



0051838

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

99-EAP-513

Mr. Michael A. Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504

SEP 28 1999



Dear Mr. Wilson:

**SIGNED HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER
(TRI-PARTY AGREEMENT) CHANGE CONTROL FORM M-45-99-02 ADDRESSING NEW
INTERIM MILESTONES FOR STABILIZATION OF THE 244-AR VAULT**

Enclosed for your approval is the signed Tri-Party Agreement Change Control Form M-45-99-02, which adds two new interim milestones addressing stabilization of the 244-AR Vault. This change control form has been prepared in response to the agreed to path forward identified at the August 24, 1999, Inter-Agency Management Integration Team meeting and the subsequent additional request by the State of Washington Department of Ecology (Ecology) to formalize a "Completion of Stabilization Activities" due date. Consistent with all previous Ecology requests, the change control form contains an enforceable interim milestone for the delivery of a stabilization plan in fiscal year 2000 from which specific target actions can be extracted and end state criteria can be defined. The U.S. Department of Energy, Richland Operations Office (RL) has also met the Ecology request of committing to an enforceable interim milestone due date for completion of stabilization activities, despite RL's considerable concern over making this commitment.

Further, the stabilization plan will address the concerns identified by Ecology's August 19, 1999, letter. In addressing these concerns within the stabilization plan, RL will evaluate the specific need and appropriate mechanisms and the degree to which they are applied, as well as further defining the end state criteria needed to put the vault in a compliant and safe storage condition. It is anticipated that Ecology will participate in the review of the stabilization plan and will have approval authority on the plan.

RL has committed to the completion of stabilization activities due date in the change control form with the caveat that this date will be re-evaluated upon issuance of the stabilization plan and with the recognition that technical assessments of the facility may or may not impact the ability to meet this date. However, with the signing of this change request, RL will initiate work on a schedule to meet the interim milestone due dates and will work to this schedule until a technical justification for altering this schedule has been encountered.

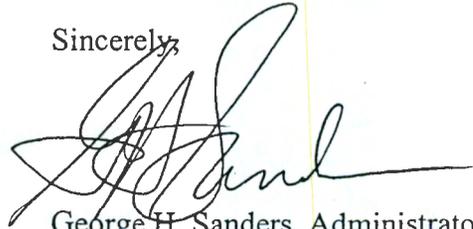
Mr. Michael A. Wilson
99-EAP-513

-2-

SEP 28 1999

If you have any questions regarding this change control form please contact me at
(509) 376-6888 or Dana Bryson, Director, Operations Program Division on (509) 372-0947.

Sincerely,



George H. Sanders, Administrator
Hanford Tri-Party Agreement

EAP:HMR

Enclosure

cc w/encl:

J. R. Wilkinson, CTUIR

L. J. Cusack, Ecology

S. E. Dahl, Ecology

A. Valero, Ecology

D. R. Sherwood, EPA

J. S. Hertzell, FDH

T. B. Veneziano, FDH

M. B. Reeves, HAB

B. G. Erlandson, LMHC

P. Sobotta, NPT

M. L. Blazek, OOE

A. R. Sherwood, WMH

R. Jim, YN

TPA Administrative Record, FDH

**Hanford Federal Facility Agreement and Consent Order
Change Control Form M-45-99-02
September 28, 1999
Page 2 of 2**

Description/Justification of Change (cont.)

Add TPA interim milestones as follows:

M-45-11	Complete Stabilization Activities for the 244-AR Vault	Sept. 30, 2003*
	Stabilization Activities End Point Criteria will be established in the Stabilization Project Plan.	
	*Target Date actions will be added based on the activities, schedule, and priority extracted from the Stabilization Project Plan (M-45-11A) and will be finalized via the TPA change control process following Ecology approval of the Stabilization Project Plan (But no later than June 1, 2000).	
M-45-11A	Submit Stabilization Project Plan for the 244-AR Vault	March 31, 2000

Note:
The Complete Stabilization Activities due date has been established prior to finalization of the planning basis for the stabilization activities. This obligation on DOE's behalf places a significant programmatic risk on DOE to stabilize the subject facility. Therefore, this date may subsequently be subject to change via the TPA change control process (Section 12.0 of the TPA) based upon finalization of the planning basis and results of the technical assessments (e.g. Hazards Assessments) prepared to support stabilization activities. Examples of issues in the Stabilization Plan which might necessitate the need for moving the completion date include but are not limited to Worker Safety and Health, Encountering Significant Radiation Levels, Permitting of Stabilization Activities, Funding Constraints and Public Involvement Issues. In establishing the above referenced completion date, Ecology has agreed to re-evaluate this date with DOE, upon Ecology approval of the Stabilization Project Plan (But no later than June 1, 2000).

Reference:

1) Letter, A. Valero, Ecology, to G. Sanders, RL, "Re: 244-AR Vault System Change Control Request to Delete Tri-Party Agreement (TPA) Milestones M-32-06 and M-32-06-T01," dated August 19, 1999.