

Change Number M-15-08-02	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date April 29, 2008
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Originator Briant Charboneau	Phone (509) 373-6137
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Class of Change

I - Signatories II - Executive Manager III - Project Manager

Change Title

Modification to Hanford Federal Facility Agreement and Consent Order Interim Milestone M-015-38B

Description/Justification of Change

This change package extends the due date of Central Plateau interim milestone M-015-38B: Submit a Revised Feasibility Study Report and Revised Proposed Plan for 200-CW-1 to Ecology, from May 31, 2009, to November 30, 2010.

The interim milestone May 31, 2009, due date was established based on the Sampling and Analysis Plan (SAP) being approved by June 29, 2007. The SAP was not approved until February 26, 2008, due to issues identified in the correspondence listed on page 2. The Agencies agree that per Article XL of the TPA Legal Agreement, Good Cause for Extensions, Paragraph 120 the interim milestone due date will be extended per approval of this change package. The revised November 30, 2010, submittal date assumes that the supplemental remedial investigation work will be completed by December 2008.

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Impact of Change

Approval of this change package extends the completion date for completion of a revised feasibility study report and proposed plan to November 30, 2010. The impact is a potential delay in remediation of the 200-CW-1 operable unit.

Affected Documents

The Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford Site internal planning, management and budget documents (e.g., baseline control documents, related work authorization and directives). Revised Feasibility Study report and proposed plan for 200-CW-1. This also impacts the follow on schedules for obtaining a ROD, work plan and remediation.

Approvals

	5/13/08	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
DOE	Date		
	5/29/08	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
EPA Ecology	Date		

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Description/Justification of Change

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In addition, TPA change request C-06-02, approved February 27, 2007, moved 216-U-10 Pond from Operable Unit 200-CW-5 (EPA Lead), 216-T-4B Pond from Operable Unit 200-CW-4 (EPA Lead), and 216-S-16 Pond and 216-S-17 Pond from Operable Unit 200-CW-2 (EPA Lead), all to Operable Unit 200-CW-1 (Ecology Lead). This changed Lead Regulatory Agency for these ponds addressed by this SAP. The change added to the review process because Ecology reviewed in detail some of the agreements made by EPA during the DQO, when EPA was the Lead Regulatory Agency.

Previous correspondence related to this issue:

Letter, July 20, 2007, DOE-RL to Ecology, 07-AMCP-0242, "Response to State of Washington Department of Ecology (Ecology) Review Comments on Sampling and Analysis Plan for Supplemental Remedial Investigation Activities at Model Group 5 Large Area Ponds Waste Sites, DOE/RL-2006-57, Draft A." This letter responded to Ecology's comments, stated that several of Ecology's comments substantively impact the scope and cost of the planned investigation, and proposed resolution workshops. "Upon approval of the SAP, RL will submit a Tri-Party Agreement Change Request to move Interim Milestone M-015-38B, accordingly."

Letter, August 30, 2007, DOE-RL to Ecology, 07-AMCP-0274, "Sampling and Analysis Plan for Supplemental Remedial Investigation Activities at Model Group 5 Large Area Ponds Waste Sites, DOE/RL-2006-57, Draft A, Updated Path Forward Plan." This letter provided a path-forward plan for the Draft A SAP. From this letter, "Upon approval of the MG-5 SAP, RL will submit a Tri-Party Agreement Change Package to move Tri-Party Agreement Interim Milestone M-15-38B accordingly."

Letter, December 20, 2007, DOE-RL to Ecology, 08-AMCP-0058, "Sampling and Analysis Plan for Supplemental Remedial Investigation Activities at Model Group 5, Large Area Ponds, Waste Sites Located Within the 200-CW-1 Operable Unit, DOE/RL-2006-57, Revision 0." This letter transmitted the Revision 0 SAP for Ecology approval. From this letter, "Impacts to the 200-CW-1 Operable Unit Tri-Party Agreement Milestone, due to delays in the document review and comment resolution process, are being evaluated. Once the MG-5 SAP is approved, the schedule impact will be finalized and a Tri-Party Agreement change request will be prepared."

Changes to the existing milestones are displayed by Highlighting to indicate addition of text and by ~~Strikeout~~ to indicate deletion of text.

M-015-38B	SUBMIT A REVISED FEASIBILITY STUDY REPORT AND REVISED PROPOSED PLAN FOR 200-CW-1 TO ECOLOGY.	05/31/2009 11/30/2010
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