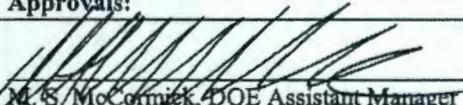
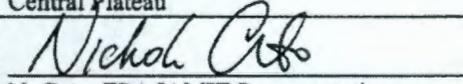


0068364

Change Number	Federal Facility Agreement and Consent Order Change Control Form		Date:	
M-34-05-04	Do not use blue ink. Type or print using black ink.		January 9, 2006	
Originator: M.S. McCormick		Phone: (509) 373-9971		
Class of Change:				
<input type="checkbox"/> I- Signatories		<input checked="" type="checkbox"/> II - Executive Manager		<input type="checkbox"/> III - Project Manager
Change Title:				
Delays in Sludge Project for the 100-K Basins.				
Description/Justification of Change:				
See attached page 3.				
Impact of Change: This TPA change delays removal and treatment of sludge from the 100-K Basins.				
Affected Documents:				
The Hanford Federal Facility Agreement and Consent Order, as amended;				
Approvals:				
 M.S. McCormick, DOE Assistant Manager Central Plateau	<u>1/10/06</u> Date	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved	
 N. Ceto, EPA IAMIT Representative	<u>1-10-06</u> Date	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved	
<u>N/A</u> Ecology	_____ Date	<input type="checkbox"/> Approved	<input type="checkbox"/> Disapproved	

RECEIVED
FEB 06 2006
EDMC

Modifications established by approval of this Tri-Party Agreement Change Request are denoted as ~~strikeout~~ for deletions/modification and ~~shading~~ for new text.

M-034-34	Complete removal of K East sludge	01/31/2006 05/07
M-034-35	Containerize K West Sludge a) All K West Bulk* Sludge is placed in containers b) Complete final pass clean up	06/30/2006 a) 07/07 b) 01/08
M-034-30	Initiate Sludge Treatment This interim milestone will be complete following treatment and packaging of the first unit of sludge into a form that is certifiable for disposal offsite.	2/28/2007 12/08
M-034-31	Complete Sludge Treatment This interim milestone will be complete following treatment and packaging of all sludge for disposal offsite.	10/31/2007 11/09

* Bulk sludge containerization means that a first pass with a vacuum has been completed to remove large amounts of sludge; racks, and debris have been removed from the area; additional vacuuming has been completed, as necessary, to expose the concrete surface of the basin less any redeposition of sludge that is suspended in the basin water; and debris has been washed to remove sludge from internal spaces and visible surface sludge.

Description/Justification of Change:

Completion of K-Basin remediation is a critical component of river corridor cleanup at Hanford. While an important milestone was achieved when K-basin fuel removal was completed 10 years after initiation, there are several critical elements of K-Basin remediation yet to be completed, among them: removal, treatment, and disposal of basin sludge; removal and disposal of basin debris; treatment of basin water; removal of the basin themselves; and excavation of soils contaminated by K-basin releases to the subsurface. Each of these elements is on the critical path for completion of K-basin remediation, interim safe storage of the reactors by 2011, and completion of the interim response actions for the 100 K Area by 2012 as required by Milestone M-16-00A.

This milestone change package is intended to reflect the current expectations for completion of several K-basin activities. It is a change required because DOE and its contractors did not adequately determine the scope of K-basin sludge and debris removal. As a consequence, inadequate planning and faulty design has resulted in significant delays on this project. While DOE believes that some of the delays may be attributed to technical difficulties and unknown conditions, EPA believes that the complexities of these difficulties and conditions could and should have been anticipated and mitigated in order to meet project milestones.

On two previous occasions EPA has assessed stipulated penalties against DOE for failure to meet K-Basin

sludge management milestones. EPA has been willing to work with DOE to adjust schedules on many occasions (1994, 1995, twice in 1999, 2000, 2001, twice in 2002, and 2004) to reflect DOE's request for flexibility in implementation of K-basin remediation tasks. Despite past enforcement actions and milestones modified to accommodate schedules proposed by DOE and its contractors, DOE has indicated that it is unable to meet the remaining interim milestones for this project, and EPA has again been requested to modify schedules.

Failure to meet these deadlines threatens the broader objective of completing K-Area and 100-Area remediation on the schedule contained in the Tri-Party Agreement. By agreeing to a limited number of milestone changes at this time, EPA affirms its expectation and DOE affirms its commitment to work safely and aggressively to complete work that will allow all the remediation activities at K-basins and the 100 K Area to be completed on the revised schedule and consistent with completion of river corridor remediation tasks by 2012 while acknowledging that some near term tasks will require additional time for completion.