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Department of Energy
Richland Operations Office
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01-RCA-426

AUG 28 2001

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Mr. Michael A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
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Addressees:

DELETION OF HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) INTERIM MILESTONES ASSOCIATED WITH THE 300-FF-1 OPERABLE UNIT (OU; M-016-03 AND M-106-03F) AND REPLACEMENT WITH PROPOSED INTERIM MILESTONES M-016-03G, M-016-03H, AND M-016-03I

The attached Tri-Party Agreement Change Request (CR) M-16-01-03 is submitted for approval. This CR addresses Tri-Party Agreement Interim Milestones associated with the 300-FF-1 OU and the 618-4 Burial Ground. These proposed milestones have been discussed at length with your staff, and represent an agreed-to path forward for this activity. Approval of the attached CR resolves the ongoing dispute resolution related to M-16-03E.

The 300-FF-1 OU workscope was defined in the Remedial Design Report for the 300-FF-1 OU (DOE/RL-96-70), with the completion date set for May 31, 1999. At that time, the scope of the milestone included the 618-4 Burial Ground. Due to the uranium drums discovered during the excavation of the 618-4 Burial Ground, the U.S. Department of Energy, Richland Operations Office (RL), the U.S. Environmental Protection Agency, and the State of Washington, Department of Ecology agreed to divide the workscope into two new milestones - M-16-03E, "Complete Remediation of the Waste Sites in the 300-FF-1 Operable Unit (excluding the 618-4 Burial Ground), to Include Excavation, Verification, and Backfilling" with a completion date of December 31, 2000, and M-16-03F, "Complete Excavation, Verification, Soil and Drummed Waste Treatment and Disposal, and Backfilling of the 618-4 Burial Ground," with a completion date of "To Be Decided" (Tri-Party Agreement Change Request M-16-98-05).

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Because of concerns about the uranium cleanup levels and the potential impact to the groundwater and Columbia River, a 300 Area uranium leach/Kd study was proposed to verify the protectiveness of the uranium cleanup level. It was anticipated that test results would be available to support regulatory approvals to proceed with backfill of the excavated 300-FF-1 OU sites by March 31, 2001. During the data quality objective process for actual design of the leach/KD study, it became evident that more time would be needed to obtain valid study results. Based on this, it is now anticipated that results will not be available until August 2002 thus impacting RL's ability to complete the workscope in accordance with the compliance completion date. The attached, signed Class II Change Request describes the assumptions, activities, and proposed milestones. In accordance with the Tri-Party Agreement, Section VIII, regulator disposition is required 14 days following receipt of the signed change request.

Please direct comments/concerns to Alex Teimouri, of my staff, on (509) 376-6222, or Bob McLeod, of the RL Environmental Restoration Division, on (509) 372-0096.

Sincerely,



Joel Hebdon, Director
Regulatory Compliance and Analysis Division

RCA:AET

Attachment

cc w/attach:

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Administrative Record