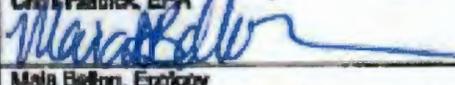
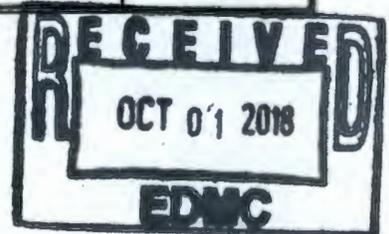


Change Number M-92-18-01	Federal Facility Agreement and Consent Order Change Control Form	Date 03/28/2018
Originator Al Farabee		Phone 509-376-8089
Class of Change <input checked="" type="checkbox"/> I - Signatories <input type="checkbox"/> II - Executive Managers <input type="checkbox"/> III - Project Managers		
Change Title Modification of Major Milestone M-092-00		
Description/Justification of Change <p>Milestone M-092-00 requires a due date to be established for completing the acquisition of new facilities, modifications of existing facilities and/or modification of planned facilities necessary for the storage, treatment/process and disposal of Hanford Site cesium and strontium (Cs/Sr) capsules, bulk sodium (Na) and 300 Area Special Case Waste (SCW).</p> <p>This change control form deletes the phrase "and 300 Area special case waste (SCW)" from the text of the milestone.</p> <p>TPA Change Control Form M-92-14-01 (approved June 4, 2014) stipulated that the date for the M-092-00 major milestone "will be established when all remaining activities to complete the open interim milestones are identified and scheduled."</p> <p>This change control form also modifies the due date for Major Milestone M-092-00 from "to be established by 9/30/2018" to "12/31/2047 or earlier as established in M-062-00".</p> <p style="text-align: center;"><i>Continued on page 2</i></p>		
Impact of Change <p>This change control form establishes a due date for Major Milestone M-092-00, and eliminates 300 Area SCW from the scope of the milestone. In addition, a separate change control form, M-92-18-03, establishes interim milestone M-092-21 and target milestones M-092-21-T01, M-092-21-T02, and M-092-21-T03. In addition, a separate change control form, M-92-18-02, modifies interim milestone M-092-09 and establishes target milestones M-092-09-T01 and M-092-09-T02.</p>		
Affected Documents <p>HFFACO (Tri-Party Agreement) Action Plan Appendix D, "Work Schedule Milestones and Target Dates Including Designation of Lead Regulatory Agency."</p>		
Approvals		
	9/27/18 Date	Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/>
	9/27/18 Date	Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/>
	9/28/18 Date	Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/>



<b>Change Number</b> M-92-18-01	<b>Federal Facility Agreement and Consent Order Change Control Form</b>		<b>Date</b> 03/28/2018
<b>Originator</b> Al Farabee			<b>Phone</b> 509-376-8089
<b>Class of Change</b> <input checked="" type="checkbox"/> I – Signatories <input type="checkbox"/> II – Executive Managers <input type="checkbox"/> III – Project Managers			
<b>Change Title</b> Modification of Major Milestone M-092-00			
<b>Description/Justification of Change</b> <p>Milestone M-092-00 requires a due date to be established for completing the acquisition of new facilities, modifications of existing facilities and/or modification of planned facilities necessary for the storage, treatment/process and disposal of Hanford Site cesium and strontium (Cs/Sr) capsules, bulk sodium (Na) and 300 Area Special Case Waste (SCW).</p> <p>This change control form deletes the phrase "and 300 Area special case waste (SCW)" from the text of the milestone.</p> <p>TPA Change Control Form M-92-14-01 (approved June 4, 2014) stipulated that the date for the M-092-00 major milestone "will be established when all remaining activities to complete the open interim milestones are identified and scheduled."</p> <p>This change control form also modifies the due date for Major Milestone M-092-00 from "to be established by 9/30/2018" to "12/31/2047 or earlier as established in M-062-00".</p> <p style="text-align: center;"><i>Continued on page 2</i></p>			
<b>Impact of Change</b> <p>This change control form establishes a due date for Major Milestone M-092-00, and eliminates 300 Area SCW from the scope of the milestone. In addition, a separate change control form, M-92-18-03, establishes interim milestone M-092-21 and target milestones M-092-21-T01, M-092-21-T02, and M-092-21-T03. In addition, a separate change control form, M-92-18-02, modifies interim milestone M-092-09 and establishes target milestones M-092-09-T01 and M-092-09-T02.</p>			
<b>Affected Documents</b> <p>HFFACO (Tri-Party Agreement) Action Plan Appendix D, "Work Schedule Milestones and Target Dates Including Designation of Lead Regulatory Agency."</p>			
<b>Approvals</b>			<b>Page 1 of 3</b>
_____	Date _____	Approved _____ Disapproved _____	
Doug Shoop, DOE	Date _____	Approved _____ Disapproved _____	
_____	Date _____	Approved _____ Disapproved _____	
Chris Hladick, EPA	Date _____	Approved _____ Disapproved _____	
_____	Date _____	Approved _____ Disapproved _____	
Maia Bellon, Ecology	Date _____	Approved _____ Disapproved _____	

**Description/Justification of Change (continued)**

**Cesium and Strontium Capsules**

In the case of the cesium and strontium capsules, the remaining activities from Milestone M-092-00 had not been scheduled because a final disposal option has not been selected. One option for capsule disposal is processing at the Hanford Waste Treatment and Immobilization Plant (WTP). Another option is disposal to the National Repository, which is indefinitely on hold (with a goal to facilitate availability by 2048). The WTP is currently scheduled to operate until 2047, according to the Amended Consent Decree between Department of Energy and State of Washington, Case 2:08-cv-05085-RMP, Document 222, dated March 11, 2016. The acquisition of new facilities for treatment/processing and final disposition of the capsules is expected to occur before the WTP option is no longer available.

Interim Milestone M-092-20 (established June 30, 2017) requires submittal of a "disposition pathways evaluation" for the Cs/Sr capsules beginning March 31, 2022, and every four years thereafter, until a final date for completion of M-092-00 is established.

Newly proposed Interim Milestone M-092-21 requires completion of the transfer of the cesium and strontium capsules from the Waste Encapsulation and Storage Facility (WESF) to a new dangerous waste-permitted interim safe storage facility on the Hanford Site. This interim step will allow continued safe storage of the capsules until a disposal decision is made.

Newly Proposed Target Milestones M-092-21-T01, M-092-21-T02, and M-092-21-T03, set forth a series of actions to develop the conceptual, preliminary, and final designs for a facility/capability to implement disposal of the cesium and strontium capsules. Target milestones M-092-21-T02 and M-092-21-T03 will be converted to interim enforceable milestones based on each prior target milestone. These new proposed Interim Milestone M-092-21 and Target Milestones M-092-21-T01, M-092-21-T02, and M-092-21-T03 are described in more detail in a separate change control form (M-92-18-03).

**Bulk Sodium**

In the case of the bulk sodium, the Record of Decision in the Final Tank Closure and Waste Management Environmental Impact Statement for the Hanford Site states that "bulk sodium inventories located at Hanford will be converted to caustic sodium hydroxide in a sodium reaction facility at Hanford, and then stored for ultimate use in the WTP." As a result, planning should occur to acquire the sodium reaction facility in time for the caustic to be used in the WTP. The largest demand for the sodium hydroxide is in the WTP Pretreatment Facility, which will operate from 2033 to 2047, according to the 2016 amendment to the Tank Waste Consent Decree.

As a result, Interim Milestone M-092-09 will be changed to require a conceptual design report (30% design) for the sodium reaction facility to be submitted to the Washington State Department of Ecology (Ecology) by December 31, 2026.

**Description/Justification of Change (continued)**

In addition, new proposed Target Milestones M-092-09-T01 and M-092-09-T02 set forth the remaining actions to complete the preliminary and final designs for the sodium reaction facility to be submitted to Ecology. Target Milestones M-092-09-T01 and M-092-09-T02 will be converted to interim enforceable milestones based on each prior milestone.

Until needed for use in WTP, it is safer to continue to store the bulk sodium than to convert it to a much larger volume of aqueous sodium hydroxide.

The change to Interim Milestone M-092-09, establishing a date of December 31, 2026 for conceptual design, and newly proposed Target Milestones M-092-09-T01 and M-092-09-T02 to complete the design are described in more detail in a separate change control form (M-92-18-02).

**300 Area Special Case Waste**

The 300 Area special case waste is no longer in the 300 Area. It has been removed from the 300 Area to 200 Area storage and disposal facilities in accordance with facility waste acceptance criteria and no longer requires management under Milestone M-092-00.

**Authorized Changes**

Modifications to the HFFACO are displayed by using double underline to indicate added text and ~~strikeout~~ to indicate deleted text.

Number	Milestone	Due Date
M-092-00 Lead Regulatory Agency: Ecology	Complete acquisition of new facilities, modification of existing facilities, and/or modification of planned facilities necessary for the storage, treatment/processing, and disposal of Hanford site cesium and strontium capsules (Cs/Sr), <u>and bulk sodium (Na)</u> , <del>and 300 Area special waste (SCW).</del>	<del>To Be Established By 9/30/2018</del> <u>12/31/2047 or earlier as established in M-062-00</u>