

Change Number	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.		Date:	
M-034-04-01			May 27, 2004	
Originator: K. A. Klein		Phone: (509) 376-7395		
Class of Change:				
<input checked="" type="checkbox"/> I - Signatories		<input type="checkbox"/> II - Executive Manager		<input type="checkbox"/> III - Project Manager
Change Title:				
Acceleration of K Basins Sludge Treatment and Disposal, Basin Remediation, and Dredging in Sludge Retrieval				
Description/Justification of Change:				
<p>The Parties have agreed on a series of Tri-Party Agreement milestones to measure progress on, and ensure the safe accelerated remediation of the K East and K West Basins and treatment and disposal of the sludge. Retrieval of the sludge will be delayed, however sludge will be containerized to provide additional environmental protection until sludge is retrieved. The milestones described in this change package are considered by the Parties to be a comprehensive pathway to a safe and stable remediation that offers net positive environmental benefits. This strategy is consistent with the goals of the Parties to minimize waste handling and reduce risk to human health and the environment.</p> <p>A total of eleven Tri-Party Agreement milestone/target date changes are necessary to implement this strategy as shown on the next page.</p> <p>Modifications established by approval of this Tri-Party Agreement Change Request are denoted as strikeout for deletions/modification and shading for new text.</p>				
Impact of Change:				
A total of eleven Tri-Party Agreement interim milestones and target dates would be impacted (accelerated, extended, deleted, or revised) by this change. Specifically, one major Tri-Party Agreement milestone is being extended, 6 interim milestones are being added, 3 interim milestones are being deleted and 1 target date is being deleted.				
Affected Documents:				
The Hanford Federal Facility Agreement and Consent Order, as amended, and Hanford Site internal planning management, and budget documents (e.g., USDOE and USDOE contractor Baseline Change Control documents; Multi-Year Work Plan; Sitewide Systems Engineering Control Documents; Project Management Plans, and, if appropriate, LDR Report requirements).				
Approvals:				
_____	_____	__ Approved	__ Disapproved	
K. A. Klein, RL Manager	Date			
_____	_____	__ Approved	__ Disapproved	
L. J. Iani, EPA Region 10 Administrator	Date			
_____	_____	__ Approved	__ Disapproved	
L. Hoffman, Ecology Interim Director	Date			

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Tri-Party Agreement Milestone M-034-18B and M-034-25-T01 remain unchanged. Modifications to existing Tri-Party Agreement milestones are denoted with ~~redline/strikeout~~; new milestones/text are denoted with shading

Number	Description	Date
M-034-00A	<p>Complete removal of the K Basins and their content. spent nuclear fuel, sludge, debris and water at DOE's K Basins.</p> <p>Note: Unless otherwise noted, the term "K Basins" is used to denote both K East and K West Basins.</p> <p>This milestone will be complete when both K East and K West Basins, spent nuclear fuel, sludge, debris and water are removed.</p>	<p>7/31/2007 3/31/2009</p>
M-034-08	<p>Initiate full scale K East Basin sludge removal DOE shall complete and approve K East sludge removal definitive design documents, all associated construction, and readiness assessments, and initiate removal of sludge from the Basin.</p>	12/31/2002
M-034-09-T01	<p>Complete K Basins rack and canister removal. All fuel storage racks and empty fuel canisters shall be removed from the K Basins.</p>	1/31/05
M-034-10	<p>Complete sludge removal from K Basins. Fuel processing in K Basins shall be complete including the capture of fuel canister sludge in the integrated water treatment system and removal of visible floor and pit sludge.</p>	8/31/04
M-034-21-T01	Initiate full scale K West Basin water removal	10/31/2005 12/31/2005
M-034-22	Complete K West Basin water removal	8/31/06
M-034-23	Initiate full scale K East Basin water removal	9/30/04
M-034-24	Complete K East Basin water removal.	9/30/05
M-034-30	<p>Initiate Sludge Treatment</p> <p>This interim milestone will be complete following treatment and packaging of the first unit of sludge for disposal at WIPP into a form that is certifiable under the RH-TRU WIPP WAC at the time of treatment.</p>	2/28/07
M-034-31	<p>Complete Sludge Treatment</p> <p>This interim milestone will be complete following treatment and packaging of all sludge for disposal at WIPP or other facility as appropriate and approved by EPA into a form that is certifiable under the RH-TRU WIPP WAC at the time of treatment.</p>	10/31/07
M-034-32	<p>Complete Removal of the K East Basin Structure</p> <p>This interim milestone will be complete when spent nuclear fuel, sludge, debris and water are removed from the K East Basin and the upper building and concrete basin are removed.</p>	3/31/07

Number	Description	Date
M-034-33	Containerize K East Sludge, all K East sludge is placed in containers. Sludge containerization initiation (10/31/2004) Sludge containerization complete (03/01/2005)	As specified in the descriptive text of this milestone
M-034-34	Complete removal of K East sludge	01/31/2006
M-034-35	Containerize K West Sludge All K West sludge is placed in containers	06/30/2006

This change adds sludge processing to the scope of Tri-Party Agreement M-034 thereby accelerating its disposal. This change also adds the removal of the K East and K West Basin structures in advance of the current timetable established in M-016-52 and M-016-53.

This change has evolved through programmatic reviews assessing the use of existing 100 Area waste management facilities for the interim storage of sludge for an unspecified time and the viability of treatment and packaging of the sludge for disposal at WIPP. The grout and remove approach toward deactivation of the basins will eliminate the need to remove all basin debris and reduce the potential worker exposure by minimizing the amount of decontamination required to attain acceptable radiation levels caused by radiological contamination that has migrated into the basins' concrete walls and floor.

The benefits of these changes are:

1. Accelerates sludge treatment for disposal
2. Reduces handling of sludge
3. Eliminates risks from long-term storage of untreated sludge
4. Accelerates sludge disposal at WIPP
5. Sequences and integrates basin deactivation activities with sludge removal activities.

Specific milestones for completion of water removal are no longer necessary, because water removal will be an integral component of the grout process and water must be removed prior to removal of the basin physical structure.

The M-034-30 milestone to initiate sludge treatment is not satisfied by treatment of the K East Basin sludge within the north loadout pit.

The Parties agree that the Record of Decision (ROD) for the 100-K Area Spent Nuclear Fuel (SNF) Basins will be modified to include treatment of sludge in order to prepare it for shipment to the Waste Isolation Pilot Plant (WIPP). A more detailed description of the waste management process for sludge that is classified as transuranic (TRU) waste will be provided in the Remedial Action Work Plan. While a date for completion of TRU sludge shipments to WIPP cannot be determined at this time, DOE agrees that the Remedial Action for the 100-K Area is not complete until shipment from Hanford to WIPP has taken place. Tri-Party Agreement Major Milestone M-016-00 requires completion of remedial actions for all non-tank farm operable units by September 30, 2024, therefore sludge shipments to WIPP will be completed no later than that date. However, consistent with CERCLA Section 120 requirements for the expeditious completion of all necessary remedial actions, DOE will seek to ship sludge to WIPP by Tri-Party Agreement Interim Milestone M-016-53 completion date of December 31, 2012. This milestone requires completion of Interim Response Actions for the 100-K Area. A portion of the treated sludge may be acceptable for disposal at ERDF as contemplated in the previously issued Interim Action ROD.