

Addendum

Proposed Changes to Hanford Central Plateau Cleanup Work and Schedule



U.S. Department of Energy • Washington State Department of Ecology • U.S. Environmental Protection Agency

Tri-Party Agreement (TPA) Milestones

What is a TPA milestone?

A TPA milestone is a legal agreement between DOE, Ecology, and EPA, that identifies cleanup actions and schedules.

What is a Major Milestone?

Major milestones are the end date for large project cleanup work that takes place over several years. A major milestone is identified by a “00” at the end. The major milestones impacted by the proposed changes are:

- M-015-00: Investigation Work on Central Plateau
- M-016-00: Cleanup Work on Central Plateau
- M-085-00: Canyon Cleanup
- M-094-00: Completion of 300 Area Facilities.

What is an Interim Milestone?

Interim milestones help set the pace to finish cleanup work for a major milestone. Multiple interim milestones are issued for each major milestone.

What changes are being proposed?

The following provides a summary of the proposed changes to the M-015, M-016, M-085, M-037, and M-094 milestone series. The full TPA change packages are available in the Administrative Record. Text in ~~strikeout~~ is proposed to be deleted and replaced with new text. New text is double-underlined.

1. **M-015 Milestone Series:** Work under the M-015 milestone series deals with completing the investigation of waste sites which is done in multiple ways. Investigation activities include drilling wells to collect groundwater samples, taking soil samples for chemical analysis, and researching past activities at waste sites. Work under this milestone series also includes analyzing different cleanup options and selecting a cleanup approach through issuance of a cleanup decision, known as a Record of Decision (ROD). The culmination of work under the M-015 milestone series is the issuance of all RODs primarily on the Central Plateau.

Number	Milestone	Due Date
M-015-00 (MAJOR Milestone)	Complete the RI/FS (or RFI/CMS and RI/FS) process for all non-tank farm operable units except for canyon/associated past practice waste site OUs covered in M-85-00.	12/31/2016 <u>06/30/2026</u>
M-015-21A	Submit a 200-BP-5 and 200-PO-1 OU Feasibility Study Report and Proposed Plan(s) to Ecology.	<u>06/30/2015</u> <u>06/30/2018</u>

M-015-38B	Submit a Feasibility Study Report and Proposed Plan(s) for the 200-CW-1, 200-CW-3, and 200-OA-1 Operable Units for Waste Sites in the Outer Area of the Central Plateau to EPA.	10/30/2015 <u>07/31/2023</u>
M-015-91B	Submit Feasibility Study Report(s) and Proposed Plan(s) for the 200-BC-1/200-WA-1 operable units (200 West Inner Area) to EPA.	12/31/2015 <u>07/31/2021</u>
M-015-92A	Submit a RCRA Facility Investigation/Corrective Measures Study & Remedial Investigation/Feasibility Study work plan for the 200-EA-1 operable unit (200 East Inner Area) to Ecology.	06/30/2015 <u>09/30/2017</u>
M-015-92B	Submit <u>RCRA Facility Investigation/Corrective Measures Study & Remedial Investigation/Feasibility Study Report(s)</u> and Proposed Corrective Action Decision(s)/Proposed Plan(s) for the 200-EA-1 and 200-IS-1 OUs (Central Plateau 200 East Inner Area) to Ecology.	12/31/2016 <u>11/30/2022</u>
<u>M-015-92C</u> new	<u>Submit RCRA Facility Investigation/Corrective Measures Study & Remedial Investigation/Feasibility Study Report and Proposed Corrective Action Decision/Proposed Plan for the 200-IS-1 OU to Ecology.</u>	<u>03/31/2023</u>
M-015-93B	Submit RCRA Facility Investigation/Corrective Measures Study & Remedial Investigation/Feasibility Study Report and Proposed Corrective Action Decision/Proposed Plan for the 200-SW-2 OU to Ecology.	12/31/2016 <u>01/31/2023</u>
M-015-110B	Submit Corrective Measures Study & Feasibility Study Report and Proposed Plan/Proposed Corrective Action Decision for the 200-DV-1 OU to Ecology.	09/30/2015 <u>09/30/2023</u>
<u>M-015-96</u> new	<u>Submit the 100-OL-1 Remedial Investigation report and a change request to establish a date for the feasibility study report to EPA and Ecology.</u>	<u>08/31/2018</u>
<u>M-015-98</u> new	<u>Complete remedial investigation of U Plant related waste sites located in 200-WA-1 in accordance with the WA-1 RI/FS Work Plan.</u>	<u>06/30/2019</u>
<u>M-015-99</u> new	<u>Complete remedial investigation of PFP related waste sites located in 200-WA-1 in accordance with the WA-1 RI/FS Work Plan.</u>	<u>06/30/2019</u>

2. **M-016 Milestone Series:** Work under the M-016 milestone series deals with the implementation of cleanup decisions identified in RODs. Once a ROD is issued, a Remedial Design/Remedial Action (RD/RA) Work Plan is due within 6 months of signing of the ROD or by an alternative date on which the TPA agencies agree. The RD/RA Work Plan includes an enforceable schedule for completion of the cleanup identified in the ROD. New milestones or revisions to current milestones are made to match schedules in RD/RA work plans, making RD/RA work plans an important part of scheduling cleanup. The proposed changes to the M-016-00 major milestone show a “to be determined” (TBD) date, which will be informed by the completion of all investigation work under the M-015-00 major milestone. Once remedies are selected, a realistic schedule can be made based on the associated RD/RA Work Plans (see M-016-02).

Number	Milestone	Due Date
M-016-00 (MAJOR Milestone)	Complete remedial actions for all non-tank farm and non-canyon operable units <u>in accordance with schedules established in approved RD/RA work plans.</u>	<u>09/30/2024</u> <u>TBD</u>
<u>M-016-02</u> new	<u>Submit a change package to establish a schedule for completion of remedial actions for all non-tank farm and non-canyon operable units (M-016-00) in accordance with the RD/RA WPs.</u>	<u>06/30/2026</u>
M-016-00B	Complete all interim 300 Area remedial actions including the 618-10 and 618-11 burial grounds but not including <u>the 618-11 burial ground, 300-296, and sites associated with retained 300 Area facilities and the utility corridors in accordance with the RD/RA Work Plan for 300-FF-2 Soils (DOE/RL-2014-13-ADD1) and as clarified in TPA-CN-660.</u> Completion of interim remedial actions for waste sites associated with the retained 300 Area facilities and their utilities are subject to approved Remedial Design/Remedial Action Work Plans.	09/30/2018
<u>M-016-85</u>	<u>Complete remedial actions for 300-296 Waste Site in accordance with RD/RA Work Plan for 300-FF-2 Soils (DOE/RL-2014-13-ADD1) and final disposition for the 324 Building and Ancillary Buildings in accordance with the Removal Action Work Plan (DOE/RL-2004-77).</u>	<u>09/30/2021</u>
<u>M-016-86</u> new	<u>Complete remedial actions for 618-11 Burial Ground in accordance with RD/RA Work Plan for 300-FF-2 Soils (DOE/RL-2014-13-ADD1).</u>	<u>09/30/2021</u>
M-016-200A	Complete U Plant canyon (221 U Facility) demolition in accordance with the Remedial Design/Remedial Action Work Plan.	<u>09/30/2017</u> <u>09/30/2021</u>
M-016-200B	Complete U Plant (221 U Facility) barrier construction in accordance with the Remedial Design/Remedial Action Work Plan.	<u>09/30/2021</u> <u>09/30/2024</u>
<u>M-016-250</u> new	<u>Develop a three year rolling prioritized schedule consistent with site-wide clean-up priorities to implement waste site removal actions per Action Memoranda (DOE/RL-2009-37, DOE/RL-2009-48, and DOE/RL-2009-86).</u> <u>This milestone series will continue on a yearly basis to reaffirm selected sites and recommend any changes to the list, to maintain a three year rolling prioritized schedule, until such time that removal actions are completed.</u>	<u>03/31/2016</u> <u>And Annually Thereafter</u>

3. **M-085 Milestone Series:** Work under the M-085 milestone series deals with the completion of cleanup actions for the canyon facilities located on the Central Plateau. Canyons refer to Hanford's five former chemical extraction plants and include B Plant (CB-1), T Plant, U Plant, REDOX (CR-1), and PUREX (CP-1). Canyons are approximately 80 feet high, 70 feet wide, and hundreds of feet long and resemble large warehouses. Based on the proposed changes, the schedule for canyon work is delayed and investigative work on the Central Plateau is prioritized.

Number	Milestone	Due Date
M-085-01	Submit a change package to establish a date for major milestone M-085-00 <u>in accordance with schedules established in approved RD/RA work plans.</u>	<u>09/30/2022</u> <u>06/30/2026</u>
<u>M-085-70</u> new	<u>Submit Remedial Investigation/Feasibility Study Work Plan for 200-CB-1 to Ecology.</u>	<u>09/30/2019</u>
<u>M-085-72</u> new	<u>Submit Removal Action Work Plan for 224-B to Ecology.</u>	<u>09/30/2020</u>
<u>M-085-74</u> new	<u>Submit engineering evaluation/cost analysis (EE/CA) to Ecology for a non-time-critical removal action to address high priority cleanup for B Plant Canyon in the 200-CB-1 operable unit.</u>	<u>06/30/2018</u>
<u>M-085-76</u> new	<u>Initiate response actions in accordance with action memorandum for a non-time-critical removal action to address high priority cleanup for B Plant Canyon in the 200-CB-1 operable unit.</u>	<u>09/30/2025</u>
<u>M-085-80</u> new	<u>Submit Remedial Investigation/Feasibility Study Work Plan for 200-CP-1 to Ecology.</u>	<u>09/30/2020</u>
<u>M-085-82</u> new	<u>Submit engineering evaluation/cost analysis (EE/CA) to Ecology for a non-time-critical removal action to address high priority cleanup for the PUREX Plant in the 200-CP-1 operable unit.</u>	<u>12/31/2017</u>
<u>M-085-84</u> new	<u>Initiate response actions in accordance with action memorandum for a non-time-critical removal action to address high priority cleanup for the PUREX Plant in the 200-CP-1 operable unit.</u>	<u>09/30/2025</u>
<u>M-085-90</u> new	<u>Submit Remedial Investigation/Feasibility Study Work Plan for 200-CR-1 to EPA.</u>	<u>09/30/2021</u>
<u>M-085-100</u> new	<u>Submit Removal Action Work Plan for 224-T to EPA.</u>	<u>09/30/2020</u>

4. **M-094 Milestone Series:** The M-094 milestone series deals with completion of cleanup for 300 Area facilities. The majority of work for the 300 Area is identified in milestone M-094-00 with a proposed completion date in 2018. Due to their complexity and high levels of contamination, the following sites have been removed from the M-094-00 and placed in M-016-00 with a proposed completion date in 2021.

- **618-10 Burial Ground** (see M-016-00B): Includes waste that was placed in trenches and vertical pipe units (VPUs). VPUs are five 55-gallon drums welded together which were used for highly radioactive waste.
- **618-11 Burial Ground** (see M-016-86): Similar to the 618-10 Burial Ground with additional challenges since it is located adjacent to a commercial nuclear power station.
- **300-296 Waste Site** (see M-016-85): Located beneath the 324 Building and consists of high levels of radioactivity from a leak below a sump area.
- **324 Building** (see M-016-85): Also known as the Chemical Materials Engineering Laboratory. Two “hot cells” inside this building were used for highly radioactive activities.

Number	Milestone	Due Date
M-094-00	<p>Complete disposition of all 300 Area surplus facilities identified in the removal action work plan(s) for the 300 Area facilities, <u>including excluding</u> the 324 Building and its ancillary buildings and structures.</p> <p>Completion of facility disposition is defined as the completion of deactivation, decontamination, decommissioning, <u>and demolition in accordance with the removal action work plan.</u> and obtaining EPA and/or Ecology approval of the appropriate project closeout documents. The cleanup of 300 FF-2 waste sites associated with 300 Area surplus facilities and utilities will be performed in accordance with Tri-Party Agreement major Milestone M-016-00B, M-016-69, and approved remedial design/remedial action work plans for 300 Area waste sites by the specified due date as approved in removal or remedial action work plans.</p>	09/30/2018

5. **M-037 Milestone Series:** The M-037 milestone series deals with the completion of closure requirements for 12 specific Treatment, Storage and Disposal (TSD) units.

Number	Milestone	Due Date
M-037-10	Complete Unit-Specific Closure Requirements according to the closure plan(s) for six (6) seven (7) TSD Units: 207-A South Retention Basin, 216-A-29 Ditch, 216-A-36B Crib, 216-A-37-1 Crib, 216-B-63 Trench, <u>and Hexone Storage and Treatment Facility (276-S-141/142), and 241-CX Tank System (241-CX-70/71/72).</u>	09/30/2020
M-037-11	Complete unit-specific closure requirements for two (2) TSD Units: 216-B-3 Main Pond system and 216-S-10 Pond and Ditch.	09/30/2016 <u>09/30/2021</u>
<u>M-037-12</u> new	<u>Complete closure requirements for Non-Radioactive Dangerous Waste Landfill, Solid Waste Landfill, and 400 Area Waste Management Unit Fuel Storage Facility and Interim Storage Area.</u>	<u>09/30/2022</u>
<u>M-037-13</u> New	<u>Complete Unit-Specific Closure Requirements according to the closure plan-241-CX Tank System (241-CX-70/71/72).</u>	<u>09/30/2022</u>

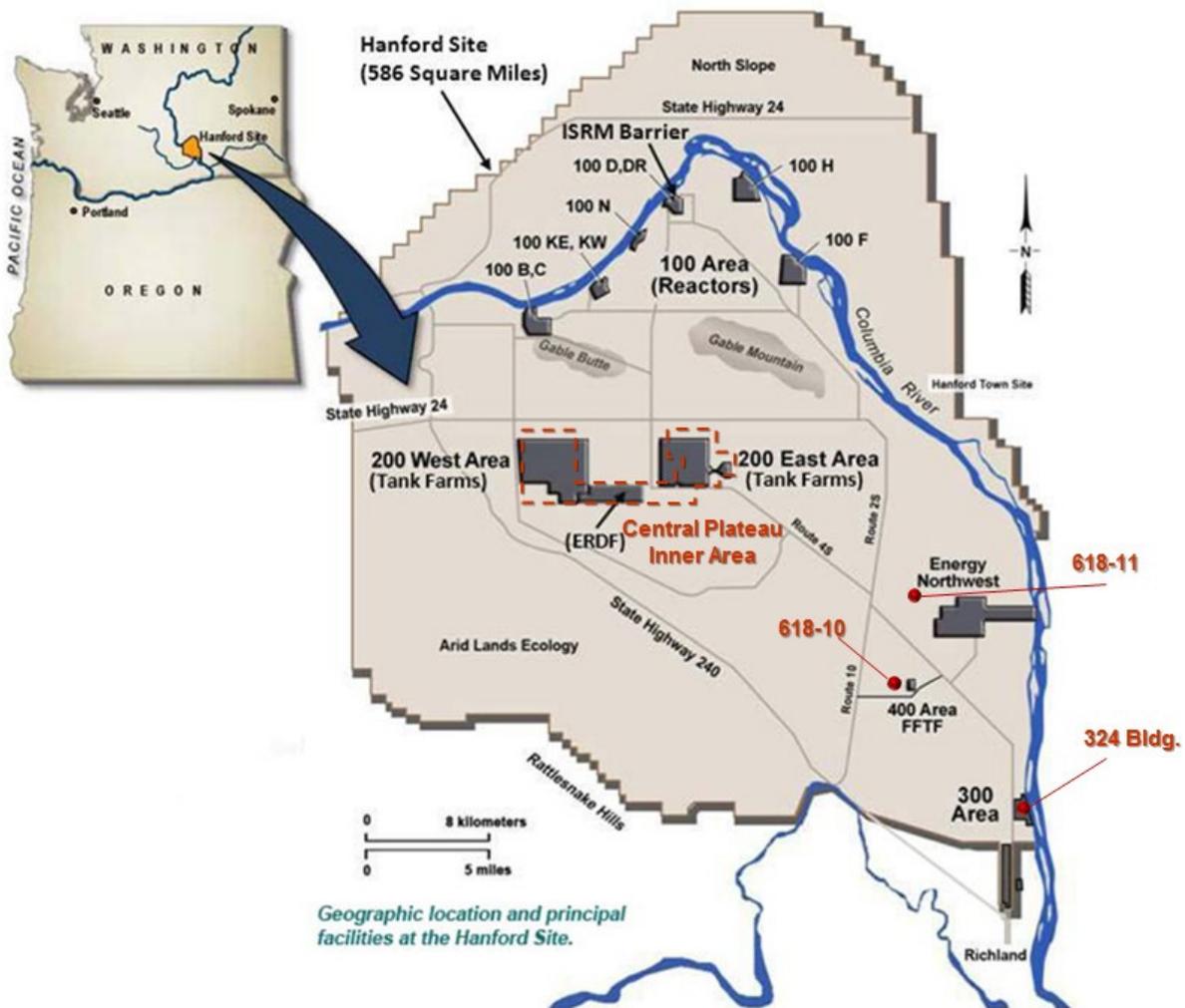
How can I comment on the Proposed Changes?

The TPA agencies are asking for your comments on the proposed changes that affect the schedule for cleanup work on the Hanford Central Plateau and 300 Area. Although commenting on change packages can be a challenge, here are a few things to consider when writing your comments.

- ***Are there general values that should be considered when planning Hanford cleanup activities?***
Some examples of general values are: prioritizing work along the Columbia River over other parts of Hanford; or delaying work at five Hanford Canyon facilities to allow for prioritization of work on other parts of Hanford.
- ***Is there certain work you feel should be given priority over other work?***
For example, do you feel scheduling completion of the 324 Building should occur before work on the Central Plateau?

Full versions of the TPA change packages are available at:

pdw.hanford.gov/arpir/index.cfm/viewDoc?accession=0079726H



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*current as of 11/12/15