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Change Number M-16-96-07	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date November 27, 1996
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Class of Change
 I - Signatories II - Executive Manager III - Project Manager

Change Title
 Modification of TPA Milestone M-16-01A and Deletion of TPA Milestone M-16-01B.

Description/Justification of Change

Current Milestones M-16-01A and M-16-01B read as follows:

M-16-01A Submit necessary 100-N Area decontamination and decommissioning (D&D) National Environmental Policy Act (NEPA) documentation for public review. 6/30/97

M-16-01B Complete negotiation of 100-N Area D&D work schedules. [Due six months after Environmental Impact Statement Record of Decision (Or Equivalent)].

Revised Milestones M-16-01A and M-16-01B will read as follows:

M-16-01A Submit draft 100-N Area Ancillary Facility Decommissioning Engineering Evaluation and Cost Analysis (EE/CA) to Ecology. The document shall contain the necessary CERCLA documentation including integrated NEPA values to support a decision in the 100-NR-1 & 2 Operable Unit Record of Decision for the Hanford Generating Plant complex and all 100-N facilities to be decommissioned (excluding 105-N/109-N Reactor and Heat Exchanger complex). The plan will contain an integrated schedule (showing durations) to perform decommissioning of facilities and remediation of waste sites in the 100-N Area. (April 30, 1997)

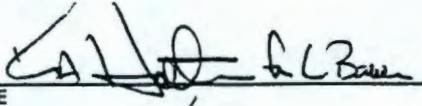
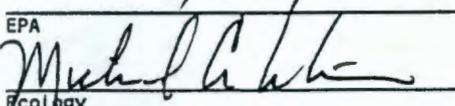
M-16-01B Deleted

- Continued on page 2 -

Impact of Change
 These modifications will allow timely integration of facility decommissioning and waste site remediation where facilities and infrastructure interfere with waste site remediation. The long term disposition of the 105-N/109-N Reactor and Heat Exchanger Complex is being addressed in current Tri-Party Agreement Reactor negotiations.

Affected Documents
 Hanford Federal Facility Agreement and Consent Order, Appendix D.

Approvals:

	12/12/96	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
DOE	Date		
	12/16/96	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
EPA Ecology	Date		



Discussion

The CERCLA decision document entitled "100-N Area Ancillary Facility Decommissioning Engineering Evaluation and Cost Analysis (EE/CA)" would be submitted to the State of Washington Department of Ecology to satisfy TPA Milestone M-16-01A. During development of the 100-NR-1 & 2 Corrective Measures Study the issue was raised regarding the integration of facility decommissioning and waste site remediation. The 100-N Area is unique with respect to the other reactor areas in that there are facilities and associated infrastructure that will interfere with remediation of waste sites in the 100-N Area. Note that this EE/CA will include the Hanford Generating Plant, however, the 105-N/109-N Reactor and Heat Exchanger Complex will be excluded because Interim Safe Storage and long-term disposition of this complex is being addressed in current Tri-Party Agreement Reactor negotiations. The 109-N Heat Exchanger building is being included with the 105-N Reactor Interim Safe Storage due to the structural integration of 109-N with the primary coolant loop of 105-N.

Integration of Decommissioning under CERCLA can be accomplished utilizing this path forward. The EE/CA could then be put out for Public Review at the same time as the other N Area decision documents (Corrective Measure Studies and Proposed Plans). The EE/CA is intended to support decision making for the 100-NR-1 & 2 Operable Units Record of Decision (ROD). The 100-NR-1 & 2 Operable Units ROD will integrate waste site remediation and facility decommissioning and specify a disposal facility for wastes generated during decommissioning and remedial actions at 100-N.

Integration of NEPA values into the EE/CA is consistent with DOE O 451.1, the June 1994 Secretary of Energy's Policy Statement on NEPA, the Council on Environmental Quality regulations and recent Hanford practice. This allows consideration of NEPA issues such as cumulative impacts as part of the CERCLA decision, while satisfying the requirements of both NEPA and CERCLA.

TPA Milestone M-16-01B would be deleted. The EE/CA will contain a schedule that integrates waste site remediation with facility decommissioning. However, the schedule will contain only durations. It is agreed that decommissioning of facilities will appropriately precede remedial actions such that timely integration is achieved. In addition it is understood that once the ROD is issued the Remedial Design/Remedial Action (RD/RA) process will be used to negotiate the schedule and the RD/RA workplan will document the negotiated schedule dates, from which appropriate TPA milestones are selected.