

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

**TENTATIVE AGREEMENT
ON
THE NEGOTIATION OF HANFORD FEDERAL
FACILITY AGREEMENT AND CONSENT ORDER REVISIONS
FOR NEAR-TERM MILESTONES FOR CENTRAL PLATEAU
OPERABLE UNITS**

April 2022



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**TENTATIVE AGREEMENT
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THE NEGOTIATION OF HANFORD FEDERAL
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The U.S. Department of Energy, Richland Operations Office (DOE-RL), Washington State Department of Ecology (Ecology), and U.S. Environmental Protection Agency (EPA), hereinafter referred to as the Parties, have concluded negotiations and reached a tentative agreement on the negotiation of Hanford Federal Facility Agreement and Consent Order (HFFACO) revisions for near-term interim milestones for Central Plateau Operable Units (OU). The Parties agreed to pilot an “Adaptive Milestone Approach” for identifying scope and schedule for HFFACO milestones for work on the Central Plateau. This Adaptive Milestone Approach aims to define achievable milestones that can demonstrate cleanup progress and be more nimble to emerging priorities, progress, issues, and resource constraints. The approach will utilize decision logic tools to consider varying scenarios, priorities, and constraints to Central Plateau cleanup with a goal of providing objective insight to optimum work sequences and timing of critical work activities. The outputs will inform meaningful discussion among the Parties when negotiating future enforceable milestone sets. Under the Adaptive Milestone Approach, the Parties will establish enforceable milestones over nominal 3-year periods. As existing milestone sets are completed, outputs from the toolset considering the latest site conditions will provide updated optimum work sequences and timing that decision-makers can use to establish the follow-on 3-year milestone set and inform short- and long-term milestone planning. The overall goal is to provide a milestone framework that facilitates efficient cleanup and provides the Parties with a success-oriented path to advance the Hanford Site mission as well as result in higher confidence that future enforceable milestones will be achievable.

This Tentative Agreement addresses 14 interim milestones placed In Abeyance by the Parties listed in Interagency Management Integration Team (IAMIT) Determination Number 2021-002, *Pilot Use of Resource Modeling and Adaptive Milestone Approach to Develop Schedules for Cleanup of Central Plateau Operable Units* (reference <https://pdw.hanford.gov/document/AR-16097>). The HFFACO change control forms included in this Tentative Agreement will create milestones to offset

**Tentative Agreement on the Negotiation of Hanford Federal Facility Agreement and Consent Order
Revisions for Near-Term Milestones for Central Plateau Operable Units**

the impacts of placing these milestones In Abeyance by:

- Establishing new milestones in the next three Federal fiscal years (FFY) 2023-2025 that support planning and progress towards some of the milestones placed in abeyance
- Establishing a 2024 milestone for DOE-RL to submit change control forms that identify new dates for the M-015, M-016, and M-085 interim milestones placed in abeyance

The Parties agree that these changes constitute Good Cause as described in HFFACO Article XL, Good Cause for Extensions, paragraph 120.E, any other event or series of events mutually agreed to by the Parties as constituting good cause.

This Tentative Agreement will support Ecology re-issuing the Hanford Hazardous Waste Management Act (HWMA) Permit for management of mixed radioactive/hazardous waste. The key elements of this Tentative Agreement that will support the permit are:

Milestones establish a 2024 date for DOE-RL to propose milestones to complete the remedial investigation/feasibility studies (RI/FS) for source operable units. This satisfies the HWMA requirement that the permit will include schedules for corrective action. The HFFACO including its Appendix D schedules are Attachment 1 to the permit.

The proposed HFFACO change control forms implementing this Tentative Agreement are attached and listed below:

Change Control Form	Change Title
M-15-22-02	Establish New Negotiated M-015 Series Milestones in TPA, Appendix D
M-16-22-02	Establish New Negotiated M-016 Series Milestones in TPA, Appendix D
M-85-22-02	Establish New Negotiated M-085 Series Milestones in TPA, Appendix D

These HFFACO change control forms are subject to public comment and modification, as required. A notice of the upcoming public comment period for the HFFACO change control forms will be distributed to the public, followed by a 45-day public comment period. Upon conclusion of the public comment period, the Parties will consider the comments and the HFFACO change control forms will be revised, as appropriate. When agreed upon, the HFFACO change control forms will be approved by the Parties, then incorporated into the HFFACO.

Unresolved revisions will be subject to HFFACO dispute resolution as provided for in HFFACO Article VIII and/or XVI.

This Tentative Agreement is to take effect upon the signatures of the Parties.



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FACILITY AGREEMENT AND CONSENT ORDER REVISIONS
FOR NEAR-TERM MILESTONES FOR CENTRAL PLATEAU
OPERABLE UNITS**

THOMAS TEYNOR  Digitally signed by THOMAS
TEYNOR
Date: 2022.04.27 08:40:03 -07'00'


William F. Hamel, Assistant Manager
for the River and Plateau
U. S. Department of Energy
Richland Operations Office

Date

 Digitally signed by
Schleif, Stephanie (ECY)
Date: 2022.04.27 10:56:40
-07'00'

David B. Bowen, Program Manager
Nuclear Waste Program
Washington State Department of Ecology

Date

 Digitally signed by
DAVID EINAN
Date: 2022.04.27
14:53:18 -07'00'

David R. Einan, Program Manager
Office of Environmental Cleanup
U.S. Environmental Protection Agency

Date

Tentative Agreement on the Negotiation of Hanford Federal Facility Agreement and Consent Order
Revisions for Near-Term Milestones for Central Plateau Operable Units

Change Number DRAFT M-15-22-02	Federal Facility Agreement and Consent Order Change Control Form	Date 1/24/2022
Originator Mike Cline, DOE-RL		Phone 509-376-6070
Class of Change <input type="checkbox"/> I – Signatories <input checked="" type="checkbox"/> II – Executive Managers <input type="checkbox"/> III – Project Managers		
Change Title Establish New Negotiated M-015 Series Milestones in TPA, Appendix D		
Description/Justification of Change On September 16, 2021, the U.S. Department of Energy, Richland Operations Office (DOE-RL), U.S. Environmental Protection Agency (EPA), and Washington State Department of Ecology (Ecology), hereafter referred to as the Parties, agreed to pilot an “Adaptive Milestone Approach” for identifying scope and schedule for Hanford Federal Facility Agreement and Consent Order (HFFACO) milestones for work on the Central Plateau. This Adaptive Milestone Approach aims to define achievable milestones that can demonstrate cleanup progress and be more nimble to emerging priorities, progress, issues, and resource constraints. The approach will utilize decision logic tools to consider varying scenarios, priorities, and constraints to Central Plateau cleanup with a goal of providing objective insight to optimum work sequences and timing of critical work activities. The outputs will inform meaningful discussion among the Parties when negotiating future enforceable milestone sets. <p style="text-align: center;"><i>Continued on page 2</i></p>		
Impact of Change <p>This change control form creates 7 new M-015 series interim Milestones: M-015-91C, M-015-91D, M-015-92D, M-015-92E, M-015-110E, M-015-117, and M-015-120. This change control form also establishes 3 new interim Milestones M-015-92F, M-015-118, and M-015-119 for DOE-RL to submit draft HFFACO change control forms which will establish new due dates for 11 existing interim milestones, they are: M-015-38B, M-015-84, M-015-91B, M-015-92B, M-015-92C, M-015-93B, M-015-93C, M-015-98, M-015-99, M-015-110B, and M-015-112.</p> <p>This change control form does not include a change to the due date for Major Milestone M-015-00. The Parties expect that DOE will, in the future, propose a change to Major Milestone M-015-00 based on the Adaptive Milestone Approach described in the Description/Justification of Change.</p> <p>This change control form is being processed in conjunction with Change Control Forms M-16-22-02 and M-85-22-02 that also modify M-016 and M-085 milestones in HFFACO Appendix D milestones.</p>		
Affected Documents HFFACO or Tri-Party Agreement (TPA) Action Plan Appendix D, “Work Schedule Milestones and Target Dates Including Designation of Lead Regulatory Agency.”		
Approvals		Page 1 of 5
W.F. Hamel, DOE-RL	Date _____ Approved _____ Disapproved _____	
N/A DOE-ORP	Date _____ Approved _____ Disapproved _____	
D.R. Einan, EPA	Date _____ Approved _____ Disapproved _____	
D.B. Bowen, Ecology	Date _____ Approved _____ Disapproved _____	

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Description/Justification of Change (continued)

Under the Adaptive Milestone Approach, the Parties will establish enforceable milestones over nominal 3-year periods. As existing milestone sets are completed, outputs from the toolset considering the latest site conditions will provide updated optimum work sequences and timing that decision-makers can use to establish the follow-on 3-year milestone set and inform short- and long-term milestone planning. The overall goal is to provide a milestone framework that facilitates efficient cleanup and provides the Parties with a success-oriented path to advance the Hanford Site mission as well as result in higher confidence that future enforceable milestones will be achievable.

With the agreement to pilot the Adaptive Milestone Approach, fourteen interim milestones listed in IAMIT Determination Number 2021-002, *Pilot Use of Resource Modeling and Adaptive Milestone Approach to Develop Schedules for Cleanup of Central Plateau Operable Units* (reference <https://pdw.hanford.gov/document/AR-16097>) were placed in abeyance. This change control form will create milestones to offset the impacts of placing in abeyance these interim milestones by:

- Establishing new milestones in the next three Federal fiscal years (FFY) 2023-2025 that support planning and progress towards some of the milestones placed in abeyance. The 200-BC-1 OU has previously been combined with the 200-WA-1 OU for remedial investigation/feasibility study (RI/FS), proposed plan, and Record of Decision planning. The parties reached conceptual agreement that the 200-BC-1 OU would likely have its own remedial action decision separate from the 200-WA-1 OU once the feasibility study tasks are completed under the RI/FS work plan.
- Establishing 2024 milestones for DOE-RL to submit change control forms that identify new dates for the M-015 interim milestones placed in abeyance.
- Establishing a milestone for the new 200-IA-1 OU to accelerate remediation of shallow sites that were reassigned from the 200-EA-1 and 200-WA-1 OUs. The draft focused feasibility study for this OU has been submitted to Ecology and EPA for review; therefore, the milestone addresses the proposed plan.
- Establishing a new milestone for a deep vadose zone laboratory treatability test report. This milestone mitigates the impact of suspending the milestone for the 200-DV-1 OU RI/FS.

The Parties agree that these changes constitute Good Cause as described in HFFACO Article XL, Good Cause for Extensions, paragraph 120.E, any other event or series of events mutually agreed to by the Parties as constituting good cause.

Tentative Agreement on the Negotiation of Hanford Federal Facility Agreement and Consent Order Revisions for Near-Term Milestones for Central Plateau Operable Units

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Authorized Changes

Modifications to HFFACO Appendix D, "Milestones and Target Dates Including Designation of Lead Regulatory Agency," are denoted by using ~~strikeout~~ to indicate text deletions and double underline to indicate text additions.

Number	Milestone	Due Date
<u>M-015-91C</u> <u>Lead Regulatory Agency: EPA</u>	<u>Submit Remedial Investigation/Feasibility Study (RI/FS) Work Plan, Revision 1, Draft A for the 200-WA-1 and 200-BC-1 Operable Units, with limited schedule information.</u>	<u>09/30/2023</u>
<u>M-015-91D</u> <u>Lead Regulatory Agency: EPA</u>	<u>Submit a draft HFFACO change control form to establish an implementation schedule (including start date) for activities in the 200-WA-1 and 200-BC-1 Operable Units Remedial Investigation/Feasibility Study (RI/FS) Work Plan.</u>	<u>09/30/2024</u>
<u>M-015-92D</u> <u>Lead Regulatory Agency: Ecology</u>	<u>Submit RCRA Facility Investigation/Corrective Measures Study (RFI/CMS) and Remedial Investigation/Feasibility Study (RI/FS) Work Plan, Draft B for the 200-EA-1 Operable Unit, with limited schedule information.</u>	<u>06/30/2024</u>
<u>M-015-92E</u> <u>Lead Regulatory Agency: Ecology</u>	<u>Submit a draft HFFACO change control form to establish an implementation schedule (including start date) for activities in the 200-EA-1 Operable Unit RFI/CMS/RI/FS Work Plan.</u>	<u>09/30/2024</u>
<u>M-015-92F</u> <u>Lead Regulatory Agency: Ecology</u>	<u>Submit a draft HFFACO change control form proposing a new due date for interim Milestone M-015-112 for submittal of the 200-IS-1 Operable Unit RFI/CMS/RI/FS Work Plan, Draft B (7 days after approval of the 200-EA-1 OU Work Plan, Rev. 0).</u>	<u>TBD</u>

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Number	Milestone	Due Date
<p><u>M-015-110E</u> <u>Lead Regulatory Agency: Ecology</u></p>	<p><u>Transmit 200-DV-1 Operable Unit Laboratory Treatability Test Report.</u></p>	<p><u>02/28/2026</u></p>
<p><u>M-015-117</u> <u>Lead Regulatory Agency: EPA/Ecology</u> <u>Dual Lead</u></p>	<p><u>Submit CERCLA Proposed Plan for the 200-IA-1 Operable Unit, Draft A.</u></p>	<p><u>04/30/2024</u></p>
<p><u>M-015-118</u> <u>Lead Regulatory Agency: Ecology</u></p>	<p><u>Submit to Ecology, a draft HFFACO change control form identifying new enforceable dates for the following interim milestones that were put "In Abeyance" by IAMIT Determination 2021-002:</u></p> <ul style="list-style-type: none"> • <u>M-015-92B, Submit RCRA Facility Investigation/Corrective Measures Study & Remedial Investigation/Feasibility Study Report and Proposed Corrective Action Decision/Proposed Plan for the 200-EA-1 OU (Central Plateau 200 East Inner Area) to Ecology.</u> • <u>M-015-92C, Submit RCRA Facility Investigation/Corrective Measures Study & Remedial Investigation/Feasibility Study Report and Proposed Corrective Action Decision/Proposed Plan for the 200-IS-1 OU to Ecology.</u> • <u>M-015-93B, Submit RCRA Facility Investigation/Corrective Measures Study & Remedial Investigation/Feasibility Study Report and Proposed Corrective Action Decision/Proposed Plan for the 200-SW-2 OU to Ecology.</u> • <u>M-015-93C, Initiate characterization field work for the 200-SW-2 Operable Unit landfills in accordance with the schedule in the approved RI/FS/RFI/CMS Work Plan.</u> • <u>M-015-110B, Submit Corrective Measures Study & Feasibility Study Report and Proposed Plan/Proposed Corrective Action Decision for the 200-DV-1 OU to Ecology.</u> 	<p><u>06/30/2024</u></p>

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Revisions for Near-Term Milestones for Central Plateau Operable Units

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Number	Milestone	Due Date
<p><u>M-015-119</u> <u>Lead Regulatory Agency: EPA</u></p>	<p><u>Submit to EPA, a draft HFFACO change control form identifying new enforceable due dates for the following interim milestones that were put "In Abeyance" by IAMIT Determination 2021-002:</u></p> <ul style="list-style-type: none"> • <u>M-015-38B, Submit a Feasibility Study Report and Proposed Plan(s) for the 200-CW-1, 200-CW-3, and 200-OA-1 Operable Units for Waste Sites in the Outer Area of the Central Plateau to EPA.</u> • <u>M-015-84, Complete remedial investigation of 200-WA-1 and 200-BC-1 operable unit waste sites in accordance with the 200-WA-1 and 200-BC-1 RI/FS Work Plan.</u> • <u>M-015-91B, Submit Feasibility Study Report(s) and Proposed Plan(s) for the 200-BC-1 and 200-WA-1 operable units (200 West Inner Area) to EPA.</u> • <u>M-015-98, Complete remedial investigation of U Plant related waste sites located in 200-WA-1 in accordance with the WA-1 RI/FS Work Plan.</u> • <u>M-015-99, Complete remedial investigation of PFP related waste sites located in 200-WA-1 in accordance with the 200-WA-1 and 200-BC-1 RI/FS Work Plan.</u> 	<p><u>06/30/2024</u></p>
<p><u>M-015-120</u> <u>Lead Regulatory Agency: EPA/Ecology</u> <u>Dual Lead</u></p>	<p><u>Submit a draft HFFACO change control form proposing enforceable milestones for Central Plateau cleanup for milestone period covering nominally FY 2025-2027, including a proposed milestone for submittal of change control forms for the next milestone period.</u></p>	<p><u>06/30/2024</u></p>

Tentative Agreement on the Negotiation of Hanford Federal Facility Agreement and Consent Order
 Revisions for Near-Term Milestones for Central Plateau Operable Units

Change Number DRAFT M-16-22-02	Federal Facility Agreement and Consent Order Change Control Form	Date 01/24/2022																														
Originator Mark French, DOE-RL		Phone 509-373-9863																														
Class of Change <input type="checkbox"/> I – Signatories <input checked="" type="checkbox"/> II – Executive Managers <input type="checkbox"/> III – Project Managers																																
Change Title Establish New Negotiated M-016 Series Milestones in TPA, Appendix D																																
Description/Justification of Change On September 16, 2021, the U.S. Department of Energy, Richland Operations Office (DOE-RL), U.S. Environmental Protection Agency (EPA), and Washington State Department of Ecology (Ecology), hereafter referred to as the Parties, agreed to pilot an “Adaptive Milestone Approach” for identifying scope and schedule for Hanford Federal Facility Agreement and Consent Order (HFFACO) milestones for work on the Central Plateau. This Adaptive Milestone Approach aims to define achievable milestones that can demonstrate cleanup progress and be more nimble to emerging priorities, progress, issues, and resource constraints. The approach will utilize decision logic tools to consider varying scenarios, priorities, and constraints to Central Plateau cleanup with a goal of providing objective insight to optimum work sequences and timing of critical work activities. The outputs will inform meaningful discussion among the Parties when negotiating future enforceable milestone sets. <p style="text-align: right;"><i>Continued on page 2</i></p>																																
Impact of Change This change control form creates 3 new M-016 series interim Milestones: M-016-92C, M-016-201, and M-016-202. This change control form also establishes new interim Milestone M-016-200 for DOE-RL to submit a draft HFFACO change control form which will establish the new due dates for 2 existing interim Milestones M-016-200A and M-016-200B. This change control form does not include a change to the due date for Major Milestone M-016-00. The Parties expect that DOE will, in the future, propose a change to Major Milestone M-016-00 based on the Adaptive Milestone Approach described in the Description/Justification of Change. This change control form is being processed in conjunction with Change Control Forms M-15-22-02 and M-85-22-02 that also modify M-015 and M-085 milestones in HFFACO Appendix D.																																
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Approvals <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; border-bottom: 1px solid black;">W.F. Hamel, DOE-RL</td> <td style="width: 10%; border-bottom: 1px solid black;">Date</td> <td style="width: 15%; border-bottom: 1px solid black;">Approved</td> <td style="width: 15%; border-bottom: 1px solid black;">Disapproved</td> <td style="width: 30%; border-bottom: 1px solid black;">_____</td> </tr> <tr> <td style="border-bottom: 1px solid black;">N/A</td> <td style="border-bottom: 1px solid black;">Date</td> <td style="border-bottom: 1px solid black;">Approved</td> <td style="border-bottom: 1px solid black;">Disapproved</td> <td style="border-bottom: 1px solid black;">_____</td> </tr> <tr> <td style="border-bottom: 1px solid black;">DOE-ORP</td> <td style="border-bottom: 1px solid black;">Date</td> <td style="border-bottom: 1px solid black;">Approved</td> <td style="border-bottom: 1px solid black;">Disapproved</td> <td style="border-bottom: 1px solid black;">_____</td> </tr> <tr> <td style="border-bottom: 1px solid black;">D.R. Einan, EPA</td> <td style="border-bottom: 1px solid black;">Date</td> <td style="border-bottom: 1px solid black;">Approved</td> <td style="border-bottom: 1px solid black;">Disapproved</td> <td style="border-bottom: 1px solid black;">_____</td> </tr> <tr> <td style="border-bottom: 1px solid black;">N/A</td> <td style="border-bottom: 1px solid black;">Date</td> <td style="border-bottom: 1px solid black;">Approved</td> <td style="border-bottom: 1px solid black;">Disapproved</td> <td style="border-bottom: 1px solid black;">_____</td> </tr> <tr> <td style="border-bottom: 1px solid black;">D.B. Bowen, Ecology</td> <td style="border-bottom: 1px solid black;">Date</td> <td style="border-bottom: 1px solid black;">Approved</td> <td style="border-bottom: 1px solid black;">Disapproved</td> <td style="border-bottom: 1px solid black;">_____</td> </tr> </table>		W.F. Hamel, DOE-RL	Date	Approved	Disapproved	_____	N/A	Date	Approved	Disapproved	_____	DOE-ORP	Date	Approved	Disapproved	_____	D.R. Einan, EPA	Date	Approved	Disapproved	_____	N/A	Date	Approved	Disapproved	_____	D.B. Bowen, Ecology	Date	Approved	Disapproved	_____	Page 1 of 3
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D.B. Bowen, Ecology	Date	Approved	Disapproved	_____																												

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Description/Justification of Change (continued)

Under the Adaptive Milestone Approach, the Parties will establish enforceable milestones over nominal 3-year periods. As existing milestone sets are completed, outputs from the toolset considering the latest site conditions will provide updated optimum work sequences and timing that decision-makers can use to establish the follow-on 3-year milestone set and inform short- and long-term milestone planning. The overall goal is to provide a milestone framework that facilitates efficient cleanup and provides the Parties with a success-oriented path to advance the Hanford Site mission as well as result in higher confidence that future enforceable milestones will be achievable.

With the agreement to pilot the Adaptive Milestone Approach, fourteen interim milestones listed in IAMIT Determination Number 2021-002, *Pilot Use of Resource Modeling and Adaptive Milestone Approach to Develop Schedules for Cleanup of Central Plateau Operable Units* (reference <https://pdw.hanford.gov/document/AR-16097>) were placed in abeyance. This change control form will create milestones to offset the impacts of placing in abeyance these interim milestones by:

- Establishing a 2024 milestone for DOE-RL to submit change control forms that identify new dates for the M-016 interim milestones placed in abeyance.
- Establishing a milestone to complete Environmental Restoration Disposal Facility (ERDF) Supercell 11 Design. This design is needed to construct a new cell that will allow for future disposal of contaminated soil and building demolition debris.
- Establishing a milestone for the 231Z Materials Engineering Laboratory to support progress towards demolishing the building and disposing of contaminated debris.
- Establishing a milestone for Outer Area waste site response actions that can be performed independently from adaptive milestone planning. Confirmatory sampling or remove treat and dispose (RTD) will be performed per existing response action decisions. The Outer Area waste sites (identified by Waste Information Data System Identification [WIDS ID]) planned for confirmatory sampling and RTD as required are 600-354, 600-355, 600-359, 600-360, 600-361, 600-362, 600-363, 600-387, 600-392, and 600-394. If confirmatory sampling indicates remediation is required for these sites, RTD will be completed by the milestone date. The Outer Area waste sites (identified by WIDS ID) planned for confirmatory sampling only are 200-E-46, 200-W BP, CTFN 2703-E, 600-71, and 600-227.

The Parties agree that these changes constitute Good Cause as described in HFFACO Article XL, Good Cause for Extensions, paragraph 120.E, any other event or series of events mutually agreed to by the Parties as constituting good cause.

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 Revisions for Near-Term Milestones for Central Plateau Operable Units

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Authorized Changes

Modifications to HFFACO Appendix D, "Milestones and Target Dates Including Designation of Lead Regulatory Agency," are denoted by using ~~strikeout~~ to indicate text deletions and double underline to indicate text additions.

Number	Milestone	Due Date
<p><u>M-016-92C</u> <u>Lead Regulatory Agency: EPA</u></p>	<p><u>Complete ERDF Supercell 11 Design and submit to EPA for approval.</u></p>	<p><u>09/30/2024</u></p>
<p><u>M-016-201</u> <u>Lead Regulatory Agency: EPA</u></p>	<p><u>Complete non-intrusive characterization of process piping, tanks and gloveboxes, and electrical/mechanical isolation for the 231Z Materials Engineering Laboratory.</u></p>	<p><u>09/30/2023</u></p>
<p><u>M-016-200</u> <u>Lead Regulatory Agency: EPA</u></p>	<p><u>Submit to EPA, a draft HFFACO change control form identifying new enforceable due dates for the following TPA interim milestones that were put In Abeyance by IAMIT Determination 2021-002:</u></p> <ul style="list-style-type: none"> • <u>M-016-200A. Complete U Plant canyon (221 U Facility) demolition in accordance with the Remedial Design/Remedial Action Work Plan.</u> • <u>M-016-200B. Complete U Plant (221 U Facility) barrier construction in accordance with the Remedial Design/Remedial Action Work Plan.</u> 	<p><u>06/30/2024</u></p>
<p><u>M-016-202</u> <u>Lead Regulatory Agency: EPA</u></p>	<p><u>Complete response actions (confirmatory sampling and remove treat dispose, as required) for 10 waste sites in the Outer Area and confirmatory sampling for an additional 5 waste sites in the Outer Area.</u></p>	<p><u>09/30/2024</u></p>

Change Control Form M-85-22-02
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Description/Justification of Change (continued)

Under the Adaptive Milestone Approach, the Parties will establish enforceable milestones over nominal 3-year periods. As existing milestone sets are completed, outputs from the toolset considering the latest site conditions will provide updated optimum work sequences and timing that decision-makers can use to establish the follow-on 3-year milestone set and inform short- and long-term milestone planning. The overall goal is to provide a milestone framework that facilitates efficient cleanup and provides the Parties with a success-oriented path to advance the Hanford Site mission as well as result in higher confidence that future enforceable milestones will be achievable.

With the agreement to pilot the Adaptive Milestone Approach, fourteen interim milestones listed in IAMIT Determination Number 2021-002, *Pilot Use of Resource Modeling and Adaptive Milestone Approach to Develop Schedules for Cleanup of Central Plateau Operable Units* (reference <https://pdw.hanford.gov/document/AR-16097>) were placed in abeyance. This change control form will create milestones to offset the impacts of placing in abeyance these interim milestones by:

- Establishing a 2024 milestone for DOE-RL to submit a change control form that identifies a new date for the M-085 interim milestone placed in abeyance.
- Establishing a milestone to complete demolition preparations for the 224B facility to support future demolition and disposal.
- Establishing a milestone to complete PUREX “cold and dark indices” to support removal of potential hazards for future work activities within the facility. Cold and dark indices will identify isolation points for all electrical and mechanical hazardous energy sources into and out of the facility in preparation for facility deactivation.

The Parties agree that these changes constitute Good Cause as described in HFFACO Article XL, Good Cause for Extensions, paragraph 120.E, any other event or series of events mutually agreed to by the Parties as constituting good cause.

Tentative Agreement on the Negotiation of Hanford Federal Facility Agreement and Consent Order Revisions for Near-Term Milestones for Central Plateau Operable Units

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Authorized Changes

Modifications to HFFACO Appendix D, "Milestones and Target Dates Including Designation of Lead Regulatory Agency," are denoted by using ~~strikeout~~ to indicate text deletions and double underline to indicate text additions.

Number	Milestone	Due Date
<p><u>M-085-72A</u> <u>Lead Regulatory Agency: Ecology</u></p>	<p><u>Complete demolition preparations for the 224B Plutonium Concentration Facility in accordance with the Removal Action Work Plan (DOE/RL-2017-33).</u></p>	<p><u>09/30/2023</u></p>
<p><u>M-085-85</u> <u>Lead Regulatory Agency: Ecology</u></p>	<p><u>Complete 202A PUREX Canyon cold and dark indices required to establish electrical and mechanical isolation of PUREX.</u></p>	<p><u>03/31/2023</u></p>
<p><u>M-085-71</u> <u>Lead Regulatory Agency: Ecology</u></p>	<p><u>Submit to Ecology, a draft HFFACO change control form identifying a new enforceable due date for the following interim milestone that was put In Abevance by IAMIT Determination 2021-002:</u></p> <ul style="list-style-type: none"> • <u>M-085-70. Submit to Ecology a Remedial Investigation/Feasibility Study Work Plan for 200-CB-1.</u> 	<p><u>06/30/2024</u></p>