

**Hanford Federal Facility Agreement and Consent Order
(Tri-Party Agreement)**

**Tentative Agreement
on
Negotiations of Hanford Federal Facility Agreement and Consent Order
Revision on Major Milestone M-092-00, Complete Acquisition of New
Facilities, Modification of Existing Facilities, and/or Modification of
Planned Facilities Necessary for the Storage, Treatment/Processing, and
Disposal of Hanford Site Cesium and Strontium Capsules (Cs/Sr), Bulk
Sodium (Na), and 300 Area Special Case Waste (SCW)**

May 2018



Tri-Party Agreement

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

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**TENTATIVE AGREEMENT
ON
NEGOTIATIONS OF HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT
ORDER REVISION ON MAJOR MILESTONE M-092-00, COMPLETE ACQUISITION OF
NEW FACILITIES, MODIFICATION OF EXISTING FACILITIES, AND/OR MODIFICATION
OF PLANNED FACILITIES NECESSARY FOR THE STORAGE,
TREATMENT/PROCESSING, AND DISPOSAL OF HANFORD SITE CESIUM AND
STRONTIUM CAPSULES (Cs/Sr), BULK SODIUM (Na), AND 300 AREA SPECIAL CASE
WASTE (SCW)**

The U.S. Department of Energy, Richland Operations Office (DOE-RL), the Washington State Department of Ecology (Ecology), and the U.S. Environmental Protection Agency (EPA), hereinafter referred to as the Parties, entered into negotiations on the M-092-00 milestone series.

For the M-092-00 Major Milestone, the parties agreed to establish an overall due date and to eliminate 300 Area special case waste (SCW) language from the milestone.

For Interim Milestone M-092-09 (Bulk Sodium), the parties agreed to modify the due date, modify the scope, and establish target milestones for achieving the capability for converting sodium to sodium hydroxide for use in the Waste Treatment and Immobilization Plant (WTP).

The Parties also agreed to establish new Interim Milestone M-092-021, to complete the transfer of the cesium and strontium capsules to a new, permitted, interim storage facility. The parties also agreed to establish target milestones to achieve the follow-on capability to implement or support the eventual final capsule disposal.

For Major Milestone M-092-00 a due date of December 31, 2047 (or earlier, as established in M-062-00) ensures that the disposition of the Hanford bulk sodium and the cesium and strontium capsules occurs before WTP completes its projected operating life.

For the 300 Area SCW, which was part of the M-092-00 milestone, documentation of removal of the 300 Area SCW from the 300 Area to other Hanford Facilities is acknowledged in Ecology Letter 14-NWP-080, April 30, 2014. The 300 Area SCW is no longer in the 300 Area. It has been removed from the 300 Area to 200 Area storage and disposal facilities in accordance with facility waste acceptance criteria. As a result, the 300 Area SCW is now located in appropriate storage/disposal facilities, therefore, the 300 Area SCW no longer requires management under Milestone M-092-00.

For Bulk Sodium (Na), a Record of Decision (ROD) was issued in the *Tank Closure and Waste Management Environmental Impact Statement* (DOE EIS-TC&WM EIS) in December of 2013 that Hanford bulk sodium inventories will be processed to caustic sodium hydroxide in a Sodium Reaction facility at Hanford, and then stored for ultimate use in the Waste Treatment and Immobilization Plant (WTP). The startup of the WTP has been delayed beyond the time that was expected when the ROD was issued. As a result, a modification was agreed for existing Interim Milestone M-092-09, “Establish milestones and/or target dates if needed for acquisition of new facilities, modifications of existing facilities, and/or modification of planned facilities necessary for storage, treatment/processing, and disposal of Hanford site sodium,” due by September 30, 2018.

The Amended Consent Decree between Department of Energy and State of Washington, Case 2:08-cv-05085-RMP, Document 222, dated March 11, 2016 established that the Pretreatment Facility of the WTP, which represents the majority of the demand for caustic sodium hydroxide additions, is now planned to operate from 2033 to 2047. The prior estimate was for startup of the Pretreatment Facility in 2019. As a result, Milestone M-092-09 will address the timing change so that this action is integrated with the completed WTP design and need for chemical additions.

In addition, the parties agreed to modify the scope of Interim Milestone M-092-09 to require a conceptual design report for the sodium reaction facility. Follow-on target milestones M-092-09-T01 and M-092-09-T02 will address the completion of the preliminary and final designs. Target milestones will be converted to enforceable milestones upon completion of each prior milestone.

For the Cs/Sr Capsules, the Parties discussed the scope of the disposition path and came to an agreement that until a repository or other disposal option and associated waste acceptance criteria are established, it is important to store the capsules in a safe manner in compliance with law and regulations, and to ensure Cs/Sr capsules are placed in interim storage in a timely manner. As a result, a new interim milestone, Interim Milestone M-092-21, will address the movement of the Cs/Sr capsules to a new, permitted, interim storage facility. Newly agreed Target Milestones M-092-21-T01, M-092-21-T02, and M-092-21-T03, set forth a series of follow on actions to develop the conceptual, preliminary, and final designs for a facility/capability to implement eventual disposal of the cesium and strontium capsules. Target milestones M-092-21-T02 and M-092-21-T03 will be converted to interim enforceable milestones based on the results of each prior target milestone.

Throughout the course of these negotiations, the Parties have agreed:

- A good cause exists for modifying Major Milestone M-092-00 and Interim Milestone M-092-09.
- To establish an additional interim milestone, M-092-21.
- To establish target milestones to assist in the implementation of Interim Milestones M-092-09 and M-092-21.

The Parties have reached a tentative agreement on these changes, described in the Agreement in Principle, and presented in the proposed Hanford Federal Facility Agreement and Consent Order (HFFACO) M-92-18-01, M-92-18-02, and M-92-18-03 Change Control Forms provided below and attached to this tentative agreement.

Change Control Form	Title
M-92-18-01	Modification of Major Milestone M-092-00
M-92-18-02	Modification of Interim Milestone M-092-09 (Bulk Sodium)
M-92-18-03	New Interim Milestone M-092-21 (Cesium and Strontium Capsules)

This Tentative Agreement and the HFFACO Change Control Forms are subject to public comment and modification, as required. A notice of the upcoming public comment period for the HFFACO Change Control Forms will be distributed to the public, followed by a 45-day public comment period. Upon conclusion of the public comment period, the Parties will consider the comments and the HFFACO Change Control Forms will be revised, as appropriate. When agreed upon, the HFFACO Change Control Forms will be approved by the Parties, then incorporated into the HFFACO.

Unresolved revisions will be subject to HFFACO dispute resolution beginning at the Interagency Management Integration Team level as provided for in HFFACO Article VIII and/or XVI.

This Tentative Agreement is to take effect upon the signatures of the Parties.



**TENTATIVE AGREEMENT
ON
NEGOTIATIONS OF HANFORD FEDERAL FACILITY AGREEMENT AND
CONSENT ORDER REVISION ON MAJOR MILESTONE M-092-00, COMPLETE
ACQUISITION OF NEW FACILITIES, MODIFICATION OF EXISTING
FACILITIES, AND/OR MODIFICATION OF PLANNED FACILITIES
NECESSARY FOR THE STORAGE, TREATMENT/PROCESSING, AND
DISPOSAL OF HANFORD SITE CESIUM AND STRONTIUM CAPSULES
(Cs/Sr), BULK SODIUM (Na), AND 300 AREA SPECIAL CASE WASTE (SCW)**



Joe R. Franco, Assistant Manager
for the River and Plateau
U. S. Department of Energy
Richland Operations Office

5/3/18
Date



Alexandra K. Smith, Program Manager
Nuclear Waste Program
Washington State
Department of Ecology

5/17/18
Date



David R. Einan, Manager
Office of Environmental Cleanup
Hanford Project Office
U.S. Environmental Protection Agency

7 May 18
Date

Change Number DRAFT M-92-18-01	Federal Facility Agreement and Consent Order Change Control Form		Date 03/28/2018
Originator Al Farabee			Phone 509-376-8089
Class of Change <input checked="" type="checkbox"/> I – Signatories <input type="checkbox"/> II – Executive Managers <input type="checkbox"/> III – Project Managers			
Change Title Modification of Major Milestone M-092-00			
Description/Justification of Change <p>Milestone M-092-00 requires a due date to be established for completing the acquisition of new facilities, modifications of existing facilities and/or modification of planned facilities necessary for the storage, treatment/process and disposal of Hanford Site cesium and strontium (Cs/Sr) capsules, bulk sodium (Na) and 300 Area Special Case Waste (SCW).</p> <p>This change control form deletes the phrase "and 300 Area special case waste (SCW)" from the text of the milestone.</p> <p>TPA Change Control Form M-92-14-01 (approved June 4, 2014) stipulated that the date for the M-092-00 major milestone "will be established when all remaining activities to complete the open interim milestones are identified and scheduled."</p> <p>This change control form also modifies the due date for Major Milestone M-092-00 from "to be established by 9/30/2018" to "12/31/2047 or earlier as established in M-062-00".</p> <p style="text-align: center;"><i>Continued on page 2</i></p>			
Impact of Change This change control form establishes a due date for Major Milestone M-092-00, and eliminates 300 Area SCW from the scope of the milestone. In addition, a separate change control form, M-92-18-03, establishes interim milestone M-092-21 and target milestones M-092-21-T01, M-092-21-T02, and M-092-21-T03. In addition, a separate change control form, M-92-18-02, modifies interim milestone M-092-09 and establishes target milestones M-092-09-T01 and M-092-09-T02.			
Affected Documents HFFACO (Tri-Party Agreement) Action Plan Appendix D, "Work Schedule Milestones and Target Dates Including Designation of Lead Regulatory Agency."			
Approvals			Page 1 of 3
_____	Date _____	Approved _____ Disapproved _____	
Doug Shoop, DOE	Date _____	Approved _____ Disapproved _____	
_____	Date _____	Approved _____ Disapproved _____	
Chris Hladick, EPA	Date _____	Approved _____ Disapproved _____	
_____	Date _____	Approved _____ Disapproved _____	
Maia Bellon, Ecology	Date _____	Approved _____ Disapproved _____	

Description/Justification of Change (continued)

Cesium and Strontium Capsules

In the case of the cesium and strontium capsules, the remaining activities from Milestone M-092-00 had not been scheduled because a final disposal option has not been selected. One option for capsule disposal is processing at the Hanford Waste Treatment and Immobilization Plant (WTP). Another option is disposal to the National Repository, which is indefinitely on hold (with a goal to facilitate availability by 2048). The WTP is currently scheduled to operate until 2047, according to the Amended Consent Decree between Department of Energy and State of Washington, Case 2:08-cv-05085-RMP, Document 222, dated March 11, 2016. The acquisition of new facilities for treatment/processing and final disposition of the capsules is expected to occur before the WTP option is no longer available.

Interim Milestone M-092-20 (established June 30, 2017) requires submittal of a “disposition pathways evaluation” for the Cs/Sr capsules beginning March 31, 2022, and every four years thereafter, until a final date for completion of M-092-00 is established.

Newly proposed Interim Milestone M-092-21 requires completion of the transfer of the cesium and strontium capsules from the Waste Encapsulation and Storage Facility (WESF) to a new dangerous waste-permitted interim safe storage facility on the Hanford Site. This interim step will allow continued safe storage of the capsules until a disposal decision is made.

Newly Proposed Target Milestones M-092-21-T01, M-092-21-T02, and M-092-21-T03, set forth a series of actions to develop the conceptual, preliminary, and final designs for a facility/capability to implement disposal of the cesium and strontium capsules. Target milestones M-092-21-T02 and M-092-21-T03 will be converted to interim enforceable milestones based on each prior target milestone. These new proposed Interim Milestone M-092-21 and Target Milestones M-092-21-T01, M-092-21-T02, and M-092-21-T03 are described in more detail in a separate change control form (M-92-18-03).

Bulk Sodium

In the case of the bulk sodium, the Record of Decision in the Final Tank Closure and Waste Management Environmental Impact Statement for the Hanford Site states that “bulk sodium inventories located at Hanford will be converted to caustic sodium hydroxide in a sodium reaction facility at Hanford, and then stored for ultimate use in the WTP.” As a result, planning should occur to acquire the sodium reaction facility in time for the caustic to be used in the WTP. The largest demand for the sodium hydroxide is in the WTP Pretreatment Facility, which will operate from 2033 to 2047, according to the 2016 amendment to the Tank Waste Consent Decree.

As a result, Interim Milestone M-092-09 will be changed to require a conceptual design report (30% design) for the sodium reaction facility to be submitted to the Washington State Department of Ecology (Ecology) by December 31, 2026.

Description/Justification of Change (continued)

In addition, new proposed Target Milestones M-092-09-T01 and M-092-09-T02 set forth the remaining actions to complete the preliminary and final designs for the sodium reaction facility to be submitted to Ecology. Target Milestones M-092-09-T01 and M-092-09-T02 will be converted to interim enforceable milestones based on each prior milestone.

Until needed for use in WTP, it is safer to continue to store the bulk sodium than to convert it to a much larger volume of aqueous sodium hydroxide.

The change to Interim Milestone M-092-09, establishing a date of December 31, 2026 for conceptual design, and newly proposed Target Milestones M-092-09-T01 and M-092-09-T02 to complete the design are described in more detail in a separate change control form (M-92-18-02).

300 Area Special Case Waste

The 300 Area special case waste is no longer in the 300 Area. It has been removed from the 300 Area to 200 Area storage and disposal facilities in accordance with facility waste acceptance criteria and no longer requires management under Milestone M-092-00.

Authorized Changes

Modifications to the HFFACO are displayed by using double underline to indicate added text and ~~strikeout~~ to indicate deleted text.

Number	Milestone	Due Date
M-092-00 Lead Regulatory Agency: Ecology	Complete acquisition of new facilities, modification of existing facilities, and/or modification of planned facilities necessary for the storage, treatment/processing, and disposal of Hanford site cesium and strontium capsules (Cs/Sr), <u>and</u> bulk sodium (Na), and 300 Area special waste (SCW).	To Be Established By 9/30/2018 <u>12/31/2047 or earlier as established in M-062-00</u>

Change Number DRAFT M-92-18-02	Federal Facility Agreement and Consent Order Change Control Form	Date 03/28/2018																	
Originator Al Farabee		Phone 509-376-8089																	
Class of Change <input type="checkbox"/> I – Signatories <input checked="" type="checkbox"/> II – Executive Managers <input type="checkbox"/> III – Project Managers																			
Change Title Modification of Interim Milestone M-092-09 (Bulk Sodium)																			
Description/Justification of Change <p>This change control form modifies the due date for Interim Milestone M-092-09 from "09/30/2018" to "12/31/2026."</p> <p>This change control form also changes the scope of Interim Milestone M-092-09 from a commitment to establish milestones and target dates, to actual identification of the interim and target milestones for processing and disposal of Hanford site sodium.</p> <p>The Record of Decision in the Final Tank Closure and Waste Management Environmental Impact Statement for the Hanford Site states that "bulk sodium inventories located at Hanford will be converted to caustic sodium hydroxide in a sodium reaction facility at Hanford, and then stored for ultimate use in the WTP." The largest demand for the sodium hydroxide is in the WTP Pretreatment Facility, which will operate from 2033 to 2047, according to the Amended Consent Decree Between Department of Energy (DOE) and State of Washington, Case 2:08-cv-05085-RMP, Document 222, dated March 11, 2016.</p> <p>Interim Milestone M-092-09 will be changed to require a conceptual design report (30% design) for the sodium reaction facility to be submitted to the Washington State Department of Ecology (Ecology) by December 31, 2026.</p> <p>Newly proposed Target Milestones M-092-09-T01 and M-092-09-T02 set forth the remaining actions to complete the preliminary and final designs for the sodium reaction facility to be submitted to the Ecology. Target Milestones M-092-09-T01 and M-092-09-T02 will be converted to interim enforceable milestones based on each prior milestone.</p>																			
Impact of Change This change control form modifies interim milestone M-092-09 and establishes target milestones M-092-09-T01 and M-092-09-T02.																			
Affected Documents HFFACO (Tri-Party Agreement) Action Plan Appendix D, "Work Schedule Milestones and Target Dates Including Designation of Lead Regulatory Agency."																			
Approvals <table border="0" style="width: 100%;"> <tr> <td style="width: 30%; border-bottom: 1px solid black;">J.R. Franco, DOE</td> <td style="width: 10%; border-bottom: 1px solid black;">Date</td> <td style="width: 15%; text-align: center;">Approved _____</td> <td style="width: 15%; text-align: center;">Disapproved _____</td> <td rowspan="4" style="width: 30%; vertical-align: middle; text-align: center;">Page 1 of 3</td> </tr> <tr> <td style="border-bottom: 1px solid black;">A.K. Smith, Ecology</td> <td style="border-bottom: 1px solid black;">Date</td> <td style="text-align: center;">Approved _____</td> <td style="text-align: center;">Disapproved _____</td> </tr> <tr> <td style="border-bottom: 1px solid black;">N/A</td> <td style="border-bottom: 1px solid black;">Date</td> <td style="text-align: center;">Approved _____</td> <td style="text-align: center;">Disapproved _____</td> </tr> <tr> <td style="border-bottom: 1px solid black;">EPA</td> <td style="border-bottom: 1px solid black;">Date</td> <td style="text-align: center;">Approved _____</td> <td style="text-align: center;">Disapproved _____</td> </tr> </table>		J.R. Franco, DOE	Date	Approved _____	Disapproved _____	Page 1 of 3	A.K. Smith, Ecology	Date	Approved _____	Disapproved _____	N/A	Date	Approved _____	Disapproved _____	EPA	Date	Approved _____	Disapproved _____	
J.R. Franco, DOE	Date	Approved _____	Disapproved _____	Page 1 of 3															
A.K. Smith, Ecology	Date	Approved _____	Disapproved _____																
N/A	Date	Approved _____	Disapproved _____																
EPA	Date	Approved _____	Disapproved _____																

Description/Justification of Change (continued)

Until needed for use in WTP, it is safer to continue to store the bulk sodium than to convert it to a much larger volume of aqueous sodium hydroxide.

The change to Interim Milestone M-092-09, establishing a date of December 31, 2026 for conceptual design, and newly proposed Target Milestones M-092-09-T01 and M-092-09-T02 to complete the design are included in this change form.

Authorized Changes

Modifications to the HFFACO are displayed by using double underline to indicate added text and ~~strikeout~~ to indicate deleted text.

Number	Milestone	Due Date
<p>M-092-09 Lead Regulatory Agency: Ecology</p>	<p>Establish milestones and/or target dates if needed for acquisition of new facilities, modifications of existing facilities, and /or modification of planned facilities necessary for storage, treatment/processing, and disposal of Hanford site sodium.</p> <p><u>Submit to Ecology, a Conceptual Design Report Package (30% design) for the sodium reaction facility/capability to convert Hanford bulk sodium to aqueous sodium hydroxide to be used in the Hanford Waste Treatment and Immobilization Plant (WTP).</u></p> <p><u>The Conceptual Design Report package shall include the Conceptual Design Report, Functional Requirements Document, Functional Design Criteria Document, preliminary drawings, DOE expectations for safety in design (or a preliminary hazard analysis report if below nuclear Hazard Category 3), preliminary cost estimate, and preliminary schedule for the design, construction, and operation of the facility.</u></p> <p><u>The preliminary schedule for the design, construction and operation of the facility referred to in the paragraphs above shall not be enforceable.</u></p> <p><u>DOE shall submit with the Conceptual Design Package a TPA Change Control Form (in accordance with TPA Action Plan Section 12.0) to replace the M-092-09-T01 target date for Preliminary Design with an enforceable interim milestone drawn from the conceptual design package schedule with allowance added to address schedule margin.</u></p>	<p>09/30/2018 <u>12/31/2026</u></p>

Authorized Changes (continued)

Modifications to the HFFACO are displayed by using double underline to indicate added text and ~~strikeout~~ to indicate deleted text.

Number	Milestone	Due Date
<p><u>M-092-09-T01</u> Lead Regulatory Agency: Ecology</p>	<p><u>Submit to Ecology, a Preliminary Design Report package (60% design) for the sodium reaction facility to convert Hanford bulk sodium to aqueous bulk sodium.</u></p> <p><u>The Preliminary Design Report package shall include the Preliminary Design Report and updated documents including: Functional Requirements Document, Functional Design Criteria Document, preliminary drawings, DOE expectations for safety in design (or a preliminary hazard analysis report if below nuclear Hazard Category 3), preliminary cost estimate, and preliminary schedule for the design, construction, and operation of the facility.</u></p> <p><u>This target date will be updated and converted to an enforceable interim milestone in accordance with the TPA Change Control Form submitted pursuant to M-092-09.</u></p> <p><u>DOE shall submit with the Preliminary Design Package a TPA Change Control Form (in accordance with TPA Action Plan Section 12.0) to replace the M-092-09-T02 target date for Final Design with an enforceable interim milestone drawn from the preliminary design package schedule with allowance added to address risk-informed schedule margin.</u></p>	<p><u>06/30/2028</u></p>
<p><u>M-092-09-T02</u> Lead Regulatory Agency: Ecology</p>	<p><u>Submit to Ecology, a Final Design Report (90%-100%) design package for the sodium reaction facility to convert Hanford bulk sodium to aqueous bulk sodium.</u></p> <p><u>The Final Design Report package shall include the Final Design Report and updated documents including: Functional Requirements Document, Functional Design Criteria Document, final drawings, DOE expectations for safety in design (or a preliminary hazard analysis report if below nuclear Hazard Category 3), cost estimate, schedule for the design, construction, and operation of the facility, and punchlist, if needed.</u></p> <p><u>This target date will convert to an enforceable milestone in accordance with the TPA Change Control Form submitted pursuant to M-092-09-T01.</u></p>	<p><u>09/30/2029</u></p>

Change Number DRAFT M-92-18-03	Federal Facility Agreement and Consent Order Change Control Form	Date 03/28/2018		
Originator Al Farabee		Phone 509-376-8089		
Class of Change <input type="checkbox"/> I – Signatories <input checked="" type="checkbox"/> II – Executive Managers <input type="checkbox"/> III – Project Managers				
Change Title New Interim Milestone M-092-21 (Cesium and Strontium Capsules)				
Description/Justification of Change This change control form establishes new Interim Milestone M-092-21 and new Target Milestones M-092-21-T01, M-092-21-T02, and M-092-21-T03. Newly proposed Interim Milestone M-092-21 requires completion of the transfer of the cesium (Cs) and strontium (Sr) capsules from the Waste Encapsulation and Storage Facility, known as WESF, to a new dangerous waste-permitted interim safe storage facility on the Hanford Site. This is an interim step that allows continued safe storage of the capsules until a disposal decision is made. For the cesium and strontium capsules, remaining activities from Milestone M-092-00 had not been scheduled because a final disposal option has not been selected. One option for capsule disposal is processing at the Hanford Waste Treatment and Immobilization Plant (WTP). Another option is disposal to the National Repository, which is indefinitely on hold (with a goal to facilitate availability by 2048). The WTP is currently scheduled to operate until 2047, according to the Amended Consent Decree Between Department of Energy and State of Washington, Case 2:08-cv-05085-RMP, Document 222, dated March 11, 2016. The acquisition of new facilities for treatment/processing and final disposition of the capsules is expected occur before the WTP option is no longer available. <p style="text-align: center;"><i>Continued on page 2</i></p>				
Impact of Change This change control form establishes Interim Milestone M-092-21 and Target Milestones M-092-21-T01, M-092-21-T02, and M-092-21-T03.				
Affected Documents HFFACO (Tri-Party Agreement) Action Plan Appendix D, “Work Schedule Milestones and Target Dates Including Designation of Lead Regulatory Agency.”				
Approvals		Page 1 of 4		
J.R. Franco, DOE	Date		Approved	Disapproved
A.K. Smith, Ecology	Date		Approved	Disapproved
N/A	Date		Approved	Disapproved
EPA	Date		Approved	Disapproved

Description/Justification of Change (continued)

Interim Milestone M-092-20 (established June 30, 2017) requires submittal of a “disposition pathways evaluation” for the cesium and strontium capsules beginning March 31, 2022, and every four years thereafter, until a final date for completion of M-092-00 is established.

Newly proposed Interim Milestone M-092-21 requires completion of the transfer of the cesium and strontium capsules from the WESF to a new dangerous waste-permitted interim safe storage facility on the Hanford Site. This interim step will allow continued safe storage of the capsules until a disposal decision is made.

The Washington State Department of Ecology (Ecology) and U.S. Department of Energy, Richland Operations Office (DOE-RL) recognize that a mutually cooperative and constructive approach is needed to complete the permitting process, which is a fundamental part of completing Interim Milestone M-092-21.

Newly Proposed Target Milestones M-092-21-T01, M-092-21-T02, and M-092-21-T03, set forth a series of follow on actions to develop the conceptual, preliminary, and final designs for a permitted facility/capability to implement disposal of the cesium and strontium capsules. Target milestones M-092-21-T02 and M-092-21-T03 will be converted to interim enforceable milestones based on each prior target milestone.

Authorized Changes

Modifications to the HFFACO are displayed by using double underline to indicate added text and ~~strikeout~~ to indicate deleted text.

Number	Milestone	Due Date
<u>M-092-21</u> <u>Lead Regulatory</u> <u>Agency: Ecology</u>	Complete the transfer of the cesium and strontium capsules from the Waste Encapsulation and Storage Facility, known as WESF, to a new, permitted, interim safe storage facility.	<u>08/31/2025</u>

Authorized Changes (continued)

Modifications to the HFFACO are displayed by using double underline to indicate added text and ~~strikeout~~ to indicate deleted text.

Number	Milestone	Due Date
<p><u>M-092-21-T01</u> <u>Lead Regulatory Agency: Ecology</u></p>	<p><u>Submit to Ecology a Conceptual Design Report Package (30% design) for any new Hanford facility/capability necessary to implement disposal of the Cs/Sr Capsules.</u></p> <p><u>The Conceptual Design Report package shall include the Conceptual Design Report, Functional Requirements Document, Functional Design Criteria Document, preliminary drawings, DOE expectations for safety in design, preliminary cost estimate, and preliminary schedule for the design, construction, and operation of the facility/capability.</u></p> <p><u>The preliminary schedule for the design, construction and operation of the facility referred to in the paragraphs above shall not be enforceable.</u></p> <p><u>DOE shall submit with the Conceptual Design Package a TPA Change Control Form (in accordance with TPA Action Plan Section 12.0) to replace the M-092-21-T02 target date for Preliminary Design with an enforceable interim milestone drawn from the conceptual design package schedule with allowance added to address schedule margin.</u></p>	<p><u>12/30/2040</u></p>
<p><u>M-092-21-T02</u> <u>Lead Regulatory Agency: Ecology</u></p>	<p><u>Submit to Ecology, a Preliminary Design Report package (60% design) for any new Hanford facility/capability necessary to implement disposal of the Cs/Sr Capsules.</u></p> <p><u>The Preliminary Design Report package shall include the Preliminary Design Report and updated documents including: Functional Requirements Document, Functional Design Criteria Document, preliminary drawings, DOE expectations for safety in design, preliminary cost estimate, and preliminary schedule for the design, construction, and operation of the facility.</u></p> <p><u>This target date will be updated and converted to an enforceable milestone in accordance with the TPA Change Control Form submitted pursuant to M-092-21-T01.</u></p> <p><u>DOE shall submit with the Preliminary Design Package a TPA Change Control Form (in accordance with TPA Action Plan Section 12.0) to replace the M-092-21-T03 target date for Final Design with an enforceable interim milestone drawn from the preliminary design package schedule with allowance added to address risk-informed schedule margin.</u></p>	<p><u>06/30/2042</u></p>

Authorized Changes (continued)

Modifications to the HFFACO are displayed by using double underline to indicate added text and ~~strikeout~~ to indicate deleted text.

Number	Milestone	Due Date
<p><u>M-092-21-T03</u> <u>Lead Regulatory</u> <u>Agency: Ecology</u></p>	<p><u>Submit to Ecology a Final Design Report (90%-100%) design package for any new Hanford facility/capability necessary to implement disposal of the Cs/Sr Capsules.</u></p> <p><u>The Final Design Report package shall include the Final Design Report and updated documents including: Functional Requirements Document, Functional Design Criteria Document, final drawings, DOE expectations for safety in design, cost estimate, schedule for the design, construction, and operation of the facility, and punchlist, if needed.</u></p> <p><u>This target date will convert to an enforceable milestone in accordance with the TPA Change Control Form submitted pursuant to M-092-21-T02.</u></p>	<p><u>09/30/2043</u></p>