



Department of Energy  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

0091976

11-AMRC-0004

NOV 15 2010

Ms. J. A. Hedges  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
3100 Port of Benton Blvd.  
Richland, Washington 99354

Dear Ms. Hedges:

SIGNED HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER  
(TRI-PARTY AGREEMENT) CHANGE FORM M-16-09-06, "SCOPE CLARIFICATION IN  
THE 100-D AREA (M-016-47)," FOR APPROVAL

Attached is the signed Tri-Party Agreement Change Form, M-16-09-06, which will provide clarification to the scope of the Tri-Party Agreement Interim Milestone M-016-47. Based on the information discussed with your staff, this change form will document the removal of 100-D-31:11 and 100-D-31:12 from the scope of Interim Milestone M-016-47, and ensure they are addressed in Target Date M-015-70-T01.

The U.S. Department of Energy Richland Operations Office requests approval and the return of the attached Tri-Party Agreement Change Form. If you have questions please contact me or your staff may contact Tom Post, Office of the Assistant Manager River Corridor Closure Project, at (509) 376-3232.

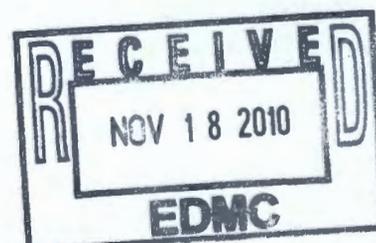
Sincerely,

Richard A. Holten, Acting Assistant Manager  
for the Central Plateau

AMRC:TCP

Attachment

cc: See Page 2



M-016-47

Ms. J. A. Hedges  
11-AMRC-0004

-2-

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cc w/attach:

G. Bohnee, NPT  
M. N. Brosee, WCH  
L. Buck, Wanapum  
D. A. Faulk, EPA  
L. E. Gadbois, EPA  
S. Harris, CTUIR  
R. Jim, YN  
S. L. Leckband, HAB  
N. M. Menard, Ecology  
R. D. Morrison, MSA  
K. Niles, ODOE  
R. E. Piippo, MSA  
D. Rowland, YN  
J. G. Vance, MSA  
M. L. Proctor, WCH  
Administrative Record, H6-08  
Environmental Portal, A3-01  
TPA Administrative Record, H6-08



**Description/Justification of Change (continued):**

Portions of the 100-D-31:11 and 100-D-31:12 segments of pipeline are located in close proximity to 183-D. The 183-D facility has been identified as a suspect bat habitat facility. Final disposition of the 183-D facility is currently on hold due to the suspect bat habitat in the facility. A bat study is being performed by DOE's River Corridor Contractor, which will result in the issuance of a report by the end of the calendar year 2010. Performing this study is necessary to determine if 183-D is a bat roosting site, which species are present, whether the species are listed on the Species of Concern list, and determining any potential mitigation actions necessary. Once a determination has been made on the controls required to protect the bat habitats, a disposition pathway will be developed for the 183-D facility. Removal of the facility or remediation of the piping, prior to this determination, could damage the 183-D foundation and compromise its structure; and thereby compromise the bat habitat within the facility.

Based on the information above, DOE and Ecology agree to remove 100-D-31:11 and 100-D-31:12 from M-016-47, and ensure they are addressed in M-015-70-T01 (due July 2011). The WIDS Database will be updated to reflect that these subsites will be evaluated in the feasibility study due under Milestone M-015-70-T01. In accordance with TPA Action Plan Section 11.6, DOE will submit remediation schedules with the RDR/RAWP required by the Record of Decision that follows on to the M-15-70-T01 Milestone. Those remediation schedules will apply to 100-D-31:11 and 100-D-31:12.

**Authorized Changes:**

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

No actual changes to the M-016-47 milestone are required. This change package provides scope clarification regarding 100-D-31:11 and 100-D-31:12 as specified in this change package on Page 1, section titled "Impact of Change." Remediation of sites 100-D-31:11 and 100-D-31:12 will be addressed in M-015-70-T01.

Milestone Number	Milestone Description	Completion Date
M-016-47	COMPLETE THE INTERIM REMEDIAL ACTIONS FOR THE 100 D AREA.	12/31/2011