



U.S. Department of Energy  
Hanford Site

20-AMRP-0011

DEC 27 2019

Mr. David Einan, Manager  
Superfund and Emergency Management Division  
Site Cleanup Section 4  
U.S. Environmental Protection Agency  
825 Jadwin Avenue, Suite 210  
Richland, Washington 99352

Dear Mr. Einan:

COMPLETION OF HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT  
ORDER (TRI-PARTY AGREEMENT) MILESTONE M-093-28

This letter documents completion of Tri-Party Agreement Milestone M-093-28, "Submit a change package for proposed interim milestones for 105-KE and 105-KW Reactor Interim Safe Storage," due December 31, 2019.

The attached change packages account for the time required to complete placing the K West Reactor in Interim Safe Storage following removal of the fuel storage basin in September 2023. These change packages have been discussed with Laura Buelow of your staff.

If there are any questions, please contact me or your staff may contact Mark French, of my staff, on (509) 373-9863.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Hamel", is written over a faint, larger version of the same signature.

William F. Hamel, Assistant Manager  
for the River and Plateau  
Richland Operations Office

AMRP:MSF

Attachments:

1. Change Control Form M-93-19-01
2. Change Control Form M-16-19-05

cc: See page 2

Mr. David Einan  
20-AMRP-0011

-2-

DEC 27 2019

cc w/attachs:

S. G. Austin, CHPRC

J. Bell, NPT

S. L. Brasher, MSA

R. Buck, Wanapum

L. C. Buelow, EPA

L. Contreras, YN

S. W. Davis, MSA

R. M. Geimer, CHPRC

M. Johnson, CTUIR

S. Leckband, HAB

N. M. Menard, Ecology

K. Niles, ODOE

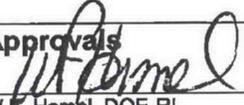
M. Pakula, Ecology

S. N. Schleif, Ecology

A. K. Smith, Ecology

Administrative Record (M-093-28)

Environmental Portal

<b>Change Number</b> M-93-19-01	<b>Federal Facility Agreement and Consent Order Change Control Form</b>		<b>Date</b> 12/13/2019
<b>Originator</b> Mark French			<b>Phone</b> 373-9863
<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>  Submit Change Control Form for Proposed Interim Milestones for 105-KE/KW Reactor Interim Safe Storage			
<b>Description/Justification of Change</b>  This change control form completes Tri-Party Agreement (TPA) interim milestone M-093-28, "Submit a change package for proposed interim milestones for 105-KE and 105-KW Reactor Interim Safe Storage," due December 31, 2019. The proposed interim milestones and target dates will complete construction of the Safe Storage Enclosures (SSE) for the 105-KE and 105-KW Reactor Buildings, in accordance with the Removal Action Work Plan. The existing M-093-27 interim milestone includes ISS of both 105-KE and 105-KW and is being revised to cover only 105-KE. A new interim milestone, M-93-29, is being proposed for the 105-KW scope of work.  <i>(Continued on page 2)</i>			
<b>Impact of Change</b> This change control form creates three new target milestones for the 105-KE and 105-KW Reactor Buildings, a new interim milestone for the 105-KW Reactor Building, modifies the scope of work for interim milestone M-093-27 to the 105-KE Reactor Building, and completes interim milestone M-093-28. There is no impact to major milestone M-093-00 with this change.  This change control form impacts completion dates for the following interim milestones (reference change control form M-16-19-05):			
<ul style="list-style-type: none"> <li>• M-016-143, Complete the interim response actions for the 100 K Area within the perimeter boundary and to the river for Phase 2 actions. Phase 2 is identified in the 100 K Area RD/RA Work Plans, and</li> <li>• M-016-00C, Complete all response actions for the 100 K Area.</li> </ul>			
<b>Affected Documents</b> The Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford Site internal planning management, and budget documents (e.g., USDOE and USDOE contractor Baseline Change Control documents, Project Management Plans) and the DOE/RL-2005-26 Rev. 2 Removal Action Work Plan for 105-KE/105-KW Reactor Facilities and Ancillary Facilities.			
<b>Approvals</b>  W.F. Hamel, DOE-RL	<u>12/26/19</u> Date	Approved  _____	Disapproved _____
D.R. Einan, EPA	_____	Approved _____	Disapproved _____
N/A	_____	Approved _____	Disapproved _____
A.K. Smith, Ecology	_____	Approved _____	Disapproved _____
			Page 1 of 2

**Description/Justification of Change (continued)**

This change control form is being coordinated in conjunction with change control form M-16-19-05, Extend Due Dates for Completion of TPA Milestones M-016-143 and M-016-00C.

Milestone M-016-181, "Complete deactivation, demolition & removal of 105-KW Fuel Storage Basin," is due September 30, 2023. Following completion of M-016-181 the U.S. Department of Energy, Richland Operations Office and the U.S. Environmental Protection Agency agree that there is insufficient time to construct a SSE over the 105-KW Reactor Building by 9/30/2024. The SSE design utilizes features that cannot be installed until after all soil remediation work has been completed. Ancillary facilities/structures will also need to be removed prior to construction of the 105-KW Reactor Building SSE. The need to complete the soil remediation and ancillary building/structure demolition around 105-KW before starting construction of the SSE requires that the completion milestone dates be extended.

**Authorized Changes**

Modifications to HFFACO Appendix D, "Milestones and Target Dates Including Designation of Lead Regulatory Agency," are denoted by using ~~strikeout~~ to indicate text deletions and double underline to indicate text additions.

<b>Milestone</b>	<b>Description</b>	<b>Due Date</b>
<u>M-093-27-T01</u> <u>Lead Regulatory Agency: EPA</u>	<u>Initiate earthwork for construction of the 105-KE Safe Storage Enclosure.</u>	<u>9/30/2022</u>
M-093-27 Lead Regulatory Agency: EPA	<del>Complete 105-KE &amp; 105-KW Reactor Interim Safe Storage in accordance with the Removal Action Work Plan.</del> <u>Complete construction of the Safe Storage Enclosure for the 105-KE Reactor Building in accordance with the Removal Action Work Plan.</u>	9/30/2024
<u>M-093-29-T01</u> <u>Lead Regulatory Agency: EPA</u>	<u>Complete preparation of the 105-KW Reactor Building for Interim Safe Storage by removing liquids and accessible hazardous and controlled materials in accordance with the Removal Action Work Plan.</u>	<u>9/30/2024</u>
<u>M-093-29-T02</u> <u>Lead Regulatory Agency: EPA</u>	<u>Initiate earthwork for construction of the 105-KW Safe Storage Enclosure.</u>	<u>9/30/2026</u>
<u>M-093-29</u> <u>Lead Regulatory Agency: EPA</u>	<u>Complete construction of the Safe Storage Enclosure for the 105-KW Reactor Building in accordance with the Removal Action Work Plan.</u>	<u>9/30/2028</u>

<b>Change Number</b> M-16-19-05	<b>Federal Facility Agreement and Consent Order</b> <b>Change Control Form</b>		<b>Date</b> 12/13/2019
<b>Originator</b> Mark French			<b>Phone</b> 373-9863
<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> Extend Due Dates for Completion of Interim Milestones M-016-143 and M-016-00C in TPA Appendix D			
<b>Description/Justification of Change</b>  This change control form extends the due dates of interim milestones M-016-143 and M-016-00C to account for the sequencing of building and structure demolition in the 100 K Area that constrains the sequence and pace of soil remediation activities and the construction of the 105-KW Safe Storage Enclosure.  The U.S. Department of Energy, Richland Operations Office and the U.S. Environmental Protection Agency agree there is good cause to extend the due date of these milestones, in accordance with Tri-Party Agreement (TPA) Article XL, "Good Cause for Extensions," paragraph 120(E).  This change control form is being coordinated in conjunction with change control form M-93-19-01, Submit Change Control Form for Proposed Interim Milestones for 105-KE/KW Reactor Interim Safe Storage.  <i>(Continued on page 2)</i>			
<b>Impact of Change</b>  This change control form extends the due date for interim milestones M-016-143 by 2 years and 6 months, and M-016-00C by 4 years. There is no impact to major milestone M-016-00 with this change.			
<b>Affected Documents</b> The Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford Site internal planning management, and budget documents (e.g., USDOE and USDOE contractor Baseline Change Control documents, Project Management Plans), DOE-RL-9617, Remedial Design Report/Remedial Action Work Plan for the 100 Area, Rev.6, and applicable change notices.			
<b>Approvals</b>  W.F. Hamel, DOE-RL	<u>12/26/19</u> Date	Approved <input checked="" type="checkbox"/>	Disapproved <input type="checkbox"/>
D.R. Einan, EPA	_____ Date	Approved <input type="checkbox"/>	Disapproved <input type="checkbox"/>
N/A	_____ Date	Approved <input type="checkbox"/>	Disapproved <input type="checkbox"/>
A.K. Smith, Ecology	_____ Date	Approved <input type="checkbox"/>	Disapproved <input type="checkbox"/>

**Description/Justification of Change (continued)**

Interim milestone M-016-143 requires completion of Phase 2 response actions (facilities and waste sites) defined in the 100 K Area RD/RA Work Plans. Demolition of remaining buildings and structures in 100 K are now scheduled to be completed by 9/30/2025 following completion of 105-KW Basin Removal in September 2023 under milestone M-016-181. This includes the removal of ancillary structures surrounding and connected to the 105-KW Reactor building required to prepare the reactor for Interim Safe Storage. Soil remediation will continue in parallel with the 100 K demolition activities but will lag completion of the buildings and structures by 18 months to complete by 3/31/2027.

Interim milestone M-016-00C to complete all remaining response actions in the 100 K Area will be delayed until 9/30/2028 to align with completion of 105-KW Safe Storage Enclosure construction.

### Authorized Changes

Modifications to HFFACO Appendix D, "Milestones and Target Dates Including Designation of Lead Regulatory Agency," are denoted by using ~~strickoeut~~ to indicate text deletions and double underline to indicate text additions.

Milestone	Description	Due Date
<b>M-016-143</b> Lead Regulatory Agency: EPA	Complete the interim response actions for the 100 K Area within the perimeter boundary and to the river for Phase 2 actions. Phase 2 is defined in the 100 K Area RD/RA Work Plans.	<del>9/30/2024</del> <u>3/31/2027</u>
<b>M-016-00C</b> Lead Regulatory Agency: EPA	Complete all response actions for the 100 K Area.	<del>9/30/2024</del> <u>9/30/2028</u>