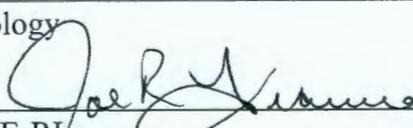
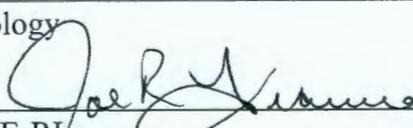
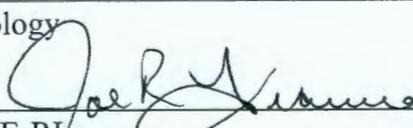
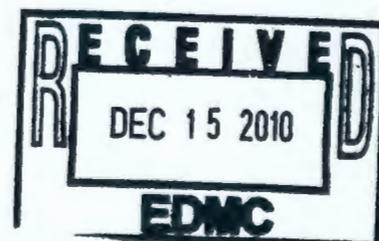


Change Number M-16-10-06	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date 12/08/2010																														
Originator Jose R. Franco, Jr.		Phone (509) 376-4343																														
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager																																
Change Title Modification of <i>Hanford Federal Facility Agreement and Consent Order</i> (HFFACO) M-016-140 Interim Milestone																																
Description/Justification of Change Approval of this change package will provide for additional time to adequately prepare a RD/RAWP for K Basin Sludge Treatment and Packaging. The requirement to prepare the RD/RAWP will be removed from M-016-140, and separate target milestone dates are established to provide annual status on developing the technology and capability to treat and package the K Basin sludge. Additional interim milestone dates and target milestone dates are being established for activities that accelerate removal of the sludge from the 105-K West Basin.																																
Impact of Change This change allows the schedule for development of the RD/RAWP for K Basin Sludge Treatment and Packaging to coincide with the expected progress of the project. Additional milestones have been developed to track progress toward achieving treatment and packaging capability for K Basin Sludge.																																
Affected Documents The <i>Hanford Federal Facility Agreement and Consent Order</i> , as amended and Hanford Site internal planning management, and budget documents (e.g., USDOE contractor Baseline Change Control documents).																																
Approvals <table border="0" style="width: 100%;"> <tr> <td style="width: 40%; border-bottom: 1px solid black;">N/A</td> <td style="width: 15%; border-bottom: 1px solid black;">12/11/10</td> <td style="width: 10%; border-bottom: 1px solid black;"></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>Ecology</td> <td>Date</td> <td></td> <td></td> <td></td> </tr> <tr> <td style="border-bottom: 1px solid black;"></td> <td style="border-bottom: 1px solid black;">12/10/2010</td> <td style="border-bottom: 1px solid black;">X</td> <td style="border-bottom: 1px solid black;">Approved</td> <td style="border-bottom: 1px solid black;">Disapproved</td> </tr> <tr> <td>DOE-RI</td> <td>Date</td> <td></td> <td></td> <td></td> </tr> <tr> <td style="border-bottom: 1px solid black;"></td> <td style="border-bottom: 1px solid black;">12/14/10</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 <input checked="" type="checkbox"/></td> </tr> <tr> <td>EPA</td> <td>Date</td> <td></td> <td></td> <td></td> </tr> </table>			N/A	12/11/10		Approved	Disapproved	Ecology	Date					12/10/2010	X	Approved	Disapproved	DOE-RI	Date					12/14/10		Approved	Disapproved <input checked="" type="checkbox"/>	EPA	Date			
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Description/Justification, Continued from Page 1

The RD/RA Work Plans to complete treatment and packaging of sludge will not be available by the March 31, 2011 Milestone completion date thus placing the entire M-016-140 interim Milestone in jeopardy.

The M-016-140 Milestone was negotiated in 2008 to promote integration of K Basin Sludge Treatment Project (STP) with 100 K Area closure activities and premised upon establishing a treatment facility within the 100 K Area. Consistent with the DOE-RL 2015 Vision to complete cleanup of the River Corridor by 2015, RL has shifted its approach from performing treatment of sludge in the 100K area to accelerating the removal of the K Basin sludge from the river corridor, by five to nine years, and placing it in safe storage on the Central Plateau pending development of final sludge treatment capabilities.

Treating sludge away from the 100 K Area provides the following advantages:

- Accelerates removal of sludge from the river corridor by approximately 5-9 years, reducing risk to the Columbia River and groundwater.
- Accelerates the removal of 100 K Area structures and completion of soil remediation activities.
- Reduces the environmental risk associated with storing and treating sludge near the river.
- Increases public safety through avoidance of potential accidents and consequences to the public associated with treatment and storage of sludge near the river.
- Avoids the cost of designing, constructing, testing, and operating a Category 2 Nuclear Treatment Facility on the Columbia River focused on a single waste stream.
- Avoids the future costs associated with decommissioning, demolishing, and disposing of the treatment facility.
- Enhances worker safety and equipment operability by minimizing the placement of new equipment within the K West Basin and in-basin sludge handling activities.

The Sludge Treatment Project has made significant progress toward removal of K Basin sludge for interim storage and identification of an appropriate treatment technology; accomplishments include:

- Successful retrieval of all settler tank sludge into an in-basin container.
- Completed sampling of sludge in five of the six in-basin containers; sampling of the sixth container is in progress and will be completed early in FY2011.
- Completed conceptual design for the removal of the Engineered Container (KE & KW floor, pit, and Settler Tube) sludge retrieval system.
- Completed preliminary design for the knockout pot material processing system.
- Implemented a rigorous testing program to ensure the technical readiness of the sludge retrieval systems that will be deployed in the KW Basin.

Description/Justification, Continued from Page 1

- Started a treatment and packaging technology evaluation that will be concluded with a formal down-select process and treatment recommendation in FY2011. EPA will be invited to participate in the down-select process.

RL intends to prepare a single RD/RA Work Plan that includes scope to complete the following elements of the M-016-140 milestone:

- Complete removal of all sludge (includes container, settler tank sludge) from K West Basin except knock out pot contents
- Complete removal of knock out pot contents
- Complete treatment and packaging of first container of TRU sludge waste certifiable for disposal at WIPP
- Complete treatment and packaging of sludge for disposal at WIPP

A design phased approach to complete the treatment and packaging of sludge will be introduced and modeled after the approach identified and successfully implemented, with EPA involvement, in the 221-U Facility RD/RA Work Plan. This single RD/RA Work Plan will include proposed target dates and interim milestones that build on recent project accomplishments and provide measureable progress to select and establish a suitable sludge treatment and packaging capability.

Description/Justification, Continued from Page 1

Modifications to existing Tri-Party Agreement milestone M-016-140 are denoted with ~~strikeout~~; new milestones/text are denoted with double underline.

M-016-140	Submit Revised RD/RA Work Plans For 100 K Area RODs As Primary Document(S) Per HFFACO 11.6 With New Proposed Milestones Including For The Following: <ul style="list-style-type: none"> • Complete Removal Of The K West Basin • Complete Removal Of All Sludge (Includes Container, Settler Tank Sludge) From K West Basin Except Knock Out Pot Contents • Complete Removal Of Knock Out Pot Contents • Complete Treatment And Packaging Of First Container Of TRU Sludge Waste Certifiable For Disposal At WIPP • Complete Treatment And Packaging Of Sludge For Disposal At WIPP • Begin 105-KW Reactor Interim Safe Storage • Complete 105-KW Reactor Interim Safe Storage • Initiate Soil Remediation Under K West Basin • Complete All Interim Response Actions At The 100 K Area 	03/31/2011
<u>M-016-170-T01</u>	<u>Complete KOP material pre-treatment</u>	<u>09/30/2011</u>
<u>M-016-171</u>	<u>Complete K Basin sludge treatment and packaging technology evaluation report</u>	<u>03/31/2012</u>
<u>M-016-172-T01</u>	<u>Complete KOP material removal from 105-K West Basin</u>	<u>09/30/2012</u>
<u>M-016-173-T01</u>	<u>Select K Basin sludge treatment and packaging technology</u>	<u>03/31/2013</u>
<u>M-016-174-T01</u>	<u>Complete final design of sludge retrieval and transfer system</u>	<u>09/30/2013</u>
<u>M-016-175</u>	<u>Begin sludge removal from 105-K West Basin</u>	<u>09/30/2014</u>
<u>M-016-176-T01A</u>	<u>Submit annual update (e.g., letter report) on development of treatment and packaging capability until a performance management baseline is implemented upon STP Phase 2, CD-2 approval</u>	<u>09/30/2011</u>
<u>M-016-176-T01B</u>	<u>Submit annual update (e.g., letter report) on development of treatment and packaging capability until a performance management baseline is implemented upon STP Phase 2, CD-2 approval</u>	<u>09/30/2012</u>

Description/Justification, Continued from Page 1

<u>M-016-176-T01C</u>	<u>Submit annual update (e.g., letter report) on development of treatment and packaging capability until a performance management baseline is implemented upon STP Phase 2, CD-2 approval</u>	<u>09/30/2013</u>
<u>M-016-176-T01D</u>	<u>Submit annual update (e.g., letter report) on development of treatment and packaging capability until a performance management baseline is implemented upon STP Phase 2, CD-2 approval</u>	<u>09/30/2014</u>
<u>M-016-176-T01E</u>	<u>Submit annual update (e.g., letter report) on development of treatment and packaging capability until a performance management baseline is implemented upon STP Phase 2, CD-2 approval</u>	<u>09/30/2015</u>
<u>M-016-176-T01F</u>	<u>Submit annual update (e.g., letter report) on development of treatment and packaging capability until a performance management baseline is implemented upon STP Phase 2, CD-2 approval</u>	<u>09/30/2016</u>
<u>M-016-176-T01G</u>	<u>Submit annual update (e.g., letter report) on development of treatment and packaging capability until a performance management baseline is implemented upon STP Phase 2, CD-2 approval</u>	<u>09/30/2017</u>
<u>M-016-176-T01H</u>	<u>Submit annual update (e.g., letter report) on development of treatment and packaging capability until a performance management baseline is implemented upon STP Phase 2, CD-2 approval</u>	<u>09/30/2018</u>
<u>M-016-177</u>	<u>Complete sludge removal from 105-K West Basin</u>	<u>12/31/2015</u>