

Description/Justification of Change (continued from previous page):

process for conducting the characterization of all tank wastes. The scope of the TWAP will cover all aspects of tank waste analysis which are generic to multiple DSTs and SSTs. A Tank Characterization Plan (TCP) will also be developed for each DST and SST using the DQO process. The TCPs will integrate the results of the various issue- and process-based DQO efforts into a specific sampling and analysis plan for a given tank. Development of TCPs through the DQO process is intended to allow users (e.g., Hanford Facility user groups, regulators) to ensure their needs will be met and that resources are devoted to gaining only necessary information.

- The extent of tank sampling and analysis will be flexible and dependent on individual tank attributes. Because data obtained prior to 1989 did not have quality assurance and quality control assured under the TPA, acceptable characterization data will be based on some sampling and analysis of each waste phase for each DST and SST as specified through the DQO process. The existing TPA M-10-00 milestone (Complete analyses of at least two complete core samples from each single-shell tank) did not allow flexibility in the application of characterization resources on a particular tank within a recognized group. For example, if the process history for a three-tank cascade indicates that their contents should be essentially the same, under this milestone one tank may be more extensively characterized, the middle tank may have confirmatory sampling and analysis, and the third tank by one core sample. Thus, although not all of the tanks will have two core samples taken, it is expected that the tank contents will be better understood by applying essentially the same resources (as were planned under M-10-00) unevenly to a group of tanks.
- A Tank Characterization Report (TCR) will be issued for each DST and SST as specified by the TWAP and TCP. If a TCR is issued without an approved TCP, it will be approved by Ecology and EPA. Tank characterization information will be reported in a timely, usable, and accessible format for all users. The TCRs are intended to be living documents and must be updated as tank waste contents change due to addition or removal of waste and as new information becomes available.
- All data for each DST and SST will be placed in the administrative record and will be available in whole or part to users upon request.

<u>Milestone</u>	<u>Description</u>	<u>Due Date</u>
M-44-00	Issue Tank Characterization Reports (TCRs) based on process knowledge, prior characterization data, and validated empirical data acquired after May 1989 for 177 Hanford high level waste tanks. Provide offsite access to electronic database(s) containing tank characterization information through the Tank Characterization Database (TCD) and Hanford Environmental Information System (HEIS) through the Tank Waste Information Network System (TWINS) or approved analogues for 177 HLW tanks.	Sept. 199

All issued TCRs will be updated quarterly as needed due to addition and/or removal of tank wastes and as new information is obtained.

Validated data packages are to be placed in the administrative record.

M-44-00 Change Request
page 3 of 4

- 1991 RECEIVED
- M-44-01 Submit a draft copy of the TWRS Tank Waste Analysis Plan's (TWAP) and Tank Characterization Plans' (TCPs) revisions, updates, and additions annually to Ecology and EPA. May 1994
(and annually thereafter)
- M-44-02 Submit TWAP and TCRs annually to Ecology and EPA for approval. The TWAP will cover safety, retrieval, pretreatment, and other processing needs. The TWAP will identify sampling and analysis activities projected for the following fiscal year. The TWAP will describe the TCPs to be issued for the year. The TCPs will cover sampling and analysis activities for each DST and SST to be characterized in the following fiscal year. The TWAP will also identify the following year's TCRs to be submitted and on what type of data they will be based. The TWAP will specify the contents of these TCRs. The TWAP and TCPs will be developed via a DQO process involving EPA, Ecology, and USDOE prior to implementation. If the three parties do not agree on any individual TCP then Ecology will issue a final decision by September 30 of that year for the scope of the plan. USDOE will implement the final decision. If USDOE disputes the final decision, the Ecology final decision will be implemented during the dispute resolution process. Aug. 1994
(and annually thereafter)
- M-44-03 Submit three TCRs for initial evaluation and approval. Oct. 1993
- M-44-04 Complete input of characterization information for 3 HLW tanks to electronic database(s). Jan. 1994
- M-44-05 Issue 20 TCRs in accordance with the approved TCPs. If an approved TCP is not issued, the TCRs must be approved by Ecology and EPA. Sept. 1994
- M-44-06 Complete input of characterization information for 20 HLW tanks to electronic database(s). Sept. 1994
- M-44-07 Complete all FY 1992 and 1993 core sample analyses and complete validation of the resulting data. March 1994
- M-44-08 Issue 30 TCRs in accordance with the approved TCPs. Complete input of characterization information for 30 HLW tanks to electronic database(s). Sept. 1995
- M-44-09 Issue 40 TCRs in accordance with the approved TCPs. Complete input of characterization information for 40 HLW tanks to electronic database(s). Sept. 1996
- M-44-10 Issue 40 TCRs in accordance with the approved TCPs. Complete input of characterization information for 40 HLW tanks to electronic database(s). Sept. 1997
- M-44-11 Issue 30 TCRs in accordance with the approved TCPs. Complete input of characterization information for 30 HLW tanks to electronic database(s). Sept. 1998

M-44-00 Change Request
page 4 of 4

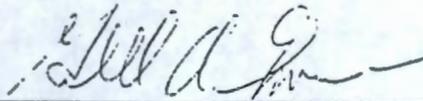
M-44-12 Issue 14 TCRs in accordance with the approved TCPs. Complete
input of characterization information for 14 HLW tanks to
electronic database(s).

Sept. 1999

IT IS SO AGREED:

Each undersigned representative of a Party certifies that he or she is fully authorized to enter into this Agreement and Action Plan and to legally bind such Party to this Agreement and Action Plan. These change requests and amendments shall be effective upon the date on which this amendment agreement is signed by the Parties. Except as amended herein, the existing provisions of the Agreement shall remain in full force and effect.

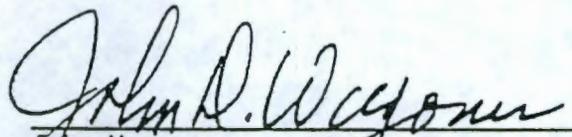
FOR THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY:



Gerald Emison
Acting Regional Administrator
Region 10
U.S. Environmental Protection Agency

1-25-94
Date

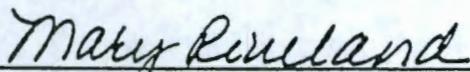
FOR THE UNITED STATES DEPARTMENT OF ENERGY:



John Wagoner
Manager
U.S. Department of Energy
Richland Operations Office

1/25/94
Date

FOR THE WASHINGTON STATE DEPARTMENT OF ECOLOGY:



Mary Riveland
Director
State of Washington
Department of Ecology

1/25/94
Date