

**Federal Facility Agreement and Consent Order
Change Control Form**

Appendix 3: M-20 Change Control Form

Submit Part B permit applications for all RCRA TSD units

Appendix 4: M-62 Change Control Form

High Level Waste and Low Level Waste pretreatment, processing and vitrification

Appendix 5: M-90 Change Control Form

Jeep

Complete Facilities for storage and disposal of immobile High Level and Low Activity Waste.

Change Number M-20-01-01 Draft	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date January 17, 2002												
Originator DOE, Office of River Protection Phone														
Class of Change <input type="checkbox"/> I – Signatories <input checked="" type="checkbox"/> II – Executive Manager <input type="checkbox"/> III – Project Manager														
Change Title Modification of Hanford Federal Facility Agreement and Consent Order (HFFACO) Hazardous Waste facility Part B Permit requirements M-20-56 and M-20-57 (Immobilized Low-Activity Waste disposal and High-Level Waste (HLW) canister storage building (CSB)) in order to resolve inconsistencies between HFFACO requirements, completion schedules within the U. S. Department of Energy's (DOE) contract No. DE-AC27-01RV14136, and DOE's Office of River Protection (ORP) baseline schedule.														
Description/Justification of Change Recent delays in the acquisition of tank waste treatment facilities at the Hanford site have been largely based on the failure of efforts to implement a cost effective "privatized" approach to tank waste treatment complex construction. Though efforts by the parties have centered on attempting to minimize programmatic delay, significant inconsistencies have grown between HFFACO requirements and adjusted DOE and DOE contractor schedules.														
Impact of Change This change request delays Part B permit application schedules by modifying Hanford Federal Facility Agreement and Consent Order (HFFACO) work requirements at M-20-56 and M-20-57. These modifications are made in order to resolve inconsistencies between HFFACO requirements, completion schedules within the U. S. Department of Energy's (DOE) contract No. DE-AC27-01RV14136 and DOE's Office of River Protection (ORP) baseline schedule.														
Affected Documents The Hanford Federal Facility Agreement and Consent Order, as amended, including HFFACO Action Plan Appendix D, DOE's Annual Land Disposal Restrictions Report, DOE's Tank Farm Closure/Post-Closure Workplan Update and Hanford site internal planning, management, and budget documents (e.g., DOE and DOE contractor Baselines, Baseline Change Control documents; Sitewide Systems Engineering Control documents; Project Management Plans; and the Hanford site Integrated Priority List (IPL)).														
Approvals <table><tbody><tr><td>_____ Ecology</td><td>_____ Date</td><td>_____ Approved</td><td>_____ Disapproved</td></tr><tr><td>_____ DOE</td><td>_____ Date</td><td>_____ Approved</td><td>_____ Disapproved</td></tr><tr><td>_____ EPA</td><td>N/A _____ Date</td><td>_____ Approved</td><td>_____ Disapproved</td></tr></tbody></table>			_____ Ecology	_____ Date	_____ Approved	_____ Disapproved	_____ DOE	_____ Date	_____ Approved	_____ Disapproved	_____ EPA	N/A _____ Date	_____ Approved	_____ Disapproved
_____ Ecology	_____ Date	_____ Approved	_____ Disapproved											
_____ DOE	_____ Date	_____ Approved	_____ Disapproved											
_____ EPA	N/A _____ Date	_____ Approved	_____ Disapproved											

M-20-01-01

January 17, 2002

Description/Justification of Change (continued)

Due to its concerns about these inconsistencies, the Washington Department of Ecology (Ecology) required that DOE develop and submit a tank waste treatment **Recovery Plan** documenting actions and associated schedules DOE proposes to implement to assure compliance with HFFACO requirements; demonstrating that though start of treatment complex construction has been delayed, the HFFACO December 2007 due date for initial treatment complex hot operations remains achievable, and will be met; and that DOE has in place federal fiscal year 2002 funds and the necessary spending authority from the Bush administration to fully support implementing the recovery plan. (See Ecology tank waste final determination of July 26, 2001 and its subsequent August 1, 2001 Notice of Penalty Incurred and due). DOE's Recovery Plan (including its initial version of this M-20-01-01 Change Request) was submitted on October 1, 2001.

Following review by Ecology, and discussions between the parties, DOE and Ecology have agreed to appropriate Recovery Plan modifications including the modification of DOE's tank waste treatment baseline and this M-20-01-01 Change Request.

This M-20-01-01 Change Request delays by approximately 1 year the due dates for submittal of the HLW Canister Storage Facility and Immobilized Low-Activity Waste disposal facility Part B applications. Part B permit submittals will be based upon the completion of design for 80% of the critical systems as defined in the respective M-90 milestones. It is assumed, that it will take 2 years to permit and obtain final status. All other M-20-00 series requirements remain unchanged.

Modifications to the M-20 milestone series incorporated into the HFFACO by approval of this M-20-01-01 Change Request are shown here as either shaded additions, or strikethrough deletions.

MS Number	Milestone Description	Due Date
M-20-56	SUBMIT CANISTER STORAGE FACILITY PART B DANGEROUS WASTE PERMIT APPLICATION TO ECOLOGY.	6/30/02 6/30/2003
M-020-57	SUBMIT ILAW DISPOSAL FACILITY CERTIFIED PART B PERMIT APPLICATION TO ECOLOGY.	8/31/02 6/30/2003

Ecy RP comments M20 1-17-2002.doc