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STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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July 10, 2018

18-NWP-115

Mr. Mike W. Cline  
Richland Operations Office  
United States Department of Energy  
PO Box 550, MSIN: H5-20  
Richland, Washington 99352

Re: Notification that the United States Department of Energy (USDOE) Action Jeopardizes Completion of Milestone M-015-110B, 200-DV-1 Operable Unit

Dear Mr. Cline:

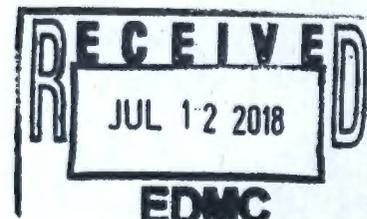
The Department of Ecology (Ecology), as the lead regulatory agency, believes that USDOE actions jeopardize the completion of *Hanford Federal Facility Agreement and Consent Order* (Tri-Party Agreement) Milestones M-015-110B.

The *Remedial Investigation/Feasibility Study and RCRA Facility Investigation/Corrective Measures Study Work Plan for the 200-DV-1 Operable Unit* (200-DV-1 Work Plan) is an approved primary document. Figure 6-1, "Project Schedule" of the 200-DV-1 Work Plan shows continuous activity on a treatability test in Federal Fiscal Year (FFY) 2019.

Section 9.3, "Document Revisions" of the Tri-Party Agreement Action Plan (Action Plan) states that in order to modify an approved primary document, "The requesting party may seek such a modification by submitting a concise written request to the appropriate project manager(s)." [underline added for emphasis]

At the Ecology Groundwater Team meeting on June 5, 2018, USDOE made a verbal announcement stating work on the 200-DV-1 operable unit would not be funded in FFY 2019. USDOE did not explain how it could skip a year of continuous activity and still meet the milestone due date for M-015-110B.

A verbal announcement does not comply with the Action Plan 9.3 requirement for a written request. Note that Action Plan 9.3 refers to a "consensus" on the need for modification to an approved primary document. USDOE may not make a unilateral decision to modify the Figure 6-1 schedule by discontinuing the activity.



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Mr. Mike W. Cline  
July 10, 2018  
Page 2 of 2

18-NWP-115

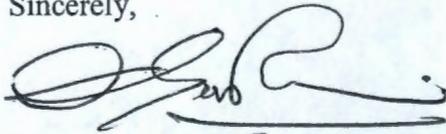
In accordance with the Tri Party Agreement Action Plan Section 4.1, "Project Manager Role," Ecology requests that USDOE provide for the 200-DV-1 operable unit current work schedule information including:

- Project task element schedule status.
- Associated "float" (defined as the project number of days until a task becomes critical path).
- The float associated with the milestone M-015-110B.

Section 4.1 of the Action Plan requires USDOE to reply to this notification within 15 working days of receipt. The reply must be made to Ecology in writing.

If you have any questions, please contact me at [dib.goswami@ecy.wa.gov](mailto:dib.goswami@ecy.wa.gov) or (509) 372-7902.

Sincerely,



Dib Goswami  
Project Manager of 200-DV-1 OU  
Nuclear Waste Program

jp/aa

cc electronic:

Dave Einan, EPA  
 Joe Franco, USDOE  
 Jon Perry, MSA  
 ERWM Staff, YN  
 Ken Niles, ODOE  
 John Price, Ecology  
 Beth Rochette, Ecology

Alex Smith, Ecology  
 Cheryl Whalen, Ecology  
 Jerry Yokel, Ecology  
 Environmental Portal  
 Hanford Facility Operating Record  
 MSA Correspondence Control  
 USDOE-RL Correspondence

cc: Matt Johnson, CTUIR  
 Jack Bell, NPT  
 Rose Longoria, YN  
 Shelley Cimon, HAB  
 Susan Leckband, HAB  
 Administrative Record  
 NWP Central File

