


Final Change Control Forms for the Tentative Agreement on the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Revisions in Response to the Milestone M-091 Series Negotiations

Change Number M-91-19-02	Federal Facility Agreement and Consent Order Change Control Form		Date 05/30/2019
Originator Mark French			Phone 509-373-9863
Class of Change <input checked="" type="checkbox"/> I – Signatories <input type="checkbox"/> II – Executive Managers <input type="checkbox"/> III – Project Managers			
Change Title Establish Due Date of Major Milestone M-091-00 in TPA Appendix D			
Description/Justification of Change <p>The Washington State Department of Ecology (Ecology) and the U.S. Department of Energy, Richland Operations Office (DOE-RL) initiated M-091-53 negotiations on March 15, 2018, as they agreed there was a need to establish revisions to the milestone M-091 series.</p> <p>This change control form establishes the due date of major milestone M-091-00, for completing the treatment to Land Disposal Restriction (LDR) treatment standards for all Hanford Site Resource Conservation and Recovery Act of 1976 (RCRA) mixed low-level waste (MLLW) and RCRA transuranic mixed (TRUM) waste.</p> <p>TPA Change Control Form M-91-09-01 (approved September 15, 2010) stipulated that the due date for the M-091-00 major milestone read "date to be established pursuant to milestone M-091-44T." This change control form proposes a new due date of September 30, 2050.</p> <p>This change control form also modifies the milestone scope to include "...and RCRA transuranic (TRUM) waste (in above ground storage as of June 30, 2009 and in retrievable storage)."</p>			
Impact of Change <p>This change control form modifies the due date for major milestone M-091-00 from "Date To Be Established Pursuant To Milestone M-091-44T" to "09/30/2050".</p> <p>This change control form is being worked in conjunction with Change Control Form M-91-19-03, Modification of M-091 Series Milestones and Target Dates in TPA Appendix D.</p>			
Affected Documents HFFACO (Tri-Party Agreement) Action Plan Appendix D, "Work Schedule Milestones and Target Dates Including Designation of Lead Regulatory Agency."			
Approvals			Page 1 of 4
Brian T. Vance	<small>Digitally signed by Brian T. Vance Date: 2021.09.27 15:45:25 -07'00'</small>	Approved <input checked="" type="checkbox"/> Disapproved _____	
Brian Vance, DOE	_____ Date		
MICHELLE PIRZADEH	<small>Digitally signed by MICHELLE PIRZADEH Date: 2021.10.01 16:43:29 -07'00'</small>	Approved <input checked="" type="checkbox"/> Disapproved _____	
Michelle Pirzadeh, EPA	 <small>Digitally signed by Laura Watson Date: 2021.09.29 11:59:12 -07'00'</small>	Approved <input checked="" type="checkbox"/> Disapproved _____	
Laura Watson, Ecology	_____ Date		

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Authorized Changes

Modifications to HFFACO Appendix D, "Milestones and Target Dates Including Designation of Lead Regulatory Agency," are denoted by using ~~strikeout~~ to indicate text deletions and double underline to indicate text additions.

Number	Milestone	Due Date
<p>M-091-00</p> <p>Lead Regulatory Agency: Ecology</p>	<p>Complete the treatment to Land Disposal Restriction (LDR) treatment standards for all Hanford Site <i>Resource Conservation and Recovery Act of 1976 (RCRA)</i> mixed low-level waste (MLLW) and <i>RCRA</i> transuranic mixed (TRUM) waste <u>(in above ground storage as of June 30, 2009 and in retrievable storage)</u>.</p> <p>DOE may choose to complete certification and shipment of TRUM waste for disposal at the Waste Isolation Pilot Plant (WIPP) in lieu of LDR treatment if, as of the time of shipment, such waste is exempt from LDR treatment standards when disposed at WIPP. Notification of certification in support of shipment will be reported at least annually as part of the project manager meetings or quarterly milestone review for inclusion in the administrative record.</p> <p>Definitions</p> <p>"Certification" as used herein is defined as:</p> <ul style="list-style-type: none"> • Completion of all activities necessary for waste to be packaged such that it can meet the Waste Isolation Pilot Plant Waste Acceptance Criteria (WIPP WAC). If subsequent WIPP certification reveals the waste cannot be shipped to WIPP this waste will not count toward meeting the milestone volume requirements (and will be subtracted from meeting such requirements) until such time as it has been determined to meet WIPP WAC or; • The TRUM has been shipped to Idaho. TRUM waste shipped to Idaho may also count toward certification based upon actual shipment to Idaho and contingent upon the waste not returning to the Hanford Site, or; • The waste has been treated to meet LDR treatment standards. <p>"Contact Handled (CH)" waste is a waste container with a surface dose rate less than or equal to 200 millirem per hour.</p> <p>"MLLW" is LLW that is subject to <i>RCRA</i> or 70.105 RCW. "LLW" is defined as radioactive waste that is not spent fuel, high-level waste, TRU waste, byproduct material, or naturally occurring radioactive material.</p> <p>"Remote Handled (RH)" waste is a waste container with a surface dose rate greater than 200 millirem per hour.</p>	<p><u>09/30/2050</u> Date To Be Established Pursuant To Milestone M-091-44T</p>

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Number	Milestone	Due Date
	<p>“Retrievably Stored Waste (RSW)” as used herein is defined as waste that is or was believed to meet the TRU waste criteria when it was placed in the 218-W-4B, 218-W-4C, 218-W-3A and 218-E-12B burial ground trenches after May 6, 1970. RSW does not include waste in containers that have deteriorated to the point that they cannot be retrieved and stabilized (e.g. placed in over-packs) in a manner that would allow them to be transported and designated without posing significant risks to workers, the public or the environment. With respect to any such containers, and with respect to any release of RSW, how to move forward will be determined through the cleanup process set forth in <i>RCRA</i>, <i>CH</i>, <i>70.105 RCW</i>, and/or the <i>Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA)</i> as appropriate. Those processes may result in additional requirements for the remediation of such wastes.</p> <p>“Retrieval of CH RSW” is defined as uncovering CH wastes within DOE’s RSW trenches, removing such CH wastes from the trenches, and transferring the waste to a permitted and compliant treatment, storage or disposal unit or the Environmental Restoration and Disposal Facility (ERDF).</p> <p>“Retrieval of RH RSW” is defined as uncovering RH wastes within DOE’s RSW trenches and caissons, removing such RH wastes from the trenches and caissons, and transferring the waste to a permitted and compliant treatment, storage or disposal unit or the ERDF.</p> <p>“Shipment” is defined as TRUM waste containers leaving the Hanford Site, and includes waste shipped to either Idaho or the Waste Isolation Pilot Plant (WIPP), and contingent upon the waste not returning to the Hanford Site.</p> <p>“Small Containers and Large Containers” as used herein have different meanings depending on whether they are used in reference to MLLW or TRUM waste.</p> <ul style="list-style-type: none"> • When referring to MLLW, small containers are containers less than 10 cubic meters, including 55-gallon drums. A large container is anything not defined as a small container. • When referring to TRUM waste, small containers are 55-gallon drums or smaller containers even if over packed in 85-gallon drums, and WIPP standard waste boxes (SWB). A WIPP SWB is a 1.8 cubic meter steel container that is approximately 0.94 meters in height, 1.8 meters in length, and 1.4 meters in width and was qualified by the DOE in 1988 as meeting the U.S. Department of Transportation (DOT) requirements for specification 7A type A packaging. A large container is defined 	

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Number	Milestone	Due Date
	<p>as any container that is not defined as a small container.</p> <p>“TRUM Waste” is TRU waste that is subject to <i>RCRA</i> or 70.105 RCW.</p> <p>“TRU Waste” as used herein is defined as waste that meets the definition in Subsection (18) of Section 2 of the WIPP Land Withdrawal Act. Pub. L. 102-579.</p> <p>“200 Area Caissons” as used herein are defined as RSW in the 218-W-4B burial ground caissons Alpha-1 through Alpha-4.</p> <p>Note: To provide further clarification on how volumes should be determined in different M-091 contexts, and to be consistent with the volumes of waste listed in the Hanford Site Solid Waste Inventory Tracking System (SWITS), the following descriptions are provided:</p> <ul style="list-style-type: none"> • Volumes for the purposes of determining amounts retrieved shall be based on the volume of the original containers in retrievable storage. For example, the volume of a 55-gallon RSW drum that would be counted toward “retrieval” would be 55-gallons (0.208 cubic meters), even if in the process of retrieval the drum needed to be over-packed into an 85 gallon drum. • The volume of MLLW “treated” will be counted as the retrieval volume (for RSW) or the MLLW pre-treatment container volume (for stored waste). • The volume of small container CH TRUM waste counted as certified will be the volume of the certified container containing the waste unless the waste is compacted. In the event that the waste is compacted, the volume of the pre-compaction container will be counted. • The volume of large container CH TRUM waste and RH TRUM waste (in above ground storage as of June 30, 2009 and in retrievable storage) will be based on the pre-treatment volume of each large container CH TRUM waste as listed in Hanford’s SWITS. <p>Note: Each requirement of these M-091 series milestones is considered a distinct work requirement independently subject to the enforcement provisions of the agreement <u>TPA</u>.</p>	