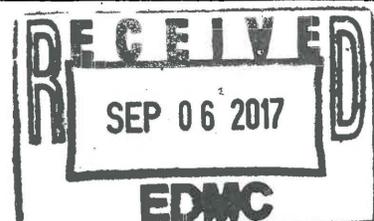


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<b>Change Number</b> M-48-06-03	<b>Federal Facility Agreement and Consent Order Change Control Form</b> <small>Do not use blue ink. Type or print using black ink.</small>	<b>Date</b> 2/22/06
<b>Originator</b> U.S. DOE-ORP	<b>Phone</b>	
<b>Class of Change</b> <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
<b>Change Title</b> Extension of due date for completion of Hanford Federal Facility Agreement and Consent Order (HFFACO) Milestone M-48-07A (2) from March 31, 2006 to June 30, 2006.		
<b>Description/Justification of Change</b> <u>Background</u> HFFACO milestone M-48-07A (2) requires completion of construction for the 241-AP-106A central pump pit upgrade (remove existing equipment, evaluate pit integrity and replace pit coating, if necessary) by March 31, 2006. The 241-AP-106A Central Pump Pit houses the transfer pump for Tank AP-106. The AP-106 tank is full. No transfers to, or from, the tank are projected until approximately the 18 <sup>th</sup> feed batch to the Waste Treatment Plant (WTP), currently projected to occur after 2020. <u>Good cause for the extension</u> As a result of the lack of a planned near term use for this system, and previous agreements with Ecology to prudently use available resources, further discussed below, ORP is requesting a 90-day extension of completion of the M-48-07A (2) milestone. This extension will allow completion of work scope within the M-48-07 milestone final due date of June 30, 2006. The prudent use of available resources for tank farm upgrades was previously addressed with Ecology as part of discussions of scope necessary to complete TPA milestone M-43-00. During those discussions Ecology agreed that components that did not have a near term mission would not need to be upgraded prior to June 30, 2005. The planned upgrades could be deferred, but must occur prior to the system use. This criterion was the basis for developing the scope for Project E-525 and establishing a clear path forward for completing milestone M-43-00. On July 24, 2002, ORP requested an upgrade to the deferral list for Double-Shell Tank System (DST) components (02-OMD-046). Ecology approved that request on January 14, 2003 (Ltr., J. Lyon to J. Rasmussen). On April 15, 2005, ORP requested to amend the deferred component list, proposing that among other things pump pit AP-106A met this criteria and that several components with no near term mission, including 241-AP-106A, be added to the list (05-TPD-045). Ecology accepted this request on April 29, 2005. (Ltr., J. Lyon to R. Schepens). Subsequently, Ecology requested that DOE upgrade 241-AP-106A because Ecology determined that the pit was integral to the emergency pump-out transfer route for tank 241-AP-106. As a result of Ecology's concern, 241-AP-106 upgrade activities were incorporated into a new milestone under TPA Milestone M-48 (TPA Change Number M-48-05-02, approved June 29, 2005).		



DOE is requesting to extend the completion date for M-48-07A (2) by 90 days, to June 30, 2006. This request is based upon the following facts that establish good cause under Section 12.3.2 of the Action Plan in the Hanford Federal Facility Agreement and Consent Order (HFFACO):

(1) On at least 50 working days during the period of October 1, 2005 through January 31, 2006, performance of open pit field work in the Tank Farms was prevented by inclement weather (high winds, rain, frost, or

snow), delaying work on the AP-106A pump pit upgrade. Inclement weather either increased the risk of contamination spread (wind), prevented accurate detection of alpha radiological contamination (moisture on surfaces) or was inconsistent with manufacturers specifications for application and curing of the coating (temperature and moisture).

(2) During that same period of time, work on the AP-106A pump pit upgrade was constrained by the need to utilize common resources (a dedicated crew for pit upgrades) to perform the following higher priority risk reduction work that either has been completed or is currently ongoing:

- Pit work and line pressure testing to meet Milestone M-48-14
- Cross-site transfer line work to support retrieval of tanks S-112 (in support of milestone M-45-00B), S-102, and S-109 (M-62-08). This work allowed for deployment of the Remote Water Lance in S-112 and the removal of more waste than had been achieved with Salt-Cake Dissolution and Modified Sluicing only.
- Waste transfers from tank AN-106 to AW Tank Farm to make DST space available to support retrieval of C-Farm waste (M-45-00B)
- Isolation of the 244-A Lift Station powered exhaust system to comply with the Federal Facility Compliance Agreement For Radionuclide NESHAP (1994)
- A backlog of general safety and Technical Safety Requirement actions such as:
  - Reinstallation of the AP-105 cover blocks
  - Tank SY-102 caustic addition
  - AN-Farm Pre and Primary A&B Banks Filter Change
  - 242A Evaporator Pre, First, and Secondary Filter Change.

These priorities were shared with Ecology representatives at weekly Integrated Management Meetings where tank farm priorities, critical path schedules and integrated project schedules are major agenda items.

This request to extend the completion date by 90 days poses minimal risk to human health and the environment because (1) no emergency transfer from a DST has ever been necessary; (2) no leaks from a DST primary to secondary containment has ever occurred; and (3) recent ultrasound testing of 241-AP-106 indicates that the tank is sound.

Section 12.3.2 of the Action Plan requires the following also be addressed for any request for extension:

- A. The timetable and deadline or schedule for which the extension is sought;  
This request for extension covers the period March 31, 2006 to June 30, 2006.
- B. The length of the extension sought;  
The length of the requested extension is 90 days, from March 31, 2006 to June 30, 2006.
- C. The good cause for the extension;  
Good cause for the extension is provided in the discussion above.

D. Any related time table and deadline or schedule that would be affected if the extension were granted. No other deadlines or schedules will be affected by this extension.

**Impact of Change**

This change defers milestone M-48-07A(2) to support mission-critical tank retrieval activities.

**Affected Documents**

The Hanford Federal Facility Agreement and Consent Order (Agreement) as amended, and Hanford Site internal planning, management, and budget documents (e.g., baseline control documents, related work authorizations and directives).

**Approvals**

\_\_\_\_\_ Date \_\_\_\_\_ Approved \_\_\_\_\_ Disapproved  
DOE

\_\_\_\_\_ Date \_\_\_\_\_ Approved \_\_\_\_\_ Disapproved  
EPA

*Jane A. Dodge* 3/30/06 \_\_\_\_\_ Approved  Disapproved  
Ecology Date

**Change Control Form M-48-06-03**

Tri-Party Agreement Interim Milestone M-45-02M (due March 1, 2006) is modified by this change form as shown below; using ~~strikeout~~ for deletions and ~~shading~~ for text additions

<p>M-048-07A</p>	<p>COMPLETE CONSTRUCTION OF THE AZ-301 CONDENSATE RETURN SYSTEM AND PIT UPGRADES. THIS INCLUDES 1) COMPLETE CONSTRUCTION OF THE AZ-301 CONDENSATE RETURN SYSTEM AND REMOVE THE AZ-151 CATCH TANK SYSTEM FROM SERVICE BY OCTOBER 31, 2005. 2) COMPLETION OF CONSTRUCTION FOR THE 241-AP-106A CENTRAL PUMP PIT UPGRADE (REMOVE EXISTING EQUIPMENT, EVALUATE PIT INTEGRITY, AND REPLACE PIT COATING, IF NECESSARY) BY MARCH 31 <del>LINE 1</del> 2006. 3) COMPLETION OF CONSTRUCTION FOR THE 241-SY-B VALVE PIT UPGRADE (REMOVE EXISTING EQUIPMENT, EVALUATE PIT INTEGRITY, AND REPLACE PIT COATING, IF NECESSARY) BY JUNE 30, 2006.</p>	<p>JUNE 30, 2006 OR AS OTHERWISE INDICATED WITHIN THE DESCRIPTIVE TEXT OF THIS MILESTONE</p>
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