



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

19-AMRP-0056

FEB 19 2019

Mr. David Einan, Manager
Office of Environmental Cleanup
Site Cleanup Unit 4
U.S. Environmental Protection Agency
825 Jadwin Avenue, Suite 210
Richland, Washington 99352

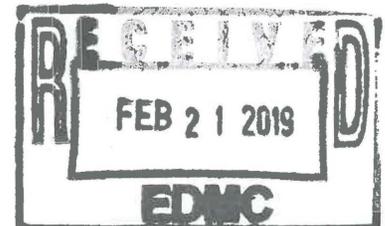
Dear Mr. Einan:

NOTIFICATION THAT HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) INTERIM MILESTONES: M-015-98, M-015-99, M-015-84, AND M-015-91B ARE AT RISK OF NOT BEING MET AND REQUEST FOR EXTENSION, CHANGE CONTROL FORM M-15-18-05

The purpose of this letter is to notify the U.S. Environmental Protection Agency (EPA) that the Tri-Party Agreement Interim Milestones: M-015-98, "Complete Remedial Investigation of U Plant Related Waste Sites Located in 200-WA-1," and subsequent follow-on Milestones M-015-99 "Complete Remedial Investigation of PFP Related Waste Sites Located in 200-WA-1," M-015-84 "Complete RI of 200-WA-1 and 200-BC-1 Waste Sites in Accordance with RI/FS Work Plan," and M-015-91B "Submit FS Report & Proposed Plan for the 200-BC-1/200-WA-1 OU" are 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 FY 2018 Budget, recent approval of the FY 2019 Budget, and completing priorities of the site. This presents good cause to extend the milestone due date by two 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-15-18-05 to extend the due date for Tri-Party Agreement Interim Milestones M-015-98 from June 30, 2019, to June 30, 2021, M-015-99 from December 31, 2019, to December 31, 2021, M-015-84 from December 31, 2021, to December 31, 2023, and M-015-91B from July 31, 2023, to July 31, 2025.



Mr. David Einan
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The extension of the interim milestone due dates and Change Control Form have been discussed with EPA's project staff.

If there are 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

AMRP:JOA

Attachment

cc w/attach:

J. Atwood, YN

S. G. Austin, CHPRC

J. Bell, NPT

S. L. Brasher, MSA

R. Buck, Wanapum

C. E. Cameron, EPA

L. Contreras, YN

S. W. Davis, MSA

M. Johnson, CTUIR

S. Leckband, HAB

N. M. Menard, Ecology

K. Niles, ODOE

S. N. Schleif, Ecology

A. K. Smith, Ecology

Administrative Record (M-015-98, M-015-99,

M-015-84, M-015-91B)

Environmental Portal

| | | | |
|---|---|--|--------------------------------------|
| Change Number M-15-18-05 | Federal Facility Agreement and Consent Order Change Control Form | | Date 06/14/2018 |
| Originator Michael Cline | | | Phone 376-6070 |
| Class of Change <input type="checkbox"/> I – Signatories <input checked="" type="checkbox"/> II – Executive Managers <input type="checkbox"/> III – Project Managers | | | |
| Change Title Extend Due Date of Interim Milestone M-015-98, and Subsequent Follow-on Milestones M-015-99, M-015-84, and M-015-91B, in the Tri-Party Agreement Action Plan, Appendix D | | | |
| Description/Justification of Change This change control form extends the due date of interim milestone M-015-98, by two years from June 30, 2019, to June 30, 2021, and subsequent follow-on milestones M-015-99, M-015-91B, and M-015-84, by two years. Efforts for the Remedial Investigation of U Plant Related Waste Sites Located in 200-WA-1 needed to start by October 1, 2017, in order to meet the due date of September 30, 2019. The U.S. Department of Energy (DOE), Richland Operations Office currently has had insufficient funding to meet all Tri-Party Agreement obligations with the FY 2018 Budget, recent approval of the FY 2019 Budget, and competing priorities of the Hanford Site. This presents good cause to extend the milestone due date by two years, based on Tri-Party Agreement Article XLVIII. Force Majeure, Paragraph 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-015-98 by 2 years, from 6/30/2019 to 6/30/2021. This will also extend the subsequent follow-on milestones by 2 years: milestone M-015-99 will be extended from 12/31/2019 to 12/31/2021; milestone M-015-84 will be extended from 12/31/2021 to 12/31/2023; and milestone M-015-91B will be extended from 7/31/2023 to 7/31/2025. There is no impact to major milestone M-015-00 with these changes. | | | |
| Affected Documents The Tri-Party Agreement, as amended, Hanford Site internal planning management, and budget documents (e.g., DOE and DOE contractor Baseline Change Control documents, Project Management Plans). | | | |
| Approved  | <u>2/19/19</u> | Approved <input checked="" type="checkbox"/> | Disapproved <input type="checkbox"/> |
| W.F. Hamel, DOE | Date | Approved <input type="checkbox"/> | Disapproved <input type="checkbox"/> |
| D.R. Einan, EPA | Date | Approved <input type="checkbox"/> | Disapproved <input type="checkbox"/> |
| N/A | Date | Approved <input type="checkbox"/> | Disapproved <input type="checkbox"/> |
| A.K. Smith, Ecology | Date | Approved <input type="checkbox"/> | Disapproved <input type="checkbox"/> |

Authorized Changes

Modifications to Tri-Party Agreement Action Plan, 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-015-98 Lead Regulatory Agency: EPA | Complete remedial investigation of U Plant related waste sites located in 200-WA-1 in accordance with the WA-1 RI/FS Work Plan | 06/30/2019 <u>6/30/2021</u> |
| M-015-99 Lead Regulatory Agency: EPA | Complete remedial investigation of PFP related waste sites located in 200-WA-1 in accordance with the 200-WA-1 and 200-BC-1 RI/FS Work Plan. | 12/31/2019 <u>12/31/2021</u> |
| M-015-84 Lead Regulatory Agency: EPA | Complete remedial investigation of 200-WA-1 and 200-BC-1 operable unit waste sites in accordance with the 200-WA-1 and 200-BC-1 RI/FS Work Plan. | 12/31/2021 <u>12/31/2023</u> |
| M-015-91B Lead Regulatory Agency: EPA | Submit Feasibility Study Report(s) and Proposed Plan(s) for the 200-BC-1 and 200-WA-1 operable units (200 West Inner Area) to EPA. | 07/31/2023 <u>7/31/2025</u> |