year effort targeted for completion in 2005. The pilot would feed into the post-cleanup risk assessment for the 100 BC Area in the 2006-2007 time frame. A plan will be developed in FY02, including conducting a data quality objectives (DQO) effort to scope the project. It is anticipated that this work will lay the foundation for the reactor area operable units in the river corridor area.

A demonstration of protectiveness of human health and the environment in the baseline risk assessment needed for the final ROD should focus on the three areas of concern defined below:

I. Vadose Zone - Address the direct exposure to humans and ecological receptors of residual soil contamination, particularly within the top 15 feet of the land surface.

II. Groundwater - Evaluate the cumulative impact of residual soil contamination on groundwater, given that it is already contaminated.

III. Riparian Zone - Evaluate the potential risk to humans and ecological receptors from contaminated groundwater where it intercepts the river shoreline.

The three parts will then have to be integrated to provide an assessment of risk to human health and the environment that will be used to demonstrate protectiveness prior to issuance of the final Proposed Plan and Record of Decision.

#### **Tasks to Be Performed in FY02:**

Implement a comprehensive risk assessment that addresses the requirements of CERCLA, including the revised Model Toxics Control Act (MTCA) ecological evaluation standards as Applicable Relevant and Appropriate Requirements and as appropriate for the ecosystem of the Hanford Site. Work with local EPA/Ecology staff to reach agreement on an appropriate risk model using Hanford species.

Coordinate and implement a consensus approach (among the contractors, DOE, and the regulators) to the management of post-remediation risks that address ecological as well as human health protection. The work will continue to focus on the 100 Area.

Coordinate with DOE, EPA/Ecology, and the Natural Resource Trustee Council (NRTC) on the design and implementation of targeted studies to evaluate the impact of soil and groundwater contamination on riparian and aquatic receptors for selected 100 Area reactor areas. These studies will address EPA/Ecology and NRTC concerns and support final risk assessments.

#### **Multi-Year Completion Dates:**

FY02 - Initiate DQO  
FY03-04 - Data collection  
FY05 - Issue report

Change Number M-016-01-06	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 12/31/01
Originator H. E. Bilson, RL Assistant Manager River Corridor	Phone 376-6628	
Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title M-016-03A Establish Date for Completion of all 300 Area Remedial Actions		
Description/Justification of Change This change establishes a date for the completion of all 300 Area interim remedial actions as required by M-016-03A and modifies the M-016-00B milestone description.  The date established under the M-016-03A milestone is the compliance date for M-016-00B. The completion of the 300 Area interim remedial actions includes:  Remediation of all identified waste sites, EPA and/or Ecology approval of associated closeout verification packages, backfill and re-vegetation of the identified waste sites in accordance with an approved Remedial Design/Remedial Action (RDRA) workplan.  The following 300 Area milestones remain the same:		
<u>Milestone</u>	<u>Description</u>	<u>Date</u>
M-016-03G	Establish an Environmental Restoration Disposal Facility (ERDF) staging area that is ready to receive drummed waste from the 618-4 Burial Ground in accordance with an ERDF Record of Decision Amendment	9/30/2002
M-016-03H	Complete Remediation of the waste sites in the 300-FF-1 Operable Unit to include excavation, verification, and regrading, including the 618-4 Burial Ground in accordance with an approved Remedial Design Report/Remedial Action Work Plan	12/31/2003
M-016-03I	Complete treatment of drummed waste from the 618-4 Burial Ground in accordance with an approved Remedial Design Report/Remedial Action Work Plan	TBD
Modifications/deletions to existing milestones are denoted using the <del>redline/strikeout</del> ; additions are denoted with <del>shading</del> . Description/Justification of Change continued on Pages 2 through 6		
Impact of Change Modifies regulatory requirements governing Hanford remediation activities. Administrative action required to incorporate this change into Appendix D.		
Affected Documents The Tri-Party Agreement Action Plan - Appendix D, as amended and Hanford site internal planning, management, and budget documents (e.g., USDOE and USDOE contractor Baseline Change Control documents; Multi Year Work Plans; Sftewide Systems Engineering Control documents; Project Management Plans; and the Hanford site Integrated Priority List and, if appropriate, LDR requirements should the subject wastes be generated as a result of this modification).		
Approvals		
K. A. Klein, RL Manager	Date	____ Approved ____ Disapproved
L. J. Iani, EPA Region 10 Administrator	Date	____ Approved ____ Disapproved
T. C. Fitzsimmons, Ecology Director	Date	____ Approved ____ Disapproved

**Impact of Change (Continued)**

Note that there are facilities that support the Hanford Site infrastructure that will remain in the 300 Area. Additionally, there may be waste sites that will not be remediated until the remaining facilities are removed due to their proximity to the facilities. The facilities and waste sites that remain will be documented and the path forward identified in milestone M-016-65.

M-016-03A will establish the compliance date for M-016-00B. The following are the remedial action changes associated with the overall River Corridor negotiations and specifically milestone M-016-03A:

**Outside the Fence Milestones**

<u>Milestone Additions</u>	<u>Description</u>	<u>Date</u>
M-016-60	Complete interim remedial actions for at least 3 of the following high environmental priority 300-FF-2 waste sites (318-4, 618-2, 618-3, 618-5 and 618-7) and complete confirmatory sampling of 300-FF-2 candidate sites 300-7 and 300-9.	12/31/2006
M-016-61	Complete interim remedial actions for the remaining high environmental priority 300-FF-2 waste sites (318-4, 618-2, 618-3, 618-5 and 618-7).	12/31/2006
M-016-62	Complete interim remedial actions for the following 300-FF-2 waste sites: 300-8, 300-16, 300-VTS, 318-4, 600-47, 600-259, 618-2, 618-3, 618-5, 618-7, 618-8, and 618-13. (See Table 1 in TPA Change Request M-16-01-06)	12/31/2012

**Definitions for milestones M-016-60 through 62.**

**Outside the Fence:** All accessible 300-FF-2 waste sites that lie north of building 3720 and the 313/333 building complex and that lie west of Stevens Dr. as identified in Table 1. (Excluding the 618-10 and 618-11 burial grounds)

**Complete Interim Remedial Actions:** Completion of the excavation, EPA and/or Ecology approval of the closeout verification package (CVP), backfill and re-vegetation for the waste sites in accordance with an approved RDRA Work Plan.

**Complete Confirmatory Sampling:** Complete sampling necessary to determine whether or not the waste site meets criteria for cleanup or can be closed out from the Waste Information Data System.

**Inside the Fence Milestones**

<u>Milestone Additions</u>	<u>Description</u>	<u>Date</u>
M-016-63	Submit a schedule and TPA milestones to complete interim remedial actions on the following 300-FF-2 waste sites (300-259, 303-M SA, 303-M UOF, UPR 300-46, UPR 300-17, and 618-1) and confirmatory sampling of the following 300-FF-2 candidate sites (300-100, 300-110, and 333 ESHWSA) (See Table 2 in TPA Change Request M-016-01-06)	6/30/2003
M-016-64	Complete interim remedial actions for the following 300-FF-2 waste sites (300-259, 303-M SA, 303-M UOF, UPR 300-46, UPR 300-17, and 618-1) (See Table 2 in TPA Change Request M-016-01-06)	9/30/2010
M-016-65	Submit a schedule and TPA milestones to complete interim remedial actions for the 300-FF-2 waste sites and confirmatory sampling of 300-FF-2 candidate sites inside the Fence.	9/30/2007

**Definitions for Milestones M-016-63 through M-016-65**

**Inside the Fence:** All 300-FF-2 waste sites that lie within or south of the building 3720 and 313/333 building complex northern boundaries and that lie east of Stevens Dr. and all other remaining waste sites within the scope of the 300-FF-2 Record of Decision. (Excluding the 618-10 and 618-11 burial grounds)

**Complete Interim Remedial Actions:** Completion of the excavation and EPA and/or Ecology approval of the closeout verification package (CVP) in accordance with an approved RDRA Work Plan. Backfill and re-vegetation for the waste sites will be addressed in Milestone M-016-65. Facility disposition will be performed in accordance with milestone M-094-03.

**Schedule:** The schedule shall include at least: 1) Dates for initiating and completing interim remedial actions at waste sites and associated impeding surplus facilities; and 2) any documents requiring EPA and/or Ecology approval prior to initiating remedial actions, e.g., Remedial Design/Remedial Action Work Plans, Engineering Evaluation/Cost Analyses (EE/CAs), Removal Action Memoranda, Removal Action Work Plans, etc. It is expected that schedules will be aligned with the associated schedules required by M-094-01 and M-094-04.

**Complete Confirmatory Sampling:** Complete sampling necessary to determine whether or not the waste site meets criteria for cleanup or can be closed out from the Waste Information Data System.

618-10 and 618-11 Milestones

Milestone/Additions	Description	Date
M-016-66	<p>Submit an intermediate design and authorization safety analysis for remedial actions at the 618-10 and 618-11 burial grounds.</p> <p>The intermediate design shall include, at a minimum, a design basis, remediation approach (i.e., process definition), site lay out, evaluation of infrastructure requirements (e.g., M-01 and Waste Isolation Pilot Plant (WIPP) integration plan), and planning for treatability tests. Intermediate design activities will utilize WIPP Remote Handled Transuranic (RH TRU) and M-01 Waste Acceptance Criteria, an evaluation of RH TRU technology development efforts and an evaluation of lessons learned from other ongoing DOE Complex TRU excavation efforts.</p> <p>The authorization safety analysis shall include at a minimum any approvals required to support additional site characterization within 618-10 and 618-11 burial grounds for design purposes and any treatability investigations.</p>	01/30/2004
M-016-67	<p>Submit an intermediate design report, a remediation schedule and a treatability investigation work plan for remedial actions at the 618-10 and 618-11 burial grounds.</p> <p>The intermediate design report should represent a 60% complete design report.</p> <p>The treatability investigation work plan must be consistent with WIPP RH TRU and M-01 Waste Acceptance Criteria and will be submitted as a TPA Primary Document.</p> <p>The remediation schedule must identify: 1) dates for initiating and completing interim remedial actions at waste sites; 2) any documents requiring EPA and/or Ecology approval prior to initiating remedial actions, e.g., RDRA Work Plans, etc.</p>	3/31/2007

Completion Milestones

Milestone

Description

Date

M-016-00B

Complete all Interim 300 Area Remedial Actions.

09/30/2018

This includes the completion of the excavation, EPA and/or Ecology approval of the closeout verification package (CVP), backfill and revegetation for the waste sites. For 618-10/11 remediation includes excavation and transport of waste from the 618-10 and 618-11 Burial Grounds to appropriate processing facilities (WRAP for Contact Handled (RH) and M-9) for RH TRU waste, ERDF or other approved disposal facilities, site closeout verification reports, backfill, and regrading of the waste sites. Facility disposition will be performed in accordance with milestone M-094-00.

PROPOSED

**Table 1: Waste Sites Outside the Fence  
(Tri-Party Agreement Change Request M-016-01-06)**

Waste Site Number	Site Description
Waste Site 300-8	Aluminum Shavings Area
Waste Site 300-18	Surface Contaminated Dumping Area #4
Waste Site 300-VTS	In Situ Vitrification Test Area
Waste Site 316-4	300 Area North Cribs
Waste Site 600-47	Dumping Area
Waste Site 600-259	Grout Waste Test Lysimeter
Burial Ground 618-2	Solid Waste Burial Ground #2
Burial Ground 618-3	Dry Waste Burial Ground
Burial Ground 618-5	Burial Ground #5
Burial Ground 618-7	Drums of Pyrophoric Zircaloy Chips in Water, with Uranium and Beryllium
Burial Ground 618-8	Uranium-Contaminated Soil Under a Parking Lot
Burial Ground 618-13	303 Building Contaminated Soil Burial Ground

**Table 2: Waste Sites Inside the Fence  
(Tri-Party Agreement Change Request M-016-01-06)**

<b>Waste Site Number</b>	<b>Site Description</b>
Candidate Waste Site 300-109	333 Building Storm Water Runoff
Candidate Waste Site 300-110	333 Building Storm Water Runoff
Candidate Waste Site 333 ESHWSA	333 Building East Side Hazardous Waste Storage Area
Waste Site 300-259	Contamination Area Surrounding 618-1 Burial Ground
Waste Site 303-M SA	303M Building Storage Area
Waste Site 303-M UGF	303M Uranium Oxide Facility
Waste Site UPR 300-46	Contaminated Soil (North of 333 Buildings)
Waste Site UPR 300-17	Contaminated asphalt area (at southeast corner of 333 Building)
Burial Ground 618-1	Solid Waste Burial Ground #1

The portions of the 300-15, 300-224, 300-258 waste sites that impinge upon ongoing cleanups associated with this table, shall be evaluated and included in the scope of remediation activity, to the extent feasible. Technical feasibility will be evaluated as part of the Remedial Design/Remedial Action Work Plan process.

<b>Change Number</b> M-93-01-02	<b>Federal Facility Agreement and Consent Order  Change Control Form</b> Do not use blue ink. Type or print using black ink.	<b>Date</b> 12/31/01									
<b>Originator</b> H. E. Bilson, RL Assistant Manager River Corridor		<b>Phone</b> 376-6628									
<b>Class of Change</b> <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager											
<b>Change Title</b> Modification of the Tri-Party Agreement M-93 series milestones Complete Final Disposition of all 100 Area Surplus Production Reactor Buildings.											
<b>Description/Justification of Change</b> <p>The M-093 milestone series provides the overall framework for disposition of the 100 Area surplus production reactors and remains a To Be Determined (TBD). Supporting M-093-00 is a series of milestones for the interim safe storage and associated activities for 8 of the 9 surplus production reactors. This change aligns the M-093 milestones for reactor interim safe storage with the objective of completion of the 100 Area reactor interim safe storage by 2012.</p> <p style="text-align: center; font-size: 48px; opacity: 0.5;">PROPOSED</p>											
Continued on Page 2 and 3 <b>Impact of Change</b> Modifies regulatory requirements governing Hanford response activities. Administrative action required to incorporate this change into Appendix D.											
<b>Affected Documents</b> The Tri-Party Agreement Action Plan – Appendix D, as amended and Hanford site internal planning, management, and budget documents (e.g., USDOE and USDOE contractor Baseline Change Control documents; Multi Year Work Plans; Sitewide Systems Engineering Control documents; Project Management Plans; and the Hanford site Integrated Priority List and, if appropriate, LDR requirements should the subject wastes be generated as a result of this modification).											
<b>Approvals</b> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 40%; border-bottom: 1px solid black;">W. Wade Ballard, RL IAMIT Representative</td> <td style="width: 10%; border-bottom: 1px solid black;">Date</td> <td style="width: 50%; text-align: right;">_____ Approved _____ Disapproved</td> </tr> <tr> <td style="border-bottom: 1px solid black;">Douglas R. Sherwood, EPA IAMIT Representative</td> <td style="border-bottom: 1px solid black;">Date</td> <td style="text-align: right;">_____ Approved _____ Disapproved</td> </tr> <tr> <td style="border-bottom: 1px solid black;">Michael A. Wilson, Ecology IAMIT Representative</td> <td style="border-bottom: 1px solid black;">Date</td> <td style="text-align: right;">_____ Approved _____ Disapproved</td> </tr> </table>			W. Wade Ballard, RL IAMIT Representative	Date	_____ Approved _____ Disapproved	Douglas R. Sherwood, EPA IAMIT Representative	Date	_____ Approved _____ Disapproved	Michael A. Wilson, Ecology IAMIT Representative	Date	_____ Approved _____ Disapproved
W. Wade Ballard, RL IAMIT Representative	Date	_____ Approved _____ Disapproved									
Douglas R. Sherwood, EPA IAMIT Representative	Date	_____ Approved _____ Disapproved									
Michael A. Wilson, Ecology IAMIT Representative	Date	_____ Approved _____ Disapproved									

**Impact of Change**

M-093-00 provides the overall framework for disposition of the 100 Area surplus production reactors. The following existing milestones were established to support the completion of the surplus reactor interim safe storage:

<u>Milestone</u>	<u>Description</u>	<u>Date</u>
M-093-00	Complete Final Disposition of all 100 Area Surplus Production Reactor Building	TBD
M-093-06-T1	Submit Surveillance and Maintenance Plan for B Reactor	TBD
M-093-10	Submit the 105-F reactor surveillance and maintenance plan for EPA approval	7/31/03
M-093-11	Complete 105-F reactor interim safe storage	9/30/03
M-093-12	Issue 105-DR reactor competitive procurement package	2/28/02
M-093-14	Initiate negotiations for the remaining surplus reactor disposition schedules	6/30/03
M-093-15	Complete negotiations for the remaining surplus reactor disposition schedules	12/31/03
M-093-16-T1	Complete 105-DR reactor interim safe storage	9/30/05
M-093-17-T1	Complete 105-D reactor interim safe storage	9/30/07
M-093-18-T1	Complete 105-H reactor interim safe storage	9/30/09
M-093-19-T1	Complete 105/109-N reactor interim safe storage design	9/30/09
M-093-20-T1	Complete 105-N reactor interim safe storage	TBD
M-093-21-T1	Complete 105-KW reactor interim safe storage	TBD
M-093-22-T1	Complete 105-KE reactor interim safe storage	TBD

Relative to the existing milestones the changes will be the deletion of M-093-10, M-093-12 and M-093-21-T1; the conversion of target milestones to interim milestones and establishing dates for milestones that are currently TBD

Signature of this package will complete Tri-Party Agreement Interim Milestone M-093-14.

Modifications and/or deletions to existing milestones are denoted using the redline/strikeout; additions are denoted with shading.

The following are the changes associated with the M-093-00 milestone negotiations:

**Deletions**

The following milestones are deleted:

<u>Milestone</u>	<u>Description</u>	<u>Date</u>
<del>M-93-10</del>	<del>Submit the 105-F reactor surveillance and maintenance plan for EPA approval</del>	<del>17/31/2003</del>

The submittal and approval of the S&M plans for the reactors placed in interim safe storage (ISS), is covered within the definition of the completion of the reactor ISS. See definitions section.

<del>M-93-12</del>	<del>Issue 105-DR reactor competitive procurement package</del>	<del>2/28/2002</del>
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This milestone is no longer valid in that the DR Reactor ISS is currently ongoing. This milestone is replaced with M-093-25.

<del>M-93-21-T1</del>	<del>Complete 105-KW reactor interim safe storage</del>	<del>TBD</del>
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The completion of KW ISS has been incorporated into the definition for completion of KE ISS

**Modifications**

The following milestone series is modified as indicated:

<u>Milestone</u>	<u>Description</u>	<u>Date</u>
<del>M-093-06-T1</del>	<del>Complete Removal Action Work Plan/S&amp;M Plan for B Reactor</del>	<del>6/30/02</del>
	Submit Surveillance and Maintenance Plan for B Reactor	TBD

**Impact of Change (Continued)**

<del>M-093-25</del>	<del>Submit an engineering evaluation of the final reactor disposition to EPA and Ecology</del>	<del>9/30/2005</del>
M-093-11	Complete 105-F reactor interim safe storage	9/30/2003 9/30/2004

The original date for completion of ISS for DR was 9/30/2005, in order to gain efficiencies DR reactor is being placed into ISS before F Reactor. As a result, DR reactor completion has been accelerated by two years and F reactor completion has been delayed by one year.

<del>M-093-16</del>	<del>Complete 105-DR Reactor Interim Storage</del>	<del>9/30/2005</del>
	Complete 105-DR reactor interim safe storage	9/30/2003

See explanation for M-093-11.

<del>M-093-17</del>	<del>Complete 105-D reactor interim safe storage</del>	<del>9/30/2007</del>
		12/31/2004

<del>M-093-18</del>	<del>Complete 105-H reactor interim safe storage</del>	<del>9/30/2009</del>
		12/31/2005

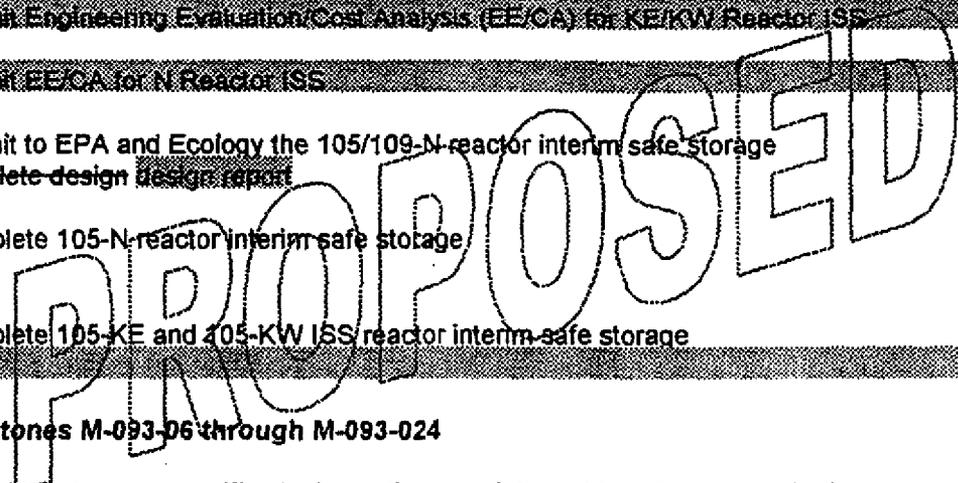
<del>M-093-23</del>	<del>Submit Engineering Evaluation/Cost Analysis (EE/CA) for KE/KW Reactor ISS</del>	<del>7/31/2006</del>
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<del>M-093-24</del>	<del>Submit EE/CA for N Reactor ISS</del>	<del>9/30/2006</del>
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<del>M-093-19</del>	<del>Submit to EPA and Ecology the 105/109-N reactor interim safe storage complete design design report</del>	<del>9/30/2009</del>
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M-093-20	Complete 105-N reactor interim safe storage	TBD 9/30/2012
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<del>M-093-22</del>	<del>Complete 105-KE and 105-KW ISS reactor interim safe storage</del>	<del>TBD</del>
		9/30/2011



**Definitions for milestones M-093-06 through M-093-024**

Complete reactor interim safe storage – This includes the completion of the physical work, the approval of the S&M plan and the approval of the closeout verification package.



<b>Change Number</b> M-094-01-01	<b>Federal Facility Agreement and Consent Order  Change Control Form</b> Do not use blue ink. Type or print using black ink.	<b>Date</b> 12/31/01
<b>Originator</b> H. E. Bilson, RL Assistant Manager River Corridor		<b>Phone</b> 376-6628
<b>Class of Change</b> <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
<b>Change Title</b> Milestone M-094-00 Establish date for Final Disposition of all 300 Area Surplus Facilities under the M-094 Series Milestones.		
<b>Description/Justification of Change</b> <p>This change establishes a date for the disposition of all 300 Area surplus facilities. M-094-00 provides the overall framework for disposition of the 300 Area surplus facilities. This change aligns the M-094-00 milestones for 300 Area surplus facility disposition with the objective of completion by 2018.</p> <p>Continued on page 2</p>		
<b>Impact of Change</b> Modifies regulatory requirements governing Hanford remediation activities. Administrative action required to incorporate this change into Appendix D. Note that there are facilities that support the Hanford Site infrastructure that will remain in the 300 Area. Additionally there may be waste sites that will not be remediated until the remaining facilities are removed due to their proximity to the facilities. The facilities and waste sites that remain will be documented and the path forward identified in Tri-Party Agreement Interim Milestone M-094-04.		
<b>Affected Documents</b> The Tri-Party Agreement Action Plan – Appendix D, as amended and Hanford site internal planning, management, and budget documents (e.g., USDOE and USDOE contractor Baseline Change Control documents; Multi Year Work Plans; Sitewide Systems Engineering Control documents; Project Management Plans; and the Hanford site Integrated Priority List and, if appropriate, LDR requirements should the subject wastes be generated as a result of this modification).		
<b>Approvals</b>  _____ K. A. Klein, RL Manager                      Date                      _____ Approved _____ Disapproved  _____ L. J. Iani, EPA Region 10 Administrator                      Date                      _____ Approved _____ Disapproved  _____ T. C. Fitzsimmons, Ecology Director                      Date                      _____ Approved _____ Disapproved		

**Impact of Change (Continued)**

M-094-00 provides the overall framework for disposition of the 300 Area surplus facilities. The following are the surplus facility changes associated with the River Corridor negotiations and specifically milestone M-094-00:

<u>Milestone Additions</u>	<u>Description</u>	<u>Date</u>
M-094-00	Complete disposition of 300 Area surplus facilities.	9/30/2018
M-094-01	Submit a schedule and TPA milestones to complete disposition of the following surplus facilities: 303M, 332, 333, 334, 334A, 3221, 3222, 3223, 3224, 3225, 324, 324B, 327 (see TPA Change Request M-94-01-01, Table 1)	6/30/2003
	The regulatory documentation (e.g., EE/CA's, action memoranda, etc.) for the following facilities: 303M, 332, 333, 334, 334A, 3221, 3222, 3223, 3224 and 3225, must be completed and associated cleanup commenced prior to the development of any documents requiring EPA and/or Ecology approval for other 300 Area facility D&D work so that "lessons learned from remedy implementation" can be factored into remaining documents.	
M-094-02	Submit an amendment to the existing 324 Building REC/HLV closure plan, DOE/RL-96-73, Rev 1, for Ecology review and approval.	7/30/2002
	The amendment shall change the existing closure plan path from clean closure to a path where the high-risk materials and wastes are removed from the facility followed by complete disposition.	
M-094-03	Complete disposition of the following surplus facilities: 303M, 332, 333, 334, 334A, 3221, 3222, 3223, 3224, 3225, 324, 324B, 327 (see TPA Change Request M-94-01-01, Table 1)	9/30/2010
M-094-04	Submit a schedule and TPA milestones to complete disposition of the surplus facilities in the 300 Area and identify the 300 Area facilities and associated waste sites that will remain past the M-094-00 date.	9/30/2007

Closure/post closure plan submittals in coordination with the 300 Area WATS and 340 associated work plan submittals should be included in the schedule along with the items identified below.

**Definitions for M-094-00 through M-094-04**

**Complete Disposition:** This includes the completion of the D&D and the EPA and/or Ecology approval of the closeout verification package for the surplus facilities. All activities necessary to take the facility to the point at which total demolition and removal of the facility and the resulting waste and debris is complete.

**Surplus Facilities:** Any facility or site (including equipment) that has no identified programmatic use by the operating phase Program Secretarial Officer.

**Schedule:** The schedule shall include at least: 1) The 300 Area surplus facilities and their associated disposition; 2) Remedial Design/Remedial Action work plan submittals, Engineering Evaluation/Cost Analyses (EE/CA), Removal Action Memoranda, removal action work plans, and other documents required to implement cleanup actions; and 3) the activities associated with sampling and closing out the remaining 300 Area surplus facilities. It is expected that schedules will be aligned with the associated schedules required by M-016-63 and M-016-65.

**Table 1: 300 Area Surplus Facilities to be Dispositioned by 9/30/2010**

<b>Surplus Facilities</b>	<b>Facility Description</b>	<b>Surplus Facilities</b>	<b>Facility Description</b>
Building 303M	Uranium Oxide Building	Building 324	Chemical Engineering Laboratory
Building 332	Packaging Test Facility	Building 324B	Chemical Engineering Laboratory Exhaust Stack
Building 333	N Fuels Building	Building 327	Post-Irradiation Test Laboratory
Building 334	Process Sewer Monitor Facility		
Building 334A	Waste Acid Storage Building		
Building 3221	Sandblasting Support Building		
Building 3222	Storage Building		
Building 3223	Storage Building		
Building 3224	Storage Building		
Building 3225	Bottle Dock		

PROPOSED