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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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July 12, 2018

18-NWP-119

Mr. Joseph R. Franco, Assistant Manager
Richland Operations Office
United States Department of Energy
PO Box 550, MSIN: H5-20
Richland, Washington 99352

Re: Disapproval of Change Control Form for Change Number M-16-18-01

Reference: See page 2

Dear Mr. Franco:

Enclosed is the disapproved signed Federal Facility Agreement and Consent Order Change Control Form, Change Number M-16-18-01, entitled "Waste Site Schedule per Action Memoranda and Amendments to Milestones M-016-255 and M-016-256."

The Department of Ecology disapproved this change notice because the parties have not agreed to the adjustments to the work scope or milestones impacted by Federal Fiscal Year (FFY) 2018 appropriations. These milestones are also involved with several other change notices that are part of the Supplemental Budget Request for FFY 2019 (reference).

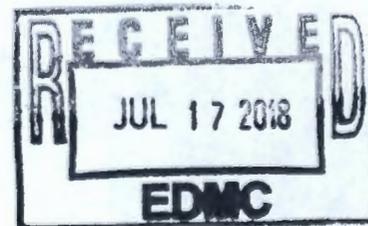
If you have any questions, please contact Nina Menard, Environmental Restoration Project Manager, at nina.menard@ecy.wa.gov or (509) 372-7941.

Sincerely,

Alexandra K. Smith
Program Manager
Nuclear Waste Program

nmm/aa
Enclosure

cc: See page 2



Mr. Joseph R. Franco
July 12, 2018
Page 2 of 2

18-NWP-119

Reference: Letter 18-NWP-096, dated July 9, 2018, "Supplemental Budget Request for Federal Fiscal Year 2019"

cc electronic w/enc:

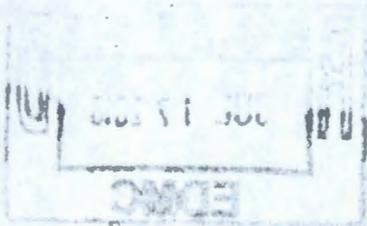
- Dave Einan, EPA
- Patti Ensign, USDOE
- Oliver Farabee, USDOE
- Jim Hansen, USDOE
- Robert Long, USDOE
- Jon Perry, MSA
- ERWM, YN
- Ken Niles, ODOE
- Nina Menard, Ecology
- John Price, Ecology
- Kim Welsch, Ecology
- Cheryl Whalen, Ecology
- Environmental Portal
- Hanford Facility Operating Record
- MSA Correspondence Control
- USDOE-RL Correspondence Control

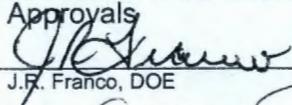
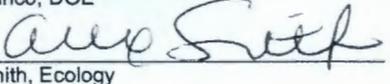
cc w/enc:

- Susan Leckband, HAB
- Administrative Record**
- NWP Central File

cc w/o enc:

- Matt Johnson, CTUIR
- Jack Bell, NPT
- Alyssa Buck, Wanapum
- Rose Longoria, YN



Change Number M-16-18-01	Federal Facility Agreement and Consent Order Change Control Form		Date 03/07/2018
Originator J. R. Franco			Phone 376-8806
Class of Change <input type="checkbox"/> I – Signatories	<input checked="" type="checkbox"/> II – Executive Managers	<input type="checkbox"/> III – Project Managers	
Change Title Waste Site Schedule per Action Memoranda and Amendments to Milestones M-016-255 and M-016-256			
Description/Justification of Change <p>This change control form provides a listing of waste sites scheduled for action (attached), which replaces the list provided via change control form M-16-17-01 for the completion of interim milestone M-016-250B, updates/modifies the waste site list included in milestones M-016-255 and M-016-256, and removes the Remove Treat Dispose (RTD) sites from the rolling list previously submitted.</p> <p>The U.S. Department of Energy, Richland Operations Office (DOE RL) currently has insufficient funding to meet all TPA obligations with the recent approval of the FY 2018 Budget and competing priorities of the site. This presents good cause to extend the milestone due date based on Article XLVIII. Force Majeure, 145.G "insufficient availability of appropriated funds, if DOE shall have made a timely request for such funds as part of the budgetary process as set forth in Article XLVIII (Cost, Schedule, Scope, Integration, Planning and Reporting) of this Agreement."</p> <p style="text-align: center;"><i>Continued on page 2</i></p>			
Impact of Change This change control form extends the due dates of interim milestone M-016-255 by two years, from September 30, 2018 to September 30, 2020 and interim milestone M-016-256 by two years, from September 30, 2019 to September 30, 2021. There is no impact to major milestone M-016-00 with this change.			
Affected Documents 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).			
Approvals  J.R. Franco, DOE	<u>7/2/18</u> Date	Approved <input checked="" type="checkbox"/>	Disapproved <input type="checkbox"/>
 A.K. Smith, Ecology	_____ Date	Approved <input type="checkbox"/>	Disapproved <input checked="" type="checkbox"/>
N/A	_____ Date	Approved <input type="checkbox"/>	Disapproved <input type="checkbox"/>
EPA	_____ Date	Approved <input type="checkbox"/>	Disapproved <input type="checkbox"/>

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Department of Ecology
NWP - Richland

Description/Justification of Change (continued)

Additionally, since the Action Memoranda cited in the milestone description were approved, the waste sites in the 200-MG-1 and 200-MG-2 operable units (OUs) have been assigned to new OUs (200-OA-1, 200-WA-1, or 200-EA-1) for final remediation. The list for this and future rolling prioritized schedules will focus on those waste sites for which the planned action is Confirmatory Sampling/No Further Action (CS/NFA). Waste sites that meet the removal action levels (RALs) contained in the 200-MG-1 Action Memoranda or RALs to be developed in a 200-MG-2 removal action work plan will be reclassified in accordance with Tri-Party Agreement procedure TPA-MP-14, "Maintenance of the Waste Information Data System (WIDS)". Further action for sites that do not meet the RALs and for all sites for which the selected action was RTD will be deferred to the current OU to ensure that remediation is consistent with cleanup levels to be established by the remedial investigation/feasibility study process for each of the respective OUs.

Authorized Changes

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

Number	Milestone	Due Date
M-016-255 Lead Regulatory Agency: Ecology	DOE shall complete the removal <u>planned action</u> of all waste sites for fiscal year 2018 <u>2020</u> as updated/modified in TPA change package M-16-17-01 <u>M-16-18-01</u> .	09/30/2018 <u>09/30/2020</u>
M-016-256 Lead Regulatory Agency: Ecology	DOE shall complete the planned action of all waste sites for fiscal year 2019 <u>2021</u> as identified in TPA change package M-16-17-01 <u>M-16-18-01</u> .	09/30/2019 <u>9/30/2021</u>

Waste Site Priority Fiscal Years 2019-2021

Priority	WIDS ID	Name or Alias	Action Memorandum	Proposed Action	OU (200-)	Fiscal Year
n/a	n/a	No waste sites planned	n/a	n/a	n/a	2019
1	2607-WL	2607-WL; 2607-WL Septic System	DOE/RL-2009-86	CS/NFA	OA-1	2020
2	200-W-14	200-W-14; 200 West Heavy Equipment Storage Area	DOE/RL-2009-86	CS/NFA	WA-1	2020
3	200-W ADB	200-W ADB; 200-W Ash Disposal Basin	DOE/RL-2009-86	CS/NFA	OA-1	2020
4	UPR-200-W-138	UPR-200-W-138; UPR-200-W-22; 221-U Vessel Vent Blower Pit French Drain; UN-200-W-138; UN-200-W-22; UN-216-W-11	DOE/RL-2009-86	CS/NFA	WA-1	2020
5	216-U-7	216-U-7; 221-U Counting Box French Drain; 221-U Vessel Vent Blower Pit French Drain	DOE/RL-2009-86	CS/NFA	WA-1	2020
6	600-71	600-71; 607 Batch Plant Burn Pit	DOE/RL-2009-86	CS/NFA	OA-1	2020
7	CTFN 2703-E	CTFN 2703-E; 200-E Chemical Drain Field; Chemical Tile Field North of 2703-E	DOE/RL-2009-86	CS/NFA	OA-1	2020
8	200-E-46	200-E-46; Debris Southeast of 282-E; RCRA Permit General Inspection #200EFY96 Item #3	DOE/RL-2009-86	CS/NFA	OA-1	2020
9	600-227	600-227; H-40 Gun Site Building Foundations	DOE/RL-2009-86	CS/NFA	OA-1	2020
10	2607-E1	2607-E1; Septic Tank and Tile Field	DOE/RL-2009-86	CS/NFA	OA-1	2020
11	216-U-3	216-U-3; 216-U-3 French Drain; 216-U-11	DOE/RL-2009-37	CS/NFA	WA-1	2021
12	216-S-25	216-S-25; 216-S-25 Crib	DOE/RL-2009-37	CS/NFA	WA-1	2021
13	216-S-18	216-S-18; 241-SX Steam Cleaning Pit; 216-S-14 Steam Cleaning Pit	DOE/RL-2009-37	CS/NFA	WA-1	2021

CS/NFA: Confirmation Sampling/No further action