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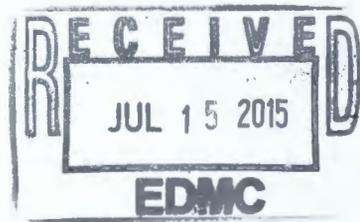
STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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July 14, 2015

15-NWP-128

Mr. Kevin W. Smith, Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352



Re: Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Change Control Form, Change Number M-45-15-03, Dated June 25, 2015

Dear Mr. Smith:

Enclosed is a copy of Tri-Party Agreement Change Control Form M-45-15-03, "Submit complete permit modification requests for Tiers 1, 2 and 3 (see Appendix I) of the SST System . . ." This request for modification to the due date and wording of the M-045-82 milestone was approved by Tom Fletcher, Office of River Protection (ORP) on June 29, 2015.

The Department of Ecology (Ecology) received the request on June 30, 2015. In accordance with the procedures of the Tri-Party Agreement (TPA) Action Plan, Section 12.3.3, Ecology has disapproved this request. The signed, disapproved Form is enclosed.

In accordance with Section 12.3.3, the basis for the Ecology disapproval is as follows:

1. The Form does not cite a "Good Cause for Extensions" in the form's Description/Justification of Change that meets the TPA requirements. Specifically, the Form states that "information required from the performance assessment as well as information from some WMA C components will not be available by the current milestone date."

TPA Paragraph 120.B states: "A delay caused by another Party's failure to meet any requirement of this Agreement." ORP's failure to fund and complete the performance assessment, despite Ecology's objections, most closely fits the circumstances described by TPA Paragraph 120B, and the Description/Justification of Change should be modified to more accurately reflect need for modification.

2. The Form does not describe all of the Impact of Change. Ecology wishes to work with ORP to develop a logic diagram (based on TPA Appendix I, Figure I-1) that describes the sequence of activities that are necessary to complete the milestone. The logic diagram is necessary in order to describe all of the Impact of Change.

M-045-82
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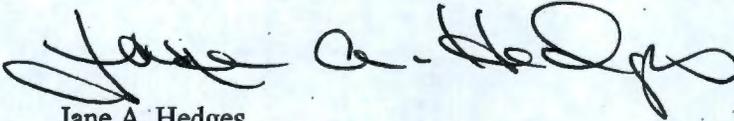


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If you have any questions, please contact John Price, TPA Section Manager, at (509) 372-7921 or john.price@ecy.wa.gov.

Sincerely,



Jane A. Hedges
Program Manager
Nuclear Waste Program

jp/tkb
Enclosure

cc electronic w/enc:

Dennis Faulk, EPA
Tom Fletcher, USDOE-ORP
Chris Kemp, USDOE-ORP
Cliff Clark, USDOE-RL
Jon Perry, MSA
Rob Piippo, MSA
Ken Niles, ODOE
Jeff Lyon, Ecology
John Price, Ecology
Environmental Portal
Hanford Facility Operating Record
USDOE-ORP Correspondence Control
USDOE-RL Correspondence Control

cc w/enc:

Steve Hudson, HAB
Administrative Record
NWP Central File

cc w/o enc:

Rod Skeen, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN
NWP Reader File