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Office of River Protection

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JUL 29 2005

05-WTP-144

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HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (HFFACO)
(ALSO KNOWN AS TRI-PARTY AGREEMENT) INTERIM MILESTONE M-62-01, "SEMI-ANNUAL COMPLIANCE REPORT FOR THE WASTE TREATMENT AND IMMOBILIZATION PLANT (WTP)," FOR JANUARY 2005 THROUGH JUNE 2005

Attached is the U.S. Department of Energy (DOE), Office of River Protection, Semi-Annual Compliance Report required by interim Milestone M-62-01 for the period from January 2005 through June 2005.

As stipulated in the M-62-01 milestone, this report includes project summaries of accomplishments, issues encountered, and actions being taken. DOE and its contractors on the WTP Project are currently in compliance with ongoing HFFACO M-62 series milestones, as stated in the attached report.

If you have any questions, please contact me, or your staff may contact John R. Eschenberg, Manager, WTP Project Office, 509-376-3681.

Sincerely,

Roy J. Schepens
Manager

WPD:RLC

Attachment

cc: See page 2

Addressees
05-WTP-144

-2-

JUL 29 2005

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**U.S. DEPARTMENT OF ENERGY (DOE)
OFFICE OF RIVER PROTECTION (ORP)
SEMI-ANNUAL PROJECT COMPLIANCE REPORT FOR THE
WASTE TREATMENT AND IMMOBILIZATION PLANT (WTP)
January 1, 2005 – June 30, 2005**



**U.S. DEPARTMENT OF ENERGY
OFFICE OF RIVER PROTECTION
2440 Stevens Center Place
Richland Washington 99352**

July 31, 2005

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**U.S. DEPARTMENT OF ENERGY (DOE), OFFICE OF RIVER PROTECTION (ORP)
RIVER PROTECTION PROJECT (RPP)**

**WTP PROJECT
SEMI-ANNUAL COMPLIANCE REPORT**

Per Hanford Federal Facility Agreement and Consent Order (HFFACO) Milestone M-62-01

1. INTRODUCTION to M-62-01 – RPP – WTP PROJECT COMPLIANCE REPORT

As required by HFFACO Milestone M-62-01, this Semi-Annual Project Compliance Report (M-62-01K) reflects the ORP WTP Project status for the period of January 1, 2005, through June 30, 2005. As detailed in M-62-01, this report documents ORP's compliance with HFFACO Milestone M-62-00 series requirements; updates WTP Project progress, activities, and issues relative to those milestones; and identifies activities expected in the foreseeable future.

Hanford Site Background: The Hanford tank waste consists of approximately 190 million curies in 54 million gallons of mixed radioactive and hazardous waste stored in underground storage tanks at the Hanford Site. This tank waste will be remediated through treatment and immobilization to protect the environment and meet regulatory requirements. DOE determined through the "Tank Waste Remediation System Environmental Impact Statement Record of Decision," that the preferred alternative to remediate the Hanford tank waste is to:

- pretreat the waste to prepare it for processing and vitrification;
- immobilize the Low-Activity Waste (LAW) for onsite disposal; and
- immobilize the High-Level Waste (HLW) for ultimate disposal in the national repository.

WTP Complex Description: The RPP – WTP is a new waste treatment and immobilization complex being designed, constructed, and commissioned for DOE by Bechtel National, Inc., (BNI) at the Hanford Site in Richland, Washington under DOE Contract No. DE-AC27-01RV14136¹. The WTP will be permitted, designed, constructed, and commissioned to treat and immobilize HLW and LAW.

The WTP complex will receive waste in batches from Hanford's Double-Shell Tank system, operated by the tank farm contractor, through a pipeline system interface. The pretreatment process will separate (or continue to refine) the waste into LAW and HLW fractions for vitrification. The vitrification process will combine pretreated tank waste with glass-forming materials and melt the mixture into a liquid that is poured into stainless steel containers. The hot glass cools and hardens and each container will be sealed in preparation for storage and permanent disposal. The dangerous waste and radioactive constituents will be destroyed, removed, or immobilized in this durable glass matrix through the WTP process. The immobilized low-activity, containerized glass waste will be disposed on site and the immobilized high-level containerized glass waste will be disposed at the national repository.

The WTP complex waste-processing facilities include the waste-separating Pretreatment (PT) Facility, the glass-making HLW Vitrification Facility, and the glass-making LAW Vitrification Facility. These process facilities are supported by the WTP complex Analytical Laboratory (LAB) for process testing and the WTP infrastructure services in the Balance of Facilities (BOF).

¹ Contract No. DE-AC27-01RV14136 between the U.S. Department of Energy and Bechtel National, Inc., dated December 11, 2000.

This Compliance Report reviews the WTP Project overall plus each of these functional areas. Financial data is through June 2005. WTP Project status is also provided monthly through the Project Manager's Meeting and the Quarterly Milestone Review Meeting reports.

2. WTP PROJECT ACCOMPLISHMENTS AND ISSUES

A. PROGRESS TO DATE

i. ORP – Project Management

Safety Record: From project inception, WTP employees have worked in excess of 31 million hours with 140 OSHA recordable injuries. The cumulative recordable case rate for the entire project is 0.9 per 200,000 hours worked. By comparison, the recordable rate for the construction industry nation-wide is 6.8 and for DOE construction contractors 2.2. There was a significant increase in the recordable case rates in Calendar Year (CY) 2004. The first three months of CY 2005 continued the high number of recordable incidents. However recently, during April to June, the number of recordable incidents dropped significantly. While this lower incident rate may be tied to the release of 550 craft from the construction site during April to June, it is thought that, overall, the increased focus on safety awareness and injury prevention has also been effective in reversing the number of incidents. The cumulative recordable case rate for CY 2005 so far is 1.47, which is comparable to last year's rate of 1.45, but still well below both DOE and national construction rates.

ORP and BNI are committed to providing a safe workplace at the WTP. Several safety initiatives were commenced during this reporting period: 8-hr Safety Leadership Training for construction supervision, modules on Effective Communications and Work Planning, implemented Construction Safety Critical Path planning, and conducted an employee perception survey during May. An increased emphasis on electrical safety included: "Hooked on Safety" presentation to BNI construction personnel, implementation of NFPA-70E, *Electrical Safety in the Workplace*, hired a National Electric Code compliance inspector, and completed 6 of 8 ORP assessments on electrical safety topics.

Project Overview: Through June 2005, the overall project is 51% complete (using current baseline, based on dollars). Design, procurement, and construction activities are continuing on LAW/BOF/Lab. Design, procurement in PT/HLW is continuing, but construction in PT/HLW has slowed to further separate engineering from construction. Based on the current trended Performance Measurement Baseline, Engineering design is 81% complete compared to 86% planned (based on dollars). Construction is 42% complete compared to 45% planned (based on dollars; i.e., construction dollars include craft labor, management, subcontracts, and other support functions). An average of 1,385 personnel (800 craft and 585 non-manual staff) were working on-site at the end of June, down from a peak of about 2,050 personnel in March. This represents a reduction of about 500 craft and 165 non-manual staff. Although construction has been slowed for the PT and HLW facilities, a significant amount of work is still occurring on the site, especially in the LAW, LAB, and BOF areas. BNI procurements are over 73% awarded. A summary of BNI contract milestone and Tri-Party Agreement (TPA) performance is included in Table 1. On April 22, 2005, ORP received BNI's 2005 WTP EAC deliverable. ORP and DOE-HQ staff have been reviewing the proposed EAC; however, until more detailed estimates are provided later this year, and further reviews are completed, DOE will not be able to make a decision on a new Performance Baseline and schedule.

Contingency: The Project identified \$550 million of cost and schedule contingency in the March 2003 approved baseline with additional Technical and Programmatic Risk Assessment (TPRA) contingency of \$100 million. The Project's available cost and schedule contingency is \$454 million (\$554 million including the TPRA), having identified up to \$96 million in contingency used from March 2003 through June 2005 with over 450 trends (change packages) approved through the Joint ORP/BNI Change Control Process. This status does not include the impacts from: (1) the mixing and hydrogen control efforts on the pulse jet mixer systems and their configurations in the non-Newtonian tanks; (2) the ground motion study seismic-response update to the design basis spectra and subsequent WTP design consequences; and (3) incorporation of hydrogen generation mitigation design changes in piping and ancillary vessels.

During the reporting period, BNI has focused management attention on, and continuing into the next period, the following:

Estimate at Completion (EAC): On April 22, 2005, BNI provided the 2005 WTP Project EAC deliverable, which was the second reforecast since the March 2003 approved baseline. This effort included evolution of costs; reforecast estimates for commodities, labor rates, and performance; an updated contingency assessment on the remaining work scope; and preliminary cost and schedule impacts of the revised seismic design criteria. DOE and an U.S. Army Corps of Engineers (USACE) Review team reviewed the EAC deliverable. Based on these reviews, DOE is currently evaluating its options on how to proceed, as the proposed BNI EAC represents an increase in both project cost and schedule duration. The above issue has been communicated to Washington State Department of Ecology by the ORP WTP Manager during recent weekly/monthly sessions.

ii. **WTP Complex Design and Construction**

Table 1: WTP Progress on Contract & HFFACO Milestones through December 2004

Contract Milestone Description	Contract Schedule Date	Actual (A)/ Estimated Date
Start of Construction (M1)	Jul-02	Jul-02 A
Set Feed Receipt Tanks in PT Facility (M2)	Mar-05	Aug-04 A
Move HLW Melter #1 into Bldg (M3)	Dec-07	Jun-07*
Completion of Hot Commissioning (M5)	Jan-11	Jan-11*
Completion of Contract Requirements (M6)	Jul-11	Jul-11*
TPA Milestone Description	Compliance Date	Actual (A)/ Estimated Date
Start of Construction (M-62-06)	Dec-02	Jul-02 A
Initial LAW Structural Steel (M-62-07A)	Oct-03	Jul-03 A
Complete Assy LAW Melter #1 and Move HLW melter #1 into Building (M-62-07B)	Dec-07	Jul 07* Jun 07*
Start of Cold Commissioning (M-62-09)	Feb-09	Feb-09*
Completion of Hot Commissioning (M-62-10)	Jan-11	Jan-11*

* Estimated date being evaluated pending receipt of revised EAC by end of year from BNI.

Facility status details are reported during the Tri-Party Agreement Program Manager's Meetings and the Quarterly Milestone Review Meetings. The individual facility and WTP construction progress are summarized as follows for this report.

PT Facility: Pretreatment (PT) completed installation of 15 major process vessels in the black cells along the north side of the building during the period. Eleven additional vessels have been fabricated and are at the site ready for installation. The shield door and the resin dewatering skid are installed in the spent resin disposal area. More than 98% of the concrete walls up to elevation 28' and nearly 75% of the concrete walls up to elevation 56' have been placed. Structural steel is now reaching elevation 56' and 60% of the floor slab placements at elevation 28' have been completed along with 10% of the floor slab placements at elevation 56'. About half of elevation 56' slab over the hot cell is now in place and piping is being installed below the cell top. PT continues to work on the piping modules that are being assembled away from the building and will be lifted into the building once they have been completed. Seven of the fifteen piping modules are being worked and the first four of these modules are expected to be complete next calendar year. Engineering completed design for over 330,000 feet of the 540,000 feet of pipe in the facility. At this point engineering has completed design of all but 4,000 feet of pipe in the black cells and all but 15,000 feet below elevation 56'. The seismic design criteria has been increased to be consistent with site conditions and BNI is evaluating vessels, structures, equipment, and piping to assure that the design is adequate in light of the revised criteria. The focus of the piping design team has now shifted to verifying the adequacy of the completed piping and piping support designs to meet the new seismic design criteria. Civil/Structural engineers are also reviewing the completed design to assure design adequacy in light of the new seismic design criteria. On a case-by-case basis, they are releasing construction forces to begin construction of features that are impacted by the revised seismic design criteria. These activities are slowing design and construction and will delay completion of construction of the PT Facility. Hydrogen generation in piping and ancillary vessels is being evaluated by engineering. A hazards analysis has identified a number of locations within the plant where hydrogen accumulation could exceed the flammability limit and will require mitigation. PT has identified twelve generic conditions that occur in numerous locations within the plant and they are developing generic designs to mitigate the hazards. These generic conditions account for over 80% of the conditions identified. Overall the PT facility is approximately 47% complete.

LAW Facility: Through this period, LAW construction completed the elevation +28' walls and concrete slabs with the exception of two slabs over the process and effluent cells. Structural steel framing at elevation +48' is nearing completion, erection of structural steel from elevation +48' to +68' (roof elevation) is underway and concrete slab work at elevation +48' is ongoing with 3 concrete slabs placed so far. All fourteen process cell vessels have been placed in the facility (process and effluent cells). In addition, the demineralized water tank has been placed at elevation +28'. Installation of a weather enclosure around the Facility for fireproofing of structural steel and application of special protective coatings (SPC) is ongoing with fireproofing and SPC applications proceeding on schedule. All four turntables have been set in the pour caves with alignment and gear meshing work continuing. The buffer store shield doors and pour cave shield doors have been installed. HVAC, cable tray, lighting, receptacles, piping, bogie rails, fan coil unit, pumps, and heat exchanger unit installations at -21' are proceeding on schedule. Installation of HVAC is proceeding at elevation +3' and has begun at elevation +28'. LAW permit submittals and Washington State Department of Ecology (Ecology) approvals are tracking to schedule. The LAW project has no significant technical issues. Through this period, overall the LAW facility is approximately 43% complete. MACT testing of the DM1200 pilot melter system was

successfully performed demonstrating a LAW feed startup ramp rate and MACT organic spiking levels which maintain activated carbon bed temperatures within specified operating ranges. Preparations have begun to place the DM1200 pilot melter in a long-term idle mode. R&T data collected to-date was used to develop the initial computer code for use during WTP operations, for determining the amounts of glass-forming chemicals to add to the low-activity waste in the melter feed preparation vessel to produce contract compliant glass.

HLW Facility: During this period, the HLW Project proceeded with placement of eleven 0' level slabs and ten 0' level walls. Approximately 4,700 cubic yards (CY) of concrete were placed during this period. The design for walls and slabs placed after April were reviewed for their compliance with the Interim Design Criteria. Construction's performance against the baseline declined due to increased difficulty in form installations and increased quantities of structural material in placements. Engineering and fabrication work continued on several major HLW components, including the Melter Feed Preparation Vessel and Melter Feed Vessel, and the Acidic Waste Vessel, the Plant Wash and Drains Vessel, the Melter, and the HEPA filter housings. The immobilized HLW reference canister designs (i.e., 3/8 and 1/8" inch side wall thicknesses) were qualified by performing DOE required drop tests on full-sized glass-filled canisters. Through this period, overall the HLW Engineering is 84% complete and Construction is 22% complete.

BOF: The BOF project overall is approximately 52% complete (largely due to 88% design and 60% construction completion). In this period, BOF achieved substantial construction completion of the following facilities, with some punchlist items remaining: (a) Cooling Tower, (b) Fire Water Pump House, (c) Steam Plant, (d) Process/Potable Water Field Erected Tanks, and (e) Simulator Building Phase 1, Plant Wide Control System Simulation Equipment. In addition to the above BOF continues installation of underground utilities and waste transfer lines, over 95% of the underground pipe and conduit design has been issued for construction and over 80% installed.

LAB: The LAB project overall is approximately 27.5% complete (largely due to 84% design completion). In this period, the LAB: (1) Received on Site all in-slab drain pipe, C2 drain vessel and initial structural steel, (2) Released structural steel design, with the exception of miscellaneous stack related steel, (3) Completed initial basemat placements, and (4) Advanced cold method development for use of alternate technologies, Laser Ablation and X-ray Florescence.

Commodities Installations: Based on the construction activities summarized above, the total project commodities placed or installed as of June 2005 are summarized in Table 2. Note: *Planned At Completion* quantities still reflect the current trended performance baseline. The estimated quantities in the WTP 2005 EAC deliverable stayed the same or declined, with the exception of structural steel and HVAC ducting, which significantly increased.

Table 2: Key Commodity Quantity Progress

Quantity Progress	Installed To-Date	Planned At Completion
Concrete	145,710 CY	252,010 CY
Structural Steel	5,765 Ton	25,030 Ton
Piping (above ground)	40,640 Ft	872,170 Ft
Piping (underground)	88,610 Ft	109,700 Ft
Conduit (above ground)	32,180 Ft	843,440 Ft
Conduit (underground)	165,750 Ft	218,790 Ft
Cable Tray	5,580 Ft	107,720 Ft
Cable & Wire	126,850 Ft	4,867,100 Ft
HVAC Ductwork	334,060 LBs.	3,510,860 LBs.

iii. Environmental Permits Required for Start of Construction:

Permitting and Licensing: DOE and BNI continue to work closely with state and Federal regulatory agencies to maintain permits, licenses, and authorizations needed to support WTP construction and commissioning. Permits required to support construction are in place. Permit modifications are required on an ongoing basis to depict the evolving engineering design. The modifications to reflect the 2+2 melter design and technetium removal in the Dangerous Waste Permit is under review by the Washington State Department of Ecology and the license conditions for the Radioactive Air Emission License modification are in final negotiations with the Washington State Department of Health, both should be closed in the next report. A status of the various permits is provided in the table below:

Table 3: Environmental Permits Required for Start of Construction

Permit	Type	Regulatory Authority	Description/Status
Radioactive Air Emission Notice of Construction (NOC) for excavation at WTP	Radioactive air emissions	State of Washington Department of Health (WDOH)	Complete - Permit provided a mechanism to continue excavation if radioactive contamination was encountered during limited construction activities.
Concrete Batch Plant NOC	Criteria air pollutants (particulate matter)	Ecology	Complete - Permit was required for construction of the concrete batch plant during the limited construction phase and operation throughout the life of the project.
Radioactive Air Emissions NOC and National Emission Standards for Hazardous Air Pollutants (NESHAPs) approvals	Radioactive Air Emissions	WDOH and U.S. Environmental Protection Agency (EPA)	Modification Pending: Radioactive air emission approvals are required from both EPA and WDOH prior to start of construction. The status for the approvals is as follows: <ul style="list-style-type: none"> <u>NESHAPs approval:</u> (Complete). A revised approval was provided by the EPA on June 13, 2003, incorporating the 2+2 melter configuration.

Table 3: Environmental Permits Required for Start of Construction

Permit	Type	Regulatory Authority	Description/Status
			<ul style="list-style-type: none"> • <u>Radioactive Air Emissions NOC</u>: The Phase II Radioactive Air Emissions License was issued by WDOH as 4 separate approvals (PTF, HLW, LAW, and Lab) on 10/22/03. The licenses include specific conditions related to design, construction and start of commissioning. A modification for the 2+2 melter configuration was sent to WDOH February 2004. ORP has received draft license conditions and is in final stages of negotiations before approval. Separate approvals will also be required prior to receipt of radioactive waste.
Prevention of Significant Deterioration (PSD) Permit	Criteria Air pollutants (Only NOx exceeds PSD significance level)	Ecology	Complete - PSD-02-01 (Amendment 1) was issued by Ecology on November 4, 2003. The revised permit includes the 2+2 melter configuration, increased hours of operation for boilers and generators, and regulates nitrogen oxide and particulate emissions from WTP. The permit includes requirements for start up and operation of WTP facilities.
Non-Radioactive Air Emission NOC	Toxic air pollutants	Ecology	Complete - A revised Non-Radioactive air emissions Approval Order (amendment 1) was issued November 24, 2003 by Ecology. The amended Order incorporates the 2+2 melter design. The Order regulates non-radioactive (toxic) air emissions from WTP. The Approval Order includes requirements for start up and operation of WTP facilities.
Resource Conservation and Recovery Act (RCRA)/Dangerous Waste Permit	Hazardous waste management	Ecology	Modifications Pending -The Temporary Authorization to Construct was issued July 1, 2002. The permit was issued September 25, 2002. A number of subsequent approvals have been issued based on compliance schedule submittals or permit modification requests. Additional approvals are required to support construction and commissioning. Those efforts are on-going. A modification package for the 2+2 melter configuration was submitted, and is currently being reviewed by the Department of Ecology. The mandatory 10 year renewal of the Hanford Facility RCRA permit is currently being prepared.

Table 3: Environmental Permits Required for Start of Construction

Permit	Type	Regulatory Authority	Description/Status
Hanford Site Discharge Permits 4508, 09, and 10.	Discharge Permits	Ecology	Complete - Hanford Site permits support hydrotest and maintenance, cooling water and storm water discharges.
Discharge Permit ST 9240	Discharge Permit	Ecology	Complete - Construction discharge volumes were updated and a new Ecology approval was provided in September 2003. Out year discharges are under evaluation.
Sand and gravel permit – 5180	Discharge Permit	Ecology	Complete - Discharge permit for concrete batch plant
Sand and gravel permit – 5181	Discharge Permit	Ecology	Complete - Discharge permit for gravel operations
On-Site Sewage Treatment Plant	Sanitary sewer	WDOH	Complete - WDOH has indicated all required engineering and operations documentation has been submitted. WDOH has approved occupancy and issued permit.

B. NEAR TERM ISSUES

i. Seismic Design Criteria

DOE provided BNI a revised Ground Motion spectra in February 2005 to be used as the design basis for Seismic Category I (SC-I) and Seismic Category II (SC-II) Systems, Structures and Components (SSCs). The revised spectra are an increase of 40% over the earlier spectra at the peak spectral acceleration. This necessitated review and reanalysis of all SC-I and SC-II SSCs to ensure compliance with the revised design basis. DOE has developed a work release procedure with BNI to control concrete placements and other construction activities, as the review and assessment of the existing design is being performed, to minimize the risk of rework.

Design confirmation of SSCs need performance of dynamic analyses for the facility structures as the first step to obtain loads and structural responses for additional analysis for the design of the SSCs. This is a complex activity, which has been started in March 2005, and scheduled to be completed in August 2005. BNI has also developed conservative Interim Design Criteria to be used for the ongoing design (in the absence of the revised dynamic load), to support construction, fabrication and procurement. BNI has also developed a formal implementation plan to ensure all SC-I and SC-II SSCs (existing design, existing construction and future design) are reviewed and revised to the updated ground motion. These activities have further separated engineering from construction, allowing more designs to be completed. BNI is in the process of providing revised spectra to the equipment vendors to re-analyze the vessels and other equipments.

Even though the revised ground motion spectra has been formulated to bound the uncertainties with the site-specific soil properties data, DOE has decided to perform deep core drilling at WTP site to obtain site-specific data to confirm the revised spectra. This activity will take more than a year to complete.

ii. PJMs Design Closure

The BNI Research and Testing (R&T) Program successfully completed testing on the mixing systems for WTP non-Newtonian fluids. During the performance period, the Pulse Jet Mixer (PJM) Task Team issued the testing basis for the selected pulse jet mixer and sparger configurations to BNI Engineering for review and incorporation into the design for the 5 affected vessels in the Pretreatment facility. BNI will finalize the PJM design specifications and submit them to ORP for review and acceptance into the WTP Safety Basis. Once approved, BNI will release these vessels for fabrication.

iii. Hydrogen Generation

BNI Engineering has completed the "Calculation of Hydrogen Generation Rates and Times to Lower Flammability Limit" (24590-WTP-M4C-V11T-00004). The objectives of the calculation are to: 1) determine steady state hydrogen generation rates (HGRs) at the maximum expected operating temperatures for specific vessels within the PT, HLW Vitrification, LAW Vitrification, and Laboratory facilities; 2) determine the times to the hydrogen lower flammability limit (LFL) in the vessel headspaces for postulated post design basis events (DBE); and calculate HGRs, and times to LFLs, for processing AN-102 and AN-107 tank wastes in the WTP.

The emphasis in the hydrogen generation and mitigation program has shifted from the continued evaluation of hydrogen accumulation in primary process vessels to potential hydrogen accumulations in piping and ancillary vessels (HPAV). High points in some of the piping systems can accumulate hydrogen to levels above the lower flammability limit if the lines are filled with radioactive slurries for short intervals (in some cases less than an hour). BNI is conducting a systematic safety review of WTP piping and ancillary vessels and expects that most of the points of accumulation can be dealt with through a combination of design changes and administrative means such as line flushing. BNI completed the review of plant systems and components that may accumulate hydrogen, and has developed conceptual engineered designed solutions including, but not limited to: automatic high point ventilation valves, air purges, drains, air assisted blowouts, and water back flushes. Specific design changes are expected to be developed in the next six months.

iv. Alternative Ion Exchange Resin Development

To reduce the single-supplier risk, BNI is developing spherical resorcinol formaldehyde (RF) resin as an alternative to the reference SuperLig 644 resin for removal of cesium from tank waste. Stage 1 development results in 2003 indicated spherical RF performed equivalently or superior in almost all areas. The spherical RF resin has the potential to endure an increased number of regeneration cycles compared to SuperLig 644 and is expected to have substantially lower cost. Stage 2 development of RF is underway and planned complete in time for potential spherical RF resin application during commissioning. The Stage 2 scope includes assessing scale-up, batch to batch performance, multi-cycle testing, and radiolytic and thermal testing. Work completed during 2004 demonstrated adequate stability and capacity. As of the end of June 2005, Microbeads completed production of the first 100-gallon lot of spherical RF. Quality appears good based on visual inspection and product size. One gallon was shipped to Battelle for testing in June with preliminary results expected in early July. The bulk of the lot will be used at SRNL for larger scale (1/2 scale) testing in the fourth quarter of 2005.

v. Ultrafiltration System Design Review

WTP Engineering Division completed a design review of the PT Facility Ultrafiltration Process System (UFP) on July 6, 2004. The design oversight concluded: (1) the WTP process flowsheet was not optimized to remove soluble aluminum during caustic leaching and (2) modification to the sizing of the filters may be required to complete treatment of all HLW by 2028. ORP authorized a study in October to address caustic leaching effectiveness and UFP throughput. BNI issued three studies evaluating approaches to improve ultrafiltration system performance to effectively leach aluminum from tank waste solids and increase system throughput to support mission completion on June 30, 2005. ORP decisions on which approach to pursue will be made in the near future. Conclusions from each study follow:

- The first study corrected the process flowsheet to effectively leach aluminum and evaluated current equipment and system capability. The flowsheet was modified to effectively leach aluminum and minimize the impact from ultrafilter acid cleaning. The study concluded that filter surface area would need to increase by 30-60 percent, filtration temperature would need to increase from 25°C to 35°C, and filter operating logic would need to be revised for simultaneous operation to treat tank waste solids between 2011 and 2028. Other changes such as sodium molarity and feed sequencing can also improve performance.
- The second study evaluated increasing filter surface area along with associated supporting equipment impacts. The study concluded increases by approximately 25-50 percent are feasible with changes to filters, pumps, heat exchangers, pulse pots, and jumper design. Design of most of this equipment can be modified with limited impact.
- The third study evaluated caustic leaching in locations upstream of the ultrafiltration system to reduce the demand and cycle times on the ultrafiltration system. Options to leach in the ultrafiltration feed preparation vessels and the feed evaporator systems appear feasible.

vi. Quality

A Management Suspension of Work for welding was issued by Construction Management due to weld records not adequately specifying preheat requirements. The suspension resulted in retrieval of all structural weld records from the field for review and updating with standardized preheat requirement prior to re-issuance for work. Following identification that weld records often contained wrong drawing revisions, the suspension of work was extended to include all weld records. The Suspension was lifted when new weld records were issued to the field containing the standardized preheat requirements and specifying current design drawing revisions. Also, training was conducted to ensure staff were fully aware of the need to determine the preheat requirements based on the thickness of the steel being welded and to update weld cards with the current revision of design drawings at the time the cards are being used to perform welding operations and accepting welds.

Procured coaxial (pipe within a pipe) Radioactive Liquid Drain piping associated with the Analytical Laboratory was fabricated incorrectly. Clam shell welds for the outer pipe in some cases lacked full penetration required by the procurement specification. This was discovered at the construction site, involved a large number of spool pieces, and required substantial rework to address the deficiencies.

A Non-Conformance Report (NCR) has been issued for all quality (Q) level spools that were procured from commercial vendors (CM). A total of 93 spools were identified in this NCR. A root cause analysis is in progress and has identified deficiencies related to the procurement of Q items from CM vendors. Currently, there is a potential PAAA noncompliance, and the NCR identified issues that are repetitive, reflecting 1) items delivered that were not per requirements, 2) materials that were received with incorrect quality levels on multiple occasions, 3) Quality Levels (QL) not being identified and assigned correctly, 4) changes in QL are not adequately documented, 5) QL material are fabricated by commercial material (CM) vendors, and 6) QL documents are transmitted to suppliers that have not been qualified to supply QL material. The root cause analysis is scheduled to be completed by July 27, 2005, but was subsequently extended. Recommendations to address root and contributing causes will be scheduled and tracked through the Quality Assurance Information System (QAIS).

The Safety Requirements Document, an authorization basis document, requires important-to-safety structural steel welding (HLW and PTF) to be performed to ASME N690 and AWS D1.1 codes. The Contractor has written Nonconformance Reports (NCR) and Corrective Action Report (CAR) to address installed cyclic loaded structural steel in the HLW and PTF which does not meet AWS D1.1 criteria, and is in the process of upgrading the site weld manual to require the use of the more stringent AWS D1.1 code for acceptance of future structural steel welding.

DOE inspections of important-to-safety (ITS) suppliers have identified generally acceptable quality programs and performance; however, program and implementation issues identified recently at two non-ITS suppliers represented significant weaknesses with the implementation of essential welding and quality programs to ensure work meets contract and referenced code and specification requirements. Issues such as lack of appropriately qualified welders, inspectors, or weld procedures were examples of the weaknesses identified. The Contractor is taking appropriate actions to improve non-ITS supplier oversight, including issuing instructions and conducting training to supplier quality representatives to ensure they periodically assess non-ITS suppliers' quality and welding programs as they relate to procurements requirements.

3. ACTIONS TAKEN OR INITIATED TO RECOVER ANY AGREEMENT SCHEDULE SLIPPAGE

There were no Agreement schedule slippages.

4. BUDGET AND COST STATUS

Status: Through June 2005, the WTP Project has a cumulative negative schedule variance of \$108.9 million and a negative cost variance of \$68.0 million on \$2,581 million of completed work to date. The negative schedule variance is primarily attributed to the slow down in construction of the PT and HLW facilities, the associated slow down in plant equipment acquisition, and BNI engineering's reanalysis of design calculations based on the revised ground motion criteria. The negative cost variance comes mainly from engineering and construction. The anticipated impacts from the pulse jet mixer mixing and hydrogen control mitigations, and the seismic design-basis spectra update impact, are now showing reflected in these variances.

Budget: The WTP Project is level funded at \$690M/yr (FY02-FY07). Anticipated spending is about \$800M in FY05, \$750M in FY06, and \$775M in FY07, as the project slows down some of the heavy construction in the PT and HLW facilities. At these reduced spend rates, a funding shortfall through FY07 is not anticipated. However, DOE is currently evaluating the proposed BNI EAC as to how it may impact future year funding.

Costs: On April 22, 2005, BNI provided the Final 2005 WTP Project EAC to ORP. In addition to the mixing and hydrogen control impacts to cost (e.g., redesign, more piping, etc) and schedule (e.g., escalation for extended work), BNI identified a significant number of potential trends due to commodity growth, increased subcontract and procurement costs, poor engineering performance and growth, additional schedule extension, increased risk, and the preliminary estimate of the potential cost and schedule impacts from the revised seismic design basis criteria. DOE is currently evaluating its options on how to proceed, as the proposed BNI EAC represents an increase in both project cost and schedule duration.

5. DOE/DOE CONTRACTOR COMPLIANCE

ORP and BNI are completing work on a schedule that will allow achievement of agreement requirements. However, the revised seismic criteria impact, unanticipated technical problems, commodity growth, and optimistic performance estimates in engineering, procurement, and construction will likely drive the Project to exceed the current cost baseline and schedule milestones. To what extent the increased costs and construction slow down will affect the HFFACO Milestones is still being determined by DOE.

6. AREAS OF NON-COMPLIANCE

There are currently no areas of non-compliance.

7. STATUS OF HFFACO MILESTONES

The HFFACO Milestones for the Waste Treatment and Immobilization Plant, the M-62 milestone series, are listed below with full text and a status as of this report.

A. M-62-00 – Complete PT Processing and Vitrification of Hanford High Level and Low Activity Tank Wastes

Milestone Date: December 31, 2028

Description: Compliance with the work schedules set forth in this M-62 series is defined as the performance of sufficient work to assure with reasonable certainty that DOE will accomplish series M-62 major and interim milestone requirements.

DOE internal work schedules (e.g., DOE approved schedule baselines) and associated work directives and authorizations shall be consistent with the requirements of this agreement. Modification of DOE contractor baseline(s) and issuance of associated DOE work directives and/or authorizations that are not consistent with agreement requirements shall not be finalized prior to approval of an agreement change request submitted pursuant to agreement action plan section 12.0.

Status: On schedule. "River Protection Project System Plan," ORP-11242, Revision 2, model runs show completion can be met. The WTP is designed with the capacity and is progressing to support this milestone. The System Plan Revision 3 is tentatively rescheduled for release in mid 2006 following the completion of optimization studies that will support M-62-08 (i.e., Submittal of Hanford Tank Waste Supplemental Treatment Technologies Report, Draft Hanford Tank Waste Treatment Baseline, and Draft Negotiations Agreement in Principle).

*Note: Impacts due to funding shortfalls, mixing and hydrogen generation mitigations, ground motion criteria reevaluations, and commodity growths, as incorporated into the WTP Project 2005 EAC, are still being evaluated. Revised EAC's and project schedules are anticipated by December 31, 2005. Thereafter, ORP using outside expertise will review and validate actual cost and schedule impacts.

B. M-62-00A – Complete WTP PT, Processing and Vitrification of Hanford HLW and LAW Tank Wastes

Milestone Date: February 28, 2018

Description: Tank waste processing shall complete the WTP PT and vitrification of no less than 10% of Hanford's tank waste by mass* and 25% by activity.

*[In meeting this requirement DOE will pretreat and vitrify no less than 6000 metric tons of sodium (in the instance of LAW feed) and 800 metric tons of waste oxides (in the instance of HLW feed)]

Status: On schedule. "River Protection Project System Plan," ORP-11242, Revision 2, model runs show completion can be met. The WTP is designed with the capacity and is progressing to support this milestone. The System Plan Revision 3 is tentatively rescheduled for release in mid 2006 following the completion of optimization studies that will support M-62-08 (i.e., Submittal of Hanford Tank Waste Supplemental Treatment Technologies Report, Draft Hanford Tank Waste Treatment Baseline, and Draft Negotiations Agreement in Principle).

C. M-62-01 – Submit Semi-Annual Project Compliance Report

Milestone Date: Semi-Annual beginning July 31, 2000

Description: DOE's manager, ORP, will submit a "Project Compliance Report" to Ecology semi-annually (a copy of this report will also be provided to EPA's Region 10 Office of Waste and Chemicals Management). This report will document DOE compliance with agreement requirements and shall be sequentially updated by information documenting work performed and issues encountered during the previous report period. The ORP project compliance report will be provided as part of the parties' Interagency Management Integration Team meetings, and shall document the status of progress to date, progress made during the report period, and activities expected in the foreseeable future. The report will include, but is not limited to: 1) a concise description of project accomplishments and issues including those encountered during the previous year and those expected in the near term; 2) when applicable, a description of actions initiated or otherwise taken to recover any agreement schedule slippage; 3) a budget and cost status; 4) a statement documenting whether or not DOE and DOE's contractor(s) remain in compliance with agreement requirements, i.e., whether or not "DOE and DOE's contractor(s) have completed sufficient work to allow achievement of agreement requirements;" and 5) concise descriptions of any noncompliance. Copies of all pertinent DOE work directives and/or authorizations issued to DOE's contractor(s) shall be provided on request.

Status: Ongoing and on schedule. Note: The M-62-01 milestone reoccurs on a semi-annual basis, and therefore each report is identified in the HFFACO by a unique alpha character included with the M-62-01 milestone. This report is M-62-01K. In addition to this semi-annual report, DOE provides the Waste Treatment and Immobilization Plant Project accomplishments, issues, cost and schedule status, and compliance status through the monthly TPA Project Manager's Meeting and the Quarterly Milestone Review reports.

D. M-62-02 – Submittal of Hanford Tank Waste Alternatives Report

Milestone Date: March 1, 2000

Description: DOE will submit a report that describes the alternatives (technical, financial, and contractual) to treat Hanford tank waste. The report will: 1) Identify and describe credible alternatives to the current privatization approach that meet DOE commitments to achieve hot operations by December 2007, and to treat no less than 10% of the tank waste by mass and 25% of the tank waste by activity by February 2018; 2) Serve as a basis to amend the FY 2001 budget request for authority to implement a contingency option (authority to use privatization set-aside funds); and 3) Be released concurrently to Ecology, EPA, and the public.

Status: COMPLETED

E. M-62-03 – Submit DOE petition for RCRA delisting of vitrified HLW

Milestone Date: December 31, 2006

Description: DOE will submit its petition for delisting of the immobilized HLW from the Waste Treatment Plant from RCRA and the Washington State Hazardous Waste Management Act (delisting petition) in accordance with 40 CFR 260.22 and Washington Administrative Code 173-303-072.

Status: On schedule. BNI submitted a draft, ORP comments incorporated, week of January 24, 2005.

F. M-62-04T – Readiness to Proceed – Support to Phase I Treatment

Milestone Date: May 1, 2000

Description: DOE and its Hanford tank farms operations contractor will complete all necessary work and achieve readiness to proceed in support of Phase I.

Status: COMPLETED

G. M-62-06 – Start of Construction – Phase I Treatment Complex

Milestone Date: December 31, 2002

Description: First placement of structural concrete at one of the treatment complex principal facilities (i.e., PT, LAW vitrification, or HLW vitrification facilities).

Status: COMPLETED

H. M-62-07A - Initial Erection of LAW Structural Steel in the Vitrification Facility.

Milestone Date: October 30, 2003

Description: This milestone represents the placement of the first structural steel column as part of initiation of BNI Baseline Schedule activity 4DL131B000 - "LAW - Elev -21 SS Columns,

Beams & Q-Deck at +3,” (Contract No. DE-AC27-01RV14136). In addition, activity 4DL121B100 “LAW - Elev -21 Place Basemat Concrete,” shall be substantially completed and activities 4DL121D000 “LAW - Elev -21 Perimeter Walls FREP,” and 4DL121F000 “LAW - Elev -21 Interior Walls FREP,” shall have been initiated.

Completion of this milestone will be met when the first structural steel column is installed at the -21 foot elevation in the LAW facility. This milestone demonstrates significant progress in design and engineering as well as construction of the LAW facility because basemat concrete will have been poured and construction of walls will have been started. In addition, procurements will have been made, not only for this facility, but for the other major facilities. Erection of structural steel in the LAW facility will also provide lessons-learned opportunity because it will be the first facility to begin this aspect of construction.

Status: COMPLETED

- I. M-62-07B – Complete Assembly of LAW Melter #1 so that it is ready for transport and installation in the LAW vitrification building (BNI baseline schedule activity 4DL321A3200 as part of DOE Contract No. DE-AC27-01RV14136), and complete schedule activity ID 4DH46102A2 – Move #1 melter into the HLW vitrification facility.**

Milestone Date: December 31, 2007

Description: This milestone represents: 1) the assembly of LAW Melter #1 to the point it is ready for Refractory as part of BNI Baseline activities 3EL3212A00 “Specifications and Analysis,” 4DL321A000 “LAW - Procure Material & Equipment for Melters,” and 4DL321A200 “LAW- Assemble Melter #1,” (Contract No. DE-AC27-01RV14136). In addition, activities 4DL121U100 “LAW - Elev +3 South Melter FREP,” and 4DL131D000 “LAW - Elev +28 Columns, Beams & Q-Decking at +48,” shall be substantially completed; and 2) moving the first HLW melter into the HLW facility as defined in BNI baseline activities ID 4DH46102A2.

Completion of this milestone will be met when: 1) LAW melter #1 will have been fully fabricated, assembled and ready for refractory material to be installed. Assembly of the melter is scheduled to occur near the end of LAW construction when the facility is most ready to have the assembled melter moved into the LAW cell where the refractory material will be installed. Meeting this milestone therefore represents significant accomplishment of the engineering, design and construction of the LAW facility; and 2) HLW melter #1 has been fully fabricated and moved into the HLW vitrification facility.

Status: The melter procurement contract for the LAW and HLW melters was awarded July 29, 2004. Note: Impacts due to funding shortfalls, mixing and hydrogen generation mitigations, ground motion criteria reevaluations, and commodity growths, as incorporated into the WTP Project 2005 EAC, are still being evaluated. Revised EAC’s and project schedules are anticipated by December 31, 2005. Thereafter, ORP using outside expertise will review and validate actual cost and schedule impacts.

- J. M-62-08 – Submittal of Hanford Tank Waste Supplemental Treatment Technologies Report, Draft Hanford Tank Waste Treatment Baseline, and Draft Negotiations Agreement in Principle (AIP).**

Milestone Date: June 30, 2006

Description: DOE will submit a supplemental treatment technologies report that describes the technical, financial, and contractual alternatives which in combination with the WTP and any

required additional LAW vitrification facilities, are needed to treat all of Hanford's tank wastes. The report will identify and describe viable path(s) forward to complete treatment of all tank wastes by December 31, 2028. The report shall apply the same selection criteria to all options and include the 2nd LAW vitrification facility as an option. The report will include: the results of all waste form performance data (compared against the performance of borosilicate glass) for all the treatment technologies being considered; performance data will be adequate to make decisions as to the acceptability of any proposed waste form for the waste being considered, and description of the considered treatment technologies (including size, throughput, technical viability, and life cycle cost estimates).

This report will also include a discussion of waste treatment plant throughput commitments and the realistic potential for enhancing the throughput of currently planned melters, proposed additional melters and potential second generation melters installed at first melter change out.

The draft baseline will contain DOE's proposed approach for treating all Hanford tank wastes (HLW, LAW, and Transuranic [TRU]) by December 31, 2028, including life cycle cost estimates that indicate projected funding requirements through completion of the RPP mission, a schedule for construction and operation of proposed new facilities and/or enhancements to the WTP, and projected throughput for each facility.

The report and baseline will be accompanied by a draft negotiations AIP and draft agreement change request containing milestones and associated agreement requirements sufficient to effectively drive all required work, including but not limited to: 1) the establishment of requirements regarding any necessary WTP modification(s); 2) the establishment of requirements scheduling the acquisition and operation of any approved treatment technology systems; 3) the establishment of production metrics for treatment complex (WTP plus any supplemental treatment system or second LAW vitrification facility) consistent with completion of treatment by December 31, 2028; and 4) the establishment of requirements scheduling acquisition and operation of feed delivery systems for any approved supplemental technology (M-47 milestones). The AIP will be finalized within 30 days of submittal and provide that negotiations will be completed within one hundred and eighty (180) days of AIP finalization, and will provide that, in the event the parties do not reach agreement within this timeframe, the negotiations will be resolved as a resolution of a dispute via final determination of the Director of Ecology pursuant to HFFACO Article VIII. Unless otherwise agreed by the parties, this final determination will be issued within seven months of AIP finalization.

Status: Change Package M-62-04-01, approved by Ecology on March 21, 2005, extended the due date for M-62-08 to June 30, 2006. Currently behind schedule; however, special project management teams are working to recover the schedule.

K. M-62-09 - Start Cold Commissioning - Waste Treatment Plant

Milestone Date: February 28, 2009

Description: DOE will start cold commissioning of its tank waste treatment plant. Start of cold commissioning is defined as introduction of first feed simulant into a process building.

Status: Impacts due to mixing and hydrogen generation mitigations, ground motion criteria reevaluations, and commodity growth, as incorporated into the WTP Project 2005 EAC, are still being evaluated. Revised EAC's and project schedules are anticipated by December 31, 2005. Thereafter, ORP using outside expertise will review and validate actual cost and schedule impacts.

L. M-62-10 - Complete Hot Commissioning - Waste Treatment Plant

Milestone Date: January 31, 2011

Description: DOE will achieve sustained throughput of PT, LAW vitrification, and HLW vitrification processes and demonstrate WTP treatment complex availability to complete treatment of no less than 10% of the tank waste by mass and 25% of the tank waste by activity by December 2018.

Status: Impacts due to mixing and hydrogen generation mitigations, ground motion criteria reevaluations, and commodity growth, as incorporated into the WTP Project 2005 EAC, are still being evaluated. Revised EAC's and project schedules are anticipated by December 31, 2005. Thereafter, ORP using outside expertise will review and validate actual cost and schedule impacts.

M. M-62-11 - Submit A Final Hanford Tank Waste Treatment Baseline

Milestone Date: June 30, 2007 (See M-62-10)

Description: Following the completion of negotiations required in M-62-08, DOE will modify its draft baseline as required and submit its revised, agreed-to, baseline for treating all Hanford tank waste (HLW, LAW, and TRU) by December 31, 2007.

Status: Change Package M-62-04-01, approved by Ecology on March 21, 2005, extended the due date for M-62-11 to June 30, 2007. Preparation of revised baseline is on schedule.