



**Department of Energy**  
 Richland Operations Office  
 P.O. Box 550  
 Richland, Washington 99352

08-AMCP-0258

AUG 21 2008

Ms. J. A. Hedges, Program Manager  
 Nuclear Waste Program  
 State of Washington  
 Department of Ecology  
 3100 Port of Benton  
 Richland, Washington 99354

**RECEIVED**  
 AUG 27 2008  
 EDMC

Dear Ms. Hedges:

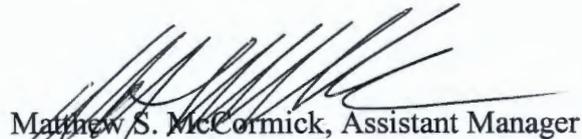
HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) CHANGE CONTROL FORM M-83-08-01, MODIFICATION TO TRI-PARTY AGREEMENT INTERIM MILESTONE M-083-41

The purpose of this letter is to forward the Tri-Party Agreement Change Package M-83-08-01 to the State of Washington Department of Ecology (Ecology) for approval. This change package deletes Tri-Party Agreement Interim Milestone M-083-41. The Plutonium Finishing Plant's 216-Z-9 Crib above grade portion (Buildings 216-Z-9A, 216-Z-9B, and 216-Z-9C) will be transitioned to the surveillance and maintenance phase per the requirements of the Tri-Party Agreement Section 8, "Facility Decommissioning Process," and the dismantlement of the crib structures will be integrated with the planned remedial action on the crib.

The dismantlement scope will be accomplished during the remedial action of Operable Unit PW-1 as part of the implementation of the anticipated 200 Area PW-1, 3, and 6 Record of Decision.

The U.S. Department of Energy, Richland Operations Office, will continue to keep Ecology informed of the progress toward completing the transition of Buildings 216-Z-9A, 216-Z-9B, and 216-Z-9C. If you have any questions, please contact me, or your staff may contact Ellen Mattlin, of my staff, on (509) 376-2385.

Sincerely,

  
 Matthew S. McCormick, Assistant Manager  
 for the Central Plateau

AMCP:SEC

Attachment

cc: See Page 2

Ms. J. A. Hedges  
08-AMCP-0258

-2-

AUG 21 2008

cc w/attach:

G. Bohnee, NPT

F. W. Bond, Ecology

L. Buck, Wanapum

N. Ceto, EPA

R. H. Engelmann, EFSH

S. Harris, CTUIR

R. Jim, YN

D. B. Klos, FHI

S. L. Leckband, HAB

K. Niles, ODOE

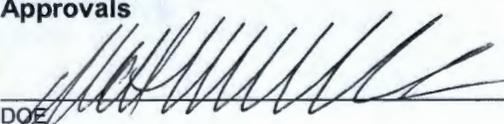
R. E. Piippo, FHI

J. B. Price, Ecology

J. G. Vance, FFS

Administrative Record

Environmental Portal

<b>Change Number</b> M-83-08-01	<b>Federal Facility Agreement and Consent Order Change Control Form</b> <small>Do not use blue ink. Type or print using black ink.</small>	<b>Date</b> August 12, 2008
<b>Originator</b> Ellen Mattlin		<b>Phone</b> (509) 376-2385
<b>Class of Change</b> <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
<b>Change Title</b> Delete <u>Hanford Federal Facility Agreement and Consent Order (Agreement) M-083-41 Interim Milestone</u>		
<b>Description/Justification of Change</b> <p>The parties agree to transition the Plutonium Finishing Plant's 216-Z-9 Crib to the surveillance and maintenance phase (S&amp;M) per the requirements of the HFFACO as documented in Section 8 of the Tri-Party Agreement Action Plan and to delete the dismantlement portion of the milestone so that the dismantlement of the crib structures can be integrated with the planned remedial action on the crib.</p> <p>A data quality objectives (DQO) process was used to determine data needs to support the dismantlement of the crib structures and to address the concern of structural integrity of the concrete slab supporting the buildings. Field activities were initiated to obtain the data identified through the DQO process. The field activities included the development and deployment of a robotic crawler system to inspect the underside of the concrete slab to support a technical evaluation of the slab integrity. The data collected from the field activities, including the concrete slab inspection, is documented in a hazard condition analysis report, HNF-34723, Facility Condition Analysis for the 216-Z-9 Crib and Cover Slab to support Removal of the Above-Grade Soil Mining Structures.</p> <p>From the evaluation of the data obtained it was determined that the conditions of the structures and slab were better than expected; therefore, immediate work was unnecessary. To preclude any impacts to the future remediation of the crib and to ensure the safety of personnel and the environment, the parties agree dismantlement and removal of the buildings above the slab is best coordinated with the planned remediation of the crib.</p> <p>Continued on Page 2</p>		
<b>Impact of Change</b> This change allows integration of the dismantlement scope with the remedial action for 216-Z-9.		
<b>Affected Documents</b> Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford Site internal planning, management and budget documents (e. g., baseline control documents, related work authorization and directives) are affected by this change. The 200-PW-1, 3, 6 Feasibility Study and Proposed Plan is affected by this change. The scope of the PFP Action Memo will be affected by the deletion of removal of these structures.		
<b>Approvals</b>  DOE _____ Date <u>8/21/08</u> <input checked="" type="checkbox"/> Approved _____ Disapproved _____ EPA _____ Date _____ Approved _____ Disapproved _____ Ecology _____ Date _____ Approved _____ Disapproved _____		

### Description/Justification of Change

Therefore, the Interim Milestone M-083-41, "Complete Transition and Dismantlement of the 216-Z-9 Crib Complex," is being deleted. The dismantlement scope will be accomplished during the remedial action of operable unit PW-1 as part of the implementation of the anticipated 200 Area PW-1, 3, 6 Record of Decision. The transition scope will be accomplished through the development of the end point criteria document.

The agencies agree that the two CERCLA actions (removal action and remedial action) need to be integrated because the mining equipment and structure removal overlaps the remediation scope of the 200 Area PW-1 Operable Unit remedial action. The transfer of the dismantlement scope is being performed because removal of the crib structures could impact the structural integrity of the waste site, and potentially affect the future selected remedial alternative. For reasons of worker safety and work scope efficiency, the removal of the mining structures should be integrated with the remedial action.

Appropriate deactivation actions will be taken and an end point criteria document for the crib structures will be developed consistent with the PFP End Point Criteria Document to support safe transition of the crib to S&M. The structures will transition to the S&M phase and remain in the S&M phase until remediation of the crib is initiated.

Approval of this change request authorizes modifications to the M83-41 interim milestone that are denoted with ~~strikeout~~ for deletion and additions are shaded.

Transition Activities		
M-083-41	<del>COMPLETE TRANSITION AND DISMANTLEMENT OF THE 216-Z-9 CRIB COMPLEX</del>  Remove the above grade portion of the 216 Z-9A, B and C buildings, pursuant to the final Action Memoranda and Work Plans covering remaining elements not covered by RCRA closure plan. DOE deactivation and decontamination activities may proceed in advance of CERCLA decision documents in accordance with section 8 of the HFFACO.	September 30, 2010