

<b>Change Number</b> M-16-06-05	<b>Federal Facility Agreement and Consent Order Change Control Form</b> Do not use blue ink. Type or print using black ink.	<b>Date</b> September 11, 2006
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<b>Originator</b> Kevin Bazzell	<b>Phone</b> (509) 373-0463
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**Class of Change**

I - Signatories                       II - Executive Manager                       III - Project Manager

**Change Title**

Extend Interim Milestone M-16-60 "Complete Interim Remedial Actions for at least 3 of the following high environmental priority 300-FF-2 waste sites (316-4, 618-2, 618-3, 618-5, and 618-7) and complete confirmatory sampling of 300-FF-2 candidate sites 300-7 and 300-9" from December 31, 2006 to April 30, 2007.

**Description/Justification of Change**

**Description:** Remediation activities have been ongoing to complete interim remedial actions at three waste sites (618-2, 618-3, and 618-5). Excavations are complete at 618-3 and 618-5, and are ongoing at 618-2. Confirmation sampling of 300-7 and 300-9 is complete. Thus, successful completion of M-16-60 is predicated on completing 618-2. Remediation activities are expected to start at 618-7 in October 2006. Remediation of 316-4 began in 2004 and due to uranium contamination at depth, further remediation was postponed in 2005 to coincide with remediation of 618-10 as the excavation boundary from 316-4 would extend into the adjacent 618-10 burial ground in order to excavate any deeper in 316-4.

Description/Justification continued on Page 2 of 2.

**Impact of Change**

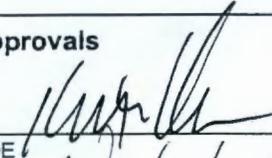
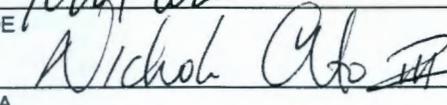
An extension of M-16-60 from December 31, 2006 to April 30, 2007; four month minimum. RL and EPA shall meet in November 2006 to discuss the scope, schedule, and cost of the additional work, and validate any further extension of the milestone.

Schedule for backfilling would extend an additional four months, or as agreed in any subsequent extension of the milestone.

Revegetation would be re-scheduled for the optimum planting window in November to December 2007.

**Affected Documents**

Hanford Federal Facility Agreement and Consent Order, as amended  
Remedial Design Report/Remedial Action Work Plan for the 300 Area, DOE/RL-2001-47, Rev. 1

<b>Approvals</b>		Page 1 of 2
DOE	 Date 9/13/06	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
EPA	 Date 14 Sept 06	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
Ecology	N/A Date	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved



Description/Justification (continued)

In July 2006, excavation at 618-2 was nearing completion to support meeting the milestone by December 31, 2006 as expected and required. However, high concentrations of plutonium, in the middle trench of 618-2 at approximately 14 feet above the groundwater table, were discovered. Preliminary evaluation of the data resulted in potentially not being protective of groundwater based on modeling. To adequately evaluate groundwater protectiveness, additional soil data at 618-2 to groundwater was necessary. An agreement between the U.S. Department of Energy, Richland Operations Office (RL) and the U.S. Environmental Protection Agency (EPA) was reached in August 2006 to pot hole to groundwater and sample at 1 meter intervals to determine the residual concentrations of plutonium between the bottom of the middle trench and groundwater. A water sample was also obtained at the end of the pot hole. The water sample results will be available by October 2006, while the soil sample results are expected in late August 2006. Additionally, groundwater sampling from a nearby well (399-1-2) to the east of 618-2 has been requested of the Pacific Northwest National Laboratory. Sampling results from this well are expected in November 2006.

**Justification:** Should the data results indicate further excavation at 618-2 is necessary to be protective of groundwater, completing M-16-60 by December 31, 2006 is not possible. RL contends that due to this unforeseen information, additional field characterization, obtaining sample results, evaluating the data, and determining protectiveness of groundwater that good cause for an extension exists as described in the *Hanford Federal Facility and Consent Order*, Article XL, and Section 12.3.2. The lateral extent of plutonium contamination also remains to be determined and discussed with EPA. Since the final data results are forthcoming and the lateral extent of contamination is still undetermined, it is not possible to provide a justification of an extension schedule. As such, it is proposed to extend the milestone a minimum of four months, with the commitment that RL shall meet with EPA in November 2006 to further define the extension length.

Hanford Federal Facility Agreement and Consent Order Interim Milestone is modified as shown below using ~~strikeout~~ to indicate text deletions and **shading** to indicate text additions:

Milestone Number	Milestone Description	Completion Date
M-16-60	Complete Interim Remedial Actions for at least 3 of the following high environmental priority 300-FF-2 waste sites (316-4, 618-2, 618-3, 618-5, and 618-7) and complete confirmatory sampling of 300-FF-2 candidate sites 300-7 and 300-9. The lateral extent of plutonium contamination also remains to be determined and discussed with EPA. Since the final data results are forthcoming and the lateral extent of contamination is still undetermined, it is not possible to provide a justification of an extension schedule. As such, it is proposed to extend the milestone a minimum of four months, with the commitment that RL shall meet with EPA in November 2006 to further define the extension length.	<del>December 31, 2006</del> <b>April 30, 2007</b>