



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950

August 19, 2019

19-NWP-132

Brian T. Vance, Manager  
Office of River Protection  
United States Department of Energy  
PO Box 450, MSIN: H6-60  
Richland, Washington 99352

Re: Ecology Disapproval of HFFACO Change Number M-45-19-05

Dear Brian T. Vance:

Enclosed is the original signed Hanford Federal Facility Agreement and Consent Order (HFFACO) Change Number 45-19-05. Ecology disapproved the change because the United States Department of Energy – Office of River Protection modified Ecology’s suggested wording for M-045-91J to read “Submit to Ecology, as a secondary document, a work plan . . .”

HFFACO Action Plan Section 11.6 states,

“Unless otherwise specified, other work plans . . . shall be prepared, reviewed, and approved as primary documents.”

Ecology requests that you modify the M-045-91J milestone to read “as a primary document” then re-submit the form to Ecology.

If there are any questions, contact Jeff Lyon, M-45 Project Manager, at [jlyo461@ecy.wa.gov](mailto:jlyo461@ecy.wa.gov) or (509) 372-7914.

Sincerely,

Alexandra K. Smith  
Program Manager  
Nuclear Waste Program

jbp/so  
Enclosure

cc: See page 2

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Brian T. Vance  
August 19, 2019  
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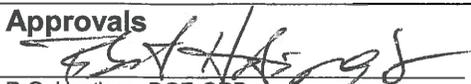
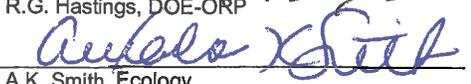
cc electronic w/enc:

Dave Einan, EPA  
Jessica Joyner, USDOE  
Dustin M. Stewart, USDOE  
Jon Perry, MSA  
Michael Turner, MSA  
ERWM Staff, YN  
Ken Niles, ODOE  
Jim Alzheimer, Ecology  
Theresa Howell, Ecology  
Jeff Lyon, Ecology  
Nina Menard, Ecology  
John Price, Ecology  
Stephanie Schleif, Ecology  
Maria Skorska, Ecology  
Alex Smith, Ecology  
Environmental Portal  
Hanford Facility Operating Record  
MSA Correspondence Control  
USDOE-ORP Correspondence Control

cc: Susan Leckband HAB  
Hanford Administrative Record  
NWP Central File

cc w/o enclosure:

Matt Johnson CTUIR  
Jack Bell, NPT  
Laurene Contreras, YN

<b>Change Number</b> M-45-19-05	<b>Federal Facility Agreement and Consent Order Change Control Form</b>		<b>Date</b> 01/21/2019
<b>Originator</b> Dustin Stewart			<b>Phone</b> 376-8950
<b>Class of Change</b> <input type="checkbox"/> I – Signatories	<input checked="" type="checkbox"/> II – Executive Managers	<input type="checkbox"/> III – Project Managers	
<b>Change Title</b>  Establish New Interim Milestones for Submittal of Additional SST Tank Integrity Assessments			
<b>Description/Justification of Change</b>  This change control form creates three new interim milestones and one target date. These milestones represent the U.S. Department of Energy, Office of River Protection (DOE-ORP) and the Washington State Department of Ecology's agreed approach to ensure continuation of the single-shell tank (SST) structural integrity program, consistent with the approaches taken in previous M-045-91 series interim milestones and target dates.  Milestone M-045-91J requires submittal of a secondary document, by August 30, 2019, that will constitute a work plan regarding the scope and criteria for obtaining adequate information necessary to support an Independent Qualified Registered Professional Engineer (IQRPE) certification of SST structural integrity under M-045-91L and for future structural integrity assessments.  Milestone M-045-91K relates to completing the process of conducting baseline visual inspections in SSTs, consistent with IQRPE recommendations in RPP-IQRPE-50028, by September 30, 2023.  Target date M-045-91K-T01 requires DOE-ORP to submit a report to Ecology documenting and evaluating the initial baseline visual inspection of all SSTs remaining to be inspected following the completion of target dates M-045-91G-T05 and M-045-91G-T06, by March 31, 2024.  Milestone M-045-91L relates to completing the next SST structural integrity assessment, consistent with the IQRPE recommendation provided in RPP-IQRPE-50028 (completed under M-045-91I), by September 30, 2034.			
<b>Impact of Change</b>  This change control form establishes 3 new interim milestones and one target date to support SST Tank Integrity Assessments.			
<b>Affected Documents</b>  Tri-Party Agreement Action Plan Appendix D, "Work Schedule Milestones and Target Dates Including Designation of Lead Regulatory Agency."			
<b>Approvals</b>			
 R.G. Hastings, DOE-ORP	7/24/19 Date	Approved <input checked="" type="checkbox"/>	Disapproved <input type="checkbox"/>
 A.K. Smith, Ecology	8/19/19 Date	Approved <input type="checkbox"/>	Disapproved <input checked="" type="checkbox"/>
N/A		Approved <input type="checkbox"/>	Disapproved <input type="checkbox"/>
EPA		Approved <input type="checkbox"/>	Disapproved <input type="checkbox"/>

**Authorized Changes**

Modifications to the HFFACO are displayed by using double underline to indicate added text and ~~strikeout~~ to indicate deleted text.

Number	Milestone	Due Date
<p><u><b>M-045-91J</b></u>  <u>Lead Regulatory Agency: Ecology</u></p>	<p><u>Submit to Ecology, as a secondary document, a work plan for the activities necessary to obtain future single-shell tank structural integrity assessments. This work plan will include the ongoing integrity program activities as recommended by the 2018 Integrity Assessment, and a schedule for activities identified in the work plan.</u></p>	<p><u>8/30/2019</u></p>
<p><u><b>M-045-91K</b></u>  <u>Lead Regulatory Agency: Ecology</u></p>	<p><u>Complete initial baseline visual inspections of all single-shell tanks in accordance with the work plan approved pursuant to M-045-91J.</u></p>	<p><u>9/30/2023</u></p>
<p><u><b>M-045-91K-T01</b></u>  <u>Lead Regulatory Agency: Ecology</u></p>	<p><u>Submit to Ecology, as a secondary document, a report evaluating and documenting the initial baseline visual inspection of all SSTs remaining to be inspected following the completion of target dates M-045-91G-T05 and M-045-91G-T06.</u></p>	<p><u>3/31/2024</u></p>
<p><u><b>M-045-91L</b></u>  <u>Lead Regulatory Agency: Ecology</u></p>	<p><u>Obtain a written assessment, reviewed and certified by an Independent Qualified Registered Professional Engineer (IORPE) attesting to single-shell tanks (SSTs) structural integrity for such a period as the IORPE believes he/she can reasonably certify. The analysis supporting the certification shall be performed in accordance with the requirements in WAC 173-303-640(2) relating to structural integrity and will include a review of previously issued SST integrity assessments. IORPE certification of SST leak integrity is not required. The IORPE assessment shall recommend revisions to the work plan and schedule for integrity assessment activities, if necessary, for the period between the IORPE certification (9/30/2034) and the end date of the mission.</u></p>	<p><u>9/30/2034</u></p>