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MAR 15 2007

07-AMCP-0109

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Addressees:

**AGREEMENTS AND ASSUMPTIONS FOR THE CENTRAL PLATEAU WASTE SITE AND
GROUNDWATER REMEDIATION HANFORD FEDERAL FACILITY AGREEMENT AND
CONSENT ORDER (TRI-PARTY AGREEMENT) M-15 and M-13 SERIES OF MILESTONES
CHANGE PACKAGES**

The purpose of this letter is to transmit the attached agreement and assumptions in reference to the U.S. Department of Energy, Richland Operations Office letter (RL) (07-AMCP-0085) dated February 13, 2007, that formed the basis used to prepare the change packages for the Tri-Party Agreement M-15 and M-13 series of milestones and Tri-Party Agreement Action Plan Sections 7.3.9, 7.3.10, (Table 9-1) and 11.6. The agreements and assumptions were recorded throughout the negotiations.

If significant changes to agreements and assumptions occur and the changes clearly affect the timely completion of the milestones, this will be considered a valid basis by RL to re-negotiate the milestone date that is affected.

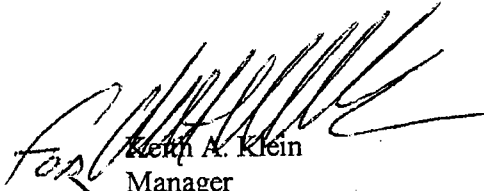
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If you have any questions, please contact me, or your staff may contact, Matt McCormick, Assistant Manager for the Central Plateau, on (509) 373-9971.

Sincerely,


Keith A. Klein
Manager

AMCP:MJV

Attachment

cc w/attach:

C. Cameron, EPA

L. J. Cusack, Ecology

R. E. Piippo, FHI

J. Price, Ecology

J. G. Vance, FFS

R. E. Wilkinson, FFS

Administrative Record

Environmental Portal

ATTACHMENT

Agreements and Assumptions

For Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) M-15
and M-13 Series of Milestones, and Tri-Party Agreement Action Plan
Sections 7.3.9, 7.3.10, 9 (Table 9-1), and 11.6

Consisting of 6 pages, including this coversheet

Agreements and Assumptions

For Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) M-15
and M-13 Series of Milestones, and Tri-Party Agreement Action Plan
Sections 7.3.9, 7.3.10, 9 (Table 9-1), and 11.6

This document contains the agreements and assumptions that formed the basis used to prepare the tentative agreement and change request packages for Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) M-15 and M-13 series of milestones and Tri-Party Agreement Action Plan Sections 7.3.9, 7.3.10, 9 (Table 9-1) and 11.6. These agreements and assumptions were recorded throughout the negotiations.

Overall Planning Basis

1. To define additional characterization needs, the U.S. Department of Energy (DOE), Richland Operations Office (RL), the U.S. Environmental Protection Agency (EPA), and the State of Washington, Department of Ecology (Ecology), hereinafter referred to as the Parties, agreed to complete supplemental Data Quality Objectives (DQOs). It is assumed that these DQO efforts will be completed by November 30, 2006, and that the Parties will be available to support this deadline.

Because these DQOs have not been completed, assumptions for the amount of additional characterization and prioritization were developed to determine milestone dates. If significant changes to assumptions occur, and they clearly affect the timely completion of the milestones, this will be considered a valid basis by RL to re-negotiate the milestone date that is affected. The assumptions used herein are based upon the following:

	Groundwater Wells	High-Risk Boreholes	Low-Medium Risk Boreholes	Direct Push	Test Pit	Treatability Test Plan Boreholes*
Model Group 1		0	0	0	0	0
200-PW-1/3/6		0	0	0	0	0
200-CW-2/4/5/SC-1 (with ponds removed)		0	0	0	0	0
200-CW-1 (with ponds added)		0	3	19	11	0
200-MW-1 (A-4 replacement)		1	0	1	0	0
200-PW-2/4		2	5	16	0	0
200-TW-1/2/PW-5		10	4	70	0	0
200-LW-1/2		2	7	27	0	0

	Groundwater Wells	High-Risk Boreholes	Low-Medium Risk Boreholes	Direct Push	Test Pit	Treatability Test Plan Boreholes*
200-BP-5	5 unconfined 3 confined aquifer wells	2	3			0
TOTAL	8	17	22	133	11	0

*At the completion of M-15-50, subsequent boreholes will be planned.

Further breakout of the above table, by fiscal year (FY), is:

2007 – 1 high-risk borehole, 3 low-medium-risk boreholes, 30 direct pushes, 11 test pits

2008 – 8 high-risk boreholes, 8 low-medium-risk boreholes, 36 direct pushes

2009 – 6 high-risk boreholes, 6 low-medium-risk boreholes, 40 direct pushes

2010 – 2 high-risk boreholes, 5 low-medium-risk boreholes, 27 direct pushes

2. Supplemental DQO processes are assumed to be conducted in a collaborative manner between the Parties. Previously submitted Remedial Investigation reports will not be updated for supplemental data. The supplemental data will be incorporated into a newly submitted or updated Feasibility Study (FS) and/or Proposed Plan (PP).

M-15-06-02 Assumptions The following assumptions are identified for specific milestones within the change package M-15-06-02.

- M-15-38B Submit a revised Feasibility Study Report and Proposed Plan for 200-CW-1 to Ecology.
Assumption: The 200-CW-3/200 North Operable Unit (OU) sites are currently included in the 100 Area Remaining Sites Record of Decision (ROD) and will not be included in the revised 200-CW-1 FS/PP.
- M-15-40D Submit a revised Feasibility Study Report and revised Proposed Plan for 200-CW-2, 200-CW-4, 200-CW-5 and 200-SC-1 OUs to EPA.
Assumptions: An engineering study and regulatory analysis related to removal of plutonium contaminated soils will be completed in FY 2007, prior to development of the Draft B FS. This assumes that there will only be minor impacts to the FS from the engineering study.
- M-15-43D Submit the Feasibility Study Report and the revised recommended remedy (ies) for 200-PW-2 and 200-PW-4 OUs to Ecology.
Assumption: Ecology will provide comments on the report currently in the review cycle, but no further work will be done to resolve those comments until the additional characterization data is available to prepare the revised FS.

- M-15-44B Submit 200-MW-1 OU Feasibility Study Report and Proposed Plan to EPA. Assumptions: Model Group 1 sites are removed from this OU. The milestone date assumes completion of the replacement borehole for 216-A-4 and push at 200-E-102 trench. Limited additional characterization south of PUREX will be required. DOE will proceed with comment resolution on the RI report currently in the review process.
- M-15-45B Submit the Feasibility Study Report and the Proposed Plan 200-PW-1, 200-PW-3, and 200-PW-6 OUs to EPA. Assumptions: There will be no supplemental characterization for this OU. The 216-Z-9 Trench slant borehole data completed characterization needs for this OU. There will be no new Step II characterization in 2007. Technologies identified by the Hanford Site carbon tetrachloride Innovative Treatment Remediation Demonstration (ITRD) are sufficient for purposes of the FS and PP to support the technology identification and screening task in the FS. The ITRD is assumed to adequately cover implementability, effectiveness, and cost screening in accordance with Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).
- M-15-46B Submit the Feasibility Study Report and the recommended remedy for 200-LW-1 and 200-LW-2 OUs to Ecology. Assumption: DOE will proceed with comment resolution on the RI report currently in the review cycle.
- M-15-48B Submit 200-ZP-1 OU Feasibility Study Report and Proposed Plan to EPA. Assumptions: The field characterization information that will be included in the FS will be limited to the information that is provided in the 200-ZP-1 Remedial Investigation Report and data that is collected through September 30, 2006.
- M-15-49 Submit a Feasibility Study Report and a recommended remedy for the 200-MG-1 OU, which includes Model Group 1 waste sites to Ecology (see Appendix C change request C-06-02)) and M-15-49B Submit a Feasibility Study Report and a Proposed Plan for the 200-MG-2 OU, which includes Model Group 1 waste sites to EPA (see Appendix C change request C-06-02). Assumptions: As part of the M-15 change request package, an Appendix C change request was prepared to create the new operable units (200-MG-1, 200-MG-2, and 200-BC-1) for waste sites. This Appendix C change request will move those sites already shown in Appendix C to the new OUs as agreed to, add those waste sites for the new OUs that were not yet in Appendix C (but were identified in the Waste information data system) and reassign sites to 200-CW-1 as detailed in M-15-38B.

Since a streamlined process is being used there will be no baseline risk assessment in the 200-MG-1 and 200-MG-2 FSs. The FSs will document a process to complete sampling during removal and during confirmatory sampling after the ROD is issued. In addition, the FS will provide a process to reclassify waste sites into and out of these OUs as additional data is gathered. The Parties agreed to develop a process to meet annually to determine remediation priorities for these OUs once the Record of Decision (ROD) is issued.

It is assumed that the Central Plateau Ecological Risk Assessment, Draft A, will be completed as scheduled, for submittal to the regulators in FY 2008, and Central Plateau ecological preliminary remediation goals will be developed to support the preparation of these FSs.

M-13-06-01 Assumptions: The following assumptions are identified for specific milestones within the change package M-13-06-01.

- M-13-27 Submit a revised RI/FS Work Plan for the 200-IS-1 and 200-IS-2 OUs to Ecology by June 30, 2007. The milestone completion date is contingent upon completing DQO workshops by November 7, 2006. The DQO is designed to be a collaborative process involving many stakeholders and participants and it is assumed that delays in the completion of this DQO will be a basis to change the June 30, 2007, milestone.
- M-13-28 Submit a revised RI/FS Work Plan for the 200-SW-1 and 200-SW-2 OUs to Ecology by September 30, 2007. The milestone completion date is contingent upon completing DQO workshops for the 200-SW-2 OU by January 15, 2007. The DQO is designed to be a collaborative process involving many stakeholders and participants and it is assumed that delays in the completion of this DQO will be a basis to change the September 30, 2007, milestone.
- M-13-50 Submit to Ecology and EPA one RI/FS work plan for all supplemental characterization required for 200 Area OUs. The remedial investigation information shall be incorporated into the appropriate Feasibility Study Reports. In instances where Resource Conservation and Recovery Act authority requires investigation of past practice units, Ecology agrees, pursuant to Ecology's Dangerous Waste Regulations, that DOE may satisfy the requirements for an RFI/CMS work plan by submitting an RI/FS work plan. It is assumed that the work plan will be streamlined by referencing existing OU work plans and other sources (Chapters 1.0 through 3.0 are expected to be no more than a few pages). The main focus of the supplemental work plan will be Chapters 4.0 and 5.0, which deal with the work plan approach and the remedial investigation process. The work plan will include a summary-level sampling and analysis plan and site-specific sampling strategies for individual waste sites planned for characterization work in FY 2007-2008; the work plan is intended to support future investigation activities, including supplemental characterization planned in FY 2009-2010, through a plug-in approach. It is assumed that concurrence on the content and format for the work plan will be reached by November 30, 2006.
- M-13-51 Submit an addendum to the 200-TW-1/2/PW-5 OU Group RI/FS work plan for a treatability test at the 200 BC Cribs and Trenches to EPA. The remedial investigation information shall be incorporated into a revised Feasibility Study Report and a revised Proposed Plan for the 200 BC Cribs and Trenches. It is assumed the outline for the brief addendum (10-15 pages) defining the excavation-based treatability test is as follows:
 - 1.0 Introduction and Background (describe overall area defined by BC Cribs and Trenches Area waste sites; objectively review disagreement between DOE and EPA regarding proposed remedy recommended in Draft A of the Focused Feasibility Study)
 - 2.0 Data Quality Objectives Process (describe process that reviews background

data, formulates principle study questions, and defines what data need to be collected to answer the questions)

3.0 Anticipated Treatability Test (define anticipated activities, beginning with a direct push technology/SGL logging campaign, followed by excavation of near-surface high-activity soil associated with selected trenches/cribs)

4.0 Schedule

It is assumed that DOE will reach agreement on this limited format to support initiating this work October 1, 2006.

Change Request P-11-06-01 will modify requirements Tri-Party Agreement Action Plan Sections 7.3.9, 7.3.10, 9 (Table 9-1), and 11.6 to implement schedule requirements for submittal of Remedial Design/Remedial Action (RD/RA) Work Plan. Specific wording includes:

The Remedial Design (RD) report shall contain at least a 90 percent design. It is assumed that the schedule for the 90 percent design for the RD (i.e., submittal date for the 90 percent remedial design report) will be proposed in the RD/RA work plan. Additionally a high-level conceptual design will be provided within the RD/RA work plan submittal.

- Within 180 days of ROD signature, or an alternative period designated in the ROD, an RD/RA work plan, including a schedule with draft milestones, shall be submitted for lead regulatory agency review and approval. The Parties recognized that the 180-day requirement will likely be extended for more complex projects based on the merits of the project.