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Change Number DRAFT M-44-97-03	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date 07/15/97
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Class of Change
 I - Signatories II - Executive Manager III - Project Manager

Change Title
 Changes to Hanford Federal Facility Agreement and Consent Order Milestone M-44-00, Tank Waste Characterization.

Description/Justification of Change

A Tri-Party Agreement milestone change is proposed to revise the strategy for existing Major Milestone M-44-00. The proposed change resulted from an extensive review of progress on the milestone to date through a partnering effort between Ecology and DOE, Richland Operation Office. It represents the next logical step in providing a systematic and integrated sampling and analysis program. As tank projects have matured, their waste information needs have been refined. This milestone change will allow characterization sampling and analysis efforts to be tailored to meet these needs. An additional benefit of the change is that the progress of sampling and analysis efforts will be immediately apparent and easily measurable.

The major milestone change revises the number of tanks to be sampled each year. The *original* milestone requires a set number of tanks to be sampled each year. However, the sampling efforts necessary to meet this requirement cannot be fully tied to the projects' needs for tank waste information. This situation has increased sampling and analysis costs, and the projects' information needs are not fulfilled in the most effective manner. Therefore, the *proposed change* removes the requirement for sampling a predetermined number of tanks, and links sampling and analysis activities directly to the projects' tank waste information needs.

(Continued on page 2)

Impact of Change

The proposed milestones refine the tank waste characterization process of collecting data/information from a predetermined number of high level waste tanks each fiscal year. This change package will not result in increased funding requirements for the Tank Waste Characterization Project per year than is currently required by the Multi-Year Work Plan.

Affected Documents

Hanford Federal Facility Agreement and Consent Order, Fifth and Sixth Amendment 89-10 Revision 4, February 1996.

Approvals

_____	_____	___ Approved ___ Disapproved
DOE	Date	
_____	_____	___ Approved ___ Disapproved
EPA	Date	
_____	_____	___ Approved ___ Disapproved
Ecology	Date	



Description/Justification of Change (continued)

- Delete Milestones M-44-00, M-44-01C, M-44-01D, M-44-01E, M-44-01F, M-44-02C, M-44-02D, M-44-02E, M-44-02F, M-44-10, M-44-11, and M-44-12.

The above milestones required planning and reporting of sampling and analysis for a predetermined number of tanks per year.

The new milestones require DOE to issue characterization deliverables consistent with identified program needs. Because of this, the Retrieval and Disposal Projects are required to develop their information needs using the Data Quality Objective (DQO) process. Therefore, target dates were added to Milestones M-45, M-51, and M-60 requiring the Retrieval and Disposal Projects to develop DQOs which define their information needs.

The TWRS information needs will be defined in a Waste Information Requirements Document (WIRD) to be submitted annually to Ecology. This document will identify annual characterization deliverables to support safe storage, retrieval, and disposal of tank waste. Additionally, the WIRD will identify tank waste characterization behavior information for each subsequent year for approval. The WIRD will describe the characterization deliverables to be issued for each year based on existing Tri-Party Agreement milestones and will specify the contents of each of these deliverables. That portion of each WIRD outside the scope of the Tri-Party Agreement which identifies tank waste characterization activities (i.e., Department of Energy Secretarial Initiatives, Defense Nuclear Facilities Safety Board Milestones), will not be subject to Ecology approval, but rather will be included for informational purposes only.

When other TWRS Program related tank waste characterization Tri-Party Agreement Milestones are revised or modified via the Tri-Party Agreement change control process, the appropriate characterization deliverables will be revised or modified to reflect the changes at the end of each fiscal year. A report of all deliverables and affected changes for the previous fiscal year shall be submitted as part of the WIRD annual submittal.

Replace the above noted milestones with M-44-00A, M-44-13A, M-44-13B, M-44-13C, M-44-13D, M-44-13E, M-44-14A, M-44-14B, M-44-14C, M-44-14D, M-44-14E, M-44-15A, M-44-15B, M-44-15C, M-44-15D, M-44-15E, M-44-15F, M-44-16A, M-44-16B, M-44-16C, M-44-16D, M-44-16E, and M-44-16F:

<u>Milestone</u>	<u>Description</u>	<u>Due Date</u>
M-44-00A	Complete delivery of information requirements as identified in the annually submitted WIRD.	9/30/02
M-44-13A	Submit draft WIRD to Ecology for Fiscal Years (FY) 1997 and 1998. Ecology will provide comments within three weeks after submittal.	7/15/97
M-44-13B	Submit draft WIRD to Ecology for FY 1999. Ecology will provide comments within 30 days after submittal.	6/30/98

Description/Justification of Change (continued)

M-44-13C	Submit draft WIRD to Ecology for FY 2000. Ecology will provide comments within 30 days after submittal.	6/30/99
M-44-13D	Submit draft WIRD to Ecology for FY 2001. Ecology will provide comments within 30 days after submittal.	6/30/00
M-44-13E	Submit draft WIRD to Ecology for FY 2002. Ecology will provide comments within 30 days after submittal.	6/30/01
M-44-14A	Submit final WIRD for FY 1997 and 1998 to Ecology. If the three parties do not agree on any individual deliverable then Ecology will issue a final decision no later than September 30 of that year for the scope of the deliverable. RL will implement the final decision issued by Ecology. If RL disputes the final decision, Ecology's final decision will be implemented during the dispute resolution process.	8/31/97
M-44-14B	Submit final WIRD for FY 1999 to Ecology. If the three parties do not agree on any individual deliverable then Ecology will issue a final decision no later than September 30 of that year for the scope of the deliverable. RL will implement the final decision issued by Ecology. If RL disputes the final decision, Ecology's final decision will be implemented during the dispute resolution process.	8/31/98
M-44-14C	Submit final WIRD for FY 2000 to Ecology. If the three parties do not agree on any individual deliverable then Ecology will issue a final decision no later than September 30 of that year for the scope of the deliverable. RL will implement the final decision issued by Ecology. If RL disputes the final decision, Ecology's final decision will be implemented during the dispute resolution process.	8/31/99
M-44-14D	Submit final WIRD for FY 2001 to Ecology. If the three parties do not agree on any individual deliverable then Ecology will issue a final decision no later than September 30 of that year for the scope of the deliverable. RL will implement the final decision issued by Ecology. If RL disputes the final decision, Ecology's final decision will be implemented during the dispute resolution process.	8/31/00
M-44-14E	Submit final WIRD for FY 2002 to Ecology. If the three parties do not agree on any individual deliverable then Ecology will issue a final decision no later than September 30 of that year for the scope of the deliverable. RL will implement the final decision issued by Ecology. If RL disputes the final decision, Ecology's final decision will be implemented during the dispute resolution process.	8/31/01
M-44-15A	Issue Characterization deliverables consistent with WIRD developed for FY 1997.	9/30/97
M-44-15B	Issue Characterization deliverables consistent with WIRD developed for FY 1998.	9/30/98

Description/Justification of Change (continued)

M-44-15C	Issue Characterization deliverables consistent with WIRD developed for FY 1999.	9/30/99
M-44-15D	Issue Characterization deliverables consistent with WIRD developed for FY 2000.	9/30/00
M-44-15E	Issue Characterization deliverables consistent with WIRD developed for FY 2001.	9/30/01
M-44-15F	Issue Characterization deliverables consistent with WIRD developed for FY 2002.	9/30/02
M-44-16A	Complete input of Characterization information for HLW tanks for which sampling and analysis were completed per WIRD, into an electronic database. Off-site access to the database containing tank waste characterization information will be made available to EPA and Ecology.	9/30/97 per FY97 WIRD
M-44-16B	Complete input of Characterization information for HLW tanks for which sampling and analysis were completed per WIRD, into an electronic database. Off-site access to the database containing tank waste characterization information will be made available to EPA and Ecology.	9/30/98 per FY98 WIRD
M-44-16C	Complete input of Characterization information for HLW tanks for which sampling and analysis were completed per WIRD, into an electronic database. Off-site access to the database containing tank waste characterization information will be made available to EPA and Ecology.	9/30/99 per FY99 WIRD
M-44-16D	Complete input of Characterization information for HLW tanks for which sampling and analysis were completed per WIRD, into an electronic database. Off-site access to the database containing tank waste characterization information will be made available to EPA and Ecology.	9/30/00 per FY00 WIRD
M-44-16E	Complete input of Characterization information for HLW tanks for which sampling and analysis were completed per WIRD, into an electronic database. Off-site access to the database containing tank waste characterization information will be made available to EPA and Ecology.	9/30/01 per FY01 WIRD
M-44-16F	Complete input of Characterization information for HLW tanks for which sampling and analysis were completed per WIRD, into an electronic database. Off-site access to the database containing tank waste characterization information will be made available to EPA and Ecology.	9/30/02 per FY02 WIRD