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Change Number M-15-96-01	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date April 9, 1996
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Originator Bob Stewart - DOE; Larry Gadbois - EPA; Dave Holland - Ecology	Phone
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Class of Change
 I - Signatories II - Executive Manager III - Project Manager

Change Title
 Modification to Due Dates for Milestones M-15-80, M-15-80C-T01, M-15-80A, and M-15-80B, under the Columbia River Comprehensive Impact Assessment (CRCIA).

Description/Justification of Change

Based on consensus of the CRCIA Management Team (described on Page 3), several project terms have been clarified as follows: [scoping level risk assessment] has become [screening assessment] and the screening assessment plus comprehensive definition (also formerly referred to as "FY 1996 work") has been termed [Phase 1 work]. Also the dates of the milestones below are rescheduled as indicated:

Note: wording changes to milestones/target dates are displayed as shaded text to show new text and ~~strikeout~~ text to show deleted text.

M-15-80 *Submit for review to EPA, Ecology, Technical Peer Reviewers, CRCIA Team, and the public for review a draft interim report (considered an initial Scoping Screening Assessment Report for the "Columbia River Comprehensive Impact Assessment" by the CRCIA Team) which incorporates human health and ecological risk assessments and documents completion of the Agreed to FY 1996 work Phase 1 work detailed on page 34, items #1 and 4 and 5.*
 Existing Due Date: July 31, 1996
 Revised Due Date: December 19, 1996

- Continued on Page 2 -

Impact of Change

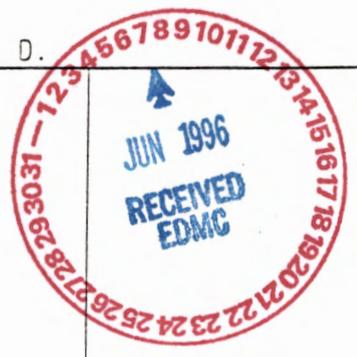
Additional budget will be required in FY 1996 and FY 1997 to complete the scope of work above under the present mode of operation. There may be future budget impacts because development of M-15-80B recommendations and execution of work required for a comprehensive assessment are not in the current budget plan.

Affected Documents

Hanford Federal Facility Agreement and Consent Order. Appendix D.

Approvals

<u>CAHansen</u>	<u>4/23/96</u>	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
DOE	Date		
<u>Douglas P. Shivers</u>	<u>4/23/96</u>	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
EPA	Date		
<u>Michael White</u>	<u>4/23/96</u>	<input checked="" type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
Ecology	Date		



Description/Justification (Continued)

- M-15-80-T01* *Submit a revised report of the draft from M-15-80 which incorporates responses to comments from the CRCIA Team, Technical Peer Reviewers and the public. Responses are to be based on consensus of the CRCIA Team to the extent practicable; to the extent that comments cannot be reconciled, "minority opinions" will be included.*
 Existing Target Date: Oct 31, 1996
 Revised Target Date: April 30, 1997
- M-15-80A* *DOE is to provide a list of comprehensive work scope tasks developed and prioritized in coordination with the CRCIA Management Team (not based on funding).*
 Existing Due Date: Sept 30, 1996
 Revised Due Date: February 28, 1997
- M-15-80B* *DOE is to provide a recommendation for follow-on work to M-15-80, primarily based on M-15-80A, as well as funding considerations, overall Sitewide objectives, and TPA authority. This will include future milestones.*
 Existing Due Date: Dec 31, 1996
 Revised Due Date: June 30, 1997

The following target date is added:

- M-15-80B-T01* *DOE is to provide to EPA and Ecology an initial recommendation for CRCIA "next phase(s)" budgeted work to be used as input into the FY 1999 budget submission (to include recommendations for FY 1998). Recommendations are to be based on CRCIA workscope prioritization discussions with the CRCIA Team.*
 Target Date: January 10, 1997

Justification for Schedule Change:

The current schedule was based on predefined constraints and limited knowledge of the schedule requirements of working with the CRCIA Team. In general, this schedule required that much of the technical work be performed in parallel with insufficient time for CRCIA Team input and little additional time for revision of technical work based on Technical Peer Reviewer, CRCIA Team, and other comments. Experience has now shown that time scheduled is insufficient based on the continuing depth of CRCIA Team involvement and the large number of comments received. The following specific delays and/or decisions have impacted the overall schedule:

- reaching agreement on key data decisions such as corridor width for data collection, river segmentation, and process for obtaining representative values for each data source within each of the segments
- receiving data
- reevaluating the contaminants with revised screens based on comments received on the contaminants report
- reaching agreement on assessment methodologies including deterministic and stochastic data input

Description/Justification (Continued)

Remaining scheduled activities have been revised to allow for the following:

- extended involvement with the CRCIA Team, reflecting conduct of business in existing forum with team interaction and consensus decision making
- incorporating reader friendliness into compilation report per technical peer review comments and CRCIA Team agreement
- extended involvement in the CRCIA Team comprehensive chapter development
- limited revision of risk assessments per data review comments

Background:

For years, appropriate scope and priority for assessments of contaminant impacts to the Columbia River have been controversial. During 1993 the Tri-Parties began work towards a Columbia River Comprehensive Impact Assessment. This effort was established in the Tri-Party Agreement in January 1994. Differences in project participants' expectations are at least partially attributable to the word "comprehensive" in the CRCIA project name and to the description of the project scope for the original M-13-80B milestone. To help establish common expectations, a CRCIA Project Management Team was formed in late August 1995, consisting of the following organizations and representatives:

- (Chair) U. S. Department of Energy, CRCIA Project Manager
- U. S. Environmental Protection Agency, CRCIA Project Manager
- State of Washington, Dept. of Ecology, CRCIA Project Manager
- Yakama Indian Nation, CRCIA Representative
- Confederated Tribes of the Umatilla Indian Reservation, CRCIA Representative
- Nez Perce Tribe, CRCIA Representative
- State of Oregon, CRCIA Representative
- Hanford Advisory Board, CRCIA Representative
- Primary Contractor, CRCIA Project Manager,
CRCIA Team Administrator
- Environmental Restoration Contractor, CRCIA Technical
Coordination Representative,
Public Involvement Representative
- General Services Support Contractor - Technical Support Representative

This team began meeting in late August 1995 and continues to meet, nominally 1/2 day per week, but as much as a full day per week, to resolve issues associated with the project. An agreement concerning the scope of the project was agreed-to and signed by CRCIA Team members on October 3, 1995. This agreement is restated on page 4 as "Phase 1 Work" and is part of the revised M-15-80 milestone.

Description/Justification (Continued)

Phase 1 Work

The following work, with proactive involvement by the non-TPA members, will be performed in response to TPA Milestone M-15-80:

- 1) Perform an assessment of Hanford-derived contaminants (existing conditions including residual contaminants from past operations) in a screening assessment to support IRM decisions.
- 2) Compile and make available to the public the approximately 2000 documents identified in Appendix A of the data compendium; pertinent supporting Hanford data will be made available.
- 3) Work with the declassification efforts of the H.A.B in identifying the Columbia River documents as a high priority for release.
- 4) Define the essential work remaining to provide an acceptable "comprehensive" river impact assessment. This work will be documented in the same report as the screening assessment.
- 5) Data (from 2&3) will be available for reconciliation against the screening assessment.

These actions are designed to fulfill the requirements for a screening assessment to support IRM decisions limited only by the time and FY 1996 funds available for this effort. However, the "comprehensiveness" issue is left open. Work identified under #4 will be assigned TPA milestones as appropriate, scoped, prioritized and scheduled.