



Department of Energy
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0058524

00-ORL-082

SEP 28 2000

Mr. Douglas R. Sherwood
Hanford Project Manager
U.S. Environmental Protection Agency
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Mr. Michael A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
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JAN 16 2003
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Addressees:

WASTE MANAGEMENT PROGRAM HANFORD FEDERAL FACILITY AGREEMENT
AND CONSENT ORDER (TRI-PARTY AGREEMENT) CHANGE CONTROL FORMS
M-91-00-02, 03 AND 04 ADDRESSING MIXED WASTES

Enclosed for your approval are two signed Tri-Party Agreement Change Control Forms, M-91-00-02 (Enclosure 1) which deletes Target Date M-91-11-T01 for a LLMW engineering study, and M-91-00-03 that modifies the M-91-01 December 2000 commitment date and deletes the corresponding footnote.

Also enclosed for your review (Enclosure 2) is a draft change request, M-91-00-04 for the revision of milestones associated with the treatment, storage and disposal of transuranic and transuranic mixed waste streams. RL and Ecology have been working together to develop an integrated strategy for waste management. RL will schedule with Ecology and EPA a presentation of the draft change request to answer questions and provide additional information.

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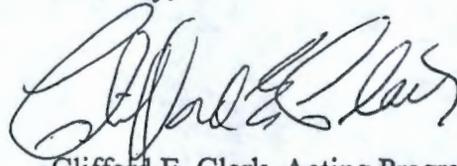
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RL looks forward to working with you and your staff to achieve the most cost effective Tri-Party Agreement compliance strategy that is in concert with Keith A. Klein's vision for the Transition of the Central Plateau.

If you have any questions, please contact me, or your staff may contact Ellen Dagan, Office of Regulatory Liaison, on (509) 376-3811.

Sincerely,



Clifford E. Clark, Acting Program Manager
Office of Regulatory Liaison

ORL:EBD

Enclosures:

1. Signed Change Request
2. Draft Change Request

cc w/encls:

L. Cusack, Ecology
F. Jamison, Ecology
R. F. Stanley, Ecology

cc w/o encls:

W. Burke, CTUIR
E. S. Aromi, FHI
L. Bounini, FHI
R. D. Hanson, FHI
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R. E. Piippo, FHI
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M. B. Reeves, HAB
P. Sobotta, NPT
M. L. Blazek, Oregon Energy
R. Jim, YN
Administrative Record

Change Number M-91-00-02	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date September 28, 2000
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Originator Helen E. Bilson	Phone (509) 376-6628
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Class of Change <input type="checkbox"/> I - Signatories	<input type="checkbox"/> II - Executive Manager	<input checked="" type="checkbox"/> III - Project Manager
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Change Title

Remove M-91-11-T01 Target Date for LLMW treatment facility Engineering Study/Functional Design Criteria Study.

Description/Justification of Change

This change removes M-91-11-T01 from the TPA. This target date identifies the need to complete and submit to the State of Washington Department of Ecology (Ecology) a LLMW treatment facility Engineering Study/Functional Design Criteria Study (FDC). When this target date was originally developed, the forecast of future waste streams was more substantial and the project was envisioned as a major construction project to design and build a new treatment/processing facility.

(Continued on page 2)

Impact of Change

This change request deletes this Target Date for LLMW treatment facility Engineering Study/Functional Design Criteria Study.

Affected Documents

Hanford Federal Facility Agreement and Consent Order, DOE's Annual Land Disposal Restrictions Report to the extent TRUM is addressed; as amended, Hanford Site internal planning and budget documents (e.g., Agreement Action Plan, Appendix D, DOE and DOE contractor Baseline Change control documents, Multi Year Work Plans, Sitewide System Engineering control documents, Project Management Plans and the Hanford Site Integrated Priority List).

Approvals		
DOE	9/28/00 Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
EPA N/A	Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved
Ecology	Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved

M-91-00-02

Description/Justification of Change (continued)

Page 2

As a result of mission/program changes which have effected the forecasted waste volumes and characteristics, HNF-4293-1, the Project Management Plan (PMP) for LLMW and Greater than Category 3 Waste (M-91-10) concluded that the required scope of the project is much smaller and construction of a new facility is not warranted. The PMP concluded that only minor modification to the existing T-Plant facility would be needed to fulfill the needs of the project. Development of an FDC will not be required, as modification of the existing T Plant Complex will be minor in scope.

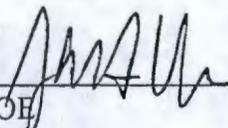
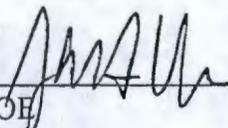
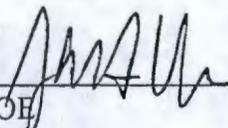
Waste identified for treatment by the PMP includes 178 cubic meters (12 packages) of stored waste, with no future waste generation forecasted. This Contact Handled (CH) LLMW stream will require sorting, size reduction and repackaging activities which can be accomplished within existing facilities and workspaces, such as the 2706-T Facility. The inorganic debris resulting from the sorting process (129 cubic meters), and the Remote Handled (RH) LLMW debris stream (3,622 cubic meters) can then be macroencapsulated in an area in the T Plant Complex that falls within the envelope of the TSD permit.

Procurement of sorting, repackaging, and size reduction equipment may be accomplished using traditional procurement specifications, without the need for an FDC. Macroencapsulation can be performed using leased equipment and will be addressed by operational budgets. This Target Date is therefore no longer necessary.

Target Date Removed By This Modification

Strikeout indicates what will be deleted from the TPA.

Number	Description	Date
M-91-11-T01	<p>Complete and submit LLMW treatment facility/Engineering Study/Functional Design Criteria Study to Ecology.</p> <p>The LLMW treatment facility Engineering Study/Functional Design Criteria Study will cover activities/facilities not considered commercially viable as documented in the approved LLMW/GTC3 PMP and associated Agreement change requests.</p>	12/31/2000

Change Number M-91-00-03	Federal Facility Agreement and Consent Order Change Control Form	Date September 28, 2000												
Originator Helen E Bilson		Phone (509) 376-6628												
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager														
Change Title Revise milestone M-91-01 'TBE' commitment date of December 2000, to 'TBD' based on approved TRU/TRUM Waste Project baseline.														
Description/Justification of Change (See attached)														
Impact of Change This change request modifies an existing commitment date to reflect the appropriate logic for arriving at a proper milestone date for M-91-01. The change will have no impact on the project or other TPA milestones or Targets.														
Affected Documents Hanford Federal Facility Agreement and Consent Order, DOE's Annual Land Disposal Restrictions Report to the extent TRUM is addressed; as amended, Hanford Site internal planning and budget documents (e.g., Agreement Action Plan, Appendix D, DOE and DOE contractor Baseline Change control documents, Multi Year Work Plans, Sitewide System Engineering control documents, Project Management Plans and the Hanford Site Integrated Priority List).														
Approvals <table style="width: 100%; border: none;"> <tr> <td style="width: 30%; border: none;">  _____ DOE </td> <td style="width: 20%; border: none;"> _____ Date </td> <td style="width: 20%; border: none;"> <input checked="" type="checkbox"/> Approved </td> <td style="width: 20%; border: none;"> <input type="checkbox"/> Disapproved </td> </tr> <tr> <td style="border: none;"> N/A _____ EPA </td> <td style="border: none;"> _____ Date </td> <td style="border: none;"> <input type="checkbox"/> Approved </td> <td style="border: none;"> <input type="checkbox"/> Disapproved </td> </tr> <tr> <td style="border: none;"> _____ Ecology </td> <td style="border: none;"> _____ Date </td> <td style="border: none;"> <input type="checkbox"/> Approved </td> <td style="border: none;"> <input type="checkbox"/> Disapproved </td> </tr> </table>			 _____ DOE	_____ Date	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved	N/A _____ EPA	_____ Date	<input type="checkbox"/> Approved	<input type="checkbox"/> Disapproved	_____ Ecology	_____ Date	<input type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
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N/A _____ EPA	_____ Date	<input type="checkbox"/> Approved	<input type="checkbox"/> Disapproved											
_____ Ecology	_____ Date	<input type="checkbox"/> Approved	<input type="checkbox"/> Disapproved											

Justification for modification of date

TPA milestone M-91-01 was assigned a date to be established (TBE) after the TRU/TRUM Project Management Plan (PMP) has been approved, but no later than December 2000. Development of the conceptual design document (CDD) will define the project technical, schedule and cost baselines and will be utilized in establishing subsequent project milestones and events including completion of facility acquisition (this is being accomplished is a separate TPA Change Request M-91-00-04). Establishing a date for M-91-01 (to complete facility acquisition) December 2000, prior to CDD, will result in a milestone date with high uncertainty and very little value in accurately tracking the TRU/TRUM Waste treatment program. Establishing a date for the M-91-01 milestone after the CDD is approved as described in this change request will result in a firm and achievable milestone date.

Description of the milestone

Approval of this change request will delete the footnote to the milestone and delete a TBE and replace it with a TBD. Strikeout indicates text to be deleted; shading indicates text to be added.

<u>Milestone</u>	<u>Description</u>	<u>Date</u>
M-91-01	<p>Complete the acquisition of new facilities, modification of existing facilities, and/or modifications of planned facilities necessary for storage and treatment/processing prior to disposal of all Hanford Site Post 1970 TRU/TRUM.</p> <p>Footnote: The date for completion of M-91-01 will be determined after required technology has been determined through the TRU/TRUM PMP, but will be no later than December 2000.</p>	<p>TBE (By December 2000)</p> <p>TBD</p>

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Change Number Draft M-91-00-04	Federal Facility Agreement and Consent Order Change Control Form DRAFT	Date September 28, 2000																																
Originator Helen E Bilson		Phone (509) 376-6628																																
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager																																		
Change Title Revise M-91 milestones associated with the treatment, storage and disposal (TSD) facilities for transuranic (TRU) and transuranic mixed (TRUM) waste streams.																																		
Description/Justification of Change This change request is based on a Preliminary Technical Baseline described in document HNF-6287-1, <u>Project Management Plan for TRU/TRUM per Tri-Party Agreement M-91-03 (PMP)</u> . The PMP describes the basis to process CH and RH TRU/TRUM waste. Continued on page 2.																																		
Impact of Change This change request deletes three Target Dates and adds five new Interim Milestones to ensure acquisition of the capabilities for the storage/treatment of TRU/TRUM waste.																																		
Affected Documents <u>Hanford Federal Facility Agreement and Consent Order, DOE's Annual Land Disposal Restrictions Report to the extent TRUM is addressed; as amended, Hanford Site internal planning and budget documents (e.g., Agreement Action Plan, Appendix D, DOE and DOE contractor Baseline Change control documents, Multi Year Work Plans, Site wide System Engineering control documents, Project Management Plans and the Hanford Site Integrated Priority List).</u>																																		
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The project schedule presented in the PMP depicts an acquisition project duration of 7.5 years, which includes the required Federal budget process for Line Item funding (if necessary), compared to 4.5 years as presently required by the Tri-Party Agreement (TPA) change request M-91-96-01 (M-91).

Justification for acquisition schedule

- Although all of the waste within the scope of this project is currently managed as TRU waste, with additional characterization and records review, a significant portion may prove to actually be non-TRU waste. This will have an influence on planning facility capacity and throughput.
- The WIPP Waste Analysis Plan (WAP) and Waste Acceptance Criteria (WAC) for RH waste are not yet issued. Design of the RH waste treatment capability prior to finalization of the WIPP-WAP/WAC would substantially increase the cost and schedule risk to the project. The risks associated with implementing the project will be mitigated by coordinating the RH project with the WIPP-WAP/WAC.
- The SW-EIS ROD, expected to be issued in calendar year 2001, will address the retrievably stored TRU and will be a key NEPA document for the M-91 project.
- Much of the waste within the scope of this project has not yet been generated; the forecast involves significant uncertainties in quantities, characteristics, and timing.

Description of the milestones

The deletion of the Target Dates and description of the new Interim Milestones for the acquisition of retrieval, storage and treatment capacity for M-91 TRU/TRUM waste are described in the following table. Interim Milestones with completion dates are proposed through the conclusion of conceptual design. The remainder of project Interim Milestone dates will be negotiated with Ecology after a firm technical baseline has been documented in the Conceptual Design Document and Congressional appropriation has been established. The 200 Area plateau rebaselining associated with the alignment to the recent outcome strategy may require further adjustments to the schedule proposed in these milestones.

Strikeout indicates text to be deleted; shading indicates text to be added.

The Target Date deletions and Interim Milestones established by approval of this change request are hereby incorporated to the TPA.

<u>Milestone</u>	<u>Description</u>	<u>Date</u>
M-91-05-T01	<p>Complete and submit TRU/TRUM retrieval and processing facility Engineering Study/Functional Design Criteria Study to Ecology.</p> <p>The TRU/TRUM engineering/functional design criteria study will cover activities/facilities not considered commercially viable as documented in the approved TRU/TRUM PMP and associated Agreement change requests.</p>	12/31/2002
M-91-06-T01	Award necessary privatized contracts for processing remote handled (RH) and large size TRU/TRUM.	9/30/2003
M-91-08-T01	Complete construction and initiate hot operations of RH and large size TRU/TRUM processing facility. (A final acquisition schedule for this facility will be established as an interim milestone no later than December 2000)	6/30/2005
M-91-30	<p>Complete and submit TRU/TRUM Project retrieval and processing facility functional design criteria to Ecology.</p> <p>The TRU/TRUM engineering/functional design criteria will cover activities/facilities not considered commercially viable. This interim milestone is complete upon transmittal of the functional design criteria to Ecology.</p>	5/31/2006
M-91-31	<p>Complete and submit TRU/TRUM Project retrieval and processing facility Conceptual Design Document (CDD) to Ecology.</p> <p>The CDD will define the project scope (and associated cost and schedule estimates) necessary to acquire the capability to treat the TRU/TRUM waste. On receipt, the CDD will be utilized in establishing additional M-91 compliance milestones completion dates leading up to the readiness to begin treating TRU/TRUM waste. This interim milestone is complete upon transmittal of the CDD to Ecology.</p>	6/30/2007
M-91-32	Initiate TRU/TRUM Project definitive design. This milestone is considered complete when Ecology is notified that authorization has been granted to begin definitive design.	TBE

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M:9133	Initiate TRU/TRUM Project implementation of the definitive design. This milestone is considered complete when Ecology is notified that authorization has been granted to begin implementation of the definitive design.	TBE
M:9134	Initiate TRU/TRUM Project hot operations of RH and large size TRU/TRUM waste processing facility.	TBE