

<b>Change Number</b>  M-90-01-03 Draft	<b>Federal Facility Agreement and Consent Order                  Change Control Form</b>  Do not use blue ink. Type or print using black ink.	<b>Date</b>  January 17, 2002												
<b>Originator</b> DOE-Office of River Protection		<b>Phone</b>												
<b>Class of Change</b> <input type="checkbox"/> I – Signatories <input checked="" type="checkbox"/> II – Executive Manager <input type="checkbox"/> III – Project Manager														
<b>Change Title</b> Modification of <u>Hanford Federal Facility Agreement and Consent Order</u> (HFFACO) M90 series requirements 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.														
<b>Description/Justification of Change</b> 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.														
<b>Impact of Change</b> This change request modifies <u>Hanford Federal Facility Agreement and Consent Order</u> (HFFACO) M90 series work requirements for M-90-08, M-90-09-T01, M-90-10 & M-90-11 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.														
<b>Affected Documents</b> The <u>Hanford Federal Facility Agreement and Consent Order</u> , 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)).														
<b>Approvals</b>  <table border="0" style="width: 100%;"> <tr> <td style="width: 45%; border-top: 1px solid black;">Ecology</td> <td style="width: 15%; border-top: 1px solid black;">Date</td> <td style="width: 15%; border-top: 1px solid black;">_____ Approved</td> <td style="width: 25%; border-top: 1px solid black;">_____ Disapproved</td> </tr> <tr> <td style="border-top: 1px solid black;">DOE</td> <td style="border-top: 1px solid black;">Date</td> <td style="border-top: 1px solid black;">_____ Approved</td> <td style="border-top: 1px solid black;">_____ Disapproved</td> </tr> <tr> <td style="border-top: 1px solid black;">EPA</td> <td style="border-top: 1px solid black;">Date</td> <td style="border-top: 1px solid black;">_____ Approved</td> <td style="border-top: 1px solid black;">_____ Disapproved</td> </tr> </table> <p style="text-align: center; margin-left: 150px;">N/A</p>			Ecology	Date	_____ Approved	_____ Disapproved	DOE	Date	_____ Approved	_____ Disapproved	EPA	Date	_____ Approved	_____ Disapproved
Ecology	Date	_____ Approved	_____ Disapproved											
DOE	Date	_____ Approved	_____ Disapproved											
EPA	Date	_____ Approved	_____ Disapproved											

**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). Storage and disposal facility TPA milestone M-90-10 and M-90-11 dates are aligned to coincide with the dates vitrified waste will be ready for disposition. Considering proposed WTP hot commissioning schedules, storage capacity will not be needed for ILAW until August 2008, and will not be required for high-level waste until June 2009. M-90-10 placement of ILAW canisters in the ILAW disposal facility is based on the assumption that the ILAW disposal facility will be ready to accept containers when the WTP begins ILAW production. This assumes lag storage capacity in WTP is not needed for ILAW and is based on M-62-09 start of Phase 1 Treatment Complex hot commissioning by December 31, 2007. For M-90-11, placement of IHLW canisters in the CSB, it is assumed that the CSB will be ready to accept canisters when WTP lag storage reaches 50% of capacity (45 canisters) based on scheduled production during hot commissioning (based on 1.5 MT/day of HLW). DOE's Recovery Plan (including its initial version of this M-20-01-01 Change Request) was submitted on October 1, 2001.

This M-90-01-03 Change Request modifies HFFACO schedules for hazardous waste facility permitting and associated ILAW disposal facility and HLW canister storage facility (CSB) acquisition in order to align HFFACO, DOE baseline, and contract requirements. All other M-90-00 series requirements remain unchanged.

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-90-01-03 Change Request.

**Modifications to the M-90 milestone series incorporated into the HFFACO by approval of this M-90-01-03 Change Request are shown here as either shaded additions, or strikethrough deletions.**

<b>MS Number</b>	<b>Milestone Description</b>	<b>Due Date</b>
M-90-00	COMPLETE ACQUISITION OF NEW FACILITIES, MODIFICATION OF EXISTING FACILITIES, AND/OR MODIFICATION OF PLANNED FACILITIES AS NECESSARY FOR STORAGE OF HANFORD SITE IHLW AND ILAW, AND DISPOSAL OF ILAW.	TO BE ESTABLISHED 9 MONTHS AFTER APPROVAL OF PROJECT MANAGEMENT PLAN
	COMPLIANCE WITH THE WORK SCHEDULES SET FORTH IN THIS M-90 SERIES IS DEFINED AS THE PERFORMANCE OF SUFFICIENT WORK TO ASSURE WITH REASONABLE CERTAINTY THAT DOE WILL ACCOMPLISH SERIES M-90 MAJOR AND INTERIM MILESTONE REQUIREMENTS.	
	DOE INTERNAL WORK SCHEDULES (E.G. DOE APPROVED SCHEDULE BASELINES) AND ASSOCIATED WORK DIRECTIVES AND AUTHORIZATIONS SHALL BE CONSISTENT WITH THE REQUIREMENTS OF THIS AGREEMENT. MODIFICATION OF DOE CONTRACTOR BASELINES(S) AND ISSUANCE OF ASSOCIATED DOE WORK DIRECTIVES AND/OR AUTHORIZATIONS THAT ARE NOT CONSISTENT WITH AGREEMENT REQUIREMENTS SHALL NOT BE FINALIZED	
M-90-08	INITIATE ILAW DISPOSAL FACILITY CONSTRUCTION.	<del>7/31/2004</del>
	INITIATION OF CONSTRUCTION OCCURS WHEN DOE OR IT'S CONTRACTOR (AS AUTHORIZED) ISSUES AN APPROVAL TO START CONSTRUCTION AND THE CONTRACTOR COMMENCES EXCAVATION OF NON-CRITICAL SYSTEMS WITHIN THE RCRA DISPOSAL FACILITY.	<u>2/28/2005</u>

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**Description/Justification of Change (continued)**

M-90-09-T01	COMPLETE DETAILED DESIGN OF ILAW DISPOSAL FACILITY CRITICAL SYSTEMS TO 80%	<u>3/30/2004</u> <u>5/30/2003</u>
	DETAILED DESIGN OF CRITICAL SYSTEMS INCLUDES THE A) LINER, B) LEACHATE COLLECTION SYSTEM AND C) LEAK DETECTION SYSTEM.	
M-90-10	INITIATE PLACEMENT OF ILAW WASTE CANISTERS IN ILAW DISPOSAL FACILITY (LOW ACTIVITY WASTE PACKAGES PLACED WITHIN THESE FACILITIES WILL BE RETRIEVABLE).	<u>4/31/2007</u> <u>8/31/2008</u>
M-90-11	COMPLETE CANISTER STORAGE FACILITY CONSTRUCTION	<u>2/04/2007</u> <u>6/30/2009</u>
	COMPLETION OF THIS MILESTONE REQUIRES THE COMPLETION OF ALL CONSTRUCTION, INTERNAL/EXTERNAL FACILITY(S) MODIFICATIONS AND STARTUP ACTIVITIES NECESSARY FOR CANNISTER STORAGE FACILITY RECEIPT OF ALL PHASE I HANFORD SITE HIGH LEVEL WASTE CANISTERS FROM TANK WASTE REMEDIATION SYSTEM (TWRS) PROCESSING. FOR PURPOSES OF THIS INTERIM MILESTONE PHASE I IHLW CANISTER STORAGE IS DEFINED AS THE CAPABILITY FOR STORAGE OF AT LEAST 600 IHLW CANISTERS. INTERIM MILESTONES AND ASSOCIATED TARGET DATES ESTABLISHING WORK SCHEDULES FOR PHASE II IHLW CANISTER STORAGE WILL BE ESTABLISHED PURSUANT TO THE PHASE II REQUEST FOR PROPOSAL FOR TWRS PRIVATIZATION. FOR PERMITTING PURPOSES DETAILS DESIGN OF CRITICAL SYSTEMS INCLUDES THE CANISTER STORAGE TUBE SYSTEM.	