

**Inter-Agency Management Integration Team (IAMIT)  
Meeting Minutes  
March 17, 2016**

Approval: *G. T. Tebb* Date: 5/16/16.  
**G. T. Tebb**  
*Ecology IAMIT Representative*

Approval: *R. J. Corey* Date: 4-18-16  
**R. J. Corey**  
*DOE-RL IAMIT Representative*

Approval: *T. W. Fletcher* Date: 4/20/16  
**T. W. Fletcher**  
*DOE-ORP IAMIT Representative*

Approval: *D. A. Faulk* Date: 5/14/16  
**D. A. Faulk**  
*EPA IAMIT Representative*

Approval: *R. E. Piippo* Date: 4-18-16  
**R. E. Piippo**  
*Mission Support Alliance, LLC*

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**Topic: IAMIT Action Tracking**

The IAMIT action tracking table was discussed as follows (see handout):

**Action No. 1** – Washington State Department of Ecology (Ecology) referred to the column regarding updates/needs for closure that states that U.S. Department of Energy (DOE) and Ecology reached agreement on treatment, storage and disposal (TSD) designations for inactive miscellaneous underground storage tanks (IMUSTs). Ecology indicated that the status is not quite accurate, and that on a staff level agreement has been reached, but the attorneys still have issues and will be reviewing some of the TSD designations. DOE Richland Operations (RL) clarified that the technical staff agree. Ecology responded that the technical staff will be meeting later today for further discussion. DOE-RL noted that the status was left over from past updates when agreement had been reached. Ecology responded that it may be correct that there had been some agreement, but not all of Ecology has reached agreement. DOE-RL stated that it was aware that Ecology had been discussing internal issues regarding action Nos. 1 and 2, and the two actions are linked together. Ecology agreed that the status would be the same for action No. 2, and a path forward for No. 2 will also be discussed with DOE-RL. This action remains open.

**Action No. 2** – It was noted that this action is tied to action No. 1 (see discussion). This action remains open.

**Action No. 3** – DOE Office of River Protection (ORP) stated that this action is in review with the legal team to determine whether there will be any changes per the Consent Decree. DOE-ORP noted that the time frame for the extension, which currently goes to March 31, 2016, is yet to be determined. Ecology stated that a meeting is scheduled with their Director on March 28, 2016, and a time frame would be provided on March 29, 2016. DOE-ORP pointed out that a change package would be needed since the dispute expires March 31, 2016. Ecology responded that it may be ready to sign an extension on March 29, 2016. DOE-ORP noted that action Nos. 6 and 7 are tied to this action. This action remains open.

**Action No. 4** – DOE-ORP stated that the discussion under action No. 3 applies to this action. DOE-ORP added that the change package (M-45-15-01) will be negotiated when action No. 3 (M-62-14-02 change package) is resolved. This action remains open.

**Action No. 5** – Ecology stated that there have been three productive meetings,

and Ecology's action is to follow up with ORP. This action remains open.

**Action No. 6** – DOE-ORP stated that this action is tied to action No. 3 (M-062-45). This action remains open.

**Action No. 7** – DOE-ORP stated that this action is tied to action No. 3. This action remains open.

**Action No. 8** – DOE-RL reported that Appendix C and Appendix J have been updated and distributed to EPA and Ecology for review. U.S. Environmental Protection Agency (EPA) asked DOE-RL to resend the updated documents. This action remains open.

**Action No. 9** – Ecology stated that it has been coordinating the TPA Appendix B updates, and indicated that they believe there is substantial agreement by EPA and Ecology on the updates. This action remains open.

**Action No. 10** – DOE-RL stated that a Kaizen was done on the Administrative Record (AR) upgrade effort that was linked to the initiative to change the requirement from hard copy to electronic copy in the AR. DOE-RL indicated that agreement has not been reached on proceeding with the initiative. Ecology stated that it is in substantial agreement with the initiative, and it has requested a scope and schedule for doing the AR upgrades. Ecology acknowledged that some individuals do not believe the initiative and the AR upgrades are linked, but Ecology believes that they are linked. Ecology stated that it would be acceptable to phase the AR upgrades over two years to spread out the cost. DOE-RL responded that the issue is linking the initiative and the AR upgrades and the cost of the AR upgrades.

DOE-RL stated that it was willing to identify funds for the AR upgrades, and if the initiative to remove the hard copy requirement was implemented, the money saved could be applied to some of the upgrades that Ecology is requesting. Ecology stated that when it started advocating for applying the cost savings to AR upgrades, the response was that it was not a cost savings but a cost avoidance. DOE-RL responded that it would be a cost savings, but the issue is which contractor would realize the cost savings. DOE-RL stated that it is not ready to make a commitment about assigning the cost savings from the initiative to remove the hard copy requirement to the AR upgrades, and further internal discussion would be needed. This action remains open.

**Action No. 11** – DOE-RL stated they are working the new language with the fiscal year 2017 changes and updating the responsiveness summary for closure. This was the most recent update they were aware of for the milestone series. Ecology stated that it could not reach agreement with EPA regarding M-037, and they requested that DOE-RL delete the M-037 milestone for nonradioactive dangerous waste landfill (NRDWL). EPA stated that language would need to be

added to the responsiveness summary to ensure transparency. EPA stated that the packages are in final review with the lawyer, and a briefing with EPA Region 10 is targeted for the middle of April 2016. This action remains open.

**Action No. 12** – EPA stated that an extension was just signed, extending the dispute to May 31, 2016. This action remains open.



IAMIT ACTION TRACKING

March 17, 2016

#	Start Date	Action	Action Status	Updates/Needs for Closure	Actionee(s)	Date Closed
1	DOE provided change control forms to Ecology on 9/16/14.	Ecology provide comments on TPA Appendix Change Control forms C-13-01 and C-14-02 that align the waste sites for operable unit 200-IS-1.	Open	Stated at monthly IAMIT, impacts TPA M/S M-015-112 IS-1 work plan that is in dispute. DOE and Ecology reached agreement on TSD designations for IMUSTs. Revised C-13-01 is under review by Ecology.	ECY/DOE	
2	11/15/2013 transmits TPA chg ctrl form 12/3/2013 Ecology disapproves 12/10/2013. DOE initiates dispute.	Resolve dispute on Ecology disapproval of TPA change control form M-15-13-02. Milestone M-015-112, 200-IS-1 RFI wrk pln.	Open	Dispute extended at the project managers level to 3/30/2015 per extension agreement 1/29/15. Dispute extended at the project manager level to 09/30/15 in accordance with agreement signed on 05/14/15. (1501370) On 09/09/15, the parties agreed to extend the dispute at the project manager level to 12/31/15. On 11/19/15, the parties agreed to extend the dispute to 1/28/16. On 01/11/16, the parties agreed to extend the dispute at the project manager level until 02/29/16. On 01/11/16, the parties agreed to extend the dispute at the Project Manager level until 02/29/16. On 02/16/16, the parties agreed to extend the dispute at the Project Manager level until 03/31/16.	Project managers resolve dispute.	

#	Start Date	Action	Action Status	Updates/Needs for Closure	Actionee(s)	Date Closed
3	Ecology disapproved TPA change control form M-62-14-02.	Resolve dispute on Ecology disapproval of TPA change control form M-62-14-02. Milestone M-062-45, Comp. Neg's 6-Mo After Last Issuance of System Plan.	Open	On 05/11/15, the parties agreed to extend dispute resolution at the project manager level until 06/15/15. On 6/11/15 the parties agreed to extend dispute resolution at the project manager level until 10/22/15. On 09/21/15, the parties agreed to extend the dispute at the project manager level until 02/18/16. On 2/18/16, the parties agreed to extend the dispute at the PM level until 03/31/16. On March 7, 2016 ORP proposed a TPA change package set and is currently being evaluated by ECY.	Project managers resolve dispute.	

4	Ecology disapproved TPA change control form M-45-15-01	Resolve dispute on Ecology disapproval of TPA change control from M-45-15-01. Milestone M-045-92 identifies due date for construction of SX Barriers 1 and 2 and design and construction of Barriers 3 and 4.	Open	<p>ORP transmitted change control form M-45-15-01 to ECY on 03/31/15 via letter 15-TF-0027, to modify M-045-92 due dates for barrier 1 and 2 construction, and barrier 3 and 4 design and construction. ECY disapproved the change control form on 04/14/15, and followed with disapproval letter 15-NWP-075 dated 04/17/15. On 04/20/15, ORP initiated dispute resolution in letter 15-TF-0042. On 04/23/15, ORP and ECY agreed to extend the period for dispute resolution at the project manager level until 08/16/15. On 07/30/15, the parties agreed to extend the dispute at the project manager level until 10/15/15. On 10/15/15, the parties agreed to extend the dispute at the project manager level until 11/16/15. On 11/13/15, the parties agreed to extend the dispute at the project manager level until 11/20/15. On 11/19/15, the parties agreed to extend the dispute at the PM level through 12/02/15. On 12/02/15, the parties agreed to extend the dispute at the PM level until 01/29/16. On 1/21/16, the parties agreed to extend the dispute at the project manager level until 2/16/16. The dispute was elevated to the IAMIT-level on 2/18/16, commencing a 21-day clock for resolution between the parties (3/10/16). ECY has signed an IAMIT determination that allows a path forward on this package based upon resolution of the Consent Decree and should either party withdraw their consent in accordance with this agreement, then the matter shall be placed on</p>	Project managers resolve dispute	
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#	Start Date	Action	Action Status	Updates/Needs for Closure	Actionee(s)	Date Closed
				<p>the agenda of the next regularly scheduled IAMIT meeting following the receipt of written notice of withdrawal by the other party. The IAMIT shall then have twenty-one (21) days to unanimously resolve the dispute in accordance with HAFFACO Article VIII, <i>Resolution of Disputes</i>, Paragraph 30, Section D.</p> <p><i>*Dispute to be addressed in change control form M-45-15-04.</i></p>		
5	Ecology disapproved TPA change control form M-45-15-03	Resolve dispute on Ecology disapproval of TPA change control from M-45-15-03. Milestone M-045-82, "Submit complete permit modification request for Tiers 1, 2, and 3 of the SST System to support final closure requirements for WMA-C."	Open	On 07/16/15, DOE initiated dispute. On 08/10/15, the parties agreed to extend the dispute resolution period until 10/20/15. On 10/19/15, the parties agreed to extend the dispute at the project manager level until 03/25/16. Substantive discussions are ongoing.	Project managers resolve dispute	
6	Ecology Disapproved TPA change control form M-47-15-01 on 1/12/16	Resolve dispute on Ecology disapproval of TPA change control form M-47-15-01. Milestone M-047-07, "Submit CD-1 for the Secondary. Liquid Waste Treatment Project".	Open	In letter 16-NWP-007, dated 01/12/16, ECY disapproved the change control form. ORP initiated dispute in letter 16-TF-0002 dated 01/19/16. On 2/18/16, the parties agreed to extend the dispute at the PM level until 03/31/16. On March 7, 2016 ORP proposed a TPA change package set and is currently being evaluated by ECY.	Project managers resolve dispute	

#	Start Date	Action	Action Status	Updates/Needs for Closure	Actionee(s)	Date Closed
7	Ecology Disapproved TPA change control form M-90-15-01 on 1/12/16	Resolve dispute on Ecology disapproval of TPA change control form M-90-15-01. Milestone M-090-13, "Submit a CD-1 for the Interim Hanford Storage Project".	Open	In letter 16-NWP-007, dated 01/12/16, ECY disapproved the change control form. ORP initiated dispute in letter 16-TF-0002 dated 01/19/16. On 2/18/16, the parties agreed to extend the dispute at the PM level until 03/31/16. On March 7, 2016 ORP proposed a TPA change package set and is currently being evaluated by ECY.	Project managers resolve dispute	
8	12/4/2014 DOE transmits draft TPA App C 12-12-03 change ctrl form to update 100 Area waste sites	EPA and Ecology review and provide comments to DOE	Open	Ecology EPA comments complete, and reclassification form for 100 K reactors tentatively accepted. Appendix J draft chg ctrl form provided to the regulators. 100-N-66 WIDS description under revision by Ecology and WCH.  In February, Alicia Boyd and WCH reached agreement on 100-N-66 revised description. Updated TPA Appendix C and J have been distributed to regulators for EPA and Ecology review.	EPA/ECY/DOE	
9	TPA Appendix B update	Provide draft TPA simple changes Appendix B change control form to regulators.	Open	DOE provided Ecology with revisions to draft Appendix B change control form (B-15-01). Ecology is reviewing.	ECY	
10	Change control form P-09-15-01 provided to regulators	P-09-15-01, "Modifications to Hanford Federal Facility Agreement and Consent Order (HFFACO) Section 9.4, Administrative Record to eliminate hard copy requirement".	Open	Public announcement reviewed and approved by parties. Ecology has expressed interest in linking this initiative with the AR upgrade effort.	ECY, EPA, DOE	
11	M-15,16,37,85,94 Series' Tentative Agreement/response to comment	TPA Agencies complete response summary and approve change control forms.	Open	Public comment binning processes completed. Come to agreement on milestone revisions, and complete responsiveness summary. Approve and implement change control form.	ECY, EPA, DOE	

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12	12/14/2015 DOE transmits TPA chg ctrl form and EPA disapproves. DOE initiates dispute on 12/21/2015.	Resolve dispute on EPA disapproval of TPA change control form M-16-15-08, <i>Remove the 600-349 waste site from Tri-Party Agreement Interim Milestone M-016-149.</i>	Open	Dispute elevated to IAMIT on 1/13/2016 with EPA allowance to submit SOD on 1/21/2016. On 01/28/16, the parties agreed to extend the dispute at the IAMIT level until 03/18/16.	DOE/EPA/Ecology	