



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

11-AMRC-0206
REISSUE

OCT 06 2011

Ms. J. A. Hedges, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

Dear Ms. Hedges:

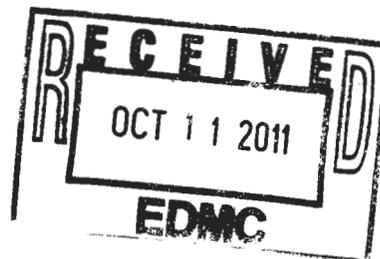
REISSUE: NOTICE OF PROPOSED CHANGES TO TRI-PARTY AGREEMENT
MILESTONES M-16-47 AND M-16-51 (90 DAY NOTICE)

This letter is being re-issued for signatures on the Attachments. Tri-Party Agreement Milestones M-16-47 and M-16-51 call for completion of interim response actions at 100-D and 100-H by December 31, 2011. Draft closure documents for several waste sites included in these milestones have been submitted and are in process of review by the U.S. Department of Energy Richland Operations Office (RL) and the State of Washington Department of Ecology. Over the next four months several documents (RCBRA Ecological Assessment, Columbia River Risk Assessment Report, draft Remedial Investigation/Feasibility Studies and Proposed Plans) are expected to place significant demands on regulator resources. To allow additional time needed for review and comment resolution on these closure documents for the remaining waste sites, RL believes it prudent to extend the schedules for completing these waste sites.

With approval of the attached change requests, completion of the following seven 100-D and five 100-H waste sites will be extended beyond December 31, 2011:

- | | | |
|-------------|----------|-----------|
| 100-D-31:8 | 100-D-30 | 116-H-5 |
| 100-D-31:9 | 118-D-1 | 118-H-1:2 |
| 100-D-31:10 | 132-D-1 | 126-H-2 |
| 1607-D5 | 128-H-1 | 600-151 |

Two signed change requests are attached (re: Tri-Party Agreement VIII.F) proposing that the above waste sites be excluded from the subject milestones. Remediation work completed to date and that which will be completed by December 31, 2011, represents significant cleanup accomplishment in meeting these milestones.



M-016-51
M-016-47

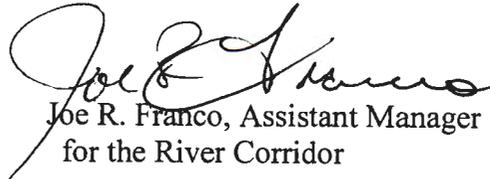
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We look forward to working with you and your staff to achieve prompt closure of these sites, and to meet the December 31, 2011, milestones. If you have questions, please contact me or your staff may contact Joanne Chance or Tom Post, of my staff, on (509) 376-0811 or (509) 376-3232, respectively.

Sincerely,



Joe R. Franco, Assistant Manager
for the River Corridor

AMRC:JCC

Attachments

cc w/attachs:

D. A. Faulk, EPA

N. M. Menard, Ecology

C. H. Page, WCH

M. L. Proctor, WCH

J. B. Price, Ecology

✓ Administrative Record, H6-08

Change Number M-16-11-18	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date September 1, 2011
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Originator M. S. French (U. S. Department of Energy, Richland Operations Office [DOE-RL])	Phone (509) 373-9863
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Class of Change

I - Signatories II - Executive Manager III - Project Manager

Change Title
Remove outstanding waste sites from the scope of milestone M-016-47 "Complete the interim remedial actions for the 100-D Area," due December 31, 2011.

Description/Justification of Change
The 100 D Area interim milestone M-16-47 was developed in April 2002 to provide a schedule to complete interim remedial actions for waste sites in the 100 Area Remaining Sites Interim Action Record of Decision (July 1999) and the 100 Area Burial Grounds Interim Action Record of Decision (September 2000) from the 100-DR-1 and 100-DR-2 Operable Units.

This change proposes removal of the 100-D-30, 100-D-31:8, 100-D-31:9, 100-D-31:10, 118-D-1, 128-D-2, 132-D-1, and 1607-D5 waste sites from the M-16-47 Tri-Party Agreement Milestone. A draft closure document for each of these sites has been submitted to RL and Ecology for review, and in most cases the documents are in the comment resolution process. Until reviews have been completed and comments resolved, it is not possible to proceed with the administrative (issuance of approved Waste Site Reclassification Forms) and field activities (backfill and revegetation where required) required to complete closure of these waste sites.

Authorized Changes:
Hanford Federal Facility Agreement and Consent Order Interim Milestone is modified or created as shown below using ~~strikeout~~ to indicate text deletions and underlined to indicate text additions:

No actual changes to M-016-47 milestone are required.

Milestone Number	Milestone Description	Completion Date
M-016-47	Complete the interim remedial actions for the 100-D Area.	12/31/2011

Impact of Change
As a result of the unexpected delays, the 100-D-30, 100-D-31:8, 100-D-31:9, 100-D-31:10, 118-D-1, 128-D-2, 132-D-1, and 1607-D5 waste sites will be removed from the M-16-47 milestone and waste site closure will be completed under the Tri-Party Agreement Milestone M-16-00A.

Affected Documents
*Hanford Federal Facility Agreement and Consent Order, Appendix D
Remedial Design Report/Remedial Action Work Plan for the 100 Area, DOE/RL-96-17, Rev. 6*

Approvals		Page 1 of 1
DOE 	Date <u>9/1/11</u> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved	
EPA N/A	Date _____ <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved	
Ecology	Date _____ <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved	

Change Number M-16-11-17	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date September 1, 2011
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Originator M. S. French (U. S. Department of Energy, Richland Operations Office [DOE])	Phone (509) 373-9863
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Class of Change

I - Signatories II - Executive Manager III - Project Manager

Change Title
Remove outstanding waste sites from the scope of Tri-Party Agreement milestone M-16-51 "Complete interim remedial actions for 100-H Area", due December 31, 2011.

Description/Justification of Change
The 100-H Area interim milestone M-16-51 was developed in April 2002 to provide a schedule to complete interim remedial actions for waste sites in the 100 Area Remaining Sites Interim Action Record of Decision (July 1999) and the 100 Area Burial Grounds Interim Action Record of Decision (September 2000) from the 100-HR-1 and 100-HR-2 Operable Units.

This change proposes removal of the 116-H-5, 126-H-2, 118-H-1:2, 128-H-1, and 600-151 waste sites from the M-16-51 Tri-Party Agreement Milestone. A draft closure document for each of these sites has been submitted to RL and Ecology for review, and in most cases the documents are in the comment resolution process. Until reviews have been completed and comments resolved, it is not possible to proceed with the administrative (issuance of approved Waste Site Reclassification Forms) and field activities (backfill and revegetation where required) required to complete closure of these waste sites.

Authorized Changes:
Hanford Federal Facility Agreement and Consent Order Interim Milestone is modified or created as shown below using strikeout to indicate text deletions and underlined to indicate text additions:

No actual changes to the M-16-51 milestone are required.

Milestone Number	Milestone Description	Completion Date
M-16-51	Complete the interim response actions for the 100-H Area.	12/31/2011

Impact of Change
As a result of the unexpected delays, the 116-H-5, 126-H-2, 118-H-1:2, 128-H-1, and 600-151 waste sites will be removed from the M-16-51 milestone and closure will be completed under the Tri-Party Agreement Milestone M-16-00A.

Affected Documents
*Hanford Federal Facility Agreement and Consent Order, Appendix D
Remedial Design Report/Remedial Action Work Plan for the 100 Area, DOE/RL-1996-17, Rev 6*

Approvals		Page 1 of 1
DOE 	9/28/11 <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved	
EPA N/A	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved	
Ecology	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved	