



Department of Energy

Richland Field Office
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SEP 23 1992

92-RPB-229

Mr. Paul T. Day
Hanford Project Manager
U.S. Environmental Protection Agency
712 Swift Blvd. Suite 5
Richland, Washington 99352

Mr. David B. Jansen, P.E.
Hanford Project Manager
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504-7600



Dear Messrs. Day and Jansen:

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER CHANGE CONTROL FORM M-20-92-3, "MODIFY PLUTONIUM URANIUM EXTRACTION PLANT PART B PERMIT APPLICATION INTERIM MILESTONE M-20-24"

Enclosed for your review and approval is another copy of the subject Class II Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Change Control Form. This change control form was prepared to establish a new interim milestone for submittal of a Part B permit application or closure plan for the Plutonium-Uranium Extraction (PUREX) Plant in fulfillment of Tri-Party Agreement Interim Milestone M-20-24.

Your letter dated August 17, 1992, requested the resubmittal of the subject change control form reflecting closure as the planning base for the PUREX Plant. The original submittal reflected either submitting a Part B permit application or a closure plan by July 1995. A formal decision to terminate operations and close the PUREX Plant has not been completed. At the present time, transition to standby is nearly completed; however, future plans for the plant remain uncertain. Until a decision is made regarding future operating plans or final shutdown conditions for the PUREX Plant, a milestone requiring the closure of PUREX cannot be negotiated. Once a decision has been formally completed, the change control form can be revised to reflect the outcome of the decision; however, at this time both options (Part B permit application or closure) must be available.

Interim Milestone M-20-24 presently requires that a Part B Dangerous Waste permit application for the PUREX Plant be submitted by September 30, 1992. Your letter stated that a July 1995, submittal date was acceptable. Since a formal decision to terminate operations and close the PUREX Plant will not be complete by September 1992, it is requested that this change control form be approved with both the Part B permit application and the closure options

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included. When the future mission for the PUREX Plant has been determined, permitting requirements will be assessed and a new change control form can be submitted, at the State of Washington Department of Ecology's (Ecology) request, to support implementation of that mission.

The original copy of the change request has been delivered via this letter to the Ecology for disposition. Upon disposition, Ecology is requested to forward the original to the U.S. Environmental Protection Agency.

Should you or your staff have any questions regarding the enclosed change control form you may contact me on (509) 376-6798, or Mr. C. E. Clark on (509) 376-9333.

Sincerely,



Steven H. Wisness
Hanford Project Manager

RPB:CEC

Enclosure

cc w/encl:

R. C. Bowman, WHC
D. L. Duncan, EPA
R. E. Lerch, WHC
J. C. Midgett, WHC
B. A. Austin, WHC
T. M. Michelena, Ecology

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Change Number M-20-92-3	Federal Facility Agreement and Consent Order Change Control Form	Date July 29, 1992
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Originator M. W. Cline	Phone (509) 376-9739
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Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager
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Change Title Modify PUREX Plant Part B Permit Application Interim Milestone M-20-24.

Description/Justification of Change - Interim Milestone M-20-24 requires that a Part B Dangerous Waste Permit Application be submitted for the PUREX Plant by September 1992. In October of 1990, The Secretary of Energy ordered that the PUREX Plant be placed in a standby condition pending issuance of the Irradiated Fuels Environmental Impact Statement Record of Decision. At the present time, transition to standby is nearly completed; however, future plans for the plant remain uncertain. Until a decision is made regarding future operating plans for the final shutdown conditions for the PUREX Plant, preparation and submittal of a Part B permit application as outlined in the Hanford Federal Facility Agreement and Consent Order Milestone M-20-24 is not considered practical. During standby operations, it is anticipated that Tanks U3, U4, and F18 of those tanks identified in the Part A permit application, and in the Notice of Intent currently in process, will be used for the storage and treatment of dangerous waste.		
Number M-20-24	Milestone Submit PUREX Plant Part B permit application or closure plan.	Due Date July 1995

Impact of Change - This change does not impact other Hanford Federal Facility Agreement and Consent Order Milestones.

Affected Documents - Hanford Federal Facility Agreement and Consent Order, Appendix D, Action Plan, Table D-3, Figure D-1.
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Approvals	<input type="checkbox"/> Approved	<input type="checkbox"/> Disapproved
		5/23/92
DOE S. H. Wisness		Date
EPA P. T. Day		Date
Ecology D. B. Jansen		Date

CORRESPONDENCE DISTRIBUTION COVERSHEET

Author	Addressee	Correspondence No.
S. H. Wisness, RL	P. T. Day, EPA D. B. Jansen, Ecology	Incoming: 9206584 Xref. ltr. 9256427D

Subject: Hanford Federal Facility Agreement and Consent Order Change Control Form M-20-92-3, "Modify Plutonium Extraction Plant Part B Permit Application Interim Milestone M-20-24"

INTERNAL DISTRIBUTION

Approval	Date	Name	Location	w/att
		Correspondence Control	A3-01	X
		President's Office		
		B. A. Austin	B2-35	X
		J. R. Bellomy	G6-02	X
		R. J. Bliss	B3-04	X
		R. V. Bowersock	S6-19	X
		R. C. Bowman	H4-57	X
		S. L. Bradley	B3-06	
		D. B. Cartmell	R3-56	x
		G. D. Carpenter	B2-16	X
		L. E. Clay	S6-19	X
		M. W. Cline	H4-57	
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		G. D. Forehand	B2-35	X
		C. J. Geier	B2-19	X
		K. A. Hadley	R3-56	X
		M. J. Hall	B2-19	X
		D. G. Harlow	S6-17	X
		G. W. Jackson, Assignee	B2-35	X
		R. J. Landon	B2-19	X
		G. J. LeBaron	S6-19	X
		R. E. Lerch	B2-35	
		P. J. Mackey	B3-15	X
		H. E. McGuire, Level 1	B3-63	
		J. C. Midgett	S6-16	X
		L. E. Michael	H4-22	X
		R. D. Morrison	B2-35	X
		S. M. Price	H4-57	X
		R. C. Roal	S6-08	X
		F. A. Ruck	H4-57	X
		EDMC	H4-22	X
		TPA File (M-20)	B2-35	X
		D. R. Dillie	B3-50	X
		F. D. Lee	B3-62	X
		L. R. Olsen	B3-62	X
		E. P. Vodney		X
		G. M. Wise	B3-70	X



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