



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

0060566

03-RCA-0382

OCT 15 2003

Ms. Linda Hoffman, Interim Director
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504

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EDMC

Dear Ms. Hoffman:

MODIFY COMPLETION DATE FOR HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) MAJOR MILESTONE M-013-00N (DUE DECEMBER 31, 2003)

In July 2003, the State of Washington Department of Ecology (Ecology) proposed a streamlined approach to investigate and remediate the 200-UR-1 Unplanned Releases Waste Group Operable Unit (OU). On July 22, 2003, Ecology recommended using an Engineering Evaluation/Cost Analysis (EE/CA) and an Action Memorandum to address cleanup of the waste sites in the 200-UR-1 OU since they contain mainly small surface contamination sites. The workscope would be conducted under the Tri-Party Agreement Major Milestone M-013-00N, "Submit 1 200 NPL RI/FS (RFI/CMS) Work Plan for the 200 UR-1, Unplanned Releases" due December 31, 2003.

The U.S. Department of Energy, Richland Operations Office (RL) and the contractor project team met with Ecology on August 14, 2003, to further discuss Ecology's proposal. Information was provided on the different waste sites in the OU which were preliminarily combined into four subsets based on site characteristics. The discussions centered on a workplan that would be substantially different from the previous workplans prepared under the Tri-Party Agreement Milestone Series M-013. The workplan would address characterization needs for those sites where additional data are required and would also propose criteria that support a decision to proceed directly to remove and dispose actions for those sites that meet the criteria for such actions. As part of the workplan, these criteria would need to be developed and negotiated with the regulators. Therefore, significant additional work will be required for this workplan to develop the strategy, evaluate all the 145 waste sites to properly place them in the appropriate subset, identify sampling plans for a number of sites, and prepare the EE/CA justification and criteria for the remove and dispose sites.

The proposed approach significantly modifies the workplan content and impacts RL's ability to meet the December 31, 2003, deliverable. RL and Ecology agreed that an extension to the due date is needed to achieve the benefits in implementation of this innovative approach. The workplan will provide information to support an Action Memorandum allowing removal and disposal actions for a subset of the waste sites that could be implemented in a flexible and timely fashion in conjunction with ongoing or future projects. This document would also provide criteria for similar waste sites in other OUs.

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In accordance with the Tri-Party Agreement, Article VIII, paragraph 30.f, this letter and attached change package (Attachment) (Tri-Party Agreement Change Request M-13-03-01) serve as the 90-day notification that the workscope will not be completed as scheduled. It is RL's belief that the additional time will allow for continued dialogue between RL and Ecology and will meet expectations and result in a quality document.

Constructive working relationships between Ecology and RL created a positive framework for approval and implementation of this concept. We look forward to working with the Ecology project and public involvement staff on the completion of this effort. If you have any questions, please call me, or your staff may contact Bryan Foley, Waste Management Division, on (509) 376-7087; or Ellen Mattlin, Regulatory Compliance and Analysis Division, on (509) 376-2385.

Sincerely,

A handwritten signature in cursive script that reads "Jean F. Schurer". The signature is written in dark ink and is positioned above the typed name of the signatory.

Keith A. Klein
Manager

RCA:EMM

Attachment

cc: See page 3

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cc w/attachs:

D. Bartus, EPA

N. Ceto, EPA

L. D. Crass, FHI

L. J. Cusack, Ecology

S. Harris, CTUIR

J. S. Hertzal, FHI

R, Jim, YN

T. Martin, HAB

R. D. Morrison, FHI

E. J. Murphy-Fitch, FHI

K. Niles, Oregon Energy

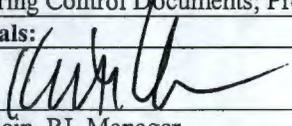
J. Price, Ecology

P. Sobotta, NPT

M. E. Todd-Robertson, FHI

M. A. Wilson, Ecology

Admin Record

Change Number M-13-03-01	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.		Date: September 24, 2003
Originator: Matt McCormick/Bryan Foley (RL)		Phone: 373-9971/376-7087	
Class of Change:			
<input checked="" type="checkbox"/> - Signatories		<input type="checkbox"/> II - Executive Manager	<input type="checkbox"/> III - Project Manager
Change Title: Modify Completion Date for Tri-Party Agreement Major Milestone M-013-00N (due December 31, 2003)			
Description/Justification of Change:			
<p>In July 2003, the State of Washington, Department of Ecology (Ecology) proposed a streamlined approach to investigate and remediate the 200-UR-1 Unplanned Releases Waste Group Operable Unit (OU). Ecology recommended using an engineering evaluation/cost analysis (EE/CA) and an Action Memorandum to address cleanup of the waste sites in the operable unit since they were mainly small surface contamination sites.</p> <p>The U.S. Department of Energy, Richland Operations Office (RL) and the contractor project team met with Ecology to further discuss Ecology's proposal. Information was provided on the different waste sites in the OU which were preliminarily combined into four subsets based on site characteristics - waste sites believed to no longer contain contaminants; sites located in the footprint of facilities that will be remediated in the future; small, surface contamination sites that would lend themselves to a remove and dispose alternative; and waste sites with extensive contamination that will likely require some type of characterization.</p> <p>The work plan would be substantially different from the previous work plans prepared under the Tri-Party Agreement milestone series M-013. The work plan will address characterization needs for those sites where additional data are required and will also propose criteria that support a decision to proceed directly to remove and dispose actions for those sites that meet the criteria for such actions. As part of the work plan, these criteria would need to be developed and negotiated with the regulators. Therefore, significant additional work will be required for this work plan to develop the strategy, evaluate all the 145 waste sites to properly place them in the appropriate subset, to identify sampling plans for a number of sites, and to prepare the engineering/cost justification and criteria for the remove and dispose sites.</p>			
Description/Justification of Change continued on page 2.			
Impact of Change:			
Extend completion date and incorporate a new option for completion of remediation of some of the 200-UR Unplanned Waste Group OU waste sites. This change package will have no impact to worker health and safety or the environment.			
Affected Documents:			
The Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford Site internal planning management, and budget documents (e.g., RL and RL contractor baseline change control documents; Multi-Year Work Plan; Sitewide Systems Engineering Control Documents; Project Management Plans, and, if appropriate, LDR Report requirements).			
Approvals:			
 K. A. Klein, RL Manager	10/9/03 Date	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
_____ R. J. Schepens, ORP Manager	_____ Date	<input type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
_____ T. C. Fitzsimmons, Ecology Director	_____ Date	<input type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
_____ L. J. Iani, EPA Region 10 Administrator	_____ Date	<input type="checkbox"/> Approved	<input type="checkbox"/> Disapproved

Implementation of this proposed approach impacts the completion of the 200-UR-1 Unplanned Releases Waste Group OU workplan planned for submittal December 31, 2003. RL and Ecology agreed that an extension is warranted so that the benefits will be realized for implementing this streamlined approach. Furthermore, the work plan will provide information to support an Action Memorandum allowing removal and disposal actions for a subset of the waste sites that could be implemented in flexible and timely fashion in conjunction with ongoing or future projects. This document would also provide criteria for similar waste sites in other OUs.

Modifications established by approval of this Tri-Party Agreement Change Request are denoted as ~~redline/strikeout~~ for deletions/modification and **shading** for new text.

Milestone	Description	Date
M-013-00N Lead: Ecology	Submit 1 200 NPL/RI/FS (RFI/CMS) Work Plan for the 200-UR-1, Unplanned Releases that provides information to support allowing removal and disposal actions for a subset of the waste sites in the 200-UR-1 OU	12/31/2003 06/30/2004