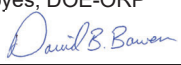


<b>Change Number</b> M-85-22-03	<b>Federal Facility Agreement and Consent Order Change Control Form</b>	<b>Date</b> 03/07/2022
<b>Originator</b> Patty Ensign, DOE-RL		<b>Phone</b> 509-372-3442
<b>Class of Change</b> <input type="checkbox"/> I – Signatories <input checked="" type="checkbox"/> II – Executive Managers <input type="checkbox"/> III – Project Managers		
<b>Change Title</b> Establish New M-085 Series Interim Milestones in TPA, Appendix D for PUREX Complex Removal Actions		
<b>Description/Justification of Change</b> <p>The change control form proposes five new Tri-Party Agreement (TPA) interim milestones through fiscal year (FY) 2025 for work to be conducted under a <i>Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)</i> non-time critical removal action as described in DOE/RL-2016-53, <i>Action Memorandum for the Plutonium Uranium Extraction (PUREX) Complex</i>, DOE/RL-2020-04, <i>Removal Action Work Plan for the PUREX Complex</i>, and DOE/RL-2020-05, <i>Sampling and Analysis Plan for the PUREX Complex</i>.</p> <p>Completion of the activities described in four new interim milestones, M-085-84A through M-085-84D, support successful completion of existing interim milestone M-085-84 to initiate response actions at PUREX, due September 30, 2025. The text of milestone M-085-84 is also being revised to refer to the PUREX Operable Unit instead of the PUREX Geographic Area. The revised terminology is consistent with language in TPA Action Plan, Appendix C, "Listing by Operable Unit."</p> <p style="text-align: center;"><i>Continued on page 2</i></p>		
<b>Impact of Change</b> <p>This change control form proposes to create 5 new interim milestones for implementation of the PUREX Complex removal actions and revises the text of existing interim milestone M-085-84.</p> <p>There is no impact to Major Milestone M-085-00 with this change.</p>		
<b>Affected Documents</b> Tri-Party Agreement Action Plan Appendix D, "Work Schedule Milestones and Target Dates Including Designation of Lead Regulatory Agency."		
<b>Approvals</b>		Page 1 of 3
William F. Hamel <small>Digitally signed by William F. Hamel Date: 2022.03.22 06:34:05 -07'00'</small> W.F. Hamel, DOE-RL	Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/> _____ Date	
N/A	Approved <input type="checkbox"/> Disapproved <input type="checkbox"/> _____ Date	
D.L. Noyes, DOE-ORP  <small>Digitally signed by Bowen, David (ECY) Date: 2022.03.22 09:58:00 -07'00'</small> D.B. Bowen, Ecology	Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/> _____ Date	
N/A	Approved <input type="checkbox"/> Disapproved <input type="checkbox"/> _____ Date	
D.R. Einan, EPA	Approved <input type="checkbox"/> Disapproved <input type="checkbox"/> _____ Date	

**Description/Justification of Change (continued)**

The U.S. Department of Energy (DOE) has completed the FY2021 field work for Corrective Action #3 of Washington State Department of Ecology (Ecology) Administrative Order #15343 which required DOE to recover and manage the white powder identified at or near PUREX Plant Tour Paths 3, 4 and 7. Interim milestones M-085-84(A thru D) initiate mobilization activities for the PUREX canyon. Upon completion of M-085-84 in FY2025, it is DOE’s intent to proceed with completion of mobilization activities and initiation of hazard abatement activities placing priority on known high risk areas within 202A. The hazard abatement activities will include additional white powder removal and removal of the source of white powder.

This change control form establishes a date for DOE to submit to Ecology a proposed schedule for the continuance of the PUREX Complex removal action, including but not limited to additional white powder removal and removal of the source of the white powder. For interim milestone M-085-86, DOE will be required to submit to Ecology a proposed schedule for the continuance of the PUREX Complex removal action, including but not limited to additional white powder removal and removal of the source of the white powder. TPA Action Plan, Section 11.6, “Other Work Plans and Supporting Schedules” requires work plans to include an implementation schedule with start and completion dates. Milestones shall be set in a manner with at least one milestone every twelve months, unless otherwise agreed to by the project managers.

**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-085-84A</u>  <u>Lead Regulatory Agency: Ecology</u>	<u>Complete electrical and mechanical isolation of the 211A building and tank yard to support demolition of the PUREX North facilities and access to 202A for characterization and removal actions.</u>	<u>09/30/2022</u>
<u>M-085-84B</u>  <u>Lead Regulatory Agency: Ecology</u>	<u>Complete demolition of PUREX ancillary facilities 203A building and tank yard, and the 205A building to support access to 202A for characterization and removal actions.</u>	<u>09/30/2023</u>
<u>M-085-84C</u>  <u>Lead Regulatory Agency: Ecology</u>	<u>Complete infrastructure upgrades (i.e., construct roads, field support facilities, waste container survey and storage areas, and decontamination stations) to support demolition preparation as described in <i>Removal Action Work Plan for the Plutonium Uranium Extraction Complex</i>, DOE/RL-2020-04.</u>	<u>09/30/2024</u>

Number	Milestone	Due Date
<u>M-085-84D</u> <u>Lead Regulatory Agency: Ecology</u>	<u>Initiate utility system isolations as described in Section 2.2.4 of the Removal Action Work Plan for the Plutonium Uranium Extraction Complex, DOE/RL-2020-04.</u>	<u>09/30/2025</u>
M-085-84 Lead Regulatory Agency: Ecology	Initiate response actions for the PUREX <del>Geographic Area</del> <u>Operable Unit</u> in accordance with the schedule in the approved Remedial/Removal Action Work Plan developed under M-085-82.	09/30/2025
<u>M-085-86</u> <u>Lead Regulatory Agency: Ecology</u>	<u>Submit to Ecology for approval, as a modification to the PUREX Removal Action Work Plan, a schedule including but not limited to additional white powder removal and removal of the source of the white powder.</u>	<u>03/30/2025</u>