Project Baseline Summary Report

Data Source: **EM CDB** Report Number: **GEN-01b**

Operations/Field Office: **Idaho** Print Date: **3/10/2000**

Site Summary Level: **Idaho National Engineering and Environmental Laboratory** HQ ID: **3003**

Project **ID-OIM-116 / Environmental Legacy Compliance (VCO)**

General Project Information

Project Description Narratives

Purpose, Scope, and Technical Approach:

This project addresses existing regulatory noncompliance issues at the INEEL. The Department of Energy and the State of Idaho Division of Environmental Quality (IDEQ) are currently finalizing a Voluntary Consent Order (VCO) covering various matters where the INEEL is not in regulatory compliance with the Resource Conservation and Recovery Act (RCRA). The actions required to bring each item covered in the VCO into compliance are covered by this project.

The VCO is scheduled to be signed in 1999. Items included in the VCO are documented in the INEEL Consent Order Action Plan. For each covered matter, the issue description, action summary, and milestones have been discussed with the IDEQ to identify the actions required to bring the matter into regulatory compliance. Consequently, the VCO provides an agreement between DOE and IDEQ on actions that will be taken to bring each current noncompliance into compliance. These actions are described in action plans and include milestones to ensure progress is being made. If a milestone is not met, stipulated penalties of $1,000/day/violation will be assessed.

The INEEL Consent Order Action Plan contains three types of covered matters. Table 2.1 of the INEEL Consent Order Action Plan includes "Covered Matters with Detailed Action Plans". The actions identified for these items bring the matter into compliance. Table 2.2 lists "Covered Matters with Tiered Milestones". These are items with an interim action (e.g., complete hazardous waste determination) required to determine the total extent of activities required to reach compliance. Table 2.3 lists "Covered Matters that are Closed". These are items that have been addressed through the VCO and the completed closure activities are documented in the INEEL Consent Order Action Plan for future reference.

For planning and cost estimating purposes, the scope of the VCO has been divided into two phases. Phase 1 includes all of the actions listed as "Covered Matters with Detailed Action Plans". For the "Covered Matters with Tiered Milestones", Phase 1 includes the activities necessary to meet the currently identified IDEQ milestones. These activities involve evaluation of what compliance activities are required (e.g. completion of a hazardous waste determination) and development of a proposed second tier of actions and milestones based on the outcome of the Phase 1 activities. Phase 2 covers the activities required to bring the "Covered Matters with Tiered Milestones" into compliance (e.g. RCRA Closure of a tank system).

Specific VCO items that are covered by this project, as of March 1999, include:

VCO Action Plan Table 2.1: Covered Matters with Detailed Action Plans:

1) CPP-641-F-2: Required cathodic protection for tanks and ancillary equipment.

2) CPP-659-F-3: Tank NCE 184 - Storage of solvent material without completing adequate RCRA characterization.

3) NEW-CDHEPA-001: Disposition of Cadmium-coated HEPA Filters at RWMC and the WERF Waste Storage Building.

4) NEW-CPP-020: Storage of Calcine and Calcine Handling Tools at NWCF.

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5) NEW-TAN-003A: Potential Storage Without a Permit at WRRTF Potable Water System.

6) NEW-TAN-004: Inadequate Hazardous Waste Determination on Rags at TAN-607/629/645/679.

7) NEW-TAN-008: Inadequate Hazardous Waste Determination and storage at TAN-616 Low-Level Radioactive Waste System.

8) NEW-TRA-001: Inadequate Hazardous Waste Determination of TRA Legacy Waste (Split funded between EM and NE).

9) NEW-TRA-006: Pipes and equipment at TRA-631 pit (NE funded - in VCO but not in this EM PBS).

10) NEW-TRA-007: Abandoned Buried Piping at TRA (four sets of lines).

11) VCO-5.1.ii(a): Storage of Equipment and Components in the MTR Canal at TRA.

12) VCO-5.1.r: Inadequate Hazardous Waste Determination on INTEC Tank Farm Soil.

,
VCO Action Plan Table 2.2: Covered Matters with Tiered Milestones:

1) NEW-CPP-016: Characterize CPP-603 Basin Water Sand Filter and Demineralization System.

2) NEW-CPP-017: Inadequate Hazardous Waste Determination on systems in CPP-604.

3) NEW-PBF-001: Characterization of equipment and components in the Power Burst Facility.

4) NEW-TRA-004: Fill, Store, & Remelt (FS&R) Facility in the ETR Building (sodium loop at the ETR).

5) SITE-TANK-004: Active Hazardous Waste Tanks to be Placed on Part A/B Permit.

6) SITE-TANK-005: Tanks Requiring Hazardous Waste Determinations or Verification of Empty.

7) VCO-5.8.d: Storage > 90 days without a permit/interim status for tanks and waste streams at TRA 630.

One of the more complicated matters covered by the VCO is the numerous (>700) tanks that require either a hazardous waste determination or a verification that the tank is empty (SITE-TANK-005). Those inactive tanks found to contain hazardous waste will be closed under RCRA. This project includes management of the site-wide inventory of tanks to ensure that the regulatory status is appropriately identified and that actions on the path forward, including long-term corrective actions in the VCO, are completed as scheduled.

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Interim actions will be identified and agreed to with IDEQ for each item covered in the VCO. These interim actions ensure that the item is maintained in a protective manner pending the actual remedial action.

This project will ensure that existing regulatory noncompliance items are being completed on schedule. A prioritized schedule of environmental compliance projects to address existing RCRA noncompliances will be maintained. Communications with the IDEQ will be maintained as actions are implemented to ensure that regulations are met, and that the actions are environmentally sound and cost-effective. Closure of each VCO action will be documented through correspondence with IDEQ. The INEEL Consent Order Action Plan will be updated as necessary and submitted to IDEQ annually. The updated INEEL Consent Order Action Plan will provide the documented agreement between DOE and IDEQ on closure of each action.

Key Project Assumptions and Excluded Scope:

The following key programmatic assumptions were made in developing the VCO cost estimates. This section also defines certain scope that is excluded. Additional assumptions are listed in the Phase 1 and Phase 2 VCO Cost Estimate documents as well as in the individual cost estimate detail sheets.

1. As negotiations continue on the VCO, specific items are changing. Upon finalization of the VCO, the Phase 1 and Phase 2 cost estimates will be revised to reflect the final scope of the VCO.

2. The cost estimate does not include any cost for treatment, storage, or disposal of remote-handled mixed waste. A treatment and disposal alternative for this waste is not readily available, as the waste does not meet the waste acceptance criteria of the Advanced Mixed Waste Treatment Facility (AMWTF). Costs will be incurred for future management of this waste, but a defensible basis for estimate was not possible due to the many uncertainties associated with management of this waste. No cost is included for modification of the Radioactive Waste Management Complex (RWMC) permit to allow storage of this waste. In addition, no cost is included for construction of additional storage buildings or vaults.

3. Field personnel assigned each tank to an endpoint based on best technical judgement. When actual analysis results are available, the endpoint may change and some tanks may require more extensive actions, while others may require less. Work package level planning will be conducted in the year prior to execution and the work scope will be adjusted as necessary.

4. The Process Equipment Waste (PEW) is not available to treat liquid waste generated during the cleaning and closing of tanks. Because no treatment alternative exists for this waste, the cost estimate only covers removing the waste from the tanks, and packaging and transporting the waste to temporary storage. The AMWTF is not designed to handle large quantities of liquid waste, nor can it take liquid or solid remote-handled mixed waste. No cost for storage, treatment, or disposal of this waste is included.

5. Recent meetings with the IDEQ increased the emphasis on determining the permitting approach for systems at INTEC, and activities in this area are currently underway. Consequently, no Phase 2 costs are included for tanks to be addressed through some type of permitting action.

6. The Phase 1 and Phase 2 cost estimate documents do not include any cost for interim actions, such as periodic inspections, removing the contents from the tank, or addition of secondary containment, that may be required. The interim actions required for a specific tank will be determined

Project Description Narratives

following the hazardous waste determination or verification that a tank is empty. A separate estimate for the interim actions was prepared and included in this PBS.

7. Two VCO items relate to tanks at the INTEC Tank Farm, Site Tank 006 and CPP-Tank Farm-F-5. The proposed pathforward for these tanks is to address them under the Notice of Noncompliance (NON) Consent Order. No costs are included in this estimate under the assumption that these activities would be covered separately.

8. A funding determination has been conducted to identify those VCO actions that will be funded by Nuclear Energy (NE). Those VCO activities are not included in this PBS.

9. As directed by DOE Management, the VCO funding has been held constant at $10M per year beginning in FY-01 with no escalation. The decision to not escalate the $10M per year funding level results in a extension of the project schedule by three years.

Project Status in FY 2006:

By FY 2006, each of the VCO actions from Table 2.1, "Covered Matters with Detailed Action Plans", will be complete. The following VCO actions from Table 2.2 "Covered Matters with Tiered Milestones" will also be complete:

NEW-TRA-004: Fill, Store, & Remelt (FS&R) Facility in the ETR Building (sodium loop at the ETR).

NEW-PBF-001: Characterization of equipment and components in the Power Burst Facility.

SITE-TANK-004: Active Hazardous Waste Tanks to be Placed on Part A/B Permit.

All Phase 1 actions for the remaining VCO items will be complete, and the Phase 2 compliance activities will be underway.

Post-2006 Project Scope:

Certain VCO actions continue post-2006. These are the larger, more complex actions listed as "Covered Matters with Tiered Milestones". The Post-2006 scope for each remaining VCO actions is listed below.

NEW-CPP-016: Characterize CPP-603 Basin Water Sand Filter and Demineralization System. ICPP-603 underwater-spent nuclear fuel storage basin used a water treatment system to maintain water quality. None of the sandfilters, wash water-holding tank, clarifier or resin beds have been sampled for characterization purposes. If characterization of the basin water treatment system indicates the presence of hazardous waste, the waste would have been stored in a non-permitted facility/unit. Based upon the results of the Phase 1 hazardous waste determinations on this system, the necessary actions to bring the system into RCRA compliance will be performed.

NEW-CPP-017: Inadequate Hazardous Waste Determination on Systems in CPP-604. The Rare Gas Plant (RGP) and several other systems within CPP-604 are inactive after the shutdown of fuel reprocessing. The inactive systems potentially contain hazardous waste, and are not on a closure plan. The hazardous waste determination for each item on the equipment list will be performed prior to 2006. The Phase 2 compliance activities will

Project Description Narratives

continue Post-2006.

SITE-TANK-005: Tanks Requiring Hazardous Waste Determinations or Verification of Empty (list included in action plan of >700 tanks). There are active waste tanks, inactive waste tanks, and inactive process/product tanks that presently have accumulations of residual materials such as sludges and liquids that have not been adequately characterized. There are also inactive waste tanks and inactive process/product tanks that are assumed to be empty but require verification of empty. All tank systems and hazardous waste determination or verification of empty will be complete by 2006. Phase 2 activities will be required for those tanks found not to be empty and to contain hazardous waste. These Phase 2 activities will be completed Post-2006.

VCO-5.8.d: Storage > 90 days without a permit/interim status for tanks and waste streams at TRA 630. TRA Bldg. 630 has several tanks (i.e. the TRA-730 catch tanks) and waste streams. TRA-730 is an underground concrete vault that contains four "catch" tanks. Sample analysis indicated the presence of RCRA characteristic waste (lead and mercury). The final RCRA-Closure activities will extend post-2006.

Project End State

Upon completion of the activities in this PBS, each of the RCRA non-compliance items identified in the VCO will have been brought into regulatory compliance. Future D&D of the facility and/or system may be necessary. All waste generated through the VCO activities will have been properly dispositioned. The INEEL Consent Order Action Plan will be completed to document the activities taken to address the RCRA non-compliance. This Action Plan can be used to reference the agreed upon actions to close the specific VCO item.

Cost Baseline Comments:

The scope and technical approach for the VCO actions are described in the "Purpose, Scope, and Technical Approach" section of this PBS. The costs to complete the actions agreed to in the VCO have been divided into Phase 1 and Phase 2 costs. Phase 1 includes all of the actions listed as "Covered Matters with Detailed Action Plans". For the "Covered Matters with Tiered Milestones", Phase 1 includes the activities necessary to meet the currently identified IDEQ milestones. These activities involve evaluation of what compliance activities are required (e.g. completion of a hazardous waste determination) and development of a proposed second tier of actions and milestones based on the outcome of the Phase 1 activities. Phase 2 covers the activities required to bring the "Covered Matters with Tiered Milestones" into compliance (e.g. RCRA Closure of a tank system).

Planning level cost estimates have been prepared for both phases of the VCO activities. Phase 1 costs are documented in the Voluntary Consent Order Phase 1 Cost Estimate, INEEL/EXT-99-00305, March 1999. Phase 2 costs are documented in the Voluntary Consent Order Phase 2 Cost Estimate, INEEL/EXT-99-00306, March 1999. Detailed work packages will be prepared in the year prior to execution.

Both the Phase 1 and Phase 2 cost estimates were prepared using a bottoms-up approach. The Lockheed Martin Idaho Technologies Company (LMITCO) Cost Estimating group prepared the cost estimates based on the input of the field personnel. The cost estimating group was used to ensure consistency across the estimate and a strong estimate basis.

The majority of the VCO activities are associated with tanks. To produce a defensible cost estimate, the most probable final action for each tank had to be determined. A flow diagram was developed to determine which endpoint best matched that tank. Using this flow diagram, field personnel assigned each tank to an endpoint. Certain separate VCO items listed in Table 2.1 and Table 2.2 of the Idaho National Engineering and

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Environmental Laboratory (INEEL) Consent Order Action Plan address components other than tanks. Those VCO items that could not be estimated based on the tank cost estimating process were addressed individually.

The Key Programmatic Assumptions and Excluded Scope listed in the scope section of this PBS have a significant affect on the cost estimate. This PBS does not include any cost for treatment, storage, or disposal of remote-handled mixed waste. Costs will be incurred for future management of this waste, but a defensible basis for estimate was not possible due to the many uncertainties associated with management of this waste. The VCO funding has been held constant at $10M per year beginning in FY-01 with no escalation.

Safety & Health Hazards:

Each action plan description in the VCO identifies a current RCRA non-compliance and lists the actions to be taken to bring the matter into compliance. The health and safety concerns associated with each action differ based on the physical, chemical, and radiological conditions, and many actions have significant health and safety concerns. A variety of RCRA hazards exist, including but not limited to, heavy metals, reactives, and volatile organics. Many of the VCO actions deal with tanks and equipment located in high radiation areas, some that have been sealed off for many years due to the high radiation fields. Hazards consistent with industrial work, such as excavating buried tanks and working in confined spaces, are also present on many VCO actions. The configuration of tanks and piping systems will have to be physically modified (i.e., holes cut in tanks, etc.) to obtain samples or to verify that the tank is empty.

Because the tanks and equipment covered by this project are located within INEEL facilities, the hazards to the public are considered to be minimal. Worker safety will be a key component of the planning for each VCO activity.

Safety & Health Work Performance:

All VCO activities will be conducted in compliance with appropriate regulations and company procedures. The Integrated Work Control System in place for INEEL facilities will be incorporated into project planning and following during implementation of each activity. Specific health and safety hazards will be identified for each action, and appropriate mitigating measures will be in place prior to initiating work.

PBS Comments:

Baseline Validation Narrative:

Phase 1 costs are documented in the Voluntary Consent Order Phase 1 Cost Estimate, INEEL/EXT-99-00305, March 1999. Phase 2 costs are documented in the Voluntary Consent Order Phase 2 Cost Estimate, INEEL/EXT-99-00306, March 1999. The Lockheed Martin Idaho Technologies Company (LMITCO) Cost Estimating group prepared these planning level cost estimates to ensure consistency across the estimate and a strong estimate basis. Jury reviews were conducted on both the Phase 1 and the Phase 2 cost estimates, although the Phase 1 jury reviews were done on a section-by-section basis and were more in-depth. DOE-ID and LMITCO subject matter experts participated in both jury reviews. Detailed work packages will be prepared in the year prior to execution.

General PBS Information

Project Validated? Yes **Date Validated:** 12/3/1998

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Project **ID-OIM-116 / Environmental Legacy Compliance (VCO)**

General PBS Information

Has Headquarters reviewed and approved project? No

Date Project was Added:

Baseline Submission Date:

FEDPLAN Project? No

Drivers:

CERCLA	RCRA	DNFSB	AEA	UMTRCA	State	DOE Orders	Other
N	Y	N	N	N	Y	Y	N

Project Identification Information

DOE Project Manager: Jeffrey G. Snook

DOE Project Manager Phone Number: (208) 526-5920

DOE Project Manager Fax Number: (208) 526-0553

DOE Project Manager e-mail address: SNOOKJG@inel.gov

Is this a High Visibility Project (Y/N):

Planning Section

Baseline Costs (in thousands of dollars)

	1997-2006 Total	2007-2070 Total	1997-2070 Total	1997	Actual 1997	1998	Actual 1998	1999	2000	2001	2002	2003	2004	2005	2006
PBS Baseline (current year dollars)	69,077	104,243	173,320						9,077	10,000	10,000	10,000	10,000	10,000	10,000
PBS Baseline (constant 1999 dollars)	63,197	79,370	142,567						8,838	9,537	9,341	9,149	8,960	8,776	8,596
PBS EM Baseline (current year dollars)	69,077	104,243	173,320						9,077	10,000	10,000	10,000	10,000	10,000	10,000
PBS EM Baseline (constant 1999 dollars)	63,197	79,370	142,567						8,838	9,537	9,341	9,149	8,960	8,776	8,596

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	2007	2008	2009	2010	2011-2015	2016-2020	2021-2025	2026-2030	2031-2035	2036-2040	2041-2045	2046-2050	2051-2055	2056-2060	2061-2065	2066-2070
PBS Baseline (current year dollars)	10,000	10,000	10,000	10,000	50,000	14,243	0	0	0	0	0	0	0	0	0	0
PBS Baseline (constant 1999 dollars)	8,419	8,246	8,076	7,910	37,175	9,544	0	0	0	0	0	0	0	0	0	0
PBS EM Baseline (current year dollars)	10,000	10,000	10,000	10,000	50,000	14,243	0	0	0	0	0	0	0	0	0	0
PBS EM Baseline (constant 1999 dollars)	8,419	8,246	8,076	7,910	37,175	9,544	0	0	0	0	0	0	0	0	0	0

Baseline Escalation Rates

1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009
			2.70%	2.10%	2.10%	2.10%	2.10%	2.10%	2.10%	2.10%	2.10%	2.10%

2010	2011-2015	2016-2020	2021-2025	2026-2030	2031-2035	2036-2040	2041-2045	2046-2050	2051-2055	2056-2060	2061-2065	2066-2070
2.10%	2.10%	2.10%	2.10%	2.10%	2.10%	2.10%	2.10%	2.10%	2.10%	2.10%	2.10%	2.10%

Project Reconciliation

Project Completion Date Changes:

Previously Projected End Date of Project:

Current Projected End Date of Project: 9/30/2017

Explanation of Project Completion Date Difference (if applicable):

Project Cost Estimates (in thousands of dollars)

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Project Reconciliation

Previously Estimated Lifecycle Cost (1997 - 2070, 1998 Dollars):		**Actual 1997 Cost:**	**Actual 1998 Cost:**
Previously Estimated Lifecycle Cost of Project (1999 - 2070, 1998 Dollars):	0	**Inflation Adjustment (2.7% to convert 1998 to 1999 dollars):**	0
Previously Estimated Lifecycle Cost (1999 - 2070, 1999 Dollars):	0		

Project Cost Changes

	Cost Adjustments	Reconciliation Narratives
Cost Change Due to Scope Deletions (-):		
Cost Reductions Due to Efficiencies (-):		
Cost Associated with New Scope (+):	142,568	New PBS created from OIM 101
Cost Growth Associated with Scope Previously Reported (+):		
Cost Reductions Due to Science & Technology Efficiencies (-):		
Subtotal:	142,568	
Additional Amount to Reconcile (+):	-1	
Current Estimated Lifecycle Cost (1999 - 2070, 1999 Dollars):	**142,567**	

Milestones

Milestone/Activity	Field Milestone Code	Original Date	Baseline Date	Legal Date	Forecast Date	Actual Date	EA	DNFSB	Mgmt. Commit.	Key Decision	Intersite
NEW-CPP-020-1			10/31/2000	12/31/2000			Y				
NEW-TRA-001-1			8/31/2000	9/30/2000			Y				
NEW-TRA-001-2			8/31/2001	9/30/2001			Y				
NEW-TRA-001-3			8/31/2002	9/30/2002			Y				
NEW-TRA-001-4			7/31/2003	9/30/2003			Y				
NEW-TRA-006-1			10/31/2000	12/31/2000			Y				
NEW-TRA-006-2			10/31/2000	12/31/2000			Y				

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Milestones

Milestone/Activity	Field Milestone Code	Original Date	Baseline Date	Legal Date	Forecast Date	Actual Date	EA	DNFSB	Mgmt. Commit.	Key Decision	Intersite
NEW-CPP-016-1			1/31/2001	3/30/2001			Y				
			12/31/2001								
NEW-CPP-017-1			6/30/2002	9/30/2002			Y				
NEW-CPP-017-2			6/30/2003	9/30/2003			Y				
NEW-CPP-017-3			6/30/2004	9/30/2004			Y				
NEW-CPP-017-4			6/30/2005	9/30/2005			Y				
			12/31/2005								
NEW-PBF-001-1			1/31/2004	3/30/2004			Y				
SITE-TANK-004-1			9/30/1999	9/30/1999			Y				
SITE-TANK-005-1			9/30/1999	9/30/1999			Y				
SITE-TANK-005-2			1/31/2001	3/31/2001			Y				
SITE-TANK-005-3			7/30/2001	9/30/2001			Y				
SITE-TANK-005-4			6/30/2002	9/30/2002			Y				
SITE-TANK-005-5			6/30/2003	9/30/2003			Y				
SITE-TANK-005-6			6/30/2004	9/30/2004			Y				
SITE-TANK-005-7			6/30/2005	9/30/2005			Y				
SITE-TANK-005-8			6/30/2006	9/30/2006			Y				
VCO-5.8.d			8/31/2000	9/30/2000			Y				
VCO Project Start			10/1/1999								
VCO Project Completion			9/30/2017								

Milestones - Part II

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Milestone/Activity	Field Milestone Code	Critical Decision	Critial Closure Path	Project Start	Project End	Mission Complete	Tech Risk	Work Scope Risk	Intersite Risk	Cancelled	Milestone Description
NEW-CPP-020-1											Transfer NWCF Calcine to CPP-601 D-Cell
NEW-TRA-001-1											Complete hazardous waste determinations and disposition 25% of waste.
NEW-TRA-001-2											Complete hazardous waste determinations and disposition 50% of waste.
NEW-TRA-001-3											Complete hazardous waste determinations and disposition 75% of waste.
NEW-TRA-001-4											Complete hazardous waste determinations and disposition 100% of waste.
NEW-TRA-006-1											Characterize and disposition waste in North-South Trench.
NEW-TRA-006-2											Submit new site identification form (if necessary).
NEW-CPP-016-1											Complete Hazardous Waste Determination
										Y	
NEW-CPP-017-1											Complete hazardous waste determination for the following systems: Radioactive Iodine Extraction Sys
NEW-CPP-017-2											Complete hazardous waste determination for the following systems: EDOG Filter System and CPM DOG Filter System.
NEW-CPP-017-3											Complete hazardous waste determination for the Rare Gas Plant.

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Milestones - Part II

Milestone/Activity	Field Milestone Code	Critical Decision	Critial Closure Path	Project Start	Project End	Mission Complete	Tech Risk	Work Scope Risk	Intersite Risk	Cancelled	Milestone Description
NEW-CPP-017-4											Complete hazardous waste determination for the following systems: WL-302 Evaporator Condenser, WM-302 Offgas Condenser, and WM-178 and -179 Air Lift Pots.
										Y	
NEW-PBF-001-1											Complete hazardous waste determinations.
SITE-TANK-004-1											Submit determination report for tanks.
SITE-TANK-005-1											Complete system identification for the INTEC active systems.
SITE-TANK-005-2											Complete system identification for remaining systems.
SITE-TANK-005-3											Complete HWD/verification of empty on 5% of tanks.
SITE-TANK-005-4											Complete HWD/verification of empty on 15% of tanks.
SITE-TANK-005-5											Complete HWD/verification of empty on 30% of tanks.
SITE-TANK-005-6											Complete HWD/verification of empty on 50% of tanks.
SITE-TANK-005-7											Complete HWD/verification of empty on 75% of tanks.
SITE-TANK-005-8											Complete HWD/verification of empty on 100% of tanks.
VCO-5.8.d											Submit draft RCRA closure plan and schedule for DEQ review and DOE

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Milestones - Part II

Milestone/Activity	Field Milestone Code	Critical Decision	Critial Closure Path	Project Start	Project End	Mission Complete	Tech Risk	Work Scope Risk	Intersite Risk	Cancelled	Milestone Description
											revision.
VCO Project Start				Y							Start of VCO PBS Project Scope
VCO Project Completion					Y						Complete VCO Project