

Department of Energy

Richland Operations Office P.O. Box 550 Richland, Washington 99352 0071819

1 8 2008

EDMC

DEC

07-KBC-0012

Dear Mr. Ceto:

Mr. Nicholas Ceto, Program Manager Office of Environmental Cleanup Hanford Project Office U.S. Environmental Protection Agency 309 Bradley Blvd., Suite 115 Richland, Washington 99352

DEC 07 2006

SUBMITTAL OF HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) CHANGE REQUESTS: M-34-06-02 FOR THE K BASIN CLOSURE PROJECT – K EAST BASIN STRUCTURE REMOVAL AND M-16-06-04 FOR THE RIVER CORRIDOR CLOSURE PROJECT – INITIATE K EAST BASIN SOIL REMEDIATION

The purpose of this letter is to forward the enclosed Tri-Party Agreement Change Requests: M-34-06-02 for the K Basin Closure (KBC) Project –"K East Basin Structure Removal;" and M-16-06-04 for the River Corridor Closure (RCC) Project –"Initiate K East Basin Soil Remediation" for your approval.

The U.S. Department of Energy-Richland Operations Office (RL) met with the U.S. Environmental Protection Agency (EPA) in January 2006 and agreed to Tri-Party Agreement Change Control Form M-34-05-04, which was signed on January 10, 2006. The approved change request delayed the dates for four interim milestones related to the sludge project for the 100-K Basins, but did not delay other interim milestones in the 100-K Basins series that are predecessor activities to the K East sludge transfer project. For example, the K East Basin structure cannot be removed and soil sites under the basin remediated prior to transferring the sludge to K West Basin to the K West Basin. However, the date for removing the K East Basin (M-034-32) and initiation of soil remediation under the basin (M-016-57) were not changed, which results in these milestones being due prior to the transferring of K East sludge to the K West Basin.

The reason RL is requesting delays for M-034-32 and M-016-57 are the same as they were in January 2006. The rationale has not changed. The validated baseline RL put in place a year ago. is the baseline RL is currently working to, and the delays being requested for M-034-32 and M-016-57 are the dates in RL's baseline. These delays are consistent with Tri-Party Agreement Change Number M-34-98-01A, which was signed by the Parties as a Class 1 change request in January of 1999 and states that "DOE, Ecology, and EPA agree that this Agreement (K Basins)

Mr. Nicholas Ceto 07-KBC-0012

project will be managed through one, unified, project schedule incorporating Agreement milestones, DOE (internal agency) milestones, Defense Nuclear Facilities Safety Board (DNFSB) milestones, and DOE contractor baseline." In addition, the removal of K East Basin and soil remediation under K East Basin is not on the critical path for the 2012 closure of the 100 K Area.

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A copy of the K Basin Closure Project validated baseline is enclosed.

If you have any questions, please contact me, or your staff may contact David Brockman, Federal Project Director for K Basin Closure, on (509) 376-1366, or Joe Franco, Assistant Manager for the River Corridor, on (509) 376-6628.

Sincerely,

Manager

KBC:EBD

Enclosures

cc w/encls: G. Bohnee, NPT L. J. Cusack, Ecology S. Harris, CTUIR J. Hedges, Ecology R. Jim, YN P. M. Knollmeyer, FHI T. M. Martin, HAB R. E. Piippo, FHI K. Niles, ODOE Administrative Record Environmental Portal

Do not use blue ink. Type or print using black ink. Originator: Joe R. Franco, Jr. Phone (509) 376 Class of Change					1
Do not use blue ink. Type or print using black ink. Originator: Joe R. Franco, Jr. Phone (509) 376 Class of Change []I- Signatories []I- Signatories []I- Signatories []II- Proje Change Title: M-016-57 Initiate KE Basin Soil Remediation Extension. Description/Justification of Change: This change form, when approved, authorizes the extension of Interim Milestone M-016-57. on Page 2) Impact of Change: The extension of M-016-57 does not directly impact other milestones in the M-016-00 series. Affected Documents The Hanford Federal Facility Agreement and Consent Order, as amended, and the Hanford Si planning management, and budget documents (e.g., USDOE and USDOE contractor Baseline Control documents; and Project Execution Plans). Approvals DOE Date DOE Date DOE Date DOE Date DATE Approved	Change Number	nange Number Federal Facility Agreement and Consent Order			
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M-16-06-04 (continued) Page 2 of 3

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Milestone	Description	Date
M-016-57	INITIATE SOIL REMEDIATION AT K EAST BASIN.	04/30/2007 08/30/2009
	INITIATE FULL SCALE REMEDIAL ACTION OF THE 105-KE FUEL STORAGE BASIN WASTE SITE WITHIN ONE MONTH OF COMPLETING MILESTONE M-34-32.	

Description/Justification Continued:

The U.S. Department of Energy-Richland Operations Office (RL) met with the U.S. Environmental Protection Agency (EPA) in January 2006 and agreed to Tri-Party Agreement (TPA) Change Control Form M-34-05-04, which was signed on January 10, 2006. The approved change request delayed the dates for four interim milestones related to the sludge project for the 100-K Basins, but did not delay other interim milestones in the 100-K Basins series that are predecessor activities to the K East sludge transfer project. For example, the K East Basin structure cannot be removed and soil sites under the basin remediated prior to transferring the sludge in the K East Basin to the K West Basin. However, the date for transferring K East sludge to K West Basin was delayed until 5/31/07; but the dates for removing the K East Basin (M-34-32) and initiation of soil remediation under the basin (M-016-57) were not changed, which results in these milestones being due prior to the transferring of K East sludge to K West Basin.

The reason RL is requesting delays for M-16-57 are the same as they were in January. The rational has not changed. The validated baseline RL put in place a year ago is the baseline RL is currently working to, and the delay being requested for M-16-57 is the date in RL's baseline. This delay is consistent with TPA Change Number M-34-98-01A, which was signed by the parties as a Class 1 change request in January of 1999 and states that "DOE, Ecology and EPA agree that this Agreement (K Basins) project will be managed through one, unified, project schedule incorporating Agreement milestones, DOE (internal agency) milestones, Defense Nuclear Facilities Safety Board (DNFSB) milestones, and DOE contractor baseline." In addition, the removal of K East Basin and soil remediation under K East Basin is not on the critical path for the 2012 closure of the 100 K Area.

Change Number	Federal Facility	Agreement and C	Consent Order	Date
M-34-06-02	Cha	December 4, 2006		
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Originator D. A. Br	ockman		Phone (5)	09) 376-1366
Class of Change [] I - Signatories	[X] II - Ex	ecutive Manager	с []I	I - Project Manager
Change Title				
M-034-32 Removal o	f the K East Basin Struct	ure Extension		
Description/Justifica This change form, wh on Page 2)	ntion of Change en approved, authorizes t	the extension of l	Interim Milestone M-0	034-32. (Continued
Impact of Change				
	34-32, K East Basin Stru Agreement Milestone M		elays the initiation of l	KE Basin soil
Affected Documents				
planning management	Facility Agreement and C , and budget documents (d Project Execution Plan	(e.g., USDOE an		
Approvals	11			
HELL MAR	<u>12/5/06</u> Date	Approved	Disapproved	
EPA	Date	Approved	Disapproved	
Ecology	Date	Approved	Disapproved	

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M-34-06-02 (continued) Page 2 of 3

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Milestone	Description	Date
M-034-32	COMPLETE REMOVAL OF THE K EAST BASIN	03/31/2007 07/30/2009
	THIS INTERIM MILESTONE WILL BE COMPLETE WHEN SPENT NUCLEAR FUEL, SLUDGE, DEBRIS AND WATER ARE REMOVED FROM THE K EAST BASIN AND THE UPPER BUILDING AND CONCRETE BASIN ARE REMOVED	ragong kanalaga da kanalaga da kanalaga na kanalaga na kanalaga na kanalaga na kanalaga na kanalaga na kanalaga

Description/Justification Continued:

The U.S. Department of Energy-Richland Operations Office (RL) met with the U.S. Environmental Protection Agency (EPA) in January 2006 and agreed to Tri-Party Agreement (TPA) Change Control Form M-34-05-04, which was signed on January 10, 2006. The approved change request delayed the dates for four interim milestones related to the sludge project for the 100-K Basins, but did not delay other interim milestones in the 100-K Basins series that are predecessor activities to the K East sludge transfer project. For example, the K East Basin structure cannot be removed and soil sites under the basin remediated prior to transferring the sludge in the K East Basin to the K West Basin. However, the date for transferring K East sludge to K West Basin was delayed until 5/31/07; but the dates for removing the K East Basin (M-34-32) and initiation of soil remediation under the basin (M-016-57) were not changed, which results in these milestones being due prior to the transferring of K East sludge to K West Basin.

The reason RL is requesting delays for M-34-32 are the same as they were in January. The rational has not changed. The validated baseline RL put in place a year ago is the baseline RL is currently working to, and the delay being requested for M-34-32 is the date in RL's baseline. This delay is consistent with TPA Change Number M-34-98-01A, which was signed by the parties as a Class 1 change request in January of 1999 and states that "DOE, Ecology and EPA agree that this Agreement (K Basins) project will be managed through one, unified, project schedule incorporating Agreement milestones, DOE (internal agency) milestones, Defense Nuclear Facilities Safety Board (DNFSB) milestones, and DOE contractor baseline." In addition, the removal of K East Basin and soil remediation under K East Basin is not on the critical path for the 2012 closure of the 100 K Area.