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Charge Number M-26-91-1	FEDERAL FACILITY AGREEMENT AND CONSENT ORDER CHANGE CONTROL FORM Do not use blue ink. Type, or print using black ink.	Date 10/25/1991
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Signature of D. G. Black Phone 376-8458

Class of Change
 I - Signatories (Section 13.0)
 II - Project Manager
 III - Unit Manager

Change Title
COMBINING MILESTONES FOR REPORTS ON LAND DISPOSAL RESTRICTIONS

Description/Justification of Change

Description:

Delete M-26-01 and M-26-02. These milestones require an annual Hanford land disposal restrictions report and schedules for achieving compliance with LDR requirements, respectively. The annual reports cover waste characterization, storage, treatment, waste minimization, schedule information, and a process for establishing interim milestones.

Replace the text of Milestone M-25-00 as follows:

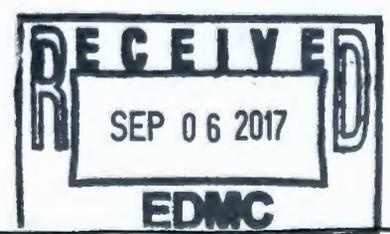
"Provide annual reports to EPA and Ecology by April 30 of each year on land disposal restrictions (LDR) of mixed wastes at Hanford. The annual LDR report will include, but not be limited to the following: (CONTINUED ON PAGE 2)

Impact of Change

Upon implementation of this change, one LDR report rather than two would be prepared annually. The reporting process would be simplified as there would be only one report to prepare, distribute, and review. Redundancy and duplication of efforts between the two reports would be eliminated. There would be no negative impacts.

Affected Documents Annual LDR reports, the most current of which are DOE/RL-91-008, March 1991, "Alternatives to Land Disposal of Solid Radioactive Mixed Wastes on the Hanford Site" (for M-25-00) and DOE/RL-91-43, October 1991, "1991 Report on Hanford Site Land Disposal Restrictions for Mixed Wastes" (for M-26-01 and M-26-02). (Continued on page 2)

Approvals	Approved	Disapproved
<i>[Signature]</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
DOE	<u>12/13/91</u>	Date
EPA		Date
Ecology		Date



COMBINING MILESTONES FOR REPORTS ON LAND DISPOSAL RESTRICTIONS (continued)

Description (continued):

- a. Waste characterization information, including plans for future characterization of stored mixed wastes and a summary of past characterization results
- b. Storage data, including current inventories, projections of future generation, and a description of current LDR waste storage practices
- c. Treatment information, including descriptions of planned treatment methods and facilities
- d. Waste reduction information, including waste minimization where relevant
- e. A schedule depicting the events necessary to achieve full compliance with LDR requirements
- f. A section on progress made in achieving compliance since the previous LDR report

The annual reports shall cover approximately the period from April 1 of the previous year to March 31 of the reporting year. Any mixed wastes that are regulated under State-only regulations shall be included in the report.

No interim milestones are to be identified; each annual report is tracked as a major milestone."

The first report under this reworded milestone would be due in April 1992.

Justification of Change:

The existing M-25-00 and M-26-01/M-26-02 milestones are largely redundant. Each milestone requires an annual LDR report. In actual practice, the M-25-00 report has been a subset of the M-26-01 report. (The difference being that the M-25-00 report has not covered liquid effluents, single-shell tanks, and double-shell tanks). M-26-02 has in the first two reports been met by including a schedule for LDR compliance that is based on schedules also prepared for the Tri-Party Agreement quarterly report. The LDR report has not been used as a vehicle for development and approval of new interim milestones for LDR compliance. This function of developing new milestones would be more appropriately achieved through general Tri-Party Agreement management activities and implementing schedule updates through the change request process. Therefore, this aspect of the LDR report, from milestone M-26-02, has been deleted from the scope of the proposed combined report. The report will still be required to have LDR compliance schedules. In summary, consolidation to a single annual report would be a more efficient and cost effective management practice.

Affected Documents (continued):

In addition, the "Hanford Federal Facilities Agreement and Consent Order," Action Plan, Table D-3 and Figure D-1 will be affected.