

TRI-PARTY AGREEMENT

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| Change Notice Number TPA-CN- 667 | TPA CHANGE NOTICE FORM | Date: May 26, 2015 |
| Document Number, Title, and Revision: Removal Action Work Plan for 105-KE/105-KW Reactor Facilities and Ancillary Facilities, DOE/RL-2005-26, Revision 1. | | Date Document Last Issued: February 2007 |
| Originator: M. K. Stewart | | Phone: 509-373-5818 |

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Description of Change:

Modification of Table 1-3 and Table B-1 to update TPA Interim Milestone Due Date Changes per TPA Change Form M-93-15-01 and M-16-15-03.

M.S. French and R.A. Lobos agree that the proposed change
DOE **Lead Regulatory Agency**
 modifies an approved workplan/document and will be processed in accordance with the Tri-Party Agreement Action Plan, Section 9.0, *Documentation and Records*, and not Chapter 12.0, *Changes to the Agreement*.

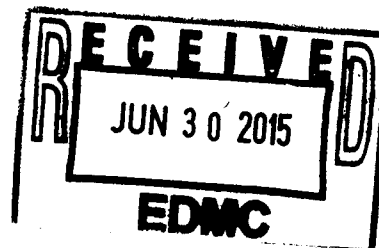
Table 1-3. Tri-Party Agreement Milestones for the 100-K Area ISS and D4 Removal Action and Table B-1. Tri-Party Agreement Milestones for the 100-KE and 100-KW Reactor Facilities and Ancillary Facilities are modified to match Milestones M-093-27 and M-093-28 due dates of 9/30/2024 and 12/31/2019, respectively, per TPA Change Form M-93-15-01. Additionally, both tables are being changed to match Milestone M-016-00C due date of 9/30/2024 per TPA Change Form M-16-15-03.

Tables 1-3 and B-1 (Pages 1-12, 1-13 and B-1) are attached.

Modifications are denoted by using ~~strikeout~~ to indicate deletions and double underline to indicate text additions.

Justification and Impacts of Change:

This change modifies the work plan to align with the due dates per TPA Change Form M-93-15-01 and M-16-15-03.



Approvals:

M.S. French
DOE Project Manager

6/5/15
Date

☒ Approved ☐ Disapproved

[Signature]
EPA Project Manager
N/A

6/8/15
Date

☒ Approved ☐ Disapproved

Ecology Project Manager

Date

☐ Approved ☐ Disapproved

Complete D4 of the portions of the 105-KE and 105-KW facilities located outside the ISS enclosure

Complete D4 of the remaining 100-K Area ancillary facilities addressed by the 105-KE and 105-KW reactor facilities and ancillary facilities EE/CA (DOE-RL 2005b) and the related action memorandum (EPA 2007)

Decommission groundwater wells encountered during D4 and ISS of the facilities, if required to facilitate D&D/D4 and ISS

Remediate contaminated soils within the footprint of the facilities or defer to a later remedial action (with approval from EPA)

Ensure impacted waste sites (e.g., french drains) within the footprint of the facilities are adequately defined and/or updated within the *Waste Information Data System* (WIDS)

Manage and dispose of all waste generated during these actions.

This RAWP was developed in response to the requirement in the 105-KE and 105-KW action memorandum to submit a work plan to EPA for approval prior to initiation of activities (EPA 2007). This RAWP was prepared in accordance with Section 7.2.4 of the *Hanford Federal Facility Agreement and Consent Order* (Tri-Party Agreement) (Ecology et al. 1989).

This RAWP implements the removal action activities including development of specific project tasks that are described in work packages and subcontract task orders. Using the most recent information concerning facility conditions, field-level work packages will be developed to direct work activities and instruct workers in the most applicable work methods. Existing contractor procedures and specifically developed instructions will be used to perform and control the facility removal and disposal actions.

Table 1-3 presents the Tri-Party Agreement milestones associated with the 100-K Area.

**Table 1-3. Tri-Party Agreement Milestones for the 100-K Area
ISS and D4 Removal Action. (2 Pages)**

| Milestone | Description | Due Date |
|-----------|--|------------------------------------|
| M-016-00 | Complete remedial action for all non-tank farm operable units | 9/30/2024 |
| M-016-00C | Complete all response actions for the 100-K Area. | 12/31/2020 9/30/2024 |
| M-016-52 | Initiate response actions for the remaining waste sites for the 100-K Area including closure of the 1706-KE waste treatment system in accordance with Section 5.5 of the Agreement Action Plan | 7/31/2009 |
| M-016-53 | Complete the interim response actions for the 100-K Area | 12/31/2012 |

**Table 13. Tri-Party Agreement Milestones for the 100-K Area
ISS and D4 Removal Action. (2 Pages)**

| Milestone | Description | Due Date |
|-----------|--|--|
| M-093-00 | Complete final disposition of 100 Area surplus production reactor buildings | To be determined |
| M-093-27 | Complete 105-KW Reactor Interim Safe Storage | 12/31/2019 <u>9/30/2024</u> |
| M-093-28 | Submit a change package for proposed interim milestones for 105-KE and 105-KW Interim Safe Storage | 12/31/2015 <u>12/31/2019</u> |

D4 = deactivation, decontamination, decommissioning, and demolition

ISS = interim safe storage

KE = K East

KW = K West

1.2 OBJECTIVES

The primary goal of CERCLA removal actions is to minimize or eliminate threats to public health or the environment caused by the presence of hazardous substances. The EE/CAs for the 100-K Area facilities (DOE-RL 2004, 2005b) each presented three alternatives for future facility management and the resulting levels of protection of public health and the environment that may be anticipated.

The recommended alternative for the 27 ancillary facilities was deactivation followed by demolition. The recommended alternative for the reactor and remaining ancillary facilities was ISS of the reactors followed by long-term S&M and D4 of the ancillary facilities and portions of the 105-KE and 105-KW Reactor Facilities. This alternative includes deactivation where needed, demolition of the buildings, removal of contaminated waste/demolition debris, and disposal of the material at the Environmental Restoration Disposal Facility (ERDF) or another approved facility and is consistent with the remedial action to be taken per 40 *Code of Federal Regulations* (CFR) Part 300.415(b)(5)(ii). This alternative also requires maintaining the Hanford Site institutional controls during the long-term S&M of the SSE.

These alternatives were chosen based on their overall ability to protect human health and the environment and their effectiveness in maintaining that protection in both the short term and the long term. The alternatives remove the threat of release of radiological and nonradiological hazardous substances to the environment resulting from facility deterioration or animal intrusion, and reduces potential exposure to personnel caused by continued S&M of aging facilities. In addition, these alternatives contribute to the efficient performance of long-term remedial actions for the 100-KR-1 and 100-KH-2 OUs. Removal actions will either attain the cleanup standards set forth in the existing 100-KR-1 and 100-KR-2 RODs and documented as directed in the RODs, or additional cleanup work beyond the removal action will be performed under the RODs. The deferral of work from the removal action to a remedial action is outlined in Section 2.1.4.1.

These alternatives protect human health and the environment, protect workers, meet the removal action objectives, achieve cost effectiveness, and provide an end state that is consistent with

The 100-K Area Interim Safe Storage, long-term surveillance and maintenance, and deactivation and demolition/deactivation, decontamination, decommissioning, and demolition (D4) removal action is scheduled to begin in 2007, or when the facilities are released for D4 by the other projects, with completion of the removal action by December 31, 2012, as governed by the associated Tri-Party Agreement (Ecology et al. 1989) milestones shown in Table B-1.

Table B-1. Tri-Party Agreement Milestones for the 100-KE and 100-KW Reactor Facilities and Ancillary Facilities.

| Milestone | Description | Due Date |
|-----------|---|-------------------------------------|
| M-016-00 | Complete remedial actions for all non-tank farm operable units | 9/30/2024 |
| M-016-00C | Complete all response actions for the 100 Areas | 12/31/2020 9/30/2024 |
| M-016-52 | Initiate response actions for the remaining waste sites for the 100K Area including closure of the 1706-KE waste treatment system in accordance with Section 5.5 of the Agreement Action Plan | 7/31/2009 |
| M-016-53 | Complete the interim response actions for the 100-K Area | 12/31/2012 |
| M-093-00 | Complete final disposition of all 100 Area surplus production reactor buildings | To be determined |
| M-093-27 | Complete 105-KW Reactor Interim Safe Storage | 12/31/2019 9/30/2024 |
| M-093-28 | Submit a change package for proposed interim milestones for 105-KE and 105-KW Interim Safe Storage | 12/31/2015 12/31/2019 |

ISS = interim safe storage

KE = K East

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The fiscal year schedules, which encompass the work scope of the 100-K Area Interim Safe Storage facilities' removal action, including assumptions, resources, and activity breakdown, will be developed with the detailed work plans for each fiscal year based on available funding.

This removal action will be scheduled and estimated using the contractor's hierarchy of schedules, which include activity logic and restraints. Activities will be resource loaded for both nonmanual and manual personnel. Equipment needs will be identified, and other materials estimated and included in the budgeted cost of work scheduled.

References

Ecology, EPA, and DOE, 1989, *Hanford Federal Facility Agreement and Consent Order*, 2 vols., as amended, Washington State Department of Ecology, U.S. Environmental Protection Agency, and U.S. Department of Energy, Olympia, Washington.