



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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September 9, 2008

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SEP 11 2008
EDMC

Mr. David A. Brockman, Manager
Richland Operations Office
United States Department of Energy
P.O. Box 550, MSIN: A7-50
Richland, Washington 99352

Re: Hanford Federal Facility Agreement and Consent Order (HFFACO) Change Control
Number M-83-08-01

Dear Mr. Brockman:

Enclosed is a copy of the signed HFFACO Change Control Number M-83-08-01. This change deletes HFFACO Interim Milestone M-083-41. Terry Noland, of Fluor Hanford, Inc., picked up the original, signed document at our office on September 8, 2008.

If you have any questions, you may call me at 509-372-7924 or Rick Bond at 509-372-7885.

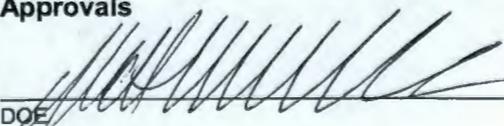
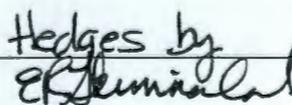
Sincerely,

Ron Skinnarland
Waste Management Section Manager
and Acting TPA Administrator
Nuclear Waste Program

lkd
Enclosure

cc: Matt McCormick, USDOE
Steve Weil, USDOE
Rob Piippo, FH
Stuart Harris, CTUIR
Gabriel Bohnee, NPT

Russell Jim, YN
Susan Leckband, HAB
Ken Niles, ODOE
Administrative Record: M-83
Environmental Portal

Change Number M-83-08-01	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date August 12, 2008
Originator Ellen Mattlin		Phone (509) 376-2385
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Delete <u>Hanford Federal Facility Agreement and Consent Order</u> (Agreement) M-083-41 Interim Milestone		
Description/Justification of Change <p>The parties agree to transition the Plutonium Finishing Plant's 216-Z-9 Crib to the surveillance and maintenance phase (S&M) per the requirements of the HFFACO as documented in Section 8 of the Tri-Party Agreement Action Plan and to delete the dismantlement portion of the milestone so that the dismantlement of the crib structures can be integrated with the planned remedial action on the crib.</p> <p>A data quality objectives (DQO) process was used to determine data needs to support the dismantlement of the crib structures and to address the concern of structural integrity of the concrete slab supporting the buildings. Field activities were initiated to obtain the data identified through the DQO process. The field activities included the development and deployment of a robotic crawler system to inspect the underside of the concrete slab to support a technical evaluation of the slab integrity. The data collected from the field activities, including the concrete slab inspection, is documented in a hazard condition analysis report, HNF-34723, Facility Condition Analysis for the 216-Z-9 Crib and Cover Slab to support Removal of the Above-Grade Soil Mining Structures.</p> <p>From the evaluation of the data obtained it was determined that the conditions of the structures and slab were better than expected; therefore, immediate work was unnecessary. To preclude any impacts to the future remediation of the crib and to ensure the safety of personnel and the environment, the parties agree dismantlement and removal of the buildings above the slab is best coordinated with the planned remediation of the crib.</p> <p>Continued on Page 2</p>		
Impact of Change This change allows integration of the dismantlement scope with the remedial action for 216-Z-9.		
Affected Documents Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford Site internal planning, management and budget documents (e. g., baseline control documents, related work authorization and directives) are affected by this change. The 200-PW-1, 3, 6 Feasibility Study and Proposed Plan is affected by this change. The scope of the PFP Action Memo will be affected by the deletion of removal of these structures.		
Approvals <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;">  DOE </div> <div style="width: 30%;"> 8/21/08 Date </div> <div style="width: 30%;"> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved </div> </div> <hr/> <div style="display: flex; justify-content: space-between;"> <div style="width: 30%;"> J.A. Hedges by Ecology  </div> <div style="width: 30%;"> 9/4/08 Date </div> <div style="width: 30%;"> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved </div> </div>		

Description/Justification of Change

Therefore, the Interim Milestone M-083-41, "Complete Transition and Dismantlement of the 216-Z-9 Crib Complex," is being deleted. The dismantlement scope will be accomplished during the remedial action of operable unit PW-1 as part of the implementation of the anticipated 200 Area PW-1, 3, 6 Record of Decision. The transition scope will be accomplished through the development of the end point criteria document.

The agencies agree that the two CERCLA actions (removal action and remedial action) need to be integrated because the mining equipment and structure removal overlaps the remediation scope of the 200 Area PW-1 Operable Unit remedial action. The transfer of the dismantlement scope is being performed because removal of the crib structures could impact the structural integrity of the waste site, and potentially affect the future selected remedial alternative. For reasons of worker safety and work scope efficiency, the removal of the mining structures should be integrated with the remedial action.

Appropriate deactivation actions will be taken and an end point criteria document for the crib structures will be developed consistent with the PFP End Point Criteria Document to support safe transition of the crib to S&M. The structures will transition to the S&M phase and remain in the S&M phase until remediation of the crib is initiated.

Approval of this change request authorizes modifications to the M83-41 interim milestone that are denoted with ~~strikeout~~ for deletion and additions are shaded.

Transition Activities		
M-083-41	COMPLETE TRANSITION AND DISMANTLEMENT OF THE 216-Z-9 CRIB COMPLEX Remove the above grade portion of the 216-Z-9A, B and C buildings, pursuant to the final Action Memoranda and Work Plans covering remaining elements not covered by RCRA closure plan. DOE deactivation and decontamination activities may proceed in advance of CERCLA decision documents in accordance with section 8 of the HFFACO.	September 30, 2010