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

JUL 2 1996

Mr. Steve M. Alexander  
Perimeter Area Section Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
1315 W. 4th Avenue  
Kennewick, Washington 99336-6018



Dear Mr. Alexander:

REQUEST FOR DEFERRAL OF TARGET DATE M-16-01E-T2

In accordance with Section 12 of the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Action Plan, the U.S. Department of Energy, Richland Operations Office (RL) requests that the State of Washington Department of Ecology (Ecology) as the lead regulatory agency approve the attached change control form deferring target date M-16-01E-T2, which requires RL to initiate pretreatment and complete removal of all N Reactor fuel storage basin water pursuant to the N Reactor Deactivation Program Plan by September 30, 1996. It is a target date that supports interim Milestone M-16-01E for N Reactor Deactivation.

On May 3, 1996, RL directed the shutdown of N Basin Remotely Operated Sediment Extraction Equipment (ROSEE) Operations, Low Dose Hardware Removal (LDHR), and Water Filtration (i.e., Amiod) Activities due to concerns related to the DOE nuclear safety order implementation process for conducting hazard classification and safety analysis. On May 8, 1996, the Ecology Hanford Project Manager for the N Area was provided with an initial notification of the shut down of N Basin activities at the monthly Project Managers Meeting.

Resolution of issues and schedule recovery have been top priorities. Although the High Exposure Rate Hardware Removal Activity was initiated on June 27, 1996, the 60-ton crane in the basin failed on July 2, 1996, which has temporarily stalled that activity for approximately three weeks. Further, resumption of the ROSEE operations, LDHR, and new Final Water Filtration are still on hold pending completion of appropriate hazard classification and analysis documents. Based on current progress, it is anticipated that water removal is now expected to be initiated in January 1997. This delay in water removal is not anticipated to impact the interim milestone requiring completion of N Area deactivation by September 30, 1997.

Section 12.2 of the Tri-Party Agreement Action Plan requires use of the change control process when a target date must be deferred by more than 60 days. Ecology is requested to review the attached change control form and provide us with approval of this deferral by signing the form.

Mr. Steve M. Alexander

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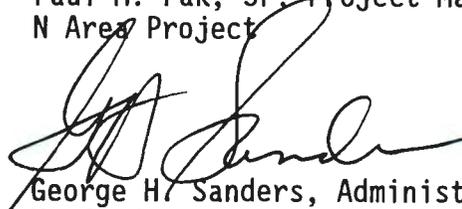
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If you have any questions or need additional information, please contact me at (509) 376-4798.

Sincerely,



Paul M. Pak, Sr. Project Manager  
N Area Project



George H. Sanders, Administrator  
Hanford Tri-Party Agreement

NAP:PMP

Attachment

cc w/attach:

M. E. Greenidge, BHI  
M. K. Harmon, EM-442  
P. S. Innis, EPA  
R. L. Person, EM-442  
D. R. Sherwood, EPA  
P. R. Staats, Ecology

9717540-0415

<b>Change Number</b>  M-16-96-03	<b>Federal Facility Agreement and Consent Order Change Control Form</b>  Do not use blue ink. Type or print using black ink.	<b>Date</b>  7/24/96
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<b>Originator</b>  P. M. Pak	<b>Phone</b>  376-4798
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**Class of Change**

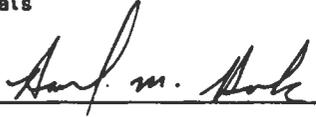
I - Signatories       II - Executive Manager       III - Project Manager

**Change Title**  
Deferral of target date M-16-01E-T2, "Initiate pretreatment and removal of all N Reactor fuel storage basin waters pursuant to the N Reactor Deactivation Program Plan."

**Description/Justification of Change**  
M-16-01E-T2 is a target date that supports interim milestone M-16-01E for N Reactor Deactivation. The target date requires RL to initiate pretreatment and complete removal of N basin water by September 30, 1996, pursuant to the N Reactor Deactivation Program Plan. N Reactor deactivation activities were placed on hold as of May 3, 1996, to resolve issues regarding the safety authorization basis. Because of the hold, there has been a delay in activities preparatory to initiating water treatment and removal and a resulting delay in meeting the target date. This delay requires that the target date be deferred to January 1997. This is not anticipated to impact the interim milestone. Section 12.2 of the Action Plan for the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) requires a Change Control Form for target date deferrals of greater than 60 days.

**Impact of Change**  
There will be a delay of approximately three months in initiation of pretreatment and removal of fuel storage basin water. The delay is not anticipated to impact the interim milestone requiring completion of N Area deactivation by September 30, 1997.

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

<b>Approvals</b>		
 _____ DOE	<u>7/25/96</u> Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
_____ EPA	_____ Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved
_____ Ecology	_____ Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved