Enclosure 2

Change Number	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date
M-015-02-01		5/09/2002

Originator
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Class of Change
[ ] I - Signatories [X] II – Executive Manager [ ] III - Project Manager

Change Title

Modify Tri-Party Agreement Milestone Series M-015 in Accordance with the Central Plateau Agreement In Principle

Description/Justification of Change

The Hanford Federal Facility Agreement and Consent Order (TPA) contains commitments for the U.S. Department of Energy (USDOE) to submit the 200 Area National Priority List (NPL) Remedial Investigation/Feasibility Study (RI/FS) Work Plans to complete the Investigation of Past-Practice Units by December 31, 2005 (Tri-Party Agreement Milestone M-013); complete all 200 Area Non-Tank Farm pre-Record of Decision (ROD) site investigations under approved work plan schedules by December 31, 2008 (Tri-Party Agreement Major Milestone M-015-00C); complete the remedial actions for all non-Tank Farm Operable Units by September 30, 2018 (Tri-Party Agreement Milestone M-016-00); and Submit Part B Permit Applications or Closure/Post Closure Plans for all Resource Conservation and Recovery Act (RCRA) Treatment, Storage, and Disposal (TSD) units (M-020-00) by February 28, 2004.

USDOE, the U.S. Environmental Protection Agency (EPA), and the State of Washington, Department of Ecology (Ecology) (parties) have completed negotiations to modify the schedule for completion of non-Tank Farm Remedial Investigations/Remedial Actions in the Central Plateau. These negotiations were conducted in accordance with the Tri-Party Agreement and the parties have provided the stakeholders/public the opportunity to review the proposed changes prior to approval. The parties have agreed to a strategy for timely waste site remediation of the non-Tank Farm RCRA corrective actions and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) past practice units for the Hanford Site Central Plateau. The parties have set the schedule for submittal of the RCRA TSD Closure/Post Closure Plans (M-020 series milestones). The schedule is coordinated with the FS submittal date and activities (M-015 series milestones). The M-015 and M-020 series milestones, while coordinated, remain independently enforceable.

The parties signed an Agreement in Principle (AIP) that called for the agencies to complete negotiations and sign a Tentative Agreement by January 31, 2002, and committed the parties to complete public comment/review and agency approval no later than June 5, 2002.

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Impact of Change
Clarifications, consolidation, and deletions of existing TPA milestones/target dates and adds two milestones supporting the 200-PW-2 OU RI/FS and one milestone to submit a Proposed Plan for a remedial action(s) at high-risk waste site(s). Maintains same timetable to complete remedial investigation and feasibility studies.

Affected Documents
The Tri-Party Agreement Action Plan – Appendix D, as amended, and Hanford site internal planning, management, and budget documents (e.g., USDOE and USDOE contractor Baseline Change Control documents; Multi-Year Work Plans; Sitewide Systems Engineering Control documents; Project Management Plans; and if appropriate, LDR Report requirements).

Approvals

K. A. Klein, RL Manager	6/2/02 Date	✓ Approved	Disapproved
L. J. Iani, EPA Region 10 Administrator	5/30/02 Date	✓ Approved	Disapproved
T. C. Fitzsimmons, Ecology Director	6-5-02 Date	✓ Approved	Disapproved

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Tri-Party Agreement M-015 milestone series identifies the schedules from approved workplans for accomplishing the necessary RI/FS work to complete 200 Area non-Tank Farm past-practice pre-Record of Decision (ROD) waste site investigations by December 31, 2008 (M-15-00C). The *200 Areas Remedial Investigation/Feasibility Study Implementation Plan – Environmental Restoration Program, DOE/RL-98-28, Rev. 0,* established an approach for investigating the waste sites. Under this plan, approximately 700 waste sites were grouped into 23 process-based operable units (OUs), which in turn were grouped into 9 major waste categories (e.g., process waste, landfills). Each of the 23 OUs were scheduled in the Tri-Party Agreement to have work plans developed under the M-013 milestone series. One OU was included in the *100 Area Remaining Sites Record of Decision.* For the remaining operable units, the three agencies have jointly developed an improved approach to the remedial investigations and subsequent remediation of the waste sites based on lessons learned from Hanford's 100 and 300 Areas.

The revised investigation approach is to evaluate one or more OUs in a single RI/FS. This reduces the number of work plans, remedial investigation reports, and feasibility studies from 22 to 12. The revised approach is able to collect data necessary to adequately characterize the site and evaluate effective remedial alternatives. Under this approach, all of the RCRA TSDs identified in the M-020 series milestones will be sampled to comply with RCRA Closure/Post Closure requirements. These improvements will be incorporated into a revision of the *200 Areas Remedial Investigation/Feasibility Study Implementation Plan – Environmental Restoration Program, DOE/RL-98-28, Rev. 0.* Of the 12 RI/FS, 5 have approved work plans and 4 are in the final stages of the approval process. All completed work plans will be revised to reflect OU consolidation.

RI/FS Grouping of OUs	Major Waste Category
200-CW-1 Gable Mountain/B-Pond & Ditch Cooling Water Group*	Steam Condensate, Cooling Water and Chemical Sewer Waste (SC/CW/CSW)
200-TW-1 Scavenged Waste Group	Tanks/Scavenged Waste
200-TW-2 Tank Waste Group	Tanks/Scavenged Waste
200-PW-5 Fission Product-Rich Process Waste Group	Process Condensate and Process Waste (PC&PW)
200-CW-5 U Pond/Z-Ditches Cooling Water Group	SC/CW/CSW
200-CW-2 S-Ponds/Ditches Cooling Water Group	SC/CW/CSW
200-CW-4 T-Ponds/Ditches Cooling Water Group	SC/CW/CSW
200-SC-1 Steam Condensate Group	SC/CW/CSW
200-CS-1 Chemical Sewer Group	SC/CW/CSW
200-PW-2 Uranium-rich Process Waste Group	PC&PW
200-PW-4 General Process Waste Group	PC&PW

RI/FS Grouping of OUs	Major Waste Category
200-PW-1 Plutonium/Organic-Rich Process Waste Group	PC&PW
200-PW-3 Organic-rich Process Waste Group	PC&PW
200-PW-6 Plutonium Process Waste Group	PC&PW
200-LW-1 300 Areas Chemical Laboratory Waste Group	Chemical Laboratory Waste (CLW)
200-LW-2 200 Areas Chemical Laboratory Waste Group	CLW
200-MW-1 Miscellaneous Waste Group	Miscellaneous Waste
200-IS-1 Tanks/Lines/Pits/Boxes Waste Group	Tanks/Lines/Pits/Boxes Waste
200-ST-1 Septic Tank and Drain Fields Waste Group	Septic Tanks & Drain Fields Waste
200-UR-1 Unplanned Release Waste Group	Unplanned Release
200-SW-2 Radioactive Landfills and Dumps Group	Landfills & Dumps Waste
200-SW-1 Non-Radioactive Landfills and Dumps Group	Landfills & Dumps Waste
Includes 14 other 200 North Waste Sites	

The three work plans were submitted to Ecology and EPA in December for the 200-LW-1 300 Area Chemical Laboratory Waste Group Operable Unit RI/FS, the 200-PW-1 Plutonium-Rich/Organic-Rich Process Condensate/Process Waste Group Operable Unit RIF/FS, and the 200-MW-1 Miscellaneous Waste Group Operable Unit RI/FS Work Plan, and are undergoing regulatory review. Each work plan contained a proposed change request identifying Tri-Party Agreement Interim Milestones. Milestones governing RI/FS work for these units will be finalized as a part of the regulatory work plan review process and not as part of the Central Plateau negotiations.

Modifications/deletions to existing milestones are denoted with ~~redline/strike out~~, new milestones are shaded.

Milestone	Description/Title	Due Date
M-015-00	Complete the RI/FS (or RFI/CMS) Process for all Operable Units	12/31/2008
M-015-00C	Complete all 200 Area Non-Tank Farm Operable Unit Pre-ROD Site Investigations under Approved Work Plan Schedules	12/31/2008
~~M-015-02E-T3~~	~~EPA will issue a final ROD for 200-BP-1 OU.~~	~~06/01/1994~~
~~M-015-02E-T4~~	~~DOE will submit a Definitive Design for the modified RCRA Barrier to EPA/Ecology 2 months after the ROD is issued by no sooner than August 1, 1994~~	~~200-BP-1 ROD + 2 Months~~
~~M-015-02E-T5~~	~~DOE will submit a remedial action plan to EPA/Ecology 4 months after the ROD is issued but no sooner than October 1, 1994.~~	~~200-BP-1 ROD + 4 Months~~

Milestone	Description/Title	Due Date
~~M-015-02E-T6~~	~~DOE will complete the bid and award cycle for the final barrier 8 months after the ROD is issued but no sooner than February 15, 1995~~	~~200-BP-1 ROD + 8 Months~~
~~M-015-02E-T7~~	~~DOE will complete remediation activities at 200-BP-1 OU 15 months after the ROD is issued but no sooner than October 14, 1994~~	~~200-BP-1 ROD + 15 Months~~
M-015-38A	Submit 200-CW-1 Gable Mountain Pond/B Pond and Ditch Cooling Water Group Feasibility Study, including 216-N-1, 216-N-2, 216-N-3, 216-N-4, 216-N-5, 216-N-6, 216-N-7, UPR-200- E-34, 600-118, 200-N-3, 600-254, 2607-N, 2607-R, UPR-200-N-1, and UPR-200-N-2 Past Practice Waste Sites ~~and 216-B-3 Pond System RCRA TSD Unit Closure Plan;~~ and Submit 200-CW-1 Gable Mountain Pond/B Pond and Ditch Cooling Water Group Proposed Plan/Proposed RCRA Permit Modification	03/31/2003
M-015-39B	Submit 200-CS-1 Chemical Sewer Group RI Report	05/31/2004
M-015-39C	Submit 200-CS-1 Chemical Sewer Group FS ~~and 216-A-29 Ditch, 216-B-63 Trench, and 216-S-10 Pond and Ditch RCRA TSD Unit Closure Plan~~ and submit 200-CS-1 Chemical Sewer Group Proposed Plan/Proposed RCRA Permit Modification	11/30/2005
~~M-015-40A~~	~~Complete 200-CW-5 U Pond/Z-Ditches Cooling Water Group Field Work~~	~~09/30/2002~~
M-015-40B	Submit 200-CW-5 U Pond/Z-Ditches Cooling Water Group RI Report including the Past Practice Waste Sites in the 200-CW-2 S-Ponds/Ditches Cooling Water Group, the 200-CW-4 T-Ponds/Ditches Cooling Water Group, and the 200-SC-1 Steam Condensate Group	05/31/2003
M-015-40C	Submit 200-CW-5 Pond/Z Ditches Cooling Water Group FS and Submit 200-CW-5 U Pond/Z Ditches Cooling Water Group Proposed Plan including the Past Practice Waste Sites in the 200-CW-2 S-Ponds/Ditches Cooling Water Group, the 200-CW-4 T-Ponds/Ditches Cooling Water Group, and the 200-SC-1 Steam Condensate Group	10/31/2004
M-015-41B	Submit 200-TW-1 OU and 200-TW-2 OU RI Report to EPA and Ecology and includes the Past Practice Waste Sites in the 200-PW-5 Fission Product-Rich Process Waste Group.	10/30/2002
M-015-41C	Submit 200-TW-1 OU and 200-TW-2 OU FS and Proposed Plan to EPA and Ecology.and includes the Past Practice Waste Sites in the 200-PW-5 Fission Product-Rich Process Waste Group. The waste site associated with the Hanford prototype barrier will be addressed by the TW-1/TW-2 Proposed Plan	03/31/2004
~~M-015-42B~~	~~Submit 200-TW-2 OU Draft A Remedial Investigation Report to Ecology~~	~~09/30/2002~~
~~M-015-42C~~	~~Submit 200-TW-2 OU Draft A Feasibility Study and Draft A Proposed Plan/Proposed Permit Modification to Ecology~~	~~03/31/2004~~
M-015-43B	Submit 200-PW-2 OU RI Report including the Past Practice Waste Sites in the 200-PW-4 General Process Waste Group	06/30/2004
M-015-43C	Submit 200-PW-2 OU Feasibility Study and Proposed Plan/Proposed RCRA Permit Modification including the Past Practice Waste Sites in the 200-PW-4 General Process Waste Group	12/31/2005
M-015-47	Submit a Proposed Plan to EPA and/or Ecology to conduct remedial action(s) for source control at high-risk waste site(s) which includes an engineering evaluation of an engineered surface barrier.	6/30/2003