

Change Number M-20-01-01	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date January 17, 2002												
Originator DOE, Office of River Protection Phone														
Class of Change <input type="checkbox"/> I – Signatories <input checked="" type="checkbox"/> II – Executive Manager <input type="checkbox"/> III – Project Manager														
Change Title Modification of <u>Hanford Federal Facility Agreement and Consent Order</u> (HFFACO) Hazardous Waste facility Part B Permit requirements M-20-56 and M-20-57 (Immobilized Low-Activity Waste disposal and High-Level Waste (HLW) canister storage building (CSB)) in order to resolve inconsistencies between HFFACO requirements, completion schedules within the U. S. Department of Energy's (DOE) contract No. DE-AC27-01RV14136, and DOE's Office of River Protection (ORP) baseline schedule.														
Description/Justification of Change Recent delays in the acquisition of tank waste treatment facilities at the Hanford site have been largely based on the failure of efforts to implement a cost effective "privatized" approach to tank waste treatment complex construction. Though efforts by the parties have centered on attempting to minimize programmatic delay, significant inconsistencies have grown between HFFACO requirements and adjusted DOE and DOE contractor schedules.														
Impact of Change This change request delays Part B permit application schedules by modifying <u>Hanford Federal Facility Agreement and Consent Order</u> (HFFACO) work requirements at M-20-56 and M-20-57. These modifications are made in order to resolve inconsistencies between HFFACO requirements, completion schedules within the U. S. Department of Energy's (DOE) contract No. DE-AC27-01RV14136 and DOE's Office of River Protection (ORP) baseline schedule.														
Affected Documents The <u>Hanford Federal Facility Agreement and Consent Order</u> , as amended, including HFFACO Action Plan Appendix D, DOE's Annual Land Disposal Restrictions Report, DOE's Tank Farm Closure/Post-Closure Workplan Update and Hanford site internal planning, management, and budget documents (e.g., DOE and DOE contractor Baselines, Baseline Change Control documents; Sitewide Systems Engineering Control documents; Project Management Plans; and the Hanford site Integrated Priority List (IPL)).														
<table border="0"> <tr> <td colspan="3">Approvals</td> </tr> <tr> <td data-bbox="219 1134 852 1228">  _____ Ecology </td> <td data-bbox="885 1134 1079 1228"> 6-3-02 ✓ Date </td> <td data-bbox="1096 1134 1550 1228"> Approved _____ Disapproved _____ </td> </tr> <tr> <td data-bbox="219 1228 852 1323">  _____ DOE </td> <td data-bbox="885 1228 1079 1323"> 5/28/02 ✓ Date </td> <td data-bbox="1096 1228 1550 1323"> Approved _____ Disapproved _____ </td> </tr> <tr> <td data-bbox="219 1323 852 1396"> _____ EPA </td> <td data-bbox="885 1323 1079 1396"> N/A Date </td> <td data-bbox="1096 1323 1550 1396"> Approved _____ Disapproved _____ </td> </tr> </table>			Approvals			 _____ Ecology	6-3-02 ✓ Date	Approved _____ Disapproved _____	 _____ DOE	5/28/02 ✓ Date	Approved _____ Disapproved _____	_____ EPA	N/A Date	Approved _____ Disapproved _____
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_____ EPA	N/A Date	Approved _____ Disapproved _____												

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Description/Justification of Change (continued)

Due to its concerns about these inconsistencies, the Washington Department of Ecology (Ecology) required that DOE develop and submit a tank waste treatment Recovery Plan documenting actions and associated schedules DOE proposes to implement to assure compliance with HFFACO requirements; demonstrating that though start of treatment complex construction has been delayed, the HFFACO December 2007 due date for initial treatment complex hot operations remains achievable, and will be met; and that DOE has in place federal fiscal year 2002 funds and the necessary spending authority from the Bush administration to fully support implementing the recovery plan. (See Ecology tank waste final determination of July 26, 2001 and its subsequent August 1, 2001 Notice of Penalty Incurred and due). DOE's Recovery Plan (including its initial version of this M-20-01-01 Change Request) was submitted on October 1, 2001.

Following review by Ecology, and discussions between the parties, DOE and Ecology have agreed to appropriate Recovery Plan modifications including the modification of DOE's tank waste treatment baseline and this M-20-01-01 Change Request.

This M-20-01-01 Change Request delays by approximately 1 year the due dates for submittal of the HLW Canister Storage Facility and Immobilized Low-Activity Waste disposal facility Part B applications. Part B permit submittals will be based upon the completion of design for 80% of the critical systems as defined in the respective M-90 milestones. It is assumed, that it will take 2 years to permit and obtain final status. All other M-20-00 series requirements remain unchanged.

Modifications to the M-20 milestone series incorporated into the HFFACO by approval of this M-20-01-01 Change Request are shown here as either shaded additions, or ~~strikethrough~~ deletions.

MS Number	Milestone Description	Due Date
M-20-56	SUBMIT CANISTER STORAGE FACILITY PART B DANGEROUS WASTE PERMIT APPLICATION TO ECOLOGY.	6/30/02 6/30/2003
M-020-57	SUBMIT ILAW DISPOSAL FACILITY CERTIFIED PART B PERMIT APPLICATION TO ECOLOGY.	8/31/02 6/30/2003

Ecology RP comments M20 1-17-2002.doc