



Change Number P-08-23-01	Federal Facility Agreement and Consent Order Change Control Form		Date 08/02/2023
Originator Mark French, DOE-RL			Phone 509-373-9863
Class of Change <input type="checkbox"/> I – Signatories <input checked="" type="checkbox"/> II – Executive Managers <input type="checkbox"/> III – Project Managers			
Change Title Update to TPA Action Plan, Section 8.0, Facility Disposition Process			
Description/Justification of Change <p>This change control form updates Tri-Party Agreement (TPA) Action Plan, Section 8.1.2 to reflect current status and Sections 8.1.3 and 8.1.4 to incorporate 400 Area facilities. The Tri-Party agencies have agreed to utilize the <i>Comprehensive Environmental Response, Compensation, and Liability Act</i> (CERCLA) to disposition the Fast Flux Test Facility (FFTF) complex structures in the 400 Area. The FFTF Reactor Building is identified in Table 8-1 as a “key” facility. The facility evaluation process was conducted to designate remaining FFTF complex structures in accordance with Section 8.0. This change to the TPA Action Plan explicitly recognizes the application of CERCLA response actions and the facility evaluation process to the 400 Area facilities.</p>			
Impact of Change <p>This change control form updates facility information status in Section 8.1.2 and incorporates 400 Area facilities into Sections 8.1.3 and 8.1.4.</p> <p>This change control form was worked in conjunction with TPA Change Control Form J-23-01 to implement corresponding changes in TPA Action Plan, Appendix J, Central Plateau Facilities and 100 Area Production Reactors.</p> <p>No work schedules or milestones are impacted by this change.</p>			
Affected Documents <p>The <i>Hanford Federal Facility Agreement and Consent Order</i> (Tri-Party Agreement), as amended. TPA Action Plan, Section 8.0, Facility Disposition Process.</p>			
Approvals			Page 1 of 6
Dale, Heather L	Digitally signed by Dale, Heather L Date: 2023.08.24 12:43:43 -07'00'	Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/>	
H.L. Dale, DOE-RL	8/24/23 Date		
N/A		Approved <input type="checkbox"/> Disapproved <input type="checkbox"/>	
D.L. Noyes, DOE-ORP	Date		
	Digitally signed by DAVID EINAN Date: 2023.08.31 13:49:51 -07'00'	Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/>	
D.R. Einan, EPA	Date		
	Digitally signed by Schleif, Stephanie (ECY) Date: 2023.08.24 14:11:49 -07'00' Adobe Acrobat version: 2023.003.20269	Approved <input checked="" type="checkbox"/> Disapproved <input type="checkbox"/>	
D.B. Bowen, Ecology	Date		

Authorized Changes

Modifications to TPA Action Plan, Section 8.0 are displayed by using double underline to indicate added text and ~~strikeout~~ to indicate deleted text.

8.1.2 Applicability

Section 8.0 was applied to the transition, the S&M and/or the disposition of key facilities located on the Hanford Site that were not fully addressed under Section 6.0, TSD Process, or Section 7.0, Past-Practice Process, of this Action Plan. As used in Section 8, the term “facility” is defined to mean buildings and structures used for material handling and processing, storage, maintenance, administrative, or support activities on the Hanford Site and is not to be confused with the term “facility” as defined under WAC 173-303-040, CERCLA or RCRA. Facilities may be above or below grade and may be contaminated or uncontaminated.

Key Facilities subject to this Section 8.0 process identified by the parties included the following: PUREX, PFP (234-5Z and 236Z), B Plant, FFTF, UO3 Plant, U Plant, REDOX (202-S Building), and DOE’s old reactor buildings (specifically: 105-B, 105-C, 105-F, 105-D, 105-DR, 105-H, 105-KE, 105-KW, and 105/109-N buildings). As of ~~February 2010~~ August 2023, the key facilities have been retired from active operation and are either:

- (1) ~~in S&M mode~~ Undergoing a removal action pending final disposition (e.g., B Plant, REDOX, and PUREX),
- (2) Have final disposition decisions that are being implemented (e.g., U Plant ~~and PFP~~), or
- (3) Have completed their ~~primary~~ disposition phase (e.g., PFP), or
- (4) Have completed an interim disposition phase and are being monitored in (e.g., interim safe storage monitoring, which includes (e.g. most of the reactor buildings). The status of each of the key facilities is described in Table 8-1.

Table 8-1. Status of “Key Facilities” as of ~~March 2010~~ August 2023

Facility	Status
Canyon Buildings	
PUREX	<p>Deactivated in accordance with PUREX/UO3 Deactivation Project Management Plan (WHC-SP-1011D) and PUREX Deactivation End Point Criteria (WHC-SD-TPP-053). S&M performed in accordance with Surveillance and Maintenance Plan for the PUREX Facility (DOE/RL-98-35). <u>Removal action activities (including S&M) in accordance with the Removal Action Work Plan for the PUREX Complex (DOE/RL-2020-04).</u></p> <p>Final disposition to be addressed using CERCLA remedial action coordinated with RCRA closure. Completion schedules to be established with RI/FS Work Plans and RD/RA Work Plans in accordance with Action Plan Section 11.6 (M-085 milestones) and closure conditions/schedules established in the Hanford Facility Dangerous Waste Permit.</p>

Table 8-1. Status of “Key Facilities” as of ~~March 2010~~ August 2023

Facility	Status
B Plant	<p>Deactivated in accordance with B Plant End Points Document (WHC-SD-TPP-054). S&M performed in accordance with Surveillance and Maintenance Plan for the 221-B Facility (B Plant) (DOE/RL-99-24).</p> <p><u>Removal action activities (including S&M) in accordance with the Removal Action Work Plan for the B Plant Complex (DOE/RL-2020-45).</u></p> <p>Final disposition to be addressed using CERCLA remedial action coordinated with RCRA closure. Completion schedules to be established with RI/FS Work Plans and RD/RA Work Plans in accordance with Action Plan Section 11.6. (M-085 milestones)</p>
U Plant	<p>Retired from active operations in approximately 1964; not formally deactivated.</p> <p>Final disposition and interim S&M in accordance with the Record of Decision for the 221-U [EPA 2005] and Remedial Design/Remedial Action Work Plan (DOE/RL-2006-21). <u>Demolition preparation was completed in 2011.</u> (M-016 milestones)</p> <p><u>Demolition and barrier installation is awaiting disposition of surrounding waste sites under a decision for the 200-WA-1 Operable Unit.</u></p>
<u>T Plant</u>	<u>Currently operating to support cleanup mission.</u>
REDOX	<p>Retired from active operations in 1967; limited deactivation. S&M performed in accordance with Surveillance and Maintenance Plan for the REDOX Facility (DOE/RL-98-19).</p> <p><u>Removal action activities (including S&M) in accordance with the Removal Action Work Plan for the REDOX Complex (DOE/RL-2017-06).</u></p> <p>Final disposition to be addressed using CERCLA remedial action. Completion schedules to be established with RI/FS Work Plans and RD/RA Work Plans in accordance with Action Plan Section 11.6. (M-085 milestones)</p>
Production Reactor Buildings	
105-B	<p>S&M performed in accordance with Surveillance and Maintenance Plan for 105-B Reactor Facility (DOE/RL-2001-68).</p> <p>Because the reactor was designated a National Historic Landmark in August 2008, further management and disposition to be addressed in accordance with Nation Park Service requirements. No further CERCLA response action is anticipated.</p>
105-C	<p>In interim safe storage with S&M performed in accordance with Surveillance and Maintenance Plan for 105-C Reactor Safe Storage Enclosure (DOE/RL-98-44). Final disposition to be determined (M-093 milestones).</p>
105-D	<p>In interim safe storage with S&M performed in accordance with Surveillance and Maintenance Plan for 105-D Reactor Safe Storage Enclosure (DOE/RL-2004-59). Final disposition to be determined (M-093 milestones).</p>
105-DR	<p>In interim safe storage with S&M performed in accordance with Surveillance and Maintenance Plan for 105-DR Reactor Safe Storage Enclosure (DOE/RL-2002-28). Final disposition to be determined (M-093 milestones).</p>
105-F	<p>In interim safe storage with S&M performed in accordance with Surveillance and Maintenance Plan for 105-F Reactor Safe Storage Enclosure (DOE/RL-2003-45). Final disposition to be determined (M-093 milestones).</p>

Table 8-1. Status of “Key Facilities” as of ~~March 2010~~ August 2023

Facility	Status
105-H	In interim safe storage with S&M performed in accordance with Surveillance and Maintenance Plan For 105-H Reactor Safe Storage Enclosure (DOE/RL-2005-67). Final disposition to be determined (M-093 milestones).
105-KE 105-KW	To be dispositioned in accordance with Removal Action Work Plan for 105-KE/KW Reactor Facilities and Ancillary Facilities (DOE/RL-2005-26). <u>Interim safe storage of 105-KE was completed in 2022.</u> Completion schedules for 105-KW are to be established in accordance with Action Plan Section 11.6. <u>Final disposition of 105-KE and 105-KW to be determined (M-093 milestones).</u>
105/109-N	In interim safe storage with S&M performed in accordance with Surveillance and Maintenance Plan for the 105-N/109-N Reactor Safe Storage Enclosure (DOE/RL-2011-06). Final disposition to be determined (M-093 milestones).
Others	
PFP (234-5Z and 236Z)	Demolition of above ground structures <u>Dispositioned</u> in accordance with Non-Time Critical Removal Action Memorandum for PFP Above Ground Structures (DOE/RL-2005-13). <u>Any remaining scope below grade will be addressed as waste sites within the 200-WA-1 Operable Unit.</u> Completion schedules have been established in accordance with Action Plan Section 11.6. (M-83 milestones)
FFTF	<u>FFTF complex placed in a safe S&M condition in 2009 in accordance with Milestone M-081-00A.</u> S&M being performed in accordance with Surveillance and Maintenance Plan for the Fast Flux Test Facility (DOE/RL-2009-26) in accordance with milestone M-081-00A. <u>An EE/CA was issued May 2023 which evaluated alternatives for a non-time-critical removal action for FFTF Tier 1 and Tier 2 non-operational facilities.</u>
UO3 Plant	Deactivated in accordance with PUREX/UO3 Deactivation Project Management Plan (WHC-SP-1011D). Dispositioned in progress in accordance with Action Memorandum for Non-Time Critical Removal Action for U-Plant Ancillary Facilities (DOE/RL-2004-67) and U Plant Ancillary Facilities Removal Action Work Plan (DOE/RL-2004-83). Completion schedules have been established in accordance with U Plant Ancillary Facilities Removal Action Work Plan (DOE/RL-2004-83).

8.1.3 Disposition of Other Facilities

Other facilities that the parties agree are subject to Section 8.0 will be dispositioned in accordance with the provisions of this section and any milestones established specific to those facilities. If there is a conflict between the provisions of this section and of a specific milestone, the provisions of the milestone will prevail. This section does not apply to the following:

- RCRA treatment or storage units either fully closed or scheduled for closure under Section 6.0 that result in the final disposition of the facility.

- Any facility which is fully addressed as part of a past practice operable unit under Section 7.0 of this action plan (i.e., N-area pilot project).

Additional facilities will be identified by the parties for CERCLA response actions on a case by case basis, using the following general criteria:

- Facilities that do not fall into any of the categories summarized in the bullets above,
- Facilities that will undergo a surveillance and maintenance period greater than 180 days with hazardous substances to be left in place,
- Facilities where either physical closure actions or waste unit remediation must be performed in conjunction with facility disposition, and/or
- Central Plateau and 400 Area facilities identified during the graded approach (Facility Evaluation) identified and incorporated into Appendix J of the Action Plan.

Facilities on the Central Plateau will be characterized to determine the hazards and risks. A Facility Evaluation, described in Section 8.1.4 will be completed for these facilities to determine how the graded approach will be applied. The Facility Evaluation will place a facility into one of the following tiers:

- **Tier 1 facilities** are facilities historically designated as “Key” (Section 8.1.2) or other complex facilities that played a major role in Hanford’s primary mission activities related to nuclear materials. Tier 1 facilities are generally large heavily shielded metal and concrete structures containing tanks, heavily shielded gloveboxes or hot cells, underground vaults, piping etc. that are integral to the facility structure which pose a threat of release of hazardous substances to the environment during disposition. Tier 1 facilities will be dispositioned under CERCLA as either a remedial action or a removal action, coordinated with closure of RCRA TSD units as needed.
- **Tier 2 facilities** are facilities not identified as Tier 1 that require a CERCLA response action. The disposition of Tier 2 facilities will be coordinated with closure of RCRA TSD units as needed.
- **Other facilities** not designated as Tier 1 or Tier 2. These facilities do not have a release or substantial threat of release of hazardous substances and will be dispositioned through the appropriate DOE processes.

8.1.4 Disposition Documentation

Documentation required to authorize implementation of the disposition phase activities: a) will be prepared in accordance with the provisions of Section 7.0 and the joint Policy on Decommissioning of Department of Energy Facilities under CERCLA, and b) will be prepared in accordance with Section 6.0 for any necessary RCRA TSD closure plans. The decision documents (e.g., Action Memoranda, Records of Decision, or Closure Plans) will be issued by the lead agency in accordance with Sections 6.0 or 7.0. Completion Schedules will be developed in accordance with the requirements of Section 11.6.

The Facility Evaluation is prepared to evaluate each facility in regards to a graded approach to identify facilities subject to removal or remedial action under CERCLA. Facilities

are placed in Tier 1 or Tier 2 based on their past history of releases or substantial threat of release. DOE ~~will~~has conducted the Facility Evaluation process for the Central Plateau and 400 Area facilities and may conduct future facility evaluations as needed. A lead regulatory agency will be identified in Appendix J corresponding with the lead regulatory agency for operable units located in the same geographic area as the facility, unless otherwise agreed to by EPA and Ecology. The lead regulatory agency's concurrence with the designation of facilities as Tier 1 or Tier 2, and the selection of response action for Tier 1 facilities, will be obtained by approval of a change to the Tri-Party Agreement Appendix J to be completed in accordance with Tri-Party Agreement Section 12.0, Changes to the Agreement. The designation will be based on the Facility Evaluation document and other documents or inspection as appropriate. The Facility Evaluation documents supporting Tier 1 or Tier 2 designations will be processed as secondary documents as defined in Action Plan Section 9, Documentation and Records.