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| Change Number<br>M-41-96-03   | Federal Facility Agreement and Consent Order<br>Change Control Form<br>Do not use blue ink. Type or print using black ink. | Date<br>February 27, 1997   |
| Originator<br>M. A. McLaughlin/C. L. Sohn   |  | Phone<br>(509)376-4084/376-8523   |
| Class of Change<br><input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager   |  |   |
| Change Title<br>Change Completion Date for Milestone M-41-21  |  |   |
| Description/Justification of Change<br>Interim Milestone M-41-21 is currently stated as follows:<br>M-41-21      Start Interim Stabilization of 2 Single Shell Tanks.      3/31/1997<br>Change Milestone M-41-21 as follows:<br>M-41-21      Start Interim Stabilization of 2 Single Shell Tanks.      5/31/1997<br>On October 16, 1995 an Unreviewed Safety Question (USQ) Evaluation was completed for the U.S. Department of Energy (DOE) by one of its contractors which raised serious concerns on the safe operation of flammable gas tanks. This evaluation was based on a screening of the Hanford tanks for trapped gas prepared for the DOE by a different Hanford contractor. The DOE was informed on October 17, 1995 of these concerns, and<br>(cont.) |  |   |
| Impact of Change<br>This Change Request results in delay to Interim Milestone M-41-21. No other milestones are impacted by this Change Request. There is no delay to Major Milestone M-41-00.   |  |   |
| Affected Documents<br>Hanford Federal Facility Agreement and Consent Order Amendment 6, Appendix D, Work Schedules.   |  |   |
| Approvals<br><br>DOE _____ Date 2/27/97 <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved<br>_____ Date _____ <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved<br>EPA _____ Date 3/13/97 <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved<br>Ecology _____ Date _____ <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved   |  |  |

Description/Justification (cont.)

advised the Washington Department of Ecology (Ecology) and the U. S. Environmental Protection Agency (EPA) of the issues at the Unit Managers Meeting on the same day. After further review of the facts in the technical studies, the DOE was unable to make a final determination on the safe operation of the flammable gas tanks without conducting a Safety Analysis.

Safety Analysis work on the flammable gas issue was contracted to a third party and a report was subsequently prepared defining work controls which were expected to allow restart of pumping for several of the affected tanks. A TPA Change Request (M-41-96-02) was approved by Ecology on September 23, 1996, which reflected a Recovery Plan for the M-41-00 Interim Stabilization Milestone. The Interim Milestones agreed to in the M-41-96-02 Change Request were based on the approval of a safety basis for operation of the tanks by September 30, 1996. However, because of the inability to resolve continuing questions concerning the operation of the Hanford tanks, the flammable gas USQ was extended to 176 of the 177 single shell and double shell tanks. Two Standing Orders with flammable gas controls were approved by DOE on November 1, 1996. The Contractor subsequently determined that exceptions were necessary to implement the Standing Orders in a compliant manner. Justification for those exceptions was approved by DOE on December 20, 1996.

The DOE recognizes the responsibility to meet established Tri-Party Agreement schedules, but when issues arise which can impact safe operations, DOE must evaluate the issues on a case by case basis and proceed to resolve the USQ in an orderly manner. DOE will work with the Contractor and the regulators to meet the original schedule, but, to ensure that operations may continue in a safe manner, it is necessary for the parties to preserve the option to adjust the Interim Milestone completion date if DOE is unable to mitigate the impact of the Flammable Gas controls.

