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STATE OF WASHINGTON

DOE-RL / DIS

DEPARTMENT OF ECOLOGY

1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

January 7, 1998

Ms. Linda Bauer
Assistant Manager
U. S. Department of Energy
P.O. Box 550
Richland, WA 99352



Dear Ms. Bauer:

Re: Hanford Federal Facility Agreement and Consent Order Change Control
Form M-16-97-06 for N Reactor Deactivation Milestone M-16-01E

The Washington State Department of Ecology has reviewed the above referenced change control form and does not find adequate basis for the requested milestone extension. The key activities scheduled for the remainder of the project are within the scope of work assessed in June 1997, which resulted in the original extension of this milestone. Enclosed, please find the signed change control form.



Should you or your staff have questions concerning this letter, please do not hesitate to contact me at (509) 736-3029.

Sincerely,

Phillip R. Staats
100N Area Project Manager
Nuclear Waste Program

PSR:skr
Enclosure

cc: Doug Sherwood, EPA
Mary Lou Blazek, ODOE
Tom Logan, BHI

Change Number M-16-97-06	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date 12/30/97
Originator H. R. Trumble		Phone (509) 376-3721
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Tri-Party Agreement Interim Milestone M-16-01E (N Reactor/100-N Area Deactivation) Modification of Due Date.		
Description/Justification of Change (Note: strikeout indicates text to be removed, <u>shading</u> indicates text to be added):		
<u>Description</u> M-16-01E Complete N Reactor/100-N Area deactivation pursuant to the work scope identified in the "N Reactor Deactivation Program Plan, " Revision 4, WHC-SP-0615, December 1993.	<u>Due Date</u> 4/1/98 <u>5/15/98</u>	
<p><u>Justification</u> Draindown of the entire N Basin cannot be initiated (Target date M-16-01E-T2) until installation of the shielding I-beams and panels has been completed in order to protect the workers. Installation of shielding is also necessary to protect the public/environment from excessive dose rates which would not be at compliant levels along the Columbia River shoreline. Shielding installation cannot be initiated prior to completing waste removal activities and removal of the fuel that has been found in the N Basin during the deactivation efforts. Delays in waste removal activities have contributed to a delay in the initiation of water draindown beyond the target date of January 1998. The fuel removal activity is on the critical path schedule and the schedule will be impacted for any fuel shipments required in addition to the one planned in the baseline work scope, which currently appears to be highly probable.</p> <p>The characterization sample of N Basin sediment was taken on December 22, 1997, and is currently being analyzed. Completion of N Basin sediment characterization (Target date M-16-01E-T3) is currently stuated as mid-February, which does not notably impact timely completion of M-16-01E. If the designation of the final sediment waste matrix (after any necessary treatment, etc) is transuranic, however, the schedule would be significantly impacted if the alternate processing/packaging method (already designed) needed to be implemented.</p> <p>This proposed schedule extension is believed to be warranted because many of the key activities scheduled for the upcoming final months are the most complex and have not been performed before at N Reactor, with associated schedule vulnerabilities that could impede timely completion of the interim milestone. While there is some opportunity that the current delay in the schedule could be recovered, the uncertainties associated with the upcoming workscope pose the potential for further delays as well, and the schedule is expected to continue to fluctuate throughout the implementation of these activities.</p>		
Impact of Change Any schedule slippage beyond the project completion date specified in the current approved FY98 Detailed Work Plan (DWP) will result in the potential for cost impacts to the DWP budget.		
Affected Documents Hanford Federal Facility Agreement and Consent Order, as amended.		
Approvals <div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="width: 45%;">  DOE  Ecology EPA </div> <div style="width: 45%;"> Date 12/31/97 Date 1/7/97 Date </div> <div style="width: 45%;"> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved <input type="checkbox"/> Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved </div> </div>		