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

03-RCA-0092

DEC 30 2002

Mr. Nicholas Ceto  
Hanford Project Manager  
U.S. Environmental Protection Agency  
712 Swift Boulevard, Suite 5  
Richland, Washington 99352

RECEIVED  
JAN 16 2003

EDMC

Dear Mr. Ceto:

**HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) INTERIM MILESTONES M-34-18A AND M-34-08**

Enclosed for your review and approval are change requests for Tri-Party Agreement Interim Milestones M-34-18A, "Complete Removal of Spent Nuclear Fuel Equivalent to 957 Metric Tons Heavy Metal from the K West Basin" and M-34-08, "Initiate full scale K East Basin sludge removal."

On October 28, 2002, RL formally notified the U.S. Environmental Protection Agency (EPA) of the potential to miss interim milestone M-34-18A. At the time, the Project was successfully implementing a recovery plan. The Project significantly improved the production rate and recovered much of the schedule that had been lost earlier in the year due to equipment problems. However, Interim Milestone M-34-18A remains behind schedule and will not be completed by the December 31, 2002, due date. It is expected that the milestone will be complete by January 31, 2003.

On September 18, 2002, the U.S. Department of Energy, Richland Operations Office (RL) formally notified EPA that the schedule for meeting interim milestone M-34-08 was at risk. Delays resulted from unanticipated fabrication and testing difficulties and setbacks in the analysis of the sludge characteristics. During October and November, installation and verification of the SNF Project Fuel Transfer System (FTS) created scheduling difficulties for sludge removal work, resulting in further delays on the Sludge Water System (SWS). Now that FTS is operational, the acceptance testing and readiness review activities are proceeding on the SWS. However, Interim Milestone M-34-08 will not be completed by the December 31, 2002, due date. It is expected that the milestone will be complete by April 30, 2003.

Mr. Nicholas Ceto  
03-RCA-0092

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RL staff will be available to meet with you, at your convenience, should you have additional questions regarding the enclosed requests. Please feel free to contact me on (509) 372-2400, or contact Steve Veitenheimer, Director, Office of Spent Nuclear Fuels, on (509)373-9725 should you wish to schedule a meeting.

Sincerely,



Joel Hebdon, Director  
Regulatory Compliance and Analysis Division

RCA:EBD

Enclosure

cc w/encl:

N. C. Boyter, FHI  
L. J. Cusack, Ecology  
L. E. Gadbois, EPA  
R. Gay, CTUIR  
J. S. Hertzell, FHI  
R. Jim, YN  
O. S. Kramer, FHI  
T. M. Martin, HAB  
J. D. Mathews, FHI  
E. J. Murphy-Fitch, FHI  
K. Niles, Oregon Energy  
R. E. Piipo, FHI  
C. A. Rodriguez, IT  
P. Sobotta, NPT  
R. F. Stanley, Ecology  
A.M. Umek, FFS  
D. J. Watson, FHI  
M. A. Wilson, Ecology  
**100-KR-2 Administrative Record**

<b>Change Number</b> M-34-02-05	<b>Federal Facility Agreement and Consent Order  Change Control Form</b> Do not use blue ink. Type or print using black ink.	<b>Date</b> 12/30/02									
<b>Originator</b> S. J. Veitenheimer U.S. Department of Energy (DOE), Richland Operations Office (RL) Office of Spent Nuclear Fuels		<b>Phone (509) 373-9725</b>									
<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> M-34-08 Initiate full scale K East Basin sludge removal due date extension.											
<b>Description/Justification of Change</b> Description of Change: Change Milestone due date of Milestone M-34-08 from 12/31/2002 to 4/30/2003 Justification: The delay in meeting this milestone is due to several factors: <ul style="list-style-type: none"> <li>• Unanticipated fabrication and testing difficulties associated with having multiple subcontractors located geographically apart.</li> <li>• Delays in the analysis of the thermal and gas generation characteristics of the sludge, which resulted in delays in safety analysis work and design development.</li> <li>• Challenges in scheduling and performing activities in support of the sludge removal while concurrently installing and verifying the SNF Project Fuel Transfer System.</li> </ul>											
<b>Impact of Change</b> No Impact. This change has no impact on M-34-10 "Complete sludge removal from K Basins" by August 31, 2004 and M-34-23, "Initiate full scale K East Basin Water removal" by September 30, 2004.											
<b>Affected Documents</b> Hanford Federal Facility Agreement and Consent Order, Appendix D, as amended.											
<b>Approvals</b> <table border="0" style="width: 100%;"> <tr> <td style="width: 35%; border-bottom: 1px solid black;"> <i>W. Wade Ballard</i>  W. Wade Ballard, AMI, DOE </td> <td style="width: 15%; border-bottom: 1px solid black;"> 12/18/02  Date </td> <td style="width: 50%; border-bottom: 1px solid black;"> <input checked="" type="checkbox"/> Approved    <input type="checkbox"/> Disapproved </td> </tr> <tr> <td style="border-bottom: 1px solid black;"> EPA </td> <td style="border-bottom: 1px solid black;"> Date </td> <td style="border-bottom: 1px solid black;"> <input type="checkbox"/> Approved    <input type="checkbox"/> Disapproved </td> </tr> <tr> <td style="border-bottom: 1px solid black;"> Ecology </td> <td style="border-bottom: 1px solid black;"> Date </td> <td style="border-bottom: 1px solid black;"> <input type="checkbox"/> Approved    <input type="checkbox"/> Disapproved </td> </tr> </table>			<i>W. Wade Ballard</i> W. Wade Ballard, AMI, DOE	12/18/02 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
<i>W. Wade Ballard</i> W. Wade Ballard, AMI, DOE	12/18/02 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									

This change control form deletes the 12/31/02 due date for Interim Milestone M-34-08 and replaces it with a 4/30/03 due date. Strikethrough text is deleted and shaded text is added.

M-34-08	Initiate full scale K East Basin sludge removal.	<del>12/31/02</del> 4/30/03
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<b>Change Number</b> M-34-02-04	<b>Federal Facility Agreement and Consent Order  Change Control Form</b> Do not use blue ink. Type or print using black ink.	<b>Date</b> 12/30/02
<b>Originator</b> S. J. Veitenheimer U.S. Department of Energy (DOE), Richland Operations Office (RL) Office of Spent Nuclear Fuels		<b>Phone (509) 373-9725</b>
<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> M-34-18A Complete Removal of Spent Nuclear Fuel Equivalent to 957 Metric Tons Heavy Metal from KW Basin due date extension.		
<b>Description/Justification of Change</b> Description of Change: Change Milestone due date of Milestone M-34-18A from 12/31/2002 to 01/31/2003 Justification: The completion of M-34-18A may be delayed for up to one month due to equipment problems and unplanned maintenance since start of operations. The December 31, 2002 milestone completion date for M-34-18A was developed in May 2000 (Tri Party Agreement Change Number M-34-00-01), five months prior to commencement of operations using a one-of-a-kind prototype process. This process had not been fully tested to the extent that could reliably predict the amount of repairs and maintenance required. The Project has made every effort to find process improvements to increase productivity and regain schedule. Improvements to the K West systems include the addition of two manual underwater process tables, three additional telescoping stiffback grapples, two additional stiffback grapples, and one additional flexible transfer crane. Other significant changes at K West were the improved methods for performing spent nuclear fuel accountability in the under water processing operations and implementation of a revised criticality safety analysis that allows multiple container movement in the west bay. Substantial improvements were also made at the Cold Vacuum Drying Facility such as revising the drying criteria and rearranging the hose and piping arrangement, which enables the fuel to be dried in approximately 50% of the time previously taken. While productivity significantly increased as a result of these improvements, the Project may still miss the December 31, 2002 date by up to one month.		
<b>Impact of Change</b> No Impact. This change will not impact the ability to meet the 2003 and 2004 milestones relating to removal of spent nuclear fuel from the KE and KW Basins (M-34-27-T01, M-34-28, and M-34-18B).		
<b>Affected Documents</b> Hanford Federal Facility Agreement and Consent Order, Appendix D, as amended.		
<b>Approvals</b> W. Wade Ballard, AMI, DOE                      12/18/02 <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved _____ Date                      _____ EPA                      Date <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved _____ Date                      _____ Ecology                      Date <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved		

This change control form deletes the 12/31/02 due date for Interim Milestone M-34-18A and replaces it with a 1/31/03 due date. Strikethrough text is deleted and shaded text is added.

M-34-18A	Complete Removal of Spent Nuclear Fuel Equivalent to 957 Metric Tons Heavy Metal from the K West Basin	<del>12/31/02</del> 1/31/03
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