



0019465

Department of Energy

Richland Operations Office
P.O. Box 550
Richland, Washington 99352

9201441

MAR 03 1992

92-WOB-053

Mr. Chuck Clarke, Director
State of Washington
Department of Ecology
P. O. Box 47600
Olympia, Washington 98504-7600

Ms. Dana A. Rasmussen, Administrator
Region 10
U.S. Environmental Protection Agency
Sixth Avenue
Seattle, Washington 98101

Dear Mr. Clarke and Ms. Rasmussen:

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER CHANGE FORM M-26-92-1
"COMBINING MILESTONES FOR REPORTS ON LAND DISPOSAL RESTRICTIONS"

Attached for your approval is the subject Class I Hanford Federal Facility Agreement and Consent Order Change Control Form. This change request is submitted for your approval to combine the M-25 and M-26 Milestone Land Disposal Restriction reports. This change request is consistent with agreements reached with Mr. Paul Day of the Environmental Protection Agency (EPA). It is my understanding that these agreements have also been coordinated between Mr. Day and the State of Washington Department of Ecology (Ecology).

The original change control form is being transmitted with this letter to EPA. Upon disposition, EPA should sign the change control form and transmit it to Ecology for their disposition and signature. The original change form should then be forwarded to the U. S. Department of Energy, Richland Field Office. A copy of the attachment is being provided to Ecology and EPA.



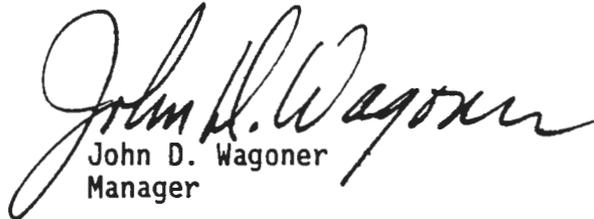
Mr. Clark and Ms. Rasmussen
92-WOB-053

-2-

MAR 5 1992

If you or your staff have any questions regarding the attached change control form, please contact S. H. Wisness, Hanford Project Manager on (509) 376-6798 or R. F. Guercia-of the Waste Management Division on (509) 376-5494.

Sincerely,



John D. Wagoner
Manager

WMD:RFG

Attachment

cc w/att:
P. T. Day, EPA
D. B. Jansen, Ecology
R. E. Lerch, WHC
M. M. McCarthy, WHC
T. B. Veneziano, WHC
R. Martinez, EM-322
T. Michelena, Ecology

Change Number

FEDERAL FACILITY AGREEMENT AND CONSENT ORDER
CHANGE CONTROL FORM

Date

M-26-92-1

Do not use blue ink. Type, or print using black ink.

2/18/1992

Originator

Phone

D. G. Black

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:

M-25-00 (Delete and combine all requirements for the annual report with revised M-26-01).

M-26-00 (Unchanged -- milestone completed October 1990).

M-26-01 Submit an Annual Hanford Land Disposal Restrictions Report in accordance with the LDR Plan to cover the period from April 1 of the previous year through March 31 of the reporting year. Annually beginning April 1992

The report shall include a description of activities planned and taken in accordance with the LDR Plan and prior annual LDR reports to achieve full compliance with LDR requirements. The report shall update all information contained in the LDR Plan and the prior annual LDR report, including plans and schedules. (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.

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

DOE John R. Wagoner 3/13/92 Date

EPA _____ Date

Ecology _____ Date

**COMBINING MILESTONES FOR REPORTS ON LAND DISPOSAL RESTRICTION
(Continued)**

Description (Continued):

The format for the report shall be based on the "Requirements for the Hanford LDR Plan," issued by EPA and Ecology on April 10, 1990. Additionally, the report shall describe any other studies or efforts that have been or will be undertaken to identify alternatives to land disposal of mixed wastes. The nonradioactive portion of any mixed wastes that are regulated under Washington State-only regulations shall be addressed in the report. The report shall be submitted as a primary document.

The report shall specify interim milestones for achieving compliance with LDR requirements at TSD mixed waste units. These milestones shall be based on significant events identified in the LDR report and are shown in schedules which are updated annually as part of the report. Appropriate milestones will be incorporated in the Agreement via the change process defined in Section 12 of the Action Plan upon issuance of the approved reports.

- M-26-02 (Delete; content has been included at end of M-26-01).
- M-26-03 (Unchanged)
- M-26-04 (Unchanged)

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).

The parties recognize that there may be reporting years in which new significant events are not identified by DOE and that setting new interim milestones may not be necessary to expedite compliance. The requirement to establish new interim milestones does not preclude the parties from setting any necessary milestones related to LDR compliance at any point throughout the year, using the change request process.

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. Add the annual LDR report to the primary document list, Section 9 of the Agreement Action Plan during the next amendment.

