

D-R-A-F-T

Hanford Federal Facility Agreement and Consent Order
Change Control Form M-41-97-02
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Description/Justification (cont.)

The Safety Assessment for pumping operations in tank 241-A-101, which was expected to be the bounding case for the flammable gas tanks, was approved on October 31, 1996. The approval, however, was subject to several contingencies, including resolution of the approval level for many of the specified process controls. Review and approval of the recommended set of controls for tank 241-A-101 was completed on May 16, 1997. Analysis was underway to assure that other tanks were bounded by A-101. However, to minimize the cost and controls, the A-101 bounding work was suspended, with current efforts underway to incorporate the safety basis for saltwell pumping into the Basis for Interim Operation/Justification for Continued Operation (BIO/JCO). This will allow the contractor to move forward with the work for pumping of the tanks which are needed to meet M-41 interim milestones.

Because of the delays necessary to satisfy contingencies in the saltwell pumping authorization basis, the schedule for completing subsequent M-41 interim milestones has continued to slip. Change Control Form M-41-97-01 was submitted to Ecology on June 27, 1997, requesting a six month delay in the due date for M-41-22. Change Control Form M-41-97-01 was not approved by Ecology and is currently in dispute.

Subsequent to the submittal of Change Control Form M-41-97-01, safety assessments carried out for the remaining tanks to be interim stabilized indicate that additional safety controls and equipment will be required to proceed with interim stabilization activities. The extensive analyses and the resulting mitigation measures have significantly extended the schedule to meet M-41 milestones even further than anticipated when Change Control Form M-41-97-01 was submitted.

For the above reasons DOE has proposed a one year reengineering moratorium on initiation of pumping for additional tanks. Pumping of the tanks that were started earlier will continue in FY 1998, but pumping of only two additional tanks is planned in Fiscal Year (FY) 1998. One of the tanks, however, is affected by pending amendments to the authorization basis.

Reengineering during FY 1998 will address reduction of saltwell pumping costs, enhancement of emergency pumping capabilities, and development of the most cost effective means of pumping tank 241-BY-105, which has a layer of cement commingled with the pumpable liquid in the tank. The schedule for completing the remaining interim stabilization work for the single shell tanks will need to be established when the results of the FY 1998 reengineering efforts are available. The schedule for initiating pumping beyond the tanks already forecasted to start by March 31, 1998 remains uncertain until that time. For these reasons, the due date for Milestone M-41-23 is changed to "to be determined."

Future M-41 interim milestones and target dates, including the major milestone, may also require adjustment and will be addressed in separate change requests.