



U.S. Department of Energy  
**Office of River Protection**

0054898

P.O. Box 450  
Richland, Washington 99352  
MAY 02 2001

01-ORP-064

Mr. Michael A. Wilson, Program Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
P.O. Box 47600  
Olympia, Washington 98504

**RECEIVED**  
MAY 16 2001

**EDMC**

Dear Mr. Wilson:

SUBMITTAL OF A SIGNED CHANGE REQUEST (CR) M-90-01-01, REVISING MILESTONE COMPLETION DATES FOR ONE TARGET AND FIVE INTERIM MILESTONES (M-90-09-T01, M-90-08, M-90-10, M-90-11, M-20-56, AND M-20-57) IN SUPPORT OF THE ACQUISITION OF NEW FACILITIES FOR THE STORAGE OF HANFORD SITE IMMOBILIZED HIGH-LEVEL WASTE (IHLW) AND IMMOBILIZED LOW-ACTIVITY WASTE (ILAW) AND THE DISPOSAL OF ILAW

- References:
1. ORP letter from H. L. Boston, ORP, and K. A. Klein, RL to T. Fitzsimmons, Ecology, and C. E. Findley, EPA, "Change Request Package," 01-ORP-044, dated February 26, 2001.
  2. Ecology letter from R. Stanley to M. E. Burandt, ORP, "U.S. Department of Energy (DOE) Draft Hanford Federal Facility Agreement and Consent Order (HFFACO) Change Request (CR) M-62-01-02," dated March 1, 2001.

This letter submits a CR in support of the acquisition of new facilities for the storage of IHLW and ILAW, the disposal of ILAW, and the planned completion of Part B permit applications for the Canister Storage Facility and the ILAW disposal facility. The modifications to the M-90-09-T01, M-90-08, M-90-10, M-90-11, M-20-56 and M-20-57 Milestones are necessary to provide consistency between Hanford Federal Facility Agreement and Consent Order milestone language, completion schedules for Contract No.'s DE-AC27-01RV14136 and DE-AC27-99RL14047 and the U.S. Department of Energy (DOE), Office of River Protection (ORP) baseline schedule. This change package reflects our recovery plan for M-90 and M-20 series milestones that were impacted by changing from a privatization contract to a Government-Owned, Contractor-Operated (GOCO) facility. There may be additional changes required once Fiscal Year 2002 budget impacts are evaluated. As discussed in recent correspondence (References 1 and 2) between DOE, ORP, and the State of Washington Department of Ecology (Ecology), this CR develops "renegotiation milestones" that are intended to revise or confirm milestone completion dates for the activities listed.

It is requested that Ecology approve the M-90-01-01CR (Enclosure 1) as lead regulatory agency. Upon approval, please return the original signed documents to this office.

Mr. Michael A. Wilson  
01-ORP-064

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If you have any questions, please contact me, or your staff may contact William Taylor, Assistant Manager for Project Delivery, (509) 372-3864.

Sincerely,



James E. Rasmussen  
Environmental Policy Advisor  
Office of River Protection

ORP:JER

Enclosure

cc w/encl:

R. Gay, CTUIR  
P. Sobotta, NPT  
R. Jim, YN  
E. Savage, BNI  
W. T. Dixon, CHG  
C. C. Haass, CHG  
M. J. Riess, CHG  
S. J. Bensussen, CHG  
J. G. Kristofski, CHG  
C. Defigh-Price, CHG  
G. L. Parsons, CHG  
K. S. Tollefson, CHG  
D. M. MacDonald, CHG  
S. L. Dahl, Ecology  
R. F. Stanley, Ecology  
M. Brown, Ecology  
D. R. Sherwood, EPA  
J. S. Hertzell, FHI  
O. S. Kramer, FHI  
T. M. Martin, HAB  
M. L. Blazek, Oregon Energy  
C. E. Clark, RL  
J. B. Hebdon, RL  
**Administrative Record**

<b>Change Number</b> M-90-01-01	<b>Federal Facility Agreement and Consent Order  Change Control Form</b> <small>Do not use blue ink. Type or print using black ink.</small>	<b>Date</b> 5/02/2001																									
<b>Originator</b> DOE, Office of River Protection		<b>Phone</b> 376-2247																									
<b>Class of Change</b> <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager																											
<b>Change Title</b> Modifications to the M-90-08, M-90-09-T01, M-90-10, M-90-11, M-20-56 and M-20-57 milestones, that are necessary to provide consistency between Tri-Party Agreement milestone language, completion schedules for contract No.'s DE-AC27-01RV14136, DE-AC27-99RL14047 and the ORP baseline schedule.																											
<b>Description/Justification of Change</b> In the September 19, 2000 approved amendment to Consent Decree No. CT-99-5076-EFS, DOE was required to award a contract to replace the terminated privatization contract for the design, construction and commissioning of a Phase I Treatment Complex by January 15, 2001. Contract No. DE-AC27-01RV14136 was awarded on December 11, 2000 for the Design, Construction and Commission of a Facility for the Phase I Hanford Tank Waste Treatment Complex. Contract No. DE-AC27-99RL14047 was recently extended for an additional 5-year term. (Continued on page 2)																											
<b>Impact of Change</b> This change recommends modifications to the M-90-08, M-90-09-T01, M-90-10, M-90-11, M-20-56 and M-20-57 milestones that are necessary to provide consistency between Tri-Party Agreement milestones, completion schedules for contract No.'s DE-AC27-01RV14136, DE-AC27-99RL-14047 and the ORP baseline schedule. Contract No. DE-AC27-01RV14136 provides for the Design, Construction and Commission of a Facility for the Phase I Hanford Tank Waste Treatment Complex. The milestone established for renegotiation of the M-90/M-20 series milestones is consistent with the recently established contracts for the Waste Treatment Contractor (WTC) and the Tank Farm Contractor (TFC). Those contracts require the evaluation of baseline schedules by the WTC on, or before April 15, 2001. The TFC is required to evaluate and integrate the WTC schedules and submit revisions to their baseline by September 1, 2001.																											
<b>Affected Documents</b> The Hanford Federal Facility Agreement and Consent Order, as amended, Hanford Site internal planning and budget documents (e.g., Agreement Action Plan, Appendix D, DOE and DOE contractor Baseline Change control documents, and Project Management Plans.																											
<b>Approvals</b> <table border="0" style="width: 100%;"> <tr> <td style="width: 35%; border-bottom: 1px solid black;"> WGTaylor  DOE - ORP </td> <td style="width: 15%; border-bottom: 1px solid black;"> 5/2/01  Date </td> <td style="width: 10%; border-bottom: 1px solid black;"> X </td> <td style="width: 10%; border-bottom: 1px solid black;"> Approved </td> <td style="width: 10%; border-bottom: 1px solid black;"> Disapproved </td> </tr> <tr> <td style="border-bottom: 1px solid black;"> N/A </td> <td style="border-bottom: 1px solid black;"> </td> <td style="border-bottom: 1px solid black;"> </td> <td style="border-bottom: 1px solid black;"> Approved </td> <td style="border-bottom: 1px solid black;"> Disapproved </td> </tr> <tr> <td style="border-bottom: 1px solid black;"> </td> <td style="border-bottom: 1px solid black;"> </td> <td style="border-bottom: 1px solid black;"> </td> <td style="border-bottom: 1px solid black;"> Approved </td> <td style="border-bottom: 1px solid black;"> Disapproved </td> </tr> <tr> <td style="border-bottom: 1px solid black;"> EPA </td> <td style="border-bottom: 1px solid black;"> </td> <td style="border-bottom: 1px solid black;"> </td> <td style="border-bottom: 1px solid black;"> Approved </td> <td style="border-bottom: 1px solid black;"> Disapproved </td> </tr> <tr> <td style="border-bottom: 1px solid black;"> Ecology </td> <td style="border-bottom: 1px solid black;"> </td> <td style="border-bottom: 1px solid black;"> </td> <td style="border-bottom: 1px solid black;"> Approved </td> <td style="border-bottom: 1px solid black;"> Disapproved </td> </tr> </table>			WGTaylor DOE - ORP	5/2/01 Date	X	Approved	Disapproved	N/A			Approved	Disapproved				Approved	Disapproved	EPA			Approved	Disapproved	Ecology			Approved	Disapproved
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			Approved	Disapproved																							
EPA			Approved	Disapproved																							
Ecology			Approved	Disapproved																							

Additional modifications are necessary to provide consistency between milestone completion dates and the ORP baseline schedule. There may be additional changes required once the Fiscal Year 2002 budget impacts are evaluated. Our authority for submitting this change is found in Article XL, Good Cause for Extensions, paragraphs 119, 120.A, 120.D, and 120.E and Article XLVII Force Majeure, paragraphs 145, 145.F and 145.G of the HFFACO and Section 12.0 of the Action Plan. The following changes will be adopted as part of this change request:

MS Number	Milestone Description	Due Date
M-90-08	INITIATE ILAW DISPOSAL FACILITY CONSTRUCTION  INITIATION OF CONSTRUCTION OCCURS WHEN THE CONTRACTOR COMMENCES EXCAVATION OF THE RCRA DISPOSAL FACILITY.  <u>*3 - COMPLETE THE RENEGOTIATION OF M-90 SERIES MILESTONES PER M-90-13</u>	7/31/2004 6/30/2006*3
M-90-09-T01	COMPLETE ILAW DISPOSAL FACILITY DETAILED DESIGN  <u>*3 - COMPLETE THE RENEGOTIATION OF M-90 SERIES MILESTONES PER M-90-13</u>	3/30/2004 6/30/2005*3
M-90-10	INITIATE PLACEMENT OF ILAW WASTE CANISTERS IN ILAW DISPOSAL FACILITY  (LOW ACTIVITY WASTE PACKAGES PLACED WITHIN THESE FACILITIES WILL BE RETRIEVABLE).  <u>*3 - COMPLETE THE RENEGOTIATION OF M-90 SERIES MILESTONES PER M-90-13</u>	1/31/2007 12/31/2008*3
M-90-11	COMPLETE CANISTER STORAGE FACILITY CONSTRUCTION  COMPLETION OF THIS MILESTONE REQUIRES THE COMPLETION OF ALL CONSTRUCTION, INTERNAL/EXTERNAL FACILITY(S) MODIFICATION AND STARTUP ACTIVITIES NECESSARY FOR CANNISTER STORAGE FACILITY RECEIPT OF ALL PHASE I HANFORD SITE HIGH LEVEL WASTE CANISTERS FROM TANK WASTE REMEDIATION SYSTEM (TWRS) PROCESSING. FOR PURPOSES OF THIS INTERIM MILESTONE PHASE I IHLW CANISTER STORAGE OF AT LEAST 600 IHLW CANISTERS. INTERIM MILESTONES AND ASSOCIATED TARGET DATES ESTABLISHING WORK SCHEDULES FOR PHASE II IHLW CANISTER STORAGE WILL BE ESTABLISHED PURSUANT TO THE PHASE II REQUEST FOR PROPOSAL FOR TWRS PRIVATIZATION.  <u>*3 - COMPLETE THE RENEGOTIATION OF M-90 SERIES MILESTONES PER M-90-13</u>	2/01/2007 12/31/2009*3
M-20-56	SUBMIT CANISTER STORAGE FACILITY PART B DANGEROUS WASTE PERMIT APPLICATION TO ECOLOGY  <u>*3 - COMPLETE THE RENEGOTIATION OF M-20 SERIES MILESTONES PER M-90-13</u>	6/30/2002
M-20-57	SUBMIT ILAW DISPOSAL FACILITY CERTIFIED PART B PERMIT APPLICATION TO ECOLOGY  <u>*3 - COMPLETE THE RENEGOTIATION OF M-20 SERIES MILESTONES PER M-90-13</u>	8/31/2002
M-90-13	<u>COMPLETE THE RENEGOTIATION OF M-90-08, M-90-09-T01, M-90-10, M-90-11, M-20-56 &amp; M-20-57 MILESTONES</u>  <u>THE PARTIES WILL REVISE OR CONFIRM MILESTONE COMPLETION DATES. REVISION IF NECESSARY SHALL BE CONSISTENT WITH HOT COMMISSIONING BY DECEMBER 2007 AND COMPLETION OF PHASE 1 TREATMENT BY FEBRUARY 2018.</u>	12/15/2001