



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

0054424

01-RCA-115

JAN 23 2001

RECEIVED
JAN 30 2001
EDMC

Mr. Michael A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504

Dear Mr. Wilson:

REQUEST TO CHANGE THE APRIL 30, 2001, SUBMITTAL DATE OF THE 2001 LAND DISPOSAL RESTRICTION (LDR) REPORT FOR THE HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) INTERIM MILESTONE M-26-01K)

In accordance with Tri-Party Agreement, Article VIII, Paragraph 30.f, the U.S. Department of Energy (Richland Operations Office [RL] and the Office of River Protection [ORP]) requests that the State of Washington Department of Ecology (Ecology) extend the April 30, 2001, submittal date for the LDR Report (Tri-Party Agreement Interim Milestone M-26-01K) to June 30, 2001. This extension is requested due to extensive revisions to the current LDR report content and format that was recently negotiated between Ecology and RL/ORP. This letter and its attachments serve as RL/ORP's 90-day notification, as stipulated in the Tri-Party Agreement, requesting the extension.

Given the current mediation/litigation/negotiation activities (and subsequent implementation of any outcome from those activities), RL/ORP are proposing/requesting a two-month extension for the 2001 LDR Report due date (Tri-Party Agreement Change Request [Attachment 1]). Attachment 2 outlines the revised preparation schedule. The two-month extension will provide all parties with some necessary time for review and comment. The attached schedule includes opportunities for Ecology to provide feedback during the report preparation.

RL/ORP are also proposing modification of the time period covered from the current April 1 through March 31 to our proposed January 1 through December 31 of each year. This will better align these activities with the Federal budget process (i.e., storage and treatment plan information used in preparing program baseline summaries). After the submittal of M-26-01K, the deliverable date for the milestone will continue to be April 30 of each year.

JAN 23 2001

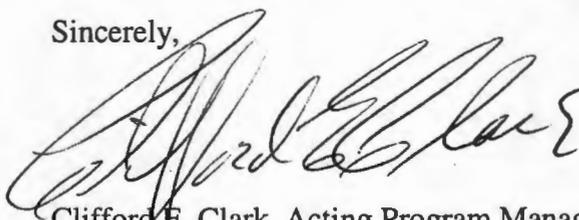
Mr. Michael A. Wilson
01-RCA-115

-2-

Ecology and RL/ORP have worked collaboratively in an attempt to resolve the issues associated with the submittal of the annual LDR Report and progress has been made. We are confident that the LDR Report and issues can be resolved to all parties' satisfaction.

In order to take advantage of the additional requested time to prepare the report, we would appreciate receiving approval within fourteen days from the date of this letter in accordance with the Tri-Party Agreement. If you have any questions, please contact Astrid Larsen, Regulatory Compliance and Analysis Division, at (509) 372-9477.

Sincerely,



Clifford E. Clark, Acting Program Manager
Office of Regulatory Liaison

RCA:APL

Attachments:

1. Tri-Party Agreement Change
Request M-26-00-01
2. Recovery Schedule

cc w/attachs:

Administrative Record, H6-08

J. H. Richards, CTUIR
L. J. Cusack, Ecology
L. E. Ruud, Ecology
R. R. Skinnarland, Ecology
R. F. Stanley, Ecology
D. R. Sherwood, EPA
J. S. Hertz, FHI
O. S. Kramer, FHI
E. J. Murphy-Fitch, FHI
M. B. Reeves, HAB
P. Sobotta, NPT
M. L. Blazek, Oregon Energy
R. Jim, YN

Federal Facility Agreement and Consent Order

Change Number
M-26-00-01

Change Control Form

Date
1/11/01

Do not use blue ink. Type or print using black ink.

Originator

Phone 736-3009

Class of Change

 I - Signatories II - Executive Manager III - Project Manager

Change Title

Date Extension for Tri-Party Agreement Milestone M-26-01K - Land Disposal Restriction Report (LDR)

Description/Justification of Change

The Land Disposal Restrictions Report (LDR) is due annually by April 30. Recent technical discussions between the U.S. Department of Energy (DOE) and the State of Washington Department of Ecology (Ecology) have resulted in significant changes to the reports content. DOE is proposing a two-month extension for delivering the 2001 Storage Report to allow the parties to work in partnership and provide more time to produce a document that is acceptable/satisfactory to all parties. A schedule outlining report preparation activities is attached to this change request and includes a series of QA checks by Ecology.

DOE is also proposing modification of the time period covered (currently April 1 through March 31; proposed January 1 through December 31). After the submittal of M-26-01K, the deliverable date for the document will return and remain April 30 of each year. This will better align these activities with the federal budget process (i.e., storage and treatment plan information would be used in preparing program baseline summaries).

Proposed revision is on page 2.

Impact of Change

Milestone will be delayed 2 months; document will be submitted June 30, 2001.

Affected Documents

The Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford site internal planning, work authorization, and budget documents (e.g., Project Management Plans, Baseline Change Control Documents and Multi Year Work Plans).

Approvals

_____ Date _____ Approved _____ Disapproved
DOE

_____ Date _____ Approved _____ Disapproved
EPA

_____ Date _____ Approved _____ Disapproved
Ecology

Proposed revision (~~deleted text~~; **new text**):

M-26-01K	Submit an annual Hanford Land Disposal Restriction Report in accordance with Agreement requirements the LDR Plan to cover the period from 4-1 1 of the previous year through 3/31 12/31 of the reporting year.	6/30/2001 4/30/2001
M-26-01L and beyond	Submit an annual Hanford Land Disposal Restriction Report in accordance with Agreement requirements the LDR Plan to cover the period from 4-1 1 of the previous year through 3/31 12/31 of the reporting year.	4/30/2002 and annually thereafter

Activity Description	Early Start	Early Finish	Duration	FY01																											
				O	N	D	I	J	F	M	A	M	I	J	J	A	S	O													
WASTE DATABASE AND DATA SHEETS																															
APPROVAL BY ECOLOGY OF NEW DATA SHEET FORMA	12/11/00*	12/11/00																													
MODIFY PROTOTYPE DB TO MATCH APPR DATA SHEET	12/12/00*	12/18/00																													
TEST / FINALIZE DATABASE	12/19/00*	01/05/01	1																												
ECOLOGY QA CHECK ON DATABASE	01/08/01*	01/09/01																													
DATABASE FAMILIARIZATION WORKSHOP	01/10/01	01/11/01																													
FIELD PERSONNEL COMPLETE DATA SHEETS	01/12/01	02/16/01	2																												
POTENTIAL MIXED WASTE TABLE ("STUFF")																															
PREP DRAFT POTENTIAL MW TABLE FORMAT	12/12/00*	12/12/00																													
APPROVAL BY ECOLOGY OF POTENTIAL MW TABLE FORMAT	12/13/00	12/19/00																													
FIRST RUN AT COMPLETING POTENTIAL MW TABLE	12/20/00	01/03/01	1																												
Start Date	10/01/00			LDR2 Sheet 1 of 3																											
Finish Date	06/29/01			LDR REPORT ACCELERATED SCHEDULE 08/30/01																											
Data Date	12/10/00			WASTE MANAGEMENT PROJECT																											
Run Date	01/10/01 08:16			LDR REPORT																											
© Primavera Systems, Inc.				<table border="1"> <thead> <tr> <th>Date</th> <th>Revision</th> <th>hecked</th> <th>Approved</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>												Date	Revision	hecked	Approved												
Date	Revision	hecked	Approved																												

Activity Description	Early Start	Early Finish	Duration	FY01														
				O	N	D	J	F	M	A	M	J	J	A	S	O		
ECOLOGY QA CHECK ON POTENTIAL MW TABLE PROG	01/04/01*	01/04/01																
DATABASE FAMILIARIZATION WORKSHOP	01/04/01*	01/11/01																
COMPLETE POTENTIAL MIXED WASTED TABLE	01/04/01	02/09/01	2															
REPORT PREPARATION																		
ISSUE CALL LETTER TO FIELD	01/04/01*	01/04/01																
ECOLOGY REV TREATMENT PLAN & STORAGE RPT OU	02/02/01*	02/09/01																
CONSISTENCY CHECK(IS ALL IN PMW TBL/ DATA SHEE	02/12/01*	03/09/01	1															
ECOLOGY QA CHECK	02/16/01	03/09/01	1															
PREPARE DRAFT REPORT	12/11/00	03/30/01	7															
CONTRACTOR/CORE DOE COMMENT PERIOD	04/02/01	04/27/01	2															

Start Date 10/01/00
 Finish Date 06/29/01
 Data Date 12/10/00
 Run Date 01/10/01 08:16
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Early Bar
 Progress Bar
 Critical Activity

LDR2 Sheet 2 of 3
 WASTE MANAGEMENT PROJECT
 LDR REPORT

LDR REPORT ACCELERATED SCHEDULE 08/30/01			
Date	Revision	checked	Approved

Activity Description	Early Start	Early Finish	Duration	FY01																		
				O	N	D	J	F	M	A	M	J	J	A	S	O						
INCORPORATE COMMENTS, EDITING, COPYING	04/30/01	05/15/01	1																			
RL/ORP COMMENT PERIOD	05/16/01	06/04/01	1																			
INCORPORATE COMMENTS, EDITING, COPYING	06/05/01	06/18/01	1																			
FINAL REPORT TO RL/ORP FOR APPROVAL		06/18/01																				
2001 REPORT TO ECOLOGY		06/29/01*																				

Start Date 10/01/00
 Finish Date 06/29/01
 Data Date 12/10/00
 Run Date 01/10/01 08:16
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 Early Bar
 Progress Bar
 Critical Activity

LDR2 Sheet 3 of 3
 WASTE MANAGEMENT PROJECT
 LDR REPORT

LDR REPORT ACCELERATED SCHEDULE 06/30/01			
Date	Revision	checked	Approved