

# START

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Change Number M-12-92-1	FEDERAL FACILITY AGREEMENT AND CONSENT ORDER CHANGE CONTROL FORM Do not use blue ink. Type or print using black ink.	Date May 20, 1992
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Originator T. M. Wintczak	Phone 376-0902
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Class of Change

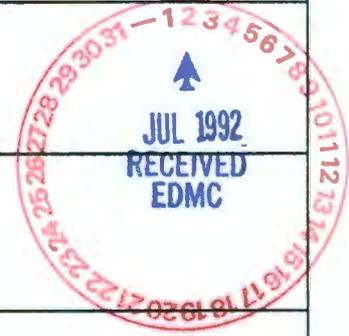
I - Signatories (Section 13.0)     II - Project Manager     III - Unit Manager

Change Title

Change of 200-UP-2 Work Plan scope and M-12-15 interim milestone date.

Description/Justification of Change

See attached



Impact of Change

Submittal of the 200-UP-2 Work Plan (M-12-15) will be delayed two months to 8/31/92. The major milestone (M-12-00) for submittal of 15 work plans by June 1992 was completed by submittal of the 100-FR-3 Work Plan.

Affected Documents

- DOE/RL-91-19, Draft A, RI/FS Work Plan for the 200-UP-2 Operable Unit, Hanford Site, Richland, Washington.
- Hanford Federal Facility Agreement and Consent Order Action Plan, Appendix C, Appendix D, Work Schedule.

Approvals     Approved     Disapproved

	6/24/92
DOE - SH Witness	Date
	6/24/92
EPA - PT Day	Date
	6/24/92
Ecology - DB Jansen	Date



DESCRIPTION/JUSTIFICATION AND IMPACT FOR CHANGE REQUEST PACKAGE  
NUMBER M-12-92-1  
ADDRESSING 200-UP-2 AND 200-UP-1 OPERABLE UNITS

DESCRIPTION - HISTORY

The Hanford Federal Facility Agreement and Consent Order change request package M-12-90-4 provides for the assessment of an aggregate area and the need for refinement of operable unit (OU) boundaries. Specifically, the M-12-15 interim milestone for submitting the 200-UP-2 Work Plan provides for defining the scope of the Work Plan based on the results of the U Plant Aggregate Area Management Study Report (AAMSR).

The U Plant AAMSR compiled and evaluated the existing body of knowledge to support the *Hanford Site Past-Practices Strategy* (DOE/RL-9104, March 1992) decision making process. Each waste management unit (WMU) and unplanned release within the aggregate area was assessed to determine the most expeditious path for remediation within the statutory requirements of the Comprehensive Environmental Response, Compensation, and Liability Act and Resource Conservation Recovery Act. A review of existing pertinent data regarding U Plant Aggregate Area WMUs and unplanned releases was summarized and evaluated in this study.

Recommended assessment paths for the WMUs and unplanned releases at the U Plant Aggregate Area were made. These recommendations are only proposed at this time and are subject to adjustment and change. Factors that may affect development of final recommendations include, but are not limited to, comments from the U.S. Environmental Protection Agency, State of Washington Department of Ecology, or the U.S. Department of Energy; identification and development of new information; and modification of the criteria used in the assessment path decision-making process. Changes in recommendations will be addressed, and more detail on recommended assessment paths for WMUs and unplanned releases will be included in Work Plans as they are developed for the actual investigation and remediation activities.

U PLANT AAMS CONCLUSIONS

Redefinition of the 200-UP-1 and 200-UP-2 OUs were suggested based on the data evaluation in the U Plant AAMSR. The geographic boundaries should be redefined to include the 216-U-14 Ditch, the 207-U Retention Basins, and their associated unplanned releases in the 200-UP-1 OU.

The reassignment of the 216-U-14 Ditch system to the 200-UP-1 OU was based on the similarities in the nature and extent of the contaminants of concern in the 216-U-14 Ditch system and other sections of the Pond system that are included within the 200-UP-1 OU. Characterization of a limited number of areas of the trench, ditches, and pond that are expected to contain the highest inventory of contaminants, e.g., effluent receiving points, is expected to provide sufficient information to initiate an Interim Remedial Measure.

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Investigation of groundwater should be removed from the scope of the 200-UP-2 OU and included in a 200 West Area Groundwater OU. The groundwater portion of the 200-UP-2 OU would be reassigned to a groundwater OU designated as 200-UP-1 and assigned a high priority. The 200-UP-1 Groundwater OU would cover the southern portion of the 200 West Area and be composed of the groundwater portions of the following OUs: 200-UP-1, 200-UP-2, 200-RO-1, 200-RO-2, and 200-RO-3.

The strategy for separating the source and groundwater OUs was based on two factors: 1) the definition of plume geometries is based on hydrogeologic regimes not geographical boundaries, and 2) the remedial actions are tied directly to specific contaminant plumes. In addition, the groundwater beneath these specific OUs is interdependent due to the mounding beneath U Pond which resulted from discharges to this WMU. It was the intent of the strategy to define a southern groundwater OU in 200 West Area. As the existing groundwater information is assimilated as part of the 200 West AAMSR, it will provide information on sources to substantiate the definition of specific groundwater OUs within the 200 West Area. The details of the 200 West Groundwater OUs will be addressed in a separate change package that is being prepared.

#### RECOMMENDATION

1. It is requested that groundwater within the 200-UP-1 and 200-UP-2 OUs be addressed under a groundwater OU designated 200-UP-1. Recommendations for the scope of the proposed 200-UP-01 Groundwater Operable Unit will be based on the 200-West AAMSR. The schedule for this Work Plan is addressed in a separate Change Request planned to designate the priority Work Plans for calendar year 1993.
2. This change package requests that the WMUs within the 200-UP-2 and 200-UP-1 OUs be investigated simultaneously under a source OU designated as 200-UP-2.
3. To most expeditiously facilitate this concept, it is also requested that the milestone M-12-15 for submittal of the 200-UP-2 Work Plan be delayed until August 1992, such that the scope of 200-UP-1 can be added to the document.

#### SPECIFIC CHANGES

##### HFFACO Appendix C:

1. All waste units currently listed under 200-UP-1 shall be moved to the 200-UP-2 operable unit.

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2. The 200-UP-1 operable unit shall be redesignated as a groundwater only operable unit which will address at a minimum the groundwater associated with the expanded 200-UP-2 operable unit with a priority of A until altered by a subsequent change form.

**HFFACO Appendix D Table D-2:**

1. Change interim milestone M-12-15 from:

M-12-15	Submit 200-UP-2 operable unit work plan (source and groundwater operable unit) or an agreed upon alternate work plan based on results of the U-Plant Aggregate Area Management Study.	June 1992
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to:

M-12-15	Submit 200-UP-2 operable unit work plan or an agreed upon alternate work plan based on results of the U-Plant Aggregate Area Management Study.	Aug. 1992
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Subject: CHANGE REQUEST M-12-92-1

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