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

00-ORL-023

JAN 28 2000

Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Boulevard, Suite 5
Richland, Washington 99352

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EDMC

Mr. Michael A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
P. O. Box 47600
Olympia, Washington 98504

Addressees:

REVISED UPDATE TO 100 AREA REMEDIAL ACTION (RA) HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) MILESTONES

Attached is the revised update to the Tri-Party Agreement Change Control Form M-16-99-02A, which replaces M-16-99-02 regarding the following four 100 Area RA Tri-Party Agreement milestones:

1. M-16-10A, Initiate RA in the 100-KR-1 Operable Unit;
2. M-16-13A, Initiate RA in the 100-FR-1 Operable Unit;
3. M-16-13B, Complete Remediation and backfill of 16 liquid waste sites and the process effluent pipelines in the 100-FR...; and
4. M-16-26C, Complete Remediation and backfill of 10 liquid waste sites and the process effluent pipelines in 100-HR....

The 110-day notice sent to the State of Washington Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) on October 13, 1999, stated that the formal change package would be issued in December 1999. By agreement, Change Request package M-16-99-02 was submitted to EPA and Ecology on January 13, 2000. Further issues were determined to need resolution between the agencies. Discussions were held with D. Faulk and D. Holland at the January 2000, Unit Manager's meetings. Comments have been received from the agencies and incorporated in the attached revisions.

The U.S. Department of Energy, Richland Operations Office is available to work with Ecology and EPA in obtaining the approval of this Tri-Party Agreement Change Control Form M-16-99-02A.

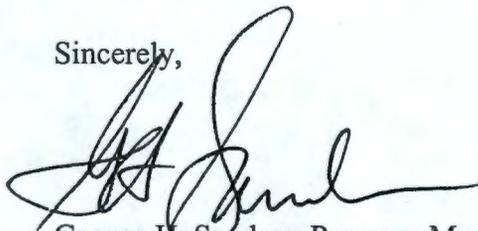
Addressees
00-ORL-023

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JAN 28 2000

If you have any questions, please contact me on (509) 376-6888, or D. C. Smith, Environmental Restoration Division on (509) 372-1544.

Sincerely,



George H. Sanders, Program Manager
Office of Regulatory Liaison

ORL:JKY

Attachment

cc w/attach:

J. R. Wilkinson, CTUIR

D. Holland, Ecology

R. F. Stanley, Ecology

R. D. Faulk, EPA

J. S. Hertzell, FHI

M. B. Reeves, HAB

P. Sobotta, NPT

M. L. Blazek, OOE

R. Jim, YN

TPA Administrative Record, FHI

Change Number M-16-99-02 Revision 1	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date January 26, 2000
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Originator D. C. Smith DOE/RICHLAND OPERATIONS-ENVIRONMENTAL RESTORATION PROJECT	Phone (509) 372-1544
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Class of Change

I - Signatories
 II - Executive Manager
 III - Project Manager

Change Title

Revise Group 4 TPA Milestones

- 1) M-16-10A, Initiate Remedial Action in the 100-KR-1 Operable Unit
- 2) M-16-13A, Initiate Remedial Action in the 100-FR-1 Operable Unit
- 3) M-16-13B, Complete 16 waste sites and the process effluent pipelines in 100-FR-1
- 4) M-16-26C, Complete 10 waste sites and the process effluent pipelines in 100-HR-1

Description/Justification of Change

The 100-FR-1, 100-HR-1, and 100-KR-1 TPA Milestones listed above are applicable to Hanford's Environmental Restoration Program for the 100 Area Remedial Action. The contracting strategy developed and implemented, to remediate the waste sites contained in these milestones, was based on combining the high priority liquid waste sites from H, F, and K (Group 4) into one contract (i.e. one contractor would perform all remediation). This was done to create economy of scale, reduce proposal preparation costs, and streamline the overall process. The unit rate pricing for this contract was based upon the assumption that active waste site excavation in one operable unit would be completed prior to initiating the next operable unit activity. This strategy is also consistent with the current capacity of the ERDF transportation and disposal infrastructure and maintains DOE's intent to have ongoing remediation continuing in the 100 Area. The subcontract strategy provides the government with the most economical method to achieve the remediation activities. As a result of this contract the schedule/sequence for accomplishing these milestones is as follows (Group 4 scope only):

1. H Area excavation will be completed first
2. F Area excavation will begin after completion of H area excavation
3. H Area CVP process and backfill will begin after completion of H excavation
4. F Area CVP process and backfill will begin after completion of F excavation
5. K Area excavation will begin after completion of F excavation
6. K Area CVP process and backfill will begin after completion of K excavation.

Description/Justification of Change Continued on Page 2

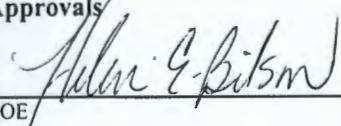
Impact of Change

Milestone initiation and completion dates require changes. No other impacts can be identified. The intention is to have ongoing remediation continuing in the Hanford 100 Area Operable Units.

Affected Documents

Hanford Federal Facility Agreement and Consent Order Action Plan.
Remedial Design Report/Remedial Action Work Plan for the 100 Area.

Approvals

 DOE	<u>1/28/00</u> Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
EPA	_____ Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved
Ecology	_____ Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved

TPA milestone M-16-26A "Initiate Remedial Action in the 100-HR-1 Operable Unit" was extended by six months (reference TPA change notice M-16-98-02-[9/30/98 to 3/31/99]). The associated completion milestone M-16-26C, for 100-H-1, was not extended at that time. In addition to the six-month delay, the remediation at the 100-HR-1 Operable Unit currently has encountered scope growth due to plumes in those sites that have been excavated. This is consistent with other remediation activities in the 100 Areas. Therefore as a result of the delayed start and the additional scope, the forecast date for completion of the liquid waste sites and process effluent pipelines in the 100-HR-1 Operable Unit is being extended.

Modify completion date for M-16-26C

M-16-26C	Complete Remediation and Backfill of 10 Liquid Waste Sites and Process Effluent Pipelines in the 100-HR-1 Operable Unit as defined in the Remedial Design Report/Remedial Action Work Plan for the 100 Area.	5/30/01
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TPA milestones M-16-13A, "Initiate Remedial Action in the 100-FR-1 Operable Unit" and M-16-13B, "Complete remediation and backfill of 16 liquid waste sites and process effluent pipelines in the 100-FR-1..." are impacted as a result of the 100-HR-1 delayed start and scope growth (plumes). Therefore, as a result of the delayed start and the additional scope at the 100-HR-1 Operable Unit, the forecast dates for initiation and completion of the liquid waste sites and process effluent pipelines in the 100-FR-1 Operable Unit are being extended. The extension also incorporates a change in production rates (durations) at 100-FR-1. The production rate change, is based on comparing the actual durations (for excavation, verification/closeout, and backfill) from the previous 4 years to the assumptions made during the preparation of the original TPA milestones. The original durations were unachievable. The new production rates add an additional 6 months to the baseline schedule. Therefore, as a result of these changes the milestone dates for M-16-13A and M-16-13B are being extended.

Modify completion date for M-16-13A and M-16-13B

M-16-13A	Initiate Remedial Action in the 100-FR-1 Operable Unit	9/29/00
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M-16-13B	Complete Remediation and Backfill of 16 Liquid Waste Sites and Process Effluent Pipelines in the 100-FR-1 and 100-FR-2 Operable Units as defined in the Remedial Design Report/Remedial Action Work Plan for the 100 Area	10/29/04
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TPA milestone M-16-10A, "Initiate Remedial Action in the 100-KR-1 Operable" is impacted as a result of the 100-HR-1 delayed start plus scope growth and duration changes at the 100-FR-1. Therefore, as a result of these changes the forecast date for initiation remediation of the liquid waste sites in the 100-KR-1 Operable Unit is being extended.

Modify completion date for M-16-10A

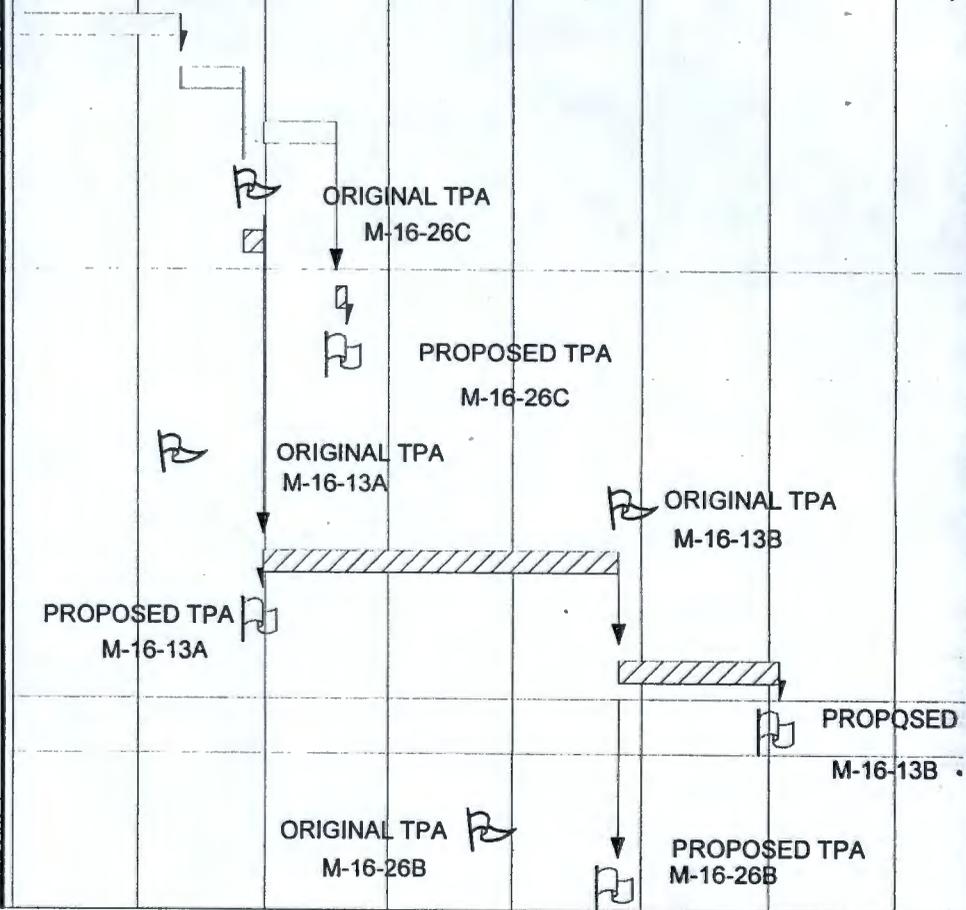
M-16-10A	Initiate Remedial Action in 100-KR-1 Operable Unit	8/01/03
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Note: See Attachments 1 and 2 for additional details.

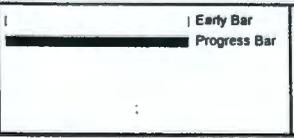
Attachments:

1. TPA Change Notice M-16-98-02
2. Schedule

Activity ID	Activity Description	Orig Dur	Early Start	Early Finish	Fiscal Year											
					FY98	FY99	FY00	FY01	FY02	FY03	FY04	FY05	FY06			
100 H AREA																
0100	ORIGINAL 100 H EXCAVATION	347*	01OCT98*	28JAN00												
0110	6 MONTH DELAY	129	31JAN00	27JUL00												
0120	ORIGINAL 100 H BACKFILL	154	29SEP00	02MAY01												
0121	ORIGINAL 100 TPA MILESTONE M-16-26C	0		31AUG00*												
2100	100 H EXC PLUME GROWTH AT H	45	28JUL00	28SEP00												
2120	100 H BACKFILL PLUME GROWTH AT H	20	03MAY01	30MAY01												
2121	PROPOSED TPA MILESTONE M-16-26C	0		30MAY01												
100 F AREA																
0139	ORIGINAL 100 F TPA MILESTONE M-16-13A	0	31JAN00*													
0161	ORIGINAL 100 F TPA MILESTONE M-16-13B	0		31AUG03*												
2140	100 F EXC AFFECTED BY H PLUME GROWTH	740	29SEP00	31JUL03												
2141	PROPOSED TPA MILESTONE M-16-13A	0	29SEP00													
2160	100 F BACKFILL AFFECTED BY H PLUME GROWTH	326	01AUG03	29OCT04												
3161	PROPOSED TPA MILESTONE M-16-13B	0		29OCT04												
100 K AREA																
0179	ORIGINAL 100 K TPA MILESTONE M-16-26B	0	31JUL02*													
3181	PROPOSED TPA MILESTONE M-16-26B	0	01AUG03													



Project Start 03DEC97
 Project Finish 29OCT04
 Data Date 01SEP98
 Run Date 26JAN00



TPA6

PROPOSED TPA MILESTONE SCHEDULE
 Attachment #2 REV 1
 TPA Change Form M-99-16-02

Sheet 1 of 1

Date	No plume growth at F included Revision	Checked	Approved