




Change Number M-15-22-02	Federal Facility Agreement and Consent Order Change Control Form		Date 1/24/2022
Originator Mike Cline, DOE-RL			Phone 509-376-6070
Class of Change <input type="checkbox"/> I – Signatories <input checked="" type="checkbox"/> II – Executive Managers <input type="checkbox"/> III – Project Managers			
Change Title Establish New Negotiated M-015 Series Milestones in TPA, Appendix D			
Description/Justification of Change <p>On September 16, 2021, the U.S. Department of Energy, Richland Operations Office (DOE-RL), U.S. Environmental Protection Agency (EPA), and Washington State Department of Ecology (Ecology), hereafter referred to as the Parties, agreed to pilot an “Adaptive Milestone Approach” for identifying scope and schedule for Hanford Federal Facility Agreement and Consent Order (HFFACO) milestones for work on the Central Plateau. This Adaptive Milestone Approach aims to define achievable milestones that can demonstrate cleanup progress and be more nimble to emerging priorities, progress, issues, and resource constraints. The approach will utilize decision logic tools to consider varying scenarios, priorities, and constraints to Central Plateau cleanup with a goal of providing objective insight to optimum work sequences and timing of critical work activities. The outputs will inform meaningful discussion among the Parties when negotiating future enforceable milestone sets.</p> <p style="text-align: center;"><i>Continued on page 2</i></p>			
Impact of Change <p>This change control form creates 6 new M-015 series interim Milestones: M-015-91C, M-015-91D, M-015-92D, M-015-92E, M-015-110E, and M-015-120. This change control form also establishes 3 new interim Milestones M-015-92F, M-015-118, and M-015-119 for DOE-RL to submit draft HFFACO change control forms which will establish new due dates for 11 existing interim milestones, they are: M-015-38B, M-015-84, M-015-91B, M-015-92B, M-015-92C, M-015-93B, M-015-93C, M-015-98, M-015-99, M-015-110B, and M-015-112.</p> <p>This change control form does not include a change to the due date for Major Milestone M-015-00. The Parties expect that DOE will, in the future, propose a change to Major Milestone M-015-00 based on the Adaptive Milestone Approach described in the Description/Justification of Change.</p> <p>This change control form is being processed in conjunction with Change Control Forms M-16-22-02 and M-85-22-02 that also modify M-016 and M-085 milestones in HFFACO Appendix D milestones.</p>			
Affected Documents HFFACO or Tri-Party Agreement (TPA) Action Plan Appendix D, “Work Schedule Milestones and Target Dates Including Designation of Lead Regulatory Agency.”			
Approvals			Page 1 of 5
William F. Hamel  Digitally signed by William F. Hamel Date: 2023.01.18 13:33:26 -08'00'		Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/>	
W.F. Hamel, DOE-RL _____ Date			
N/A _____ Date		Approved <input type="checkbox"/> Disapproved <input type="checkbox"/>	
DOE-ORP _____ Date			
 Digitally signed by DAVID EINAN Date: 2023.01.19 12:45:15 -08'00'		Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/>	
D.R. Einan, EPA _____ Date			
 Digitally signed by D.B. Bowen Date: 2023.01.19 15:19:39 -08'00'		Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/>	
D.B. Bowen, Ecology _____ Date			

Description/Justification of Change (continued)

Under the Adaptive Milestone Approach, the Parties will establish enforceable milestones over nominal 3-year periods. As existing milestone sets are completed, outputs from the toolset considering the latest site conditions will provide updated optimum work sequences and timing that decision-makers can use to establish the follow-on 3-year milestone set and inform short- and long-term milestone planning. The overall goal is to provide a milestone framework that facilitates efficient cleanup and provides the Parties with a success-oriented path to advance the Hanford Site mission as well as result in higher confidence that future enforceable milestones will be achievable.

With the agreement to pilot the Adaptive Milestone Approach, fourteen interim milestones listed in IAMIT Determination Number 2021-002, *Pilot Use of Resource Modeling and Adaptive Milestone Approach to Develop Schedules for Cleanup of Central Plateau Operable Units* (reference <https://pdw.hanford.gov/document/AR-16097>) were placed in abeyance. This change control form will create milestones to offset the impacts of placing in abeyance these interim milestones by:

- Establishing new milestones in the next three Federal fiscal years (FFY) 2023-2025 that support planning and progress towards some of the milestones placed in abeyance. The 200-BC-1 OU has previously been combined with the 200-WA-1 OU for remedial investigation/feasibility study (RI/FS), proposed plan, and Record of Decision planning. The parties reached conceptual agreement that the 200-BC-1 OU would likely have its own remedial action decision separate from the 200-WA-1 OU once the feasibility study tasks are completed under the RI/FS work plan.
- Establishing 2024 milestones for DOE-RL to submit change control forms that identify new dates for the M-015 interim milestones placed in abeyance.
- Establishing a new milestone for a deep vadose zone laboratory treatability test report. This milestone mitigates the impact of suspending the milestone for the 200-DV-1 OU RI/FS.

The Parties agree that these changes constitute Good Cause as described in HFFACO Article XL, Good Cause for Extensions, paragraph 120.E, any other event or series of events mutually agreed to by the Parties as constituting good cause.

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
<p><u>M-015-91C</u> <u>Lead Regulatory Agency: EPA</u></p>	<p><u>Submit Remedial Investigation/Feasibility Study (RI/FS) Work Plan, Revision 1, Draft A for the 200-WA-1 and 200-BC-1 Operable Units, with limited schedule information.</u></p>	<p><u>09/30/2023</u></p>
<p><u>M-015-91D</u> <u>Lead Regulatory Agency: EPA</u></p>	<p><u>Submit a draft HFFACO change control form to establish an implementation schedule (including start date) for activities in the 200-WA-1 and 200-BC-1 Operable Units Remedial Investigation/Feasibility Study (RI/FS) Work Plan.</u></p>	<p><u>09/30/2024</u></p>
<p><u>M-015-92D</u> <u>Lead Regulatory Agency: Ecology</u></p>	<p><u>Submit RCRA Facility Investigation/Corrective Measures Study (RFI/CMS) and Remedial Investigation/Feasibility Study (RI/FS) Work Plan, Draft B for the 200-EA-1 Operable Unit, with limited schedule information.</u></p>	<p><u>06/30/2024</u></p>
<p><u>M-015-92E</u> <u>Lead Regulatory Agency: Ecology</u></p>	<p><u>Submit a draft HFFACO change control form to establish an implementation schedule (including start date) for activities in the 200-EA-1 Operable Unit RFI/CMS/RI/FS Work Plan.</u></p>	<p><u>09/30/2024</u></p>
<p><u>M-015-92F</u> <u>Lead Regulatory Agency: Ecology</u></p>	<p><u>Submit a draft HFFACO change control form proposing a new due date for interim Milestone M-015-112 for submittal of the 200-IS-1 Operable Unit RFI/CMS/RI/FS Work Plan, Draft B (7 days after approval of the 200-EA-1 OU Work Plan, Rev. 0).</u></p>	<p><u>TBD</u></p>

Number	Milestone	Due Date
<p><u>M-015-110E</u></p> <p><u>Lead Regulatory Agency: Ecology</u></p>	<p><u>Transmit 200-DV-1 Operable Unit Laboratory Treatability Test Report.</u></p>	<p><u>02/28/2026</u></p>
<p><u>M-015-118</u></p> <p><u>Lead Regulatory Agency: Ecology</u></p>	<p><u>Submit to Ecology, a draft HFFACO change control form identifying new enforceable dates for the following interim milestones that were put “In Abeyance” by IAMIT Determination 2021-002:</u></p> <ul style="list-style-type: none"> • <u>M-015-92B, Submit RCRA Facility Investigation/Corrective Measures Study & Remedial Investigation/Feasibility Study Report and Proposed Corrective Action Decision/Proposed Plan for the 200-EA-1 OU (Central Plateau 200 East Inner Area) to Ecology.</u> • <u>M-015-92C, Submit RCRA Facility Investigation/Corrective Measures Study & Remedial Investigation/Feasibility Study Report and Proposed Corrective Action Decision/Proposed Plan for the 200-IS-1 OU to Ecology.</u> • <u>M-015-93B, Submit RCRA Facility Investigation/Corrective Measures Study & Remedial Investigation/Feasibility Study Report and Proposed Corrective Action Decision/Proposed Plan for the 200-SW-2 OU to Ecology.</u> • <u>M-015-93C, Initiate characterization field work for the 200-SW-2 Operable Unit landfills in accordance with the schedule in the approved RI/FS/RFI/CMS Work Plan.</u> • <u>M-015-110B, Submit Corrective Measures Study & Feasibility Study Report and Proposed Plan/Proposed Corrective Action Decision for the 200-DV-1 OU to Ecology.</u> 	<p><u>06/30/2024</u></p>

Number	Milestone	Due Date
<p><u>M-015-119</u></p> <p><u>Lead Regulatory Agency: EPA</u></p>	<p><u>Submit to EPA, a draft HFFACO change control form identifying new enforceable due dates for the following interim milestones that were put “In Abeyance” by IAMIT Determination 2021-002:</u></p> <ul style="list-style-type: none"> • <u>M-015-38B, Submit a Feasibility Study Report and Proposed Plan(s) for the 200-CW-1, 200-CW-3, and 200-OA-1 Operable Units for Waste Sites in the Outer Area of the Central Plateau to EPA.</u> • <u>M-015-84, Complete remedial investigation of 200-WA-1 and 200-BC-1 operable unit waste sites in accordance with the 200-WA-1 and 200-BC-1 RI/FS Work Plan.</u> • <u>M-015-91B, Submit Feasibility Study Report(s) and Proposed Plan(s) for the 200-BC-1 and 200-WA-1 operable units (200 West Inner Area) to EPA.</u> • <u>M-015-98, Complete remedial investigation of U Plant related waste sites located in 200-WA-1 in accordance with the WA-1 RI/FS Work Plan.</u> • <u>M-015-99, Complete remedial investigation of PFP related waste sites located in 200-WA-1 in accordance with the 200-WA-1 and 200-BC-1 RI/FS Work Plan.</u> 	<p><u>06/30/2024</u></p>
<p><u>M-015-120</u></p> <p><u>Lead Regulatory Agency: EPA/Ecology Dual Lead</u></p>	<p><u>Submit a draft HFFACO change control form proposing enforceable milestones for Central Plateau cleanup for milestone period covering nominally FY 2025-2027, including a proposed milestone for submittal of change control forms for the next milestone period.</u></p>	<p><u>06/30/2024</u></p>