



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950

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April 17, 2015

15-NWP-075

Mr. Thomas W. Fletcher, Assistant Manager
Office of River Protection
United States Department of Energy
PO Box 450, MSIN: H6-60
Richland, Washington 99352

Re: Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Change Control Form,
Change Number M-045-15-01, dated 03/26/15

Dear Mr. Fletcher:

Enclosed is a copy of Tri-Party Agreement (TPA) Change Control Package M-045-15-01, disapproved by Jane Hedges. The original, signed change control form was delivered to the Office of River Protection's document control on April 14.

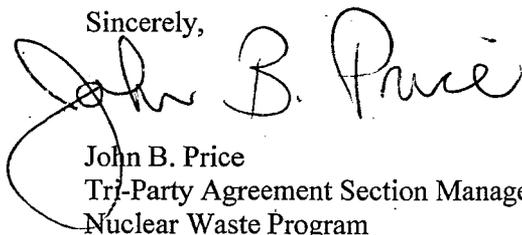
The change package had proposed to modify TPA milestone M-045-92 due dates for construction of single-shell tank interim barriers, delaying construction of Barriers 1 and 2, and design and construction of Barriers 3 and 4.

The Department of Ecology (Ecology) disapproved the change request because construction of these interim barriers is necessary to mitigate impacts to human health and the environment due to releases that have already occurred, slowing their migration. The sooner these barriers are constructed, the better. This urgency is further heightened by delays in construction of the Waste Treatment Plant and the corresponding delays in single-shell tank retrievals. The proposed schedule delay would provide less protection of human health and the environment than construction on the existing milestone schedule.

In Ecology's opinion, the interim barriers should cover a larger area than what the United States Department of Energy (USDOE) has so far proposed. Based on evaluation of technical data, Ecology believes that larger barriers would provide greater protection of human health and the environment than the smaller barriers proposed by USDOE.

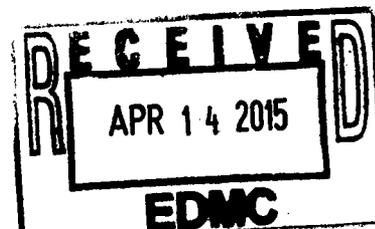
If you have any questions, please contact Jeff Lyon, Ecology Project Manager, at (509) 372-7914 or jeff.lyon@ecy.wa.gov.

Sincerely,


John B. Price
Tri-Party Agreement Section Manager
Nuclear Waste Program

tkb
Enclosure

cc: See page 2



Mr. Thomas W. Fletcher
April 17, 2015
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cc electronic w/enc:

Dennis Faulk, EPA
Lori Huffman, USDOE-ORP
Chris Kemp, USDOE-ORP
Cliff Clark, USDOE-RL
Jon Perry, MSA
Rob Piippo, MSA
Ken Niles, ODOE
Dib Goswami, Ecology
Jeff Lyon, Ecology
John Price, Ecology
Environmental Portal
Hanford Facility Operating Record
USDOE-ORP Correspondence Control
USDOE-RL Correspondence Control

cc w/enc:

Steve Hudson, HAB
Administrative Record: M-045-15-01
NWP Central File

cc w/o enc:

Rod Skeen, CTUIR
Gabriel Bohnee, NPT
Russell Jim, YN
NWP Reader File

Change Number M-45-15-01	Federal Facility Agreement and Consent Order Change Control Form <small>Do not use blue ink. Type or print using black ink.</small>	Date 03/26/15
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Originator T. W. Fletcher, DOE-ORP	Phone (509) 376-3434
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Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager
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Change Title Modify Milestone M-045-92 Due Dates
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Description/Justification of Change
 This change control form modifies Milestone M-045-92 due dates for construction of Barriers 1 and 2 and design and construction of Barriers 3 and 4.

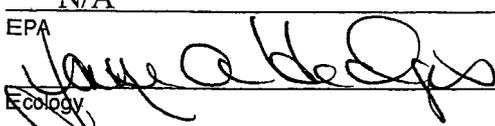
Good cause exists for changing the milestone due dates because ORP was required to shift resources to other higher priority, higher risk work scope for the Radioactive Liquid Tank Waste Stabilization and Disposition Project (i.e. Project Baseline Summary ORP-0014), including among other things, safety concerns. As a result, construction of the SX Barriers 1 and 2 has been delayed.

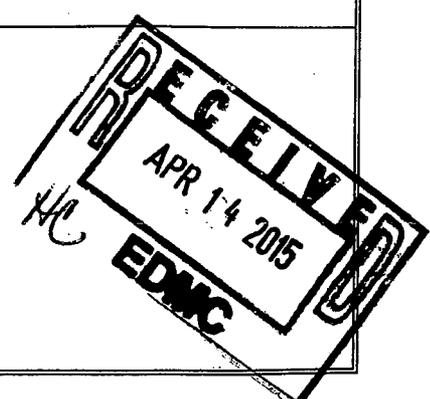
Good cause also exists to delay the design and construction of Barriers 3 and 4 as the Washington State Department of Ecology (Ecology) and ORP have yet to agree upon the locations for these barriers. As all barrier designs are site specific, and without a location, no barrier design and associated monitoring plan can be developed, and construction cannot be completed by the current milestone due date. At the July 22, 2014, TPA Milestone M-045-56 meeting, it was agreed between Ecology and ORP that discussions of FY2015 interim measures would be deferred to a future meeting which has not yet been held. Those discussions would have included decisions as to which interim measures would be performed in FY2015, including the locations for any interim surface barriers to be designed and constructed. It is proposed that Ecology and ORP discuss barrier locations during the M-045-56 Milestone annual interim measures meetings held by the end of July 2015.

ORP has requested resources for an updated design, if necessary, to prevent water intrusion, and construction of Barriers 1 and 2 and starting in fiscal year 2016 with construction anticipated to be completed in October 2018. The original sequencing and durations of design and construction activities among the four barriers has been preserved with the proposed changes reflected in the milestone language below.

Impact of Change
 This change control form modifies the dates on pending actions under Milestone M-045-92 and establishes new dates for reaching agreement on a path forward.

Affected Documents
 The HFFACO, as amended, and Hanford Site internal planning, management, and budget documents (e.g., River Protection Project System Plan, Baseline Control documents, and related work authorizations and directives).

Approvals	
 _____ DOE	3/26/15 <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved Date
N/A _____ EPA	_____ Approved <input type="checkbox"/> Disapproved
 _____ Ecology	4/14/15 <input type="checkbox"/> Approved <input checked="" type="checkbox"/> Disapproved Date



Specific changes to Tri-Party Agreement Appendix D are displayed with double underline to indicate addition of text and by ~~strikeout~~ to indicate deletion of text.

<p>M-045-92 Lead Agency: Ecology</p>	<p>After the determination identified in Milestone M-045-22, complete installation of four (4) additional interim barriers, according to the following schedule (unless Ecology and USDOE have determined to continue vadose zone testing and DOE has submitted a change request for M-045-92):</p> <ul style="list-style-type: none"> • By October 31, 20158, construct barriers 1 and 2 in 241-SX farm, per the design and monitoring plans already approved by Ecology under milestones M-045-922, <u>or per updated designs approved by Ecology.</u> <p>Construct the remaining two (2) barriers per the following revised schedule:</p> <ul style="list-style-type: none"> • <u>DOE and Ecology will agree on locations for Barrier 3 and 4 by September 30, 2015.</u> • Barrier 3 Design/Monitoring Plan 06/30/15 <u>06/30/18</u> • Construct Barrier 3 10/31/16 <u>10/31/19</u> • Barrier 4 Design/Monitoring Plan 06/30/16 <u>06/30/19</u> • Construct Barrier 4 10/31/17 <u>10/31/20</u> <p>The design and monitoring plans will be consistent with those developed for WMA T and TY unless DOE and Ecology agree otherwise. Ecology will authorize construction upon approval of the final design and monitoring plans.</p>	<p>10/31/2017 <u>10/31/2020</u> Or As Indicated In the Descriptive Text Of This Milestone</p>
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