



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

19-SGD-0025

MAY 16 2019

Ms. Alexandra K. Smith, Program Manager
Nuclear Waste Program
Washington State Department of Ecology
3100 Port of Benton Boulevard
Richland, Washington 99354

Dear Ms. Smith:

NOTIFICATION THAT HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) INTERIM MILESTONE M-085-70 IS AT RISK OF NOT BEING MET AND REQUEST FOR EXTENSION

The purpose of this letter is to notify the Washington State Department of Ecology (Ecology) that the Tri-Party Agreement Interim Milestone M-085-70, "Submit to Ecology a Remedial Investigation/Feasibility Study Work Plan for 200-CB-1," is at risk of not being met.

The U.S. Department of Energy Richland Operations Office (RL) currently has insufficient funding to meet all Tri-Party Agreement obligations with the recent approval of the Fiscal Year 2018 and Fiscal Year 2019 Budgets and competing priorities of the site. In addition, it is anticipated that this funding level and competing priorities will continue in Fiscal Year 2020. This presents good cause to extend the milestone due date by three years based on Article XLVIII Cost, Schedule, Scope, Integration, Planning, and Reporting of the Agreement.

In accordance with Tri-Party Agreement Action Plan, Section 12.0, RL requests approval of the attached Change Control Form M-85-18-01 to extend the due date for Tri-Party Agreement Interim Milestone M-085-70 from September 30, 2019, to September 30, 2022.

The extension of this milestone due date and draft change control form have been discussed with Theresa Howell of your staff.

Ms. Alexandra K. Smith
19-SGD-0025

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If you have any questions, please contact me or your staff may contact Mike Cline, of my staff, on (509) 376-6070.

Sincerely,



William F. Hamel, Assistant Manager
for the River and Plateau

SGD:MWC

Attachment

cc w/attach:

J. Atwood, YN
S. G. Austin, CHPRC
D. B. Bartus, EPA
J. Bell, NPT
S. L. Brasher, MSA
R. Buck, Wanapum
L. Contreras, YN
S. W. Davis, MSA
D. R. Einan, EPA
T. Q. Howell, Ecology
M. Johnson, CTUIR
S. Leckband, HAB
K. Niles, ODOE
J. B. Price, Ecology
S. N. Schleif, Ecology
Administrative Record (M-085-70, 200-CB-1)
Environmental Portal

Change Number M-85-18-01	Federal Facility Agreement and Consent Order Change Control Form	Date 05/14/2019
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Originator Michael Cline	Phone 376-6070
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Class of Change <input type="checkbox"/> I – Signatories <input checked="" type="checkbox"/> II – Executive Managers <input type="checkbox"/> III – Project Managers
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Change Title
Extend Due Date of Interim Milestone M-085-70 in TPA Action Plan, Appendix D

Description/Justification of Change

This change control form extends the due date of interim milestone M-085-70, "Submit to Ecology a Remedial Investigation/Feasibility Study Work Plan for 200-CB-1", by three (3) years, from September 30, 2019 to September 30, 2022. Effort for the development of the work plan for the Remedial Investigation of B Canyon located in 200-CB-1 Operable Unit is estimated to take up to two (2) years to perform; therefore, the activity needed to start by October 1, 2017, in order to meet the due date of September 30, 2019.

The United States Department of Energy (DOE), Richland Operations Office currently has insufficient funding to meet all TPA obligations with the recent approval of the FY2018 and FY2019 Budgets and competing priorities of the site. In addition, it is anticipated that this funding level and competing priorities will continue in FY2020. This presents good cause to extend the milestone due date based on Article XLVIII. Force Majeure, 145.G "insufficient availability of appropriated funds, if DOE shall have made a timely request for such funds as part of the budgetary process as set forth in Article XLVIII (Cost, Schedule, Scope, Integration, Planning and Reporting) of this Agreement".

Impact of Change

This change control form extends the due date of interim milestone M-085-70 by three (3) years, from 9/30/2019 to 9/30/2022. There is no impact to major milestone M-085-00 with this change.

Affected Documents

The Hanford Federal Facility Agreement and Consent Order (HFFACO), as amended, and Hanford Site internal planning management, and budget documents (e.g., USDOE and USDOE contractor Baseline Change Control documents, Project Management Plans).

Approvals  W.F. Hamra, DOE	5/15 Date	Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/>	Page 1 of 2
A.K. Smith, Ecology	Date	Approved <input type="checkbox"/> Disapproved <input type="checkbox"/>	
N/A D.R. Einan, EPA	Date	Approved <input type="checkbox"/> Disapproved <input type="checkbox"/>	

Authorized Changes

Modifications to HFFACO Appendix D, "Milestones and Target Dates Including Designation of Lead Regulatory Agency," are denoted by using ~~strikeout~~ to indicate text deletions and double underline to indicate text additions.

Number	Milestone	Due Date
M-085-70 Lead Regulatory Agency: Ecology	Submit to Ecology a Remedial Investigation/Feasibility Study Work Plan for 200-CB-1.	09/30/2019 <u>09/30/2022</u>