Change Number	Federal Facility Agreement and Consent Order Change Control Form	Date
M-37-22-01		03/30/2022

Originator John Price, Ecology

Phone 509-372-7921

Class of Change

[ ] I – Signatories [**X**] II – Executive Managers [ ] III – Project Managers

Change Title

Modify Due Dates for M-037 Series Milestones in TPA, Appendix D

Description/Justification of Change

In April 2020 the U.S. Department of Energy, Richland Operations Office (DOE-RL) and Washington State Department of Ecology (Ecology) modified the M-037 series milestones to coordinate the development and implementation of closure plans for Treatment, Storage and Disposal (TSD) units with the investigation and remediation of closely associated past-practice units. The "Coordinated Closure" Initiative depends on completion of remedial investigation/feasibility studies (RI/FS) for the past practice units to develop the closure plan documentation. DOE has submitted most of the closure plans, which will be revised to incorporate the results of the past-practice investigation process and establish coordinated closure requirements.

In June 2021, the DOE-RL, Ecology, and U.S. Environmental Protection Agency (EPA) placed 14 interim milestones in abeyance by Interagency Management Integration Team (IAMIT) Determination Number: 2021-001, *Temporary Suspension of Tri-Party Agreement Milestones from the Agreement in Principle for the Negotiation of Hanford Federal Facility Agreement and Consent Order Revisions in Response to Federal Fiscal Year 2018-2020 Appropriation in Conjunction with the RASCAL Recommendations (Interagency Management Integration Team Determination 2020-006) for Expediting Remedial Cleanup on the Hanford Central Plateau (*reference https://pdw.hanford.gov/document/AR-14379), including RI/FS milestones referenced in the M-037 milestones. This change control form requires DOE-RL to submit all the coordinated closure plans to Ecology by September 30, 2034, whether or not the applicable RI/FS is completed by that time.

The Parties agree that there is Good Cause for modification of the M-037 milestones in accordance with TPA paragraph 120.D: “D. A delay caused, or which is likely to be caused, by the grant of an extension in regard to another timetable and deadline or schedule.”

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Impact of Change

This change control form establishes a “no later than 9/30/2034” due date for DOE-RL to submit coordinated closure plans for six M-037 milestones: M-037-21, M-037-23, M-037-24, M-037-27, M-037-28, and M-037-29.

Affected Documents

Tri-Party Agreement Action Plan Appendix D, “Work Schedule Milestones and Target Dates Including Designation of Lead Regulatory Agency.”

Approvals

William F. Hamel Digitally signed by William F. Hamel Date: 2022.06.06 06:19:10 -07'00'		Approved	X	Disapproved	
W.F. Hamel, DOE-RL	Date				
N/A		Approved		Disapproved	
DOE-ORP	Date				
David B. Bowen Digitally signed by Bowen, David (ECY) Date: 2022.05.31 15:23:36 -07'00'		Approved	X	Disapproved	
D.B. Bowen, Ecology	Date				
N/A		Approved		Disapproved	
D.R. Einan, EPA	Date				

Description/Justification of Change (continued):

DOE reserves the right to submit a change control form to request modification of these milestone deadlines, in accordance with the procedures in Section 12 of the TPA Action Plan, in conjunction with DOE's every-three-years proposals pursuant to the Adaptive Milestone Approach described in IAMIT Determination 2021-002, *Pilot Use of Resource Modeling and Adaptive Milestone Approach to Develop Schedules for Cleanup of Central Plateau Operable Units* (reference https://pdw.hanford.gov/document/AR-16097). Ecology reserves to right to disapprove such a change control form if good cause for the requested extension is not established.

Authorized Changes

Modifications to HFFACO Appendix D, "Milestones and Target Dates Including Designation of Lead Regulatory Agency," are denoted by using ~~strikeout~~ to indicate text deletions and double underline to indicate text additions.

Number	Milestone	Due Date
M-037-21 Lead Regulatory Agency: Ecology	DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4) for the following TSD Units: 216-A-29 Ditch, 216-A-36B Crib, 216-A-37-1 Crib, and 216-B-63 Trench. The CC Proposal shall be submitted to Ecology within 270 days of the last CAD/ROD signature for the 200-EA-1 OU. The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include all outstanding closure information required by WAC 173-303-610(3)(a)(i)–(vii) and, as applicable, all outstanding post-closure information required by WAC 173-303-610(8)(b). If the use of alternative requirements has been requested for closure of any of these TSD Units under WAC 173-303-610(1)(e), the CC Proposal shall also include all outstanding information required by WAC 173-303-610(3)(a)(ix). If a CC Proposal has not been developed by the "no later than" date in this milestone due date, then a closure plan shall be due on that date. DOE reserves the right to submit a change control form to request modification of this milestone deadline, in accordance with the procedures in Section 12 of the TPA Action Plan, in conjunction with DOE's every-three-years proposals pursuant to the Adaptive Milestone Approach described in IAMIT Determination 2021-002. Ecology reserves the right to disapprove such a change control form if good cause for the requested extension is not established.	Within 270 days of the last CAD/ROD signature for the 200-EA-1 OU but no later than 9/30/2034

Number	Milestone	Due Date
M-037-23 Lead Regulatory Agency: Ecology	DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4) for the following TSD Units: 216-B-3 Main Pond system and 216-S-10 Pond and Ditch. The CC Proposal shall be submitted to Ecology within 270 days of the last ROD signature for the 200-OA-1 OU. The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include all outstanding closure information required by WAC 173-303-610(3)(a)(i)–(vii) and, as applicable, all outstanding post-closure information required by WAC 173-303-610(8)(b). If the use of alternative requirements has been requested for closure of any of these TSD Units under WAC 173-303-610(1)(e), the CC Proposal shall also include all outstanding information required by WAC 173-303-610(3)(a)(ix). If a CC Proposal has not been developed by the "no later than" date in this milestone due date, then a closure plan shall be due on that date. DOE reserves the right to submit a change control form to request modification of this milestone deadline, in accordance with the procedures in Section 12 of the TPA Action Plan, in conjunction with DOE's every-three-years proposals pursuant to the Adaptive Milestone Approach described in IAMIT Determination 2021-002. Ecology reserves the right to disapprove such a change control form if good cause for the requested extension is not established.	Within 270 days of the last ROD signature for the 200-OA-1 OU but no later than 9/30/2034

Number	Milestone	Due Date
M-037-24 Lead Regulatory Agency: Ecology	DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4) for the following TSD Units: 241-CX Tank System (CX-70, CX-71, and CX-72) and Inactive SST Components outside the WMAs. The CC Proposal shall be submitted to Ecology within 270 days of the last CAD/ROD signature for the 200-IS-1 OU. The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include all outstanding closure information required by WAC 173-303-610(3)(a)(i)–(vii) and, as applicable, all outstanding post-closure information required by WAC 173-303-610(8)(b). If the use of alternative requirements has been requested for closure of any of these TSD Units under WAC 173-303-610(1)(e), the CC Proposal shall also include all outstanding information required by WAC 173-303-610(3)(a)(ix). If a CC Proposal has not been developed by the "no later than" date in this milestone due date, then a closure plan shall be due on that date. DOE reserves the right to submit a change control form to request modification of this milestone deadline, in accordance with the procedures in Section 12 of the TPA Action Plan, in conjunction with DOE's every-three-years proposals pursuant to the Adaptive Milestone Approach described in IAMIT Determination 2021-002. Ecology reserves the right to disapprove such a change control form if good cause for the requested extension is not established.	Within 270 days of the last CAD/ROD signature for the 200-IS-1 OU but no later than 9/30/2034

Number	Milestone	Due Date
M-037-27 Lead Regulatory Agency: Ecology	DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4) for the following TSD Units: Low-Level Burial Grounds Green Islands. The CC Proposal shall be submitted to Ecology within 270 days of the last CAD/ROD signature for the 200-SW-2 OU. The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include all outstanding closure information required by WAC 173-303-610(3)(a)(i)–(vii) and, as applicable, all outstanding post-closure information required by WAC 173-303-610(8)(b). If the use of alternative requirements has been requested for closure of any of the Green Island TSD Units under WAC 173-303-610(1)(e), the CC Proposal shall also include all outstanding information required by WAC 173-303-610(3)(a)(ix). If a CC Proposal has not been developed by the "no later than" date in this milestone due date, then a closure plan shall be due on that date. DOE reserves the right to submit a change control form to request modification of this milestone deadline, in accordance with the procedures in Section 12 of the TPA Action Plan, in conjunction with DOE's every-three-years proposals pursuant to the Adaptive Milestone Approach described in IAMIT Determination 2021-002. Ecology reserves the right to disapprove such a change control form if good cause for the requested extension is not established.	Within 270 days of the last CAD/ROD signature for the 200-SW-2 OU but no later than 9/30/2034

Number	Milestone	Due Date
M-037-28 Lead Regulatory Agency: Ecology	DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4) for all TSD Units in the 221-B Canyon Facility. The CC Proposal shall be submitted to Ecology within 270 days of the last CAD/ROD signature for the 200-CB-1 OU. The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include all outstanding closure information required by WAC 173-303-610(3)(a)(i)–(vii) and, as applicable, all outstanding post-closure information required by WAC 173-303-610(8)(b). If the use of alternative requirements has been requested for closure of any of these TSD Units under WAC 173-303-610(1)(e), the CC Proposal shall also include all outstanding information required by WAC 173-303-610(3)(a)(ix). If a CC Proposal has not been developed by the "no later than" date in this milestone due date, then a closure plan shall be due on that date. DOE reserves the right to submit a change control form to request modification of this milestone deadline, in accordance with the procedures in Section 12 of the TPA Action Plan, in conjunction with DOE's every-three-years proposals pursuant to the Adaptive Milestone Approach described in IAMIT Determination 2021-002. Ecology reserves the right to disapprove such a change control form if good cause for the requested extension is not established.	Within 270 days of the last CAD/ROD signature for the 200-CB-1 OU but no later than 9/30/2034

Number	Milestone	Due Date
M-037-29 Lead Regulatory Agency: Ecology	DOE shall submit a Coordinated Closure (CC) Proposal as a permit modification request pursuant to WAC 173-303-830(4) for the following TSD Units: PUREX Tunnels 1 and 2 and all TSD Units in the PUREX Canyon Facility. The CC Proposal shall be submitted to Ecology within 270 days of the last CAD/ROD signature for the 200-CP-1 OU. The CC Proposal shall be prepared in accordance with the process described in TPA Action Plan Section 5.5 and include all outstanding closure information required by WAC 173-303-610(3)(a)(i)–(vii) and, as applicable, all outstanding post-closure information required by WAC 173-303-610(8)(b). If the use of alternative requirements has been requested for closure of any of these TSD Units under WAC 173-303-610(1)(e), the CC Proposal shall also include all outstanding information required by WAC 173-303-610(3)(a)(ix). If a CC Proposal has not been developed by the "no later than" date in this milestone due date, then a closure plan shall be due on that date. DOE reserves the right to submit a change control form to request modification of this milestone deadline, in accordance with the procedures in Section 12 of the TPA Action Plan, in conjunction with DOE's every-three-years proposals pursuant to the Adaptive Milestone Approach described in IAMIT Determination 2021-002. Ecology reserves the right to disapprove such a change control form if good cause for the requested extension is not established.	Within 270 days of the last CAD/ROD signature for the 200-CP-1 OU but no later than 9/30/2034