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

13-AMRP-0074  
REISSUE

**JAN 02 2013**

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

Dear Ms. Hedges:

REISSUE - STATE OF WASHINGTON DEPARTMENT OF ECOLOGY REVIEW  
COMMENTS OF CALENDAR YEAR 2011 TRANSURANIC MIXED/MIXED LOW-LEVEL  
WASTE PROJECT MANAGEMENT PLAN SUBMITTED FOR TRI-PARTY AGREEMENT  
MILESTONE M-091-03

The purpose of this reissue is to correct the Tri-Party Agreement Milestone number in the next sentence. This letter is in response to the October 29, 2012, (12-NWP-172) State of Washington Department of Ecology Review Comments of Calendar Year 2011 Transuranic Mixed/Mixed Low-Level Waste Project Management Plan Submitted for Tri-Party Agreement Milestone M-091-03.

The U.S. Department of Energy Richland Operations Office is providing the attached Comment Responses.

If you have any questions, please contact me or your staff may contact Al Farabee, of my staff, on (509) 376-8089.

Sincerely,

Jonathan A. Dowell, Assistant Manager  
for the River and Plateau

AMRP:MSC

Attachment

cc: See Page 2



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Ms. J. A. Hedges  
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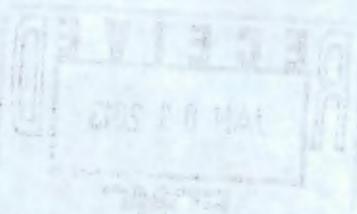
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cc w/attach:

G. Bohnee, NPT  
R. Buck, Wanapum  
D. A. Faulk, EPA  
S. Harris, CTUIR  
R. Jim, YN  
S. L. Leckband, HAB  
N. M. Menard, Ecology  
K. Niles, ODOE  
D. Rowland, YN  
D. G. Singleton, Ecology  
Administrative Record (M-91)  
Environmental Portal

cc w/o attach:

L. M. Dittmer, CHPRC  
R. A. Kaldor, MSA  
K. J. Lueck, CHPRC  
T. W. Noland, MSA  
R. E. Piippo, MSA



**Attachment**

Item	Ecology Comments per Letter, 12-NWP-172, dated October 29, 2012, <i>Ecology Review of Calendar Year 2011 Transuranic Mixed/Mixed Low-Level Waste Project Management Plan Submitted for TPA Milestone M-091-03.</i>	DOE Response
1	<p>Global (Lowe)   The scope of the PMP needs to be adjusted to agree with the M-91-03 milestone text. Many of the M-91 series milestones are specific to waste in above ground storage as of June 30, 2009 and in retrievable storage. However, milestone M-91-03 for the PMP encompasses all RCRA MLLW and TRUM waste, current and future generated. The TPA Section 11.5 also defines the content of the PMP and states it is to address "integration with other programs and projects" and provide capability information which includes "performance and specification requirements and projected capacity needs." The scope must include waste anticipated to be received from other generators (e.g., Tank Closure, 222 S). The PMP should be consistent with and reference the latest documented SWIFT forecast. The information is needed to adequately size and estimate future facilities and processing capabilities.</p>	<p>Partially Accepted. Generators are required to meet the <i>Hanford Site Solid Waste Acceptance Criteria</i> (HNF-EP-0063) prior to acceptance into a Waste Management Facility (e.g., CWC, WRAP, T Plant), however, nondestructive assay (NDA) and nondestructive examination (NDE) capabilities at WRAP may be utilized by generators to characterize their waste but no treatment will be performed and waste will be returned to generator once characterization has been completed. The applicable Solid Waste Integrated Forecast Technical (SWIFT) report volumes will be incorporated into the projected TRUM waste shipments to the WIPP presented in Figure 4-2.</p>
2	<p>Global (Lowe)   The TPA Section 11.5 says the PMP is to describe project interface control, specifically site-wide systems engineering. There are existing interface control documents with commitments to other projects and programs for waste management services that should be cited and described in the PMP.</p>	<p>Accepted. Section 8.6 will be expanded to include interface documents with other projects (e.g., Waste Treatment Plant [WTP]).</p>
3	<p>Global (Lowe)   Delete the mention of in-trench treatment in Trenches 31 &amp; 34 throughout the document. In-trench treatment is no longer allowed.</p>	<p>Not Accepted. The latest Ecology-approved permit documentation (WA7890008967, Operating Unit 17, Low-Level Burial Grounds, Part A Form, Revision 14, dated October 1, 2008) explicitly allows storage, treatment, and disposal of waste in Burial Ground 218-W-5, Trenches 31 and 34 (i.e., the Mixed Waste Trenches). Ecology approved this on September 22, 2008. EPA agreed to this change after their one comment (no treatment directly on the operational – dirt – layers of the trenches) was addressed. DOE agreed with this comment. No formal notification has been provided or approved that rescinds in-trench treatment.</p>

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4	Section 3.3.3 and Section 4.2.2 (Lowe)	Offsite commercial processing of MLLW and TRUM waste is described. Please insert a sentence referring the reader to Section B1.8 where onsite and offsite transportation of waste is discussed.	Accepted.
5	Section 4.2.2 (Lowe)	The assumption that “other TRU waste generated during Hanford Cleanup activities (e.g., 618-10/11, PFP) will be compliantly packaged at the point of generation” is questionable. For example, cleanup of 618-10/11 is likely focused on retrieving the waste and getting it in a safe form to transport elsewhere where it can be further managed (temporary storage, NDE/NDA, treatment, repackaging, etc.) until disposed.	Not Accepted. Generators are required to meet the <i>Hanford Site Solid Waste Acceptance Criteria</i> (HNF-EP-0063) prior to acceptance into a Waste Management Facility (e.g., CWC, WRAP, T Plant), however, NDA/NDE capabilities at WRAP may be utilized by generators to characterize their waste but no treatment will be performed and waste will be returned to generator once characterization has been completed.
6	Table 4-1 (Lowe)	There are two M-91-44 milestones shown with incorrect descriptions and due dates. The list should be modified to agree with the current TPA.	Partially Accepted. The descriptions will be corrected however the purposes of the dates were to show anticipated completion dates. The 9/30/2030 completion date for certifying the waste allows time to ship waste by the 12/31/2030 completion date. Will clarify in the text.
7	Section 4.3.2 (Lowe)	Change the statement to “ <del>Three</del> <u>The</u> TRUPACT-II containers are typically shipped three at a time to WIPP”.	Accepted.
8	Table 5-2 (Lowe)	The entry “Sodium Metal Contaminated Debris” is said to have been processed at an offsite commercial facility in May 2011. It is unclear if this waste still exists or should be removed from the list of No-Path Forward Waste.	Not Accepted. Table 5-2, <i>No-Path-Forward Waste Dispositioned in FY 2011</i> , provides a list of no-path-forward wastes that have been dispositioned and would therefore no longer be no-path-forward waste. Will add the disposal date for the last two items for clarity.
9	Section 6.3 (Lowe)	Change the list of storage buildings associated with WRAP to “... <u>2404-WA</u> , <u>24042-WB</u> , and <u>2404-WC</u> ...”. Change the next sentence to “The storage capacity at WRAP also includes <u>temporary</u> outdoor storage that is intended to facilitate the WRAP waste management activities...”.	Partially Accept. Will correct 2404-WB. 2404-WA will not be added since the latest Ecology-approved permit documentation (WA7890008967, Operating Unit 7, Waste Receiving and Processing Facility, Part A Form, Revision 6, dated October 1, 2008) does not include 2404-WA.

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10	Section 6.4 (Lowe)	Change the sentence to “The MWTs (218-W-5 LLBG, Trenches 31 and 34) provide storage for various sized containers of mixed waste <u>which meet LDR requirements.</u> ”	Not Accepted. The latest Ecology-approved permit documentation (WA7890008967, Operating Unit 17, Low-Level Burial Grounds, Part A Form, Revision 14, dated October 1, 2008) explicitly allows storage of non LDR compliant waste at Burial Ground 218-W-5, Trenches 31 and 34 (i.e., the Mixed Waste Trenches).
11	Section 7.3.2 (Lowe)	The text discusses debris waste that cannot be packaged into WIPP-certifiable containers at the point of generation and how the future M-91 large container CH-TRUM and RH-TRUM facility could be used but “this would result in the facility to operate past the anticipated shutdown date of FY2030 as currently planned.” The alternative of repackaging the waste at WRAP and T Plant is also mentioned but “this would require WRAP and T Plant to be operated longer than anticipated.” This logic is in error; a path forward must be provided. (The facility is not yet designed or constructed, but we’re planning for its shutdown?)	Accepted.
12	Section 8.1 (Lowe)	Descriptions are provided for most of the WBS planning elements except for support to ERDF (WBS 013.10) and IDF (WBS 013.12). Please provide these descriptions so the reader can understand the scope of these activities.	Accepted.
13	iii/3 (Compliance)	Revise 2 <sup>nd</sup> sentence as follows: “These changes <del>refocused the major milestone from delayed</del> the acquisition of facilities to the treatment of Hanford Site <i>Resource Conservation and Recovery Act of 1976</i> <sup>3</sup> MLLW and the certification and shipment of TRUM waste, <del>to satisfy land disposal treatment standards</del> <u>but added shipment milestones for TRUM waste.</u> ”	Not Accepted. Language taken from the approved Federal Facility Agreement and Consent Order Change Control Form, M-091-09-01.
14	Table ES-1 Table 1-2 (Compliance)	Add an additional column to the table, showing milestone status as either “Completed” “On Schedule” “At Risk” or “To Be Missed”	Not Accepted. Not required per the TPA, Section 11.5.

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15	1-1 et seq. (Compliance)	Delete discussion of <i>Hanford Site Cleanup Completion Framework</i> beginning in 3 <sup>rd</sup> paragraph, continuing through the 2nd paragraph on page 1-2.	Not Accepted. As stated in the response to Comment 1, the M-091 Project Management Plan (PMP) is to address integration with other programs and projects. It is important for the reader to have background information on how M-091 work scope fits within with other site projects and priorities. The language is consistent the letter 12-HAB-0030 sent to the Hanford Advisory Board (HAB) and signed by DOE, Ecology, and EPA on September 5, 2012.
16	1-1 (Compliance)	Delete Table 1-1	Not Accepted. The Executive Summary is a standalone section and the therefore the milestone status table in repeated in the body of the document.
17	1-2/3 (Compliance)	Revise 1 <sup>st</sup> sentence as follows: "Ecology, EPA and DOE approved changes to the M-091 Milestones in September 2010 <del>that align with the</del> <i>Completion Framework</i> ."	Accepted.
18	1-2/3 (Compliance)	Revise 1 <sup>st</sup> sentence as follows: "The major M-091 Milestone previously <del>focused on</del> <u>included a near-term date for</u> the acquisition and modification of facilities/capabilities to support retrieval, storage, and treatment of wastes."	Not Accepted. Language consistent with the Fact Sheet, <i>Proposed Tri-Party Agreement Changes for Mixed Low-level Waste and Transuranic Mixed Waste</i> , associated with the approved Federal Facility Agreement and Consent Order Change Control Form, M-091-09-01.
19	1-2/4 (Compliance)	Delete paragraph "During negotiations . . . priority cleanup activities."	Not Accepted. See Comment #18 response.
20	1-2/5 (Compliance)	Delete end of paragraph ". . . based on the <i>Framework Cleanup</i> and available resources."	Please provide clarity to the objection of the paragraph.
21	1-6/2 (Compliance)	Revise last sentence of Section 1.2 as follows: "Provided in Chapter 7 is a summary of the CERCLA cleanup actions that have the potential to generate waste with TRU constituents greater than 100 nCi/g, along with projected volumes, <del>and</del> <u>schedules</u> from the CERCLA cleanup actions authorized in records of decision (RODs) and action memoranda, <del>and</del> <u>milestone schedules for CERCLA cleanup actions still in the investigatory phase</u> ."	Not Accepted. Per TPA Milestone M-016-93B, the work plan will reflect retrieval decisions, projected waste volumes, and schedules from all cleanup actions authorized in Record of Decisions and Action Memoranda. Milestone schedules for CERCLA cleanup actions still in the investigatory phase are not required.

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22	Sec 1.4 (Compliance)	In second bullet, delete 2 occurrences of text “in-trench treatment,” – this has been discontinued.	Not Accepted. See Comment #3 response.
23	Fig 1-4 (Compliance)	Delete “or In-Trench Treatment (MWT 31 & 34)	Not Accepted. See Comment #3 response.
24	Fig 1-5 (Compliance)	Delete Figure 1-5. FY15 and FY16 in particular are not compliant with milestone requirements.	Please provide basis for the comment.
25	1-10/3 (Compliance)	<p>Delete paragraph.</p> <ul style="list-style-type: none"> <li>• Basing waste work-off rate on “Plateau Remediation Contract baseline” is inappropriate, because text doesn’t state whether that baseline is TPA-compliant.</li> <li>• The paragraph includes the false statement “. . . and current funding through Congressional appropriation.” The latter statement would only apply to FY12.</li> <li>• ARRA funding is past, and a future funding profile isn’t based on past funding (although certainly the ETC is based on work performed to date, including ARRA-funded work).</li> </ul>	<p>Not Accepted.</p> <p>Bullet 1: The text states that “<i>Given the anticipated funding levels and competing site priorities, it has become necessary to suspend M-091 Milestone work scope for next several years until resources become available. As a result, several M-091 target dates and enforceable milestones are at risk of not being completed on schedule.</i>”</p> <p>Bullet 2 &amp; 3: Please provide clarity to the objection of the statement. As required, the annual update of the PMP documents work completed during the previous federal fiscal year and work scheduled for the coming fiscal year. There was FY 2011 ARRA funding carry over into FY 2012.</p>
26	1-10/3 (Compliance)	Although the paragraph is deleted, please identify where in text DOE explains the assumptions cited in the sentence “Funding for FY2019 through FY2031 was estimated based on assumptions regarding operations that support completion of the M-091 Milestones series and is subject to change as planning is refined.” One of the basic purposes of this PMP is to document planning assumptions, so those assumptions should be explained in detail in this report.	Not Accepted. See Appendix D for planning assumptions.

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27	1-10/4 (Compliance)	Revise first sentence as follows: "Given the anticipated funding levels and competing site priorities, <del>it has become necessary</del> <u>DOE has chosen</u> to suspend M-091 Milestone work scope for the next few years <del>until resources become available.</del> "	Not Accepted. The language is consistent with the approved Federal Facility Agreement and Consent Order Change Control Form, M-091-09-01, and the letter, 12-HAB-0030, sent to the HAB from DOE, Ecology, and EPA on September 5, 2012.
28	1-11 (Compliance)	Delete the first two and last sentences of the bulleted paragraph.	Not Accepted. See Comment #15 response.
29	1-12 (Compliance)	Delete the first bullet.	Please provide basis for the comment.
30	2-1/2 (Compliance)	Delete the sentence "Containers determined to present unacceptable hazards to the workers will be documented and may be reburied to provide adequate protection during storage." Re-burying a waste box does not meet the criteria for compliant storage, and would not be allowed.	Partially Accepted. The sentence will be written to say, "Containers determined to present unacceptable hazards to the workers will be documented and a path forward identified. The containers will be retrieved per TPA milestone requirements."
31	2-1/last (Compliance)	DOE has lost WIPP certification capability at Hanford. Replace the generic "Operation ramp-up" with details about how and when DOE will re-develop certification capability at Hanford.	Not Accepted. Details for re-deployment of certification capability at Hanford have not been established and subject to national priorities.
32	Sec 2.1 2 <sup>nd</sup> (Compliance)	Delete sentence "The schedule of retrieval activities is based on the funding profile given in Figure 8-1." Replace the logic for retrieval with some other basis, e.g., minimizing the life-cycle retrieval cost, optimizing retrieval vs. capacity for re-packaging, optimal WIPP shipment schedule, off-site treatment capacity, etc.	Partially Accepted. The sentence will be revised to state, "The schedule of retrieval activities is based on the funding profile given in Figure 8-1, while evaluating other factors such as, minimizing the life-cycle retrieval cost, optimizing retrieval versus capacity for re-packaging, optimal WIPP shipment schedule, and offsite treatment capacity."
33	2-1/last (Compliance)	Revise the first sentence to read "... retrieval of RSW will not occur in FY 2012 through FY 2015." DOE has target milestones for FY12 through FY15, but cannot unilaterally decide not to retrieve in FY15.	Partially Accepted. The sentence will be revised to state "...retrieval of RSW is not expected to occur in FY 2012 through FY 2015."

**Attachment**

34	2-1/last (Compliance)	Delete 3 <sup>rd</sup> and 4 <sup>th</sup> sentences of the last paragraph.	Partially Accepted. The 3 <sup>rd</sup> sentence will be revised to state, "If retrieval is delayed....."
35	2-6/1 (Compliance)	For sentence beginning on page 2-3, DOE needs to develop a plan now for RH drums in poor condition. Revise sentence to read "If <u>When</u> RH containers are found that are believed to have poor integrity, they will be covered with lead blankets, soil, or other shielding to reduce dose rates and <u>a plan an advanced retrieval capability will be developed for executed to retrieve</u> retrieving these containers."	Not Accepted. Wording in PMP accurately depicts what happens and meets requirements.
36	2-6/4 (Compliance)	Add additional text describing how the waste processing manages waste with free liquids, because the text states: "During the winter months, a drum warming unit will be used to melt any liquids inside a drum prior to going into the real-time radiography equipment."	Not Accepted. The interim <i>Waste Receiving and Processing Facility Waste Analysis Plan</i> (HNF-2165) identifies how DOE manages drums with free liquids.
37	3-1/1 (Compliance)	Revise sentences as follows "The combination of <del>commercial</del> <u>Commercial</u> capabilities and <del>in-trench treatment</del> will continue to be used for treating the remaining MLLW. The MLLW that cannot currently be treated <del>either commercially or by in-trench treatment</del> is considered no-path-forward waste."	Not Accepted. See Comment #3 response.
38	3-1/3 (Compliance)	Delete paragraph beginning with sentence "In-trench treatment will continue to be performed to meet the LDR requirements."	Not Accepted. See Comment #3 response.
39	3-1/last (Compliance)	Revise sentence as follows: " <del>Under the anticipated annual funding profile, DOE has suspended</del> treatment of MLLW will not occur during FY2013 <u>and FY2014 through FY2015.</u> "	Partially Accepted. The sentence will be revised to state, "Under the projected annual funding profile, treatment of MLLW is not anticipated to occur FY 2013 through FY 2015.
40	3-1 (Compliance)	Delete the sentence beginning "The treatment of MLLW will restart during FY2016 once retrieval operations has restarted and feed is available." The logic underlying this statement has two errors: one, Ecology has not agreed that DOE would not retrieve during FY2015, and there is MLLW feed already available in the current CWC stored waste.	Partially Accepted. The sentence will be revised to state, "The treatment of MLLW will restart during FY 2016 once funding becomes available.

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41	3-2/last (Compliance)	Additional treatability groups need to be added to the bullets, and additional text. This PMP confirms on page 2-4 that free liquids occur in drums, and a 2012 Ecology inspection at CWC confirms the presence of free liquids. One of the treatability groups should explicitly acknowledge waste with free liquids, and describe the appropriate treatment.	Not Accepted. Treatability groups are established and approved in the LDR report under the M-026-01 milestone series.
42	3-3/1 (Compliance)	Revise first bullet as follows: “RH and Large Container,” Treatment Path: <del>In-trench treatment</del> ; commercial’	Not Accepted. See Comment #3 response.
43	Sec. 3.3 (Compliance)	Replace following sentence with description of other capabilities, as in-trench treatment is no longer allowed: “In-trench treatment in the MWTs may be used to minimize significant worker risks and physical infrastructure capabilities associated with opening and processing some of the wastes contained in this treatability group.”	Not Accepted. See Comment #3 response.
44	Sec 3.3.5 (Compliance)	Revise Subsection heading as follows: “Commercial and <del>In-Trench</del> Treatment (MLLW-07)”	Not Accepted. See Comment #3 response.
45	3-5/2 & 3 (Compliance)	Delete the 2 <sup>nd</sup> and 3 <sup>rd</sup> paragraphs, as in-trench treatment is no longer allowed.	Not Accepted. See Comment #3 response.
46	Sec 4 – intro (Compliance)	This section is mis-leading because it implies that WRAP is a current capability, whereas WRAP is on standby status. It is also mis-leading because it implies that WIPP certification is occurring at WRAP, while WRAP is on stand-by. Revise the intro to be more factual, and introduce text that will have to be added later in the chapter. Section 4 will need detail to describe the activities and schedule to bring WRAP back on-line, and to re-instate WIPP certification capability at Hanford.	Not Accepted. Revision 11 of the PMP represents FY 2011 status and will be updated to FY 2012 status in the next annual submittal.
47	Sec 4.2.1 (Compliance)	Revise sentence as follows: “DOE repackages <u>has the capability to repackage</u> small containers of TRUM waste into WIPP certifiable containers at T Plant and WRAP as described in the following subsections,” The present tense of the sentence “repackages” is misleading, because it implies that DOE is currently repackaging small containers, whereas WRAP is currently in standby mode.	Not Accepted. Revision 11 of the PMP represents FY 2011 status and will be updated to FY 2012 status in the next annual submittal.

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48	Sec 4.2.1.1 (Compliance)	Revise sentence as follows: "DOE utilizes <u>can utilize</u> the T Plant for treating . . ." The present tense of the sentence "utilizes" is mis-leading, because it implies that DOE is currently treating waste at T Plant, but there is currently no treatment occurring at T Plant.	Not Accepted. Revision 11 of the PMP represents FY 2011 status and will be updated to FY 2012 status in the next annual submittal.
49	Fig 4-3 (Compliance)	Modify the figure to include a step(s) accounting for free liquids. This PMP confirms on page 2-4 that free liquids occur in drums, and a 2012 Ecology inspection at CWC confirms the presence of free liquids.	Not Accepted. Free liquids are represented/identified as a prohibited item.
50	Sec 4.2.3 (Compliance)	This section should describe the caisson waste that would come into the SWOC from 618-10 and 618-11, and describe whether or not the CERCLA waste is following the same process as the RSW.	Not Accepted. See Comment #5 response.
51	Table 4-1 (Compliance)	Modify the table to show the 618-10 and 618-11 caisson wastes. The table should include dates that are compliant with the M-16 Milestone series dates applicable to the CERCLA waste.	Accepted. See Comment # 1 response. The applicable SWIFT report volumes will be incorporated into the projected TRUM shipments to WIPP presented in Table 4-2.
52	Table 4-1 (Compliance)	Modify the table to show the CERCLA wastes to be generated from the 200-PW-1/3/6 remedial action. The table should reflect completion of the remedial action (including TRUM waste disposal at WIPP) by 9/30/2024 date for M-16-00 Milestone.	Accepted. See Comment # 1 response. The applicable SWIFT report volumes will be incorporated into the projected TRUM shipments to WIPP presented in Table 4-2.
53	Sec 4.31. (Compliance)	This section omits the fact that Hanford has lost its WIPP certification capability. This section should be expanded to discuss the activities and schedule for re-acquiring the certification capability at Hanford.	Not Accepted. See Comment #31 response.
54	Sec 4.3.2 (Compliance)	Revise sentence as follows: "At WRAP DOE <u>has the capability to load</u> <del>loads</del> drums and SWBs of CH-TRUM waste . . ." The present tense of the sentence "repackages" is mis-leading, because it implies that DOE is currently loading waste, whereas WRAP is currently in standby mode.	Not Accepted. Revision 11 of the PMP represents FY 2011 status and will be updated to FY 2012 status in the next annual submittal.
55	5-1/2 (Compliance)	Delete text "in-trench treatment,"	Not Accepted. See Comment #3 response.

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56	5-1/3 (Compliance)	Delete third paragraph. Note this would paragraph would justify DOE suspending waste retrieval in FY12-14, and then not meeting the M-91 milestone series.	Please clarify comment.
57	Table 7-2 (Compliance)	Add a date for 200-CW=5 and PW-1/3/6 OUs. Although an execution schedule has not been developed for those OUs, this PMP should project a date (e.g., no later than FY22 in order to meet M-16-00 Milestone date).	Accepted.
58	Sec. 8.1/1 (Compliance)	<p>Delete paragraph.</p> <ul style="list-style-type: none"> <li>• Basing waste work-off rate on “Plateau Remediation Contract baseline” is inappropriate, because text doesn’t state whether that baseline is TPA-compliant.</li> <li>• The paragraph includes the false statement “. . . and current funding through Congressional appropriation.” The latter statement would only apply to FY12.</li> <li>• ARRA funding is past, and a future funding profile isn’t based on past funding (although certainly the ETC is based on work performed to date, including ARRA-funded work).</li> </ul>	Not Accepted. See Comment #25 response.
59	Sec 8.1/1 (Compliance)	Although the paragraph is deleted, please identify where in text DOE explains the assumptions cited in the sentence “Funding for FY2019 through FY2031 was estimated based on assumptions regarding operations that support completion of the M-091 Milestones series and is subject to change as planning is refined.” One of the basic purposes of this PMP is to document planning assumptions, so those assumptions should be explained in detail in this report.	Not Accepted. See Comment #25 response.
60	Sec 8.3.1/1 (Compliance)	Delete third sentence, “Given preliminary budget levels and site priorities, work will be curtailed sharply that supports the M-091 Milestone series.”	Not Accepted. See Comment #27 response.
61	8-4/last (Compliance)	Delete the 2 <sup>nd</sup> sentence in the last paragraph on page 8-4, that continues onto page 8-5: “Focus on the completion of cleanup along the River Corridor coupled with future funding uncertainty formed the basis for the recently renegotiated milestones.”	Not Accepted. See Comment #18 response.

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62	8-5/1 (Compliance)	Revise sentence as follows: "Target (unenforceable) milestones were established for the M-091 Milestone work in FY 2012 through FY 2014 and enforceable milestones were agreed to for FY 2015 and FY 2016-as <del>the River Corridor cleanup is completed and funding is made available to refocus on MLLW and TRUM retrieval.</del> "	Not Accepted. See Comment #18 response.
63	Sec 8.3.2 (Compliance)	Delete this section. The logic underlying this section has two errors: one, Ecology has not agreed that DOE would not retrieve during FY2015, and there is MLLW feed already available in the current CWC stored waste.	Partially Accepted. Will revise section to address small amount of MLLW currently in above ground storage.
64	Sec 8.3.3.1 (Compliance)	Revise text of first sentence to read "The alpha caisson wastes <u>in the 218-W-4B burial ground</u> contain waste containers . . ."	Accepted.
65	Sec 8.3.3.1 (Compliance)	Move last paragraph of subsection up to be first subsection, and add a statement that the 618-10 and 618-11 wastes will be retrieved prior to retrieval of caisson wastes from the 218-W-4B burial ground.	Not Accepted. Last paragraph already states that the 618-10/11 caissons will be retrieved prior to the alpha caissons.
66	Sec 8.3.7 (Compliance)	This section omits the fact that DOE has lost WIPP certification capability at Hanford. Add text with details about how and when DOE will re-develop certification capability at Hanford.	Not Accepted. Revision 11 of the PMP represents FY 2011 status and will be updated to FY 2012 status in the next annual submittal. Details for re-deployment of certification capability at Hanford have not been established and subject to national priorities.