



U.S. Department of Energy

0059414

Office of River Protection

P.O. Box 450
Richland, Washington 99352

MAY 05 2003

03-ED-070

Mr. Tom C. Fitzsimmons, Director
State of Washington
Department of Ecology
P. O. Box 47600
Olympia, Washington 98504

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EDMC

Dear Mr. Fitzsimmons:

U.S. DEPARTMENT OF ENERGY (DOE) PROPOSED CHANGE REQUEST OF M-62-03-01 THAT MODIFIES THE HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (HFFACO) M-62, M-47 AND M-90 MILESTONES

This letter transmits a proposal by the DOE, Office of River Protection (ORP) to modify interrelated requirements of the HFFACO milestones M-62, M-47, and M-90, as described in proposed HFFACO Change Control Form M-62-03-01 (attached). This draft proposal is submitted in accordance with Section 12.3.2 of the HFFACO Action Plan. I am proposing this modification to reflect and accommodate contract, baseline, and schedule requirements that are necessary to properly align and adjust contract schedule in order to properly achieve the referenced HFFACO milestones, as well as the overall objectives of the HFFACO. The specific justifications for these changes under HFFACO Action Plan Section 12.3.2 are provided below. Previously, we have discussed these changes informally. Based on discussions we've had, I believe you understand our need to be reasonably flexible in directing our contractors to achieve contract, HFFACO, and other milestones and that coordination of all of these in a meaningful way is extremely complex. As an aside to submission of this request, because the existing coordination procedures are complex, I'd like to propose, independent of this proposal, discussion of this and other issues under the HFFACO with you on a recurrent basis, with participation of appropriate staff.

As we have discussed, building the Waste Treatment and Immobilization Plant (WTP) is ORP's highest priority. It is imperative that we move forward with a plan that affords the highest probability of success. This Change Request incorporates complex-wide experience to define a high confidence schedule to build and commission the WTP in time to begin full radioactive operations in January 2011. The higher confidence schedule extends the time allowed for construction and modifies the commissioning strategy.

The change in commissioning strategy will extend the cold commissioning period, thereby extending problem solving opportunities before radioactive wastes are introduced to the plant. DOE and commercial industry have found that correcting process problems after the introduction of radioactive wastes is much more difficult, poses a greater worker safety risk, and is more costly. To ensure that full plant performance is demonstrated, a composite test feed will be

Mr. Tom C. Fitzsimmons
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developed and processed. This approach may result in an earlier transition to full operations, thereby achieving the M-62-10 milestone "Complete Hot Commissioning – Phase I Treatment Complex," on or ahead of schedule.

Included in this Change Request are extensions to due dates within Milestones M-47 and M-90 series to align waste feed operations and canister storage capacity to the above referenced M-62 milestone changes. DOE recognizes that any changes to M-62, M-47, and M-90 milestones require the consent of the Parties to the HFFACO and looks forward to discussing these matters with you.

If you have any questions, please contact me, or you staff may contact James E. Rasmussen, (509) 376-2247.

Sincerely,


Roy J. Schepens
Manager

ED:WR

Attachment

cc w/attach:

W. T. Dixon, CHG

S. B. Fowler, CHG

M. N. Jarayassi, CHG

R. Gay, CTUIR

S. Dahl, Ecology

J. J. Lyon, Ecology

J. Hertz,el, FHI

J. L. Hanson, INNOV

P. Sobotta, NPT

K. Niles, Oregon Energy

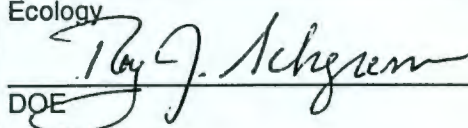
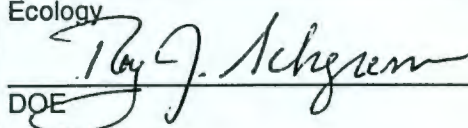
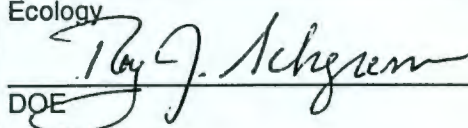
J. Shorin, WA AGO

R. Jim, YN

Administrative Record

Attachment
03-ED-070

Change Control Form for M-62-03-01, dated May 2, 2003

Change Number M-62-03-01	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date May 02, 2003																				
Originator DOE-Office of River Protection		Phone																				
Class of Change <input type="checkbox"/> I – Signatories <input checked="" type="checkbox"/> II – Executive Manager <input type="checkbox"/> III – Project Manager																						
Change Title Modification of <u>Hanford Federal Facility Agreement and Consent Order</u> (HFFACO) requirements M-62-07B & M-62-09, in order to redefine “hot commissioning” and to resolve inconsistencies between HFFACO requirements, completion schedules within the U. S. Department of Energy’s (DOE) contract No. DE-AC27-01RV14136 and DOE’s Office of River Protection (ORP) baseline schedule. Modification of HFFACO M-47-02, M-47-03A, M-47-04, M-90-10, and M-90-11 milestones to align Waste Feed Operations and Canister Storage capabilities with hot commissioning.																						
Description/Justification of Change This M-62-03-01 Change Request modifies milestones M-47-02, M-47-03A, M-47-04, M-90-10, M-90-11, M-62-07B and M-62-09 due dates and updates the M-62-09 milestone description to align with the revised baseline change request to the U. S. Department of Energy’s (DOE) contracts No. DE-AC27-01RV14136 and No.DE-AC27-99RL14047.																						
Impact of Change This change request Modifies <u>Hanford Federal Facility Agreement and Consent Order</u> (HFFACO) work requirements at M-62-07B & M-62-09 in order to redefine “hot commissioning” and to resolve inconsistencies between HFFACO requirements, completion schedules within the U. S. Department of Energy’s (DOE) contract No. DE-AC27-01RV14136 and DOE’s Office of River Protection (ORP) baseline schedule.																						
Affected Documents The <u>Hanford Federal Facility Agreement and Consent Order</u> , as amended, including HFFACO Action Plan Appendix D, DOE’s Annual Land Disposal Restrictions Report, DOE’s Tank Farm Closure/Post-Closure Workplan Update and Hanford site internal planning, management, and budget documents (e.g., DOE and DOE contractor Baselines, Baseline Change Control documents.																						
Approvals <table border="0" style="width: 100%;"> <tr> <td style="width: 40%; border-bottom: 1px solid black;">Ecology</td> <td style="width: 20%; border-bottom: 1px solid black;">Date</td> <td style="width: 20%; text-align: center;">_____ Approved _____ Disapproved</td> <td style="width: 20%;"></td> </tr> <tr> <td style="text-align: center;"></td> <td style="text-align: center;">5/5/03</td> <td style="text-align: center;">✓ Approved _____ Disapproved</td> <td></td> </tr> <tr> <td style="border-bottom: 1px solid black;">DOE</td> <td style="border-bottom: 1px solid black;">Date</td> <td></td> <td></td> </tr> <tr> <td style="text-align: center;">N/A</td> <td></td> <td style="text-align: center;">_____ Approved _____ Disapproved</td> <td></td> </tr> <tr> <td style="border-bottom: 1px solid black;">EPA</td> <td style="border-bottom: 1px solid black;">Date</td> <td></td> <td></td> </tr> </table>			Ecology	Date	_____ Approved _____ Disapproved			5/5/03	✓ Approved _____ Disapproved		DOE	Date			N/A		_____ Approved _____ Disapproved		EPA	Date		
Ecology	Date	_____ Approved _____ Disapproved																				
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DOE	Date																					
N/A		_____ Approved _____ Disapproved																				
EPA	Date																					

The April 2003 WTP baseline change request resulted from the following developments and issues:

- We have learned through research and technology that the WTP is a more robust plant with greater operational flexibility than previously recognized.
- To take advantage of this flexibility, DOE has begun implementing the accelerated cleanup initiative, which for the WTP, will require installation of two HLW melters and two LAW melters.
- The accelerated cleanup initiative requires a new approach to commissioning that will better attain the M62-10 milestone (Completion of Hot Commissioning for the Phase 1 Treatment Complex) by 01/31/2011

This new commissioning strategy will extend the cold commissioning period thereby extending problem solving opportunities before the plant becomes radioactive. DOE and commercial industry have found that correcting process problems after the plant becomes radioactive is much more difficult, poses a greater worker safety risk, and is more costly than while the plant is cold. To ensure that full plant performance is demonstrated, a composite test feed will be developed and processed. This approach may result in an earlier transition to full operations, thereby achieving the M-62-10 milestone, Complete Hot Commissioning, on or ahead of schedule.

Included in this Change Request are extensions to due dates within milestones M-47 and M-90 series to align waste feed operations and canister storage capacity to the above referenced M-62 milestone changes.

Modifications to the M-62, M-47 and M-90 milestone series incorporated into the HFFACO by approval of this M-62- 03-01 Change Request are shown here as either shaded additions, or ~~strikethrough~~ deletions.

MS Number	Milestone Description	Due Date
M-62-00	<p>COMPLETE PRETREATMENT PROCESSING AND VITRIFICATION OF HANFORD HIGH LEVEL (HLW) AND LOW ACTIVITY (LAW) TANK WASTES.</p> <p>COMPLIANCE WITH THE WORK SCHEDULES SET FORTH IN THIS M-62 SERIES IS DEFINED AS THE PERFORMANCE OF SUFFICIENT WORK TO ASSURE WITH REASONABLE CERTAINTY THAT DOE WILL ACCOMPLISH SERIES M-62 MAJOR AND INTERIM MILESTONE REQUIREMENTS.</p> <p>DOE INTERNAL WORK SCHEDULES (E.G., DOE APPROVED SCHEDULE BASELINES) AND ASSOCIATED WORK DIRECTIVES AND AUTHORIZATIONS SHALL BE CONSISTENT WITH THE REQUIREMENTS OF THIS AGREEMENT. MODIFICATION OF DOE CONTRACTOR BASELINE(S) AND ISSUANCE OF ASSOCIATED DOE WORK DIRECTIVES AND/OR AUTHORIZATIONS THAT ARE NOT CONSISTENT WITH AGREEMENT REQUIREMENTS SHALL NOT BE FINALIZED PRIOR TO APPROVAL OF AN AGREEMENT CHANGE REQUEST SUBMITTED PURSUANT TO AGREEMENT ACTION PLAN SECTION 12.0</p>	12/31/2028
M-62-00A	COMPLETE PRETREATMENT PROCESSING AND VITRIFICATION OF HANFORD HLW	2/28/2018

¹ In meeting this requirement DOE will pretreat and vitrify no less than 6000 metric tons of sodium (in the instance of LAW feed) and 800 metric tons of waste oxides (in the instance of HLW feed).

M-62- 03-01 May 02, 2003
 Description/Justification of Change (continued)

AND LAW PHASE I TANK WASTES.

PHASE I TANK WASTE PROCESSING SHALL PRETREAT AND VITRIFY NO LESS THAN 10% OF HANFORD'S TANK WASTE BY MASS¹ AND 25% BY ACTIVITY.

M-62-01	<p>SUBMIT SEMI-ANNUAL PROJECT COMPLIANCE REPORT</p> <p>DOE's MANAGER, OFFICE OF RIVER PROTECTION (ORP), WILL SUBMIT A "<u>PROJECT COMPLIANCE REPORT</u>" TO ECOLOGY SEMI-ANNUALLY (A COPY OF THIS REPORT WILL ALSO BE PROVIDED TO EPA's REGION 10 OFFICE OF WASTE AND CHEMICALS MANAGEMENT). THIS REPORT WILL DOCUMENT DOE COMPLIANCE WITH AGREEMENT REQUIREMENTS AND SHALL BE SEQUENTIALLY UPDATED BY INFORMATION DOCUMENTING WORK PERFORMED AND ISSUES ENCOUNTERED DURING THE PREVIOUS REPORT PERIOD. THE ORP PROJECT COMPLIANCE REPORT WILL BE PROVIDED AS PART OF THE PARTIES' INTER AGENCY MANAGEMENT INTEGRATION TEAM (IAMIT) MEETINGS, AND SHALL DOCUMENT THE STATUS OF PROGRESS TO DATE, PROGRESS MADE DURING THE REPORT PERIOD, AND ACTIVITIES EXPECTED IN THE FORSEEABLE FUTURE. THE REPORT WILL INCLUDE, BUT IS NOT LIMITED TO: (1) A CONCISE DESCRIPTION OF PROJECT ACCOMPLISHMENTS AND ISSUES INCLUDING THOSE ENCOUNTERED DURING THE PREVIOUS YEAR AND THOSE EXPECTED IN THE NEAR TERM, (2) WHEN APPLICABLE, A DESCRIPTION OF ACTIONS INITIATED OR OTHERWISE TAKEN TO RECOVER ANY AGREEMENT SCHEDULE SLIPPAGE, (3) A BUDGET AND COST STATUS, (4) A STATEMENT DOCUMENTING WHETHER OR NOT DOE AND DOE'S CONTRACTOR(S) REMAIN IN COMPLIANCE WITH AGREEMENT REQUIREMENTS, I.E., WHETHER OR NOT "DOE AND DOE'S CONTRACTOR(S) REMAIN IN COMPLIANCE WITH AGREEMENT REQUIREMENTS, I.E., WHETHER OR NOT "DOE AND DOE'S CONTRACTOR(S) HAVE COMPLETED SUFFICIENT WORK TO ALLOW ACHIEVEMENT OF AGREEMENT REQUIREMENTS.", AND (5) CONCISE DESCRIPTIONS OF ANY NONCOMPLIANCE. COPIES OF ALL PERTINANT DOE WORK DIRECTIVES AND/OR AUTHORIZATIONS ISSUED TO DOE'S CONTRACTOR(S) SHALL BE PROVIDED ON REQUEST.</p>	Semi-annually beginning July 31, 2001
M-62-02	<p>SUBMITTAL OF HANFORD TANK WASTE TREATMENT ALTERNATIVES REPORT.</p> <p>DOE WILL SUBMIT A REPORT THAT DESCRIBES THE ALTERNATIVES (TECHNICAL, FINANCIAL, AND CONTRACTUAL) TO TREAT HANFORD TANK WASTE. THE REPORT WILL: 1.) IDENTIFY AND DESCRIBE CREDIBLE ALTERNATIVES TO THE CURRENT PRIVATIZATION APPROACH THAT MEET DOE COMMITMENTS TO ACHIEVE HOT OPERATIONS BY DECEMBER, 2007, AND TO TREAT NO LESS THAN 10 PERCENT OF THE TANK WASTE BY MASS AND 25 PERCENT OF THE TANK WASTE BY ACTIVITY BY FEBRUARY, 2018, 2.) SERVE AS A BASIS TO AMEND THE FISCAL YEAR 2001 BUDGET REQUEST FOR AUTHORITY TO IMPLIMENT A CONTINGENCY OPTION (AUTHORITY TO USE PRIVATIZATION SET-ASIDE FUNDS), AND 3.) BE RELEASED CONCURRENTLY TO ECOLOGY, EPA, AND THE PUBLIC.</p>	3/01/2000
M-62-03	<p>SUBMIT DOE PETITION FOR RCRA DELISTING OF VITRIFIED HLW.</p> <p>DOE WILL SUBMIT ITS PETITION FOR DELISTING OF THE IMMOBILIZED HIGH-LEVEL WASTE (HLW) FROM THE PHASE I WASTE TREATMENT PLANT FROM RCRA AND THE WASHINGTON STATE HWMA (DELISTING PETITION) IN ACCORDANCE WITH 40 CFR 260.22 AND WAC 173-303-072.</p>	12/31/2006
M-62-04T	<p>READINESS TO PROCEED – SUPPORT TO PHASE I TREATMENT.</p> <p>DOE AND ITS HANFORD TANK FARMS OPERATIONS CONTRACTOR WILL COMPLETE ALL NECESSARY WORK AND ACHIEVE READINESS TO PROCEED IN SUPPORT OF PART B-2, PHASE I.</p>	5/01/2000
M-62-06	<p>START OF CONSTRUCTION – PHASE I TREATMENT COMPLEX.</p>	<p>12/31/2002 completed</p>

Description/Justification of Change (continued)

FIRST PLACEMENT OF STRUCTURAL CONCRETE AT ONE OF THE TREATMENT COMPLEX PRINCIPAL FACILITIES (I.E., PRETREATMENT, LOW-ACTIVITY WASTE VITRIFICATION, OR HIGH-LEVEL WASTE VITRIFICATION FACILITIES).

M-62-07A INITIAL ERECTION OF LOW-ACTIVITY WASTE VITRIFICATION FACILITY ELEVATION -21' STRUCTURAL STEEL COLUMNS, BEAMS, AND Q DECK AT ELEVATION +3 (BNI BASELINE SCHEDULE ACTIVITY 4DL131B000 AS PART OF DOE CONTRACT No. DE-AC27-01RV14136). 10/30/2003

This milestone represents the placement of the first structural steel column as part of initiation of BNI Baseline Schedule activity 4DL131B000 -LAW - Elev -21 SS Columns, Beams & Q-Deck at +3 (Contract No. DE-AC27-01RV14136). In addition activity 4DL121B100 LAW - Elev -21 Place Basemat Concrete shall be substantially completed and activities 4DL121D000 LAW - Elev -21 Perimeter Walls FREP and 4DL121F000 LAW - Elev -21 Interior Walls FREP shall have been initiated.

Completion of this milestone will be met when the first structural steel column is installed at the -21foot elevation in the LAW facility. This milestone demonstrates a significant progress in design and engineering as well as construction of the LAW facility because basemat concrete will have been poured and construction of walls will have been started. In addition, procurements will have been made, not only for this facility, but for the other major facilities. Erection of structural steel in the LAW facility will also provide a lessons learned opportunity because it will be the first facility to begin this aspect of construction.

M-62-07B COMPLETE ASSEMBLY OF LOW ACTIVITY WASTE VITRIFICATION FACILITY MELTER #1 SO THAT IT IS READY FOR TRANSPORT AND INSTALLATION IN THE LAW VITRIFICATION BUILDING (BNI BASELINE SCHEDULE ACTIVITY 4DL321A300 AS PART OF DOE CONTRACT No. DE-AC27-01RV14136). 11/30/2005
07/31/2007

This milestone represents the assembly of LAW Melter #1 to the point it is ready for Refractory as part of BNI Baseline activities 3EL3212A00 Specifications and Analysis, 4DL321A000 LAW - Procure Material & Equipment for Melters and 4DL321A200 LAW- Assemble Melter #1 (Contract No. DE-AC27-01RV14136). In addition, activities 4DL121U100 LAW - Elev +3 South Melter FREP and 4DL131D000 LAW - Elev +28 Columns, Beams & Q-Decking at +48 shall be substantially completed.

Completion of this milestone will be met when LAW melter #1 will have been fully fabricated, assembled and ready for refractory material to be installed. Assembly of the melter is scheduled to occur near the end of LAW construction when the facility is most ready to have the assembled melter moved into the LAW cell where the refractory material will be installed. Meeting this milestone therefore represents significant accomplishment of the engineering, design and construction of the LAW facility. Furthermore, assembly of the first melter provides significant opportunity for lessons learned that can be applied in the assembly of the other two LAW melters as well as the HLW melter.

M-62-08 SUBMITTAL OF HANFORD TANK WASTE PHASE II TREATMENT ALTERNATIVES REPORT. 7/31/2005

DOE WILL SUBMIT A PRELIMINARY REPORT THAT DESCRIBES THE TECHNICAL,

Description/Justification of Change (continued)

	FINANCIAL, AND CONTRACTUAL ALTERNATIVES TO TREAT THE TANK WASTES REMAINING AFTER COMPLETION OF PHASE I TREATMENT. THE REPORT WILL IDENTIFY CREDIBLE ALTERNATIVES TO COMPLETE TREATMENT OF THE REMAINING WASTES BY 2028, AND AID IN BUDGET PLANNING FOR FUTURE BUDGET AUTHORITY SUBMITTAL. THE REPORT WILL BE UPDATED EVERY TWO YEARS UNTIL THE TANK WASTE TREATMENT PHASE II PLAN IS FINALIZED.	
M-62-09	START (HOT) COLD COMMISSIONING – PHASE I TREATMENT COMPLEX. DOE WILL START HOT COMMISSIONING OF ITS TANK WASTE TREATMENT COMPLEX (DEFINED AS FIRST PRINCIPAL FACILITY RECEIPT OF RADIOACTIVE TANK WASTE FOR TREATMENT).	12/31/2007 <u>02/28/2009</u>
M-62-10	COMPLETE HOT COMMISSIONING – PHASE I TREATMENT COMPLEX DOE WILL ACHIEVE SUSTAINED THROUGHPUT OF PRETREATMENT, LOW-ACTIVITY WASTE VITRIFICATION AND HIGH-LEVEL WASTE VITRIFICATION PROCESSES, AND DEMONSTRATED TREATMENT COMPLEX AVAILABILITY TO COMPLETE TREATMENT OF NO LESS THAN 10% OF THE TANK WASTE BY MASS AND 25% OF THE TANK WASTE BY ACTIVITY BY DECEMBER 2018.	01/31/2011
M-62-11	SUBMITTAL OF HANFORD TANK WASTE TREATMENT PHASE II PLAN. DOE WILL SUBMIT TO ECOLOGY A DETAILED PLAN AND PROPOSAL FOR THE PROCESSING OF THE REMAINDER OF DOE'S LAW AND HLW WASTES (PHASE II WASTES). THIS PLAN AND PROPOSAL WILL BE ACCOMPANIED BY A DRAFT NEGOTIATIONS AGREEMENT IN PRINCIPLE (AIP), AND DRAFT AGREEMENT CHANGE REQUEST CONTAINING SUFFICIENT ENFORCEABLE MILESTONES AND ASSOCIATED AGREEMENT REQUIREMENTS TO EFFECTIVELY DRIVE PHASE II WORK TO COMPLETION IN ACCORDANCE WITH AGREEMENT REQUIREMENTS. PHASE II AGREEMENT NEGOTIATIONS WILL BE COMPLETED WITHIN SIX (6) MONTHS OF AIP FINALIZATION.	1/31/2014
M-62-12	ISSUANCE OF DOE AUTHORIZATION TO PROCEED – PHASE II TREATMENT. DOE WILL AUTHORIZE THE CONTRACT PHASE TO DESIGN, CONSTRUCT, COMMISSION, AND PROVIDE SERVICES FOR HANFORD TANK WASTE PRETREATMENT, LOW-ACTIVITY WASTE VITRIFICATION, AND HIGH-LEVEL WASTE VITRIFICATION OF ALL REMAINING HANFORD TANK WASTE, CONSISTENT WITH COMPLETION OF TREATMENT BY DECEMBER 2028.	TBD (To be determined by negotiations provided for at M-62-11).
M-047-02	COMPLETE STARTUP AND TURNOVER ACTIVITIES FOR REQUIRED TRANSFER SYSTEM UPGRADES TO ALLOW TRANSFER OF FIRST HIGH-LEVEL WASTE FEED TO THE PRETREATMENT/TREATMENT COMPLEX.	3/31/2007 <u>3/31/2009</u>
M-47-03	START CONSTRUCTION OF WASTE RETRIEVAL AND MOBILIZATION SYSTEMS FOR SELECTED INITIAL HIGH-LEVEL WASTE FEED TANK.	7/30/2004 <u>(COMPLETED)</u>
M-47-03A	COMPLETE STARUP AND TURNOVER ACTIVITIES FOR WASTE RETRIEVAL AND MOBILIZATION SYSTEMS FOR SELECTED INITIAL HIGH-LEVEL WASTE FEED TANK.	2/28/2007 <u>3/31/2009</u>
M-47-04	COMPLETE STARUP AND TURNOVER ACTIVITIES FOR REQUIRED TRANSFER SYSTEM UPGRADES TO ALLOW TRANSFER OF FIRST LOW-ACTIVITY WASTE FEED TO THE PRETREATMENT/TREATMENT COMPLEX. <u>EXCEPT DELAY INSTALLATION OF THE PUMP UNTIL REQUIRED TO SUPPORT WTP WASTE FEED ACTIVITIES.</u>	6/30/2007 <u>3/31/2009</u>
M-47-05	START CONSTRUCTION OF WASTE RETRIEVAL AND MOBILIZATION SYSTEMS FOR SELECTED INITIAL LOW-ACTIVITY WASTE FEED TANK (OTHER THAN AZ-101 AND AZ-AZ-102).	5/31/2004

Description/Justification of Change (continued)

M-47-05A	COMPLETE STARTUP AND TURNOVER ACTIVITIES FOR WASTE RETRIEVAL AND MOBILIZATION SYSTEMS FOR SELECTED INITIAL LOW-ACTIVITY WASTE FEED TANK (OTHER THAN AZ-101 OR AZ-102).	4/30/2006
M-47-06	COMPLETE NEGOTIATION OF ADDITIONAL AGREEMENT REQUIREMENTS (MILESTONES, TARGET DATES, AND ASSOCIATED LANGUAGE) GOVERNING WORK NECESSARY TO SUPPORT COMPLETION OF TREATMENT COMPLEX OPERATIONS BY 2018.	6/30/2010
M-90-08	INITIATE ILAW DISPOSAL FACILITY CONSTRUCTION. INITIATION OF CONSTRUCTION OCCURS WHEN DOE OR IT'S CONTRACTOR (AS AUTHORIZED) ISSUES AN APPROVAL TO START CONSTRUCTION AND THE CONTRACTOR COMMENCES EXCAVATION OF NON-CRITICAL SYSTEMS WITHIN THE RCRA DISPOSAL FACILITY.	2/28/2005
M-90-09-T-01	COMPLETED DETAILED DESIGN OF ILAW DISPOSAL FACILITY CRITICAL SYSTEMS TO 80%. DETAILED DESIGN OF CRITICAL SYSTEMS INCLUDES THE A) LINER, B) LEACHATE COLLECTION SYSTEM AND C) LEAK DETECTION SYSTEM.	5/30/2003
M-90-10	INITIATE READY TO ACCEPT PLACEMENT OF ILAW WASTE CANISTERS IN ILAW DISPOSAL FACILITY. (LOW ACTIVITY WASTE PACKAGES PLACED WITHIN THESE FACILITIES WILL BE RETRIEVABLE).	8/31/2008 <u>12/31/2009</u>
M-90-11	COMPLETE CANISTER STORAGE FACILITY CONSTRUCTION. COMPLETION OF THIS MILESTONE REQUIRES THE COMPLETION OF ALL CONSTRUCTION, INTERNAL/EXTERNAL FACILITY(S) MODIFICATIONS AND STARTUP ACTIVITIES NECESSARY FOR CANISTER STORAGE FACILITY RECEIPT OF ALL PHASE I HANFORD SITE HIGH LEVEL WASTE CANISTERS FROM TANK WASTE REMEDIATION SYSTEM (TWRS) PROCESSING TREATMENT PLANT. FOR PURPOSES OF THIS INTERIM MILESTONE PHASE I IHLW CANISTER STORAGE IS PHASE I IHLW CANISTER STORAGE IS DEFINED AS THE CAPABILITY FOR STORAGE OF AT LEAST 600 IHLW CANISTERS. INTERIM MILESTONES AND ASSOCIATED TARGET DATES ESTABLISHING WORK SCHEDULES FOR PHASE II IHLW CANISTER STORAGE WILL BE ESTABLISHED PURSUANT TO THE PHASE II REQUEST FOR PROPOSAL FOR TWRS PRIVITIZATION. FOR PERMITTING PURPOSES DETAILS DESIGNS OF CRITICAL SYSTEMS INCLUDES THE CANISTER STORAGE TUBE SYSTEM. CONSTRUCTION OF IHLW NON-CRITICAL SYSTEMS AND PROCUREMENT OF THE CANISTER STORAGE TUBE SYSTEM WILL BEGIN PRIOR TO ISSUANCE OF THE FINAL STATUS IHLW PART B PERMIT.	6/30/2009 <u>8/31/2010</u>