

## **I-1 Extension Request Operating Instructions**

The following delineates the operating instructions to be followed by the U.S. Department of Energy (DOE), U.S. Environmental Protection Agency (EPA), and Tennessee Department of Environment and Conservation (TDEC) when requesting changes to the Federal Facility Agreement (FFA) milestones (FFA Section XXX, Extensions), submitting the 30-calendar days automatic extension, and submitting modification record forms for extensions. Nothing in this instruction affects the Appendix E and Appendix J milestone commitments discussed elsewhere in the FFA (in other words, this process does not address all milestone modifications).

### **Requesting Changes to FFA Appendix E Milestones**

1. As soon as the need to revise, add, or eliminate an Appendix E milestone is identified, DOE will communicate to the appropriate TDEC and EPA Project Team point-of-contact manager by either conference call or at a working group meeting.
2. DOE will follow up this verbal request with a written request to EPA and TDEC FFA Project Managers. The written request should contain (a) the document and date requiring the extension, (b) the new proposed date if it can be determined, (c) justification supporting the extension (Section XXX.B), (d) any related schedules that will be affected by the extension, and (e) project implementation strategy. Attachment I-1.1 provides the contents of this written request. Following approval of the milestone extension, the FFA Milestones Appendix E table will be updated.
3. TDEC and EPA must respond in writing within 14 days of receipt of the written request to approve or disapprove the extension request. Failure by EPA or TDEC to respond within the 14-day period shall be deemed to constitute concurrence with the requested extension.

If consensus is not received with respect to the justification or the scheduled extension, any of the parties may seek and obtain a determination through the dispute resolution process. The parties have 14 days in which to invoke dispute resolution once a statement of nonconcurrence with the requested extension is received.

4. Upon approval of the extension, work proceeds to the new schedule. As specified in the FFA, if dispute resolution is invoked, any applicable stipulated penalties will be tolled until a decision is reached on whether the requested extension is approved. If the extension is denied, then penalties may be assessed and may accrue from the date of the disputed schedule.
5. The extension letter shown in Attachment I-1.1 also can be used to revise FFA Appendix J milestones if needed.

### **Thirty-Calendar Days Automatic Extensions**

1. Thirty-calendar days automatic extensions are available to EPA and TDEC for the submission of EPA and TDEC comments on D1 and D2 versions of documents and to DOE for submission of D2 versions of documents. This automatic extension can be submitted via email per the example shown in Attachment I-1.2.
2. The 30-calendar days automatic extension can only be used once for the D1 version and once for the D2 version for a submission. If another extension is needed, then the additional extension process is used (see below).

**Submitting Modification Record Forms for Additional Extensions**

1. If additional extensions are needed beyond the 30-calendar days automatic extension for the submission of EPA and TDEC comments on D1 and D2 versions of documents or for the submission of D2 versions of documents by DOE, then a Modification Record Form (shown in Attachment I-1.3) or a letter similar to that shown in Attachment I-1.1 is used.
2. The Modification Record Form will be approved in 2 weeks, or the extension is approved.

**Summary**

The following table summarizes when the three extension types are used.

Type	Letter <sup>a</sup>	Email <sup>b</sup>	Modification Record Form <sup>c</sup>
FFA Appendix E Milestone Extensions	X		
FFA Appendix J Milestone Revisions	X		
30-Calendar Days Automatic Extensions		X	
Additional Extensions	X		X

<sup>a</sup>See Attachment I-1.1.

<sup>b</sup>See Attachment I-1.2.

<sup>c</sup>See Attachment I-1.3.

**Attachment I-1.1. Appendix E and Appendix J Milestone Extension Request Letter**

[Address to EPA/TDEC FFA Project Managers]

Dear [EPA/TDEC FFA Project Managers]

**FEDERAL FACILITY AGREEMENT MILESTONE EXTENSION REQUEST FOR [SPECIFIC PROJECT TITLE (AND DOCUMENT NUMBER AS APPROPRIATE)]**

In accordance with the *Federal Facility Agreement for the Oak Ridge Reservation* (FFA), Section XXX, Extensions, the U.S. Department of Energy (DOE) requests your approval to extend the due date for submission of the [Appendix E D1 milestone or for any other extension request for specific project title (and document number as appropriate)].

**Schedule and date sought to be extended:** The current FFA milestone date is as follows:

Document: Current milestone [Identify the document and version and the current milestone date]

**Length of extension sought:**

Document: Duration (in days) [Identify the document and version and the duration (in days) of the delay]

**New milestone date:** The requested new FFA milestone date is as follows:

Document: New milestone [Identify the document and version and the new milestone date]

**Good causes(s) for the extension:** The reason for this milestone extension is under FFA Section XXX.B.#, [list title of section]. [Identify the Section XXX.B category(ies) of good cause(s). Provide a thorough description of the specific nature of the events that demonstrate cause of delay and length of delay.]

**Related schedules impacted if extension granted:** [Identify the subsequent scheduled activity, the impacted dates, and the new dates requested. The duration of the delay for related schedules must be described and justified. This section should state that no subsequent milestones are affected if there are no related schedule impacts.]

**Description of project implementation strategy:** [As appropriate, this section should describe how the issues necessitating an extension to the project schedule can be managed to avoid further project delays.]

If you have any questions or if we can be of further assistance, please contact [list name(s) of appropriate DOE Federal Project Director and DOE FFA Project Manager and phone numbers].

Sincerely,

[List name and title of appropriate DOE Federal Project Director and DOE FFA Project Manager  
Or appropriate EPA or TDEC FFA Project Manager and insert signatures]

cc:  
[List names]

**Attachment I-1.2. Thirty-Calendar Days Automatic Extension**

[Address to DOE/EPA/TDEC]

[DOE/EPA/TDEC] is taking the automatic 30-days extension to submit the [identify the document title (and the document number as appropriate)]. The current date is [list the current milestone date], and the new date will be [list the new milestone date].

Thank you,

**Attachment I-1.3. Additional Extensions**

Modification Record Form

**FEDERAL FACILITY AGREEMENT  
FOR THE  
OAK RIDGE RESERVATION**

Modification(s): [Milestone change(s)]

Minor \_\_\_ Major\_\_\_

[Describe the specific project title and explain if the milestone change is for EPA or TDEC comments on the D1 or D2 version of the document or the DOE submission of the D2 version of the document. State the existing due date and the requested due date.]

Approved By: \_\_\_\_\_  
DOE FFA Project Manager

Date: \_\_\_\_\_

\_\_\_\_\_  
TDEC FFA Project Manager

Date: \_\_\_\_\_

\_\_\_\_\_  
EPA FFA Project Manager

Date: \_\_\_\_\_

**Comments/Justification:**

[Provide an explanation of the extension requested and the reason for the extension. This section should state that no subsequent milestones are affected if there are no related schedule impacts.]