

Inter-Agency Management Integration Team Meeting Minutes October 15, 2020



SIGNATURES:

Approval: William F. Hamel Digitally signed by William F. Hamel
Date: 2020.12.03 12:33:59 -08'00' Date: _____
W.F. Hamel, DOE-RL IAMIT Representative

Approval: Robert G. Hastings Digitally signed by Robert G. Hastings
Date: 2020.11.24 08:38:26 -08'00' Date: _____
R.G. Hastings, DOE-ORP IAMIT Representative

Approval: J.B. Price Date: Dec 2, 2020
J.B. Price, Ecology IAMIT Representative

Approval: David E. Einan Digitally signed by DAVID EINAN
Date: 2020.12.02 16:16:56 -08'00' Date: _____
D.R. Einan, EPA IAMIT Representative

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1.0 WELCOME AND LOGISTICS/FORMAT

The Inter-Agency Management Integration Team (IAMIT) meetings are normally held monthly between the U.S. Department of Energy (DOE), Washington State Department of Ecology (Ecology), and the U.S. Environmental Protection Agency (EPA); also referred to as the Parties.

This meeting was held remotely via video and telecom utilizing the Microsoft Office Teams software, a communication and collaboration platform, due to the Hanford Site's current Phase 2 Remobilization process stemming from the COVID-19 (coronavirus) pandemic.

Mission Support Alliance, LLC (MSA) welcomed the IAMIT members and explained this was a standard IAMIT meeting that would cover the agenda items and action tracking table provided in the handout (see attachments).

2.0 REVIEW IAMIT ACTION TRACKING TABLE

2.1 Action Items

2.1.1 Agreement in Principle for the Negotiation of HFFACO Revisions in Response to Federal Fiscal Year (FFY) 2018-2020 Appropriation in Conjunction with the Representative Analogous Site Coordinating Agency Liaisons (RASCAL) Recommendations for Expediting Remedial Cleanup on the Hanford Central Plateau (or Budget/RASCAL AIP)

On August 25, 2020, the Parties signed an Agreement in Principle (AIP) for the Negotiation of Hanford Federal Facility Agreement and Consent Order (HFFACO) Revisions in Response to Federal Fiscal Year (FFY) 2018-2020 Appropriation in Conjunction with the Representative Analogous Site Coordinating Agency Liaisons (RASCAL) Recommendations (IAMIT Determination 2020-006) for Expediting Remedial Cleanup on the Hanford Central Plateau (or Budget/RASCAL AIP). The Parties are currently in negotiations and plan to conclude these negotiations by January 15, 2021 with a signed Tentative Agreement.

EPA stated the negotiations team met twice. The first meeting was an introductory meeting and the second meeting generated some general discussions and actions that DOE is currently working on and will bring back to the negotiations team at the next meeting. This item will be tracked at the IAMIT level in the interim.

2.1.2 Possible Adoption of the Principles and Parameters in Regulatory Documents

The Principles and Parameters Working Group has almost completed work on the draft Principles and Parameters document (DOE/RL-2019-46) and draft Change Control Form F-20-01 that will add the Principles and Parameters document into TPA Appendix F, "Supporting Technical Plans and Procedures."

DOE stated they had received the Principles and Parameters document (DOE/RL-2019-46) back from the CHPRC publication department, were going to review it, and then send the final draft to Ecology and EPA for review next week. DOE also indicated that the Change Control Form F-20-01 was complete and ready for the signature process.

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EPA requested a final review of Change Control Form F-20-01.

DOE took the action to send the final drafts of DOE/RL-2019-46 and Change Control Form F-20-01 to Ecology and EPA for final review. This item will be tracked at the IAMIT level in the interim.

2.1.3 Changes/Updates to TPA Paragraphs 148/149

On July 30, 2020, the Parties approved an extension to the TPA Paragraphs 148/149 AIP, which enables negotiations to continue through January 15, 2021. The Parties held two negotiation sessions in August 2020.

At the September 17, 2020 IAMIT meeting, the Parties agreed to put these negotiations on hold until the “Hanford tank waste mission holistic negotiations” progress further. There was no update provided this month. This item will be tracked at the IAMIT level in the interim.

2.1.4 Potential Agreement in Principle to Begin Negotiations on Waste Management Area (WMA) C Closure Milestones

At the July 16, 2020 IAMIT meeting, DOE showed interest in entering into an AIP to negotiate these milestones with Ecology but wanted to discuss the potential negotiation topics and milestones further with Ecology prior to committing.

At the September 17, 2020 IAMIT meeting, the Parties indicated that DOE and Ecology met twice to discuss these milestones and DOE stated the WMA C milestones are part of the ongoing “Hanford tank waste mission holistic negotiations” being conducted between DOE and Ecology. However, Ecology requested another meeting with DOE to discuss the proposed mega barrier, which would cover WMA C after remediation.

During this IAMIT meeting, Ecology stated they met with DOE and appreciated the information that DOE had provided on the mega barrier issue. Ecology added they will review the information and get back to DOE in a few weeks. Ecology also added that the WMA C closure milestones are not interdependent with any other part of the tank waste mission and that the only tie-in to the Hanford tank waste mission holistic negotiations is budget-related.

DOE stated they would like to progress as much as possible with C Farm closure from a practical approach to reduce their costs of maintaining systems and reduce risk in the tank farms. DOE added they are working well with Ecology on answering questions and trying to identify a path forward.

Ecology agreed with DOE’s statement and committed to meeting with DOE in a few weeks since this is outside of the holistic negotiations scope. Ecology has the action to review the mega barrier information and get back to DOE. This item will be tracked at the IAMIT level in the interim.

2.2 Status Updates

2.2.1 Draft Agreement in Principle: Revising and Updating TPA Appendices H and I

There was no update provided this month. At the October 17, 2019 IAMIT meeting, the Parties agreed revisions to Appendices H and I would be placed on hold pending the potential path forward determined from the Hanford tank waste mission holistic discussions. DOE proposed to continue tracking until discussions conclude. This item will be tracked at the IAMIT level in the interim.

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2.2.2 Modifications to Tri-Party Agreement Section 9.4, Administrative Record (AR) to Eliminate Hard Copy Requirements

There was no update provided this month. At the February 20, 2020 IAMIT meeting, DOE noted the proposed changes to Section 9.4 have some nexus to the M-035-09K dispute. The Parties agreed this item should be placed on hold pending the M-035-09K dispute that is with the Washington State Pollution Control Hearings Board. This item will be tracked at the IAMIT level in the interim.

2.2.3 Waste Management Area A/AX Closure Process “Kaizen”

At the September 17, 2020 IAMIT meeting, the Parties agreed to postpone the Kaizen until January 2021. The Parties also agreed that the scope of the Kaizen should be expanded to include, among other possible subjects, lessons learned from the Single Shell Tank closure process. MSA has the action to coordinate the logistics and schedule the Kaizen in January 2021. There was no update provided this month. This item will be tracked at the IAMIT level in the interim.

2.2.4 Gaps in Deactivation, Decommissioning, Decontamination and Demolition (D4) Planning

At the April 16, 2020 IAMIT meeting, DOE took the action to provide an update to the IAMIT on D4 planning efforts once the site is able to resume normal operations, pending ongoing mission essential operations due to coronavirus and pending Hanford prime contracts’ transition.

EPA pointed out that it would be helpful to have a rough order of magnitude on the contaminated soil and rubble to inform negotiations. EPA requested that DOE provide to EPA and Ecology its expectation for “level of detail” on information it would be providing prior to formal discussions beginning on D4 planning.

DOE took the action to contact EPA and ECY to discuss D4 planning “level of detail” prior to the next IAMIT meeting, scheduled for November 19, 2020. This item will be tracked at the IAMIT level in the interim.

2.3 Recently Closed/Other Agreements

Tri-Party Agreement Dispute (IAMIT Level) Milestone M-015-93C / TPA Change Control Form M-15-18-03 – “Initiate Characterization Field Work for 200-SW-2 OU Landfills”

At the September 17, 2020 IAMIT meeting, the Parties agreed to combine any future discussions regarding the TPA dispute on Milestone M-015-93C/Change Control Form M-15-18-03 with the AIP for the Negotiations of HFFACO Revisions in Response to FFY 2018 Appropriation and FFY 2019 President’s Budget, which is now referred to as the AIP for the Negotiation of HFFACO Revisions in Response to FFY 2018-2020 Appropriation in Conjunction with the RASCAL Recommendations (IAMIT Determination 2020-006) for Expediting Remedial Cleanup on the Hanford Central Plateau. Refer to Section 2.1.1 above. This item will no longer be tracked at the IAMIT level.

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3.0 UPCOMING TOPICS/ACTION ITEMS FOR FUTURE IAMIT MEETINGS

MSA asked if there were emerging issues the IAMIT would like to discuss or include on upcoming meeting agendas. The IAMIT representatives did not have any new items to add.

MSA stated the Calendar Year 2021 Tri-Party Agreement Milestone Review and IAMIT Meeting Schedule was being drafted and will be provided to the IAMIT for approval at the November 19, 2020 IAMIT meeting.

4.0 REVIEW OF TODAY'S ACTIONS/UPCOMING IAMIT MEETINGS

The following actions were captured during the meeting and provided to the Parties following this IAMIT meeting:

No.	IAMIT Topic	Actions from 10/15/20 IAMIT Meeting
1	Possible Adoption of the Principles and Parameters in Regulatory Documents	DOE took the action to send the final drafts of DOE/RL-2019-46 and Change Control Form F-20-01 to Ecology and EPA for final review.
2	Potential Agreement in Principle to Begin Negotiations on Waste Management Area (WMA) C Closure Milestones	Ecology has the action to review the mega barrier information and get back to DOE.
3	Gaps in Deactivation, Decommissioning, Decontamination and Demolition (D4) Planning	DOE took the action to contact EPA and ECY to discuss D4 planning "level of detail" prior to the next IAMIT meeting, scheduled for November 19, 2020.
4	Calendar Year 2021 Tri-Party Agreement Milestone Review and IAMIT Meeting Schedule	MSA is drafting the Calendar Year 2021 Tri-Party Agreement Milestone Review and IAMIT Meeting Schedule and will provide to the IAMIT for approval at the November 19, 2020 IAMIT meeting.

The next IAMIT meeting is scheduled for November 19, 2020.

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5.0 LIST OF ATTENDEES

Bergman, Theresa	CHPRC
Brasher, Stephanie	MSA
Cameron, Craig	EPA
Capron, Jason	DOE
Cline, Michael	DOE
Davis, Scott	MSA
Einan, Dave	EPA
Hamel, Bill	DOE
Harkins, Brian	DOE
Hastings, Rob	DOE
Higgins, Kathy	DOE
Hildebrand, Doug	DOE
Jewett, Marc	Central Plateau Cleanup Company (CPCCo)
Lobos, Rod	DOE
Menard, Nina	Ecology
Price, John	Ecology
Turner, Michael	MSA
Welsch, Kim	Ecology



Inter-Agency Management Integration Team (IAMIT) Meeting
Thursday, October 15, 2020
8:00 - 8:35 a.m.

*Meeting held via Teams video/teleconference

Agenda

No	Time	Lead / Org	Topic
1	8:00– 8:02 a.m.	Michael Turner, MSA	Welcome and Meeting Logistics/Format
2	8:02 – 8:20 a.m.	Michael Turner, MSA/ IAMIT and attendees	Review IAMIT Action Tracking Table
3	8:20 – 8:25 a.m.	IAMIT members	New Topics for Upcoming IAMIT Meetings
4	8:25 - 8:35 a.m.	Michael Turner, MSA/ IAMIT and attendees	Review of Today's Actions
5	8:35 a.m.	Adjourn	

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TABLE I. ACTION ITEMS¹

1. *Agreement in Principle for the Negotiation of HFFACO Revisions in Response to Federal Fiscal Year (FFY) 2018-2020 Appropriation in Conjunction with the RASCAL Recommendations (IAMIT Determination 2020-006) for Expediting Remedial Cleanup on the Hanford Central Plateau (or Budget/RASCAL AIP)*

Reference:	Agreement in Principle (AIP) approved 8/25/20
Affected Milestone:	M-015-00, M-015-38B, M-015-84, M-015-91B, M-015-92B, M-015-92C, M-015-93B, M-015-93C, M-015-98, M-015-99, M-015-110B, M-015-112, M-016-200A, M-016-200-B, M-085-70, M-085-90
Originated:	12/20/18
Status:	Open - Agreement in Principle (AIP) approved 8/25/20 to conclude negotiations by 1/15/20
Dispute Extended:	N/A
Action:	Negotiating milestones
Comments:	These negotiations are driven primarily by requirements found in HFFACO, Legal Agreement, Paragraph 148.A, which requires DOE-RL to include in its annual budget request to the DOE Office of Environmental Management (DOE-EM) estimated funding levels required to achieve full compliance with HFFACO milestones. The FFY 2018 appropriation by Congress and the FFY 2019 President's budget request to Congress, respectively, were less than the DOE-RL estimated funding levels submitted to DOE-EM. HFFACO, Legal Agreement, Paragraph 149.G allows DOE-RL to propose changes to milestones in response to congressional budget appropriations that are less than estimated funding levels required to achieve full compliance. HFFACO, Legal Agreement, Paragraph 149.D states that DOE-RL shall assess the impacts of the President's budget on DOE-RL's ability to complete milestones on time. At the 12/20/18 IAMIT meeting, Ecology stated they had received drafts of the AIP and TA on 12/19/18, were scheduled to meet with their attorneys to review them, and will respond back to DOE. At the 01/31/19 IAMIT, Ecology stated EPA had been on furlough and needed to restart these discussions. At the 2/21/19 IAMIT, the Parties were asked for an update on status. There was no change in status. At

¹ *New information shown in blue.

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the 3/21/19 IAMIT, Ecology stated that both Ecology and EPA were discussing the language in the AIP and TA and will send to DOE. Action is with Ecology and EPA to provide comments. Ecology questioned the language in the AIP/TA and sent it to EPA for their review. At the 04/24/19 IAMIT, DOE-RL took the action to schedule a teleconference between the Tri-Parties to discuss current status and path forward to negotiations. On 05/06/19, DOE received the AIP from EPA and is currently reviewing it for approval. At the 06/20/19 IAMIT, the parties discussed expectations for the AIP. Ecology stated there is a letter going to DOE regarding budget that was currently in review with Ecology legal. On 07/03/19 Ecology noted it would not sign AIP until it received a response to its letter of 07/10/19 (19-NWP-109). DOE requested an extension to 08/02/19 to respond to the letter. At the 08/15/19 IAMIT meeting, Ecology stated that the AIP remains on hold until it gets a reply to its 07/10/19 letter. DOE said it was still coordinating its response with DOE Headquarters. EPA also requested to see the DOE response when issued. As of 09/09/19, DOE-RL requested Ecology's reconsideration of approving the AIP to begin negotiating the milestones impacted by the FFY 2018 and 2019 budget via letter 19-AMRP-0074. At the 10/17/19 IAMIT Ecology stated they wanted to resolve the issues with TPA Paragraphs 148/149 before signing an AIP. DOE disagreed, saying the issues were separate. At the 11/21/19 IAMIT, the parties agreed that the "Representative Analogous Site Coordinating Agency Liaisons (RASCAL)" team conclusions might provide a resolution to this issue. The RASCAL team, comprised of all three agencies is currently evaluating a proposal, which will ensure consistent remedies for similar conceptual site model groups and associated waste sites, and could potentially reduce characterization pre-ROD and post-ROD. At the 4/16/20 IAMIT, an update on RASCAL Team progress was presented. The IAMIT granted approval to proceed with next steps, the RASCAL Team will: (1) Draft a White Paper, and (2) engage the contractor for cost estimates, to include cost avoidance and proposed milestones and report back to the IAMIT in a couple of months. At the 05/26/20 IAMIT, the RASCAL Team noted it was planning an update to the IAMIT in June, with a possible draft IAMIT Determination and White Paper ready for review as well. Ecology

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reiterated the RASCAL process will not solve all issues with all of the milestones, in particular milestone M-015-93C for the 200-SW-2 Operable Unit. As of 06/11/20, an IAMIT Determination had been drafted and will be shared with the IAMIT. DOE agreed to take M-015-93B and M-015-93C, out of the “budget” negotiations and add them to the M-091 milestone negotiations. At the 6/18/20 IAMIT, the Parties agreed that a new Agreement in Principle (AIP) should be drafted to address RASCAL Team milestones and others that were previously to be addressed in the draft “Budget AIP”. MSA took the action to draft the AIP, which is in review. IAMIT determination 2020-006 “RASCAL Recommendations for Expediting Remedial Cleanup on the Hanford Central Plateau” was signed on 06/23/20. At the 07/16/20 IAMIT meeting, DOE stated they were reviewing the AIPs. The RASCAL Team is currently working on completing the binning of the waste sites and plans to produce a document to memorialize how the RASCAL Team decided to bin the different waste sites. The RASCAL Team anticipates having a few more sessions to complete this process and get it documented. The Parties signed TPA Change Control Form C-20-02, establishing the new 200-IA-1 Operable Unit, on 8/11/20. [Milestone M-015-93C was included in the Budget/RASCAL AIP, which was signed 08/25/20, and plans are to conclude negotiations by 01/15/2021. At the 09/17/20 IAMIT, the Parties agreed to combine discussions regarding the TPA dispute on Milestone M-015-93C/Change Control Form M-15-18-03 with the AIP for the Negotiations of HFFACO Revisions in Response to FFY 2018 Appropriation and FFY 2019 President’s Budget, which is now referred to as the AIP for the Negotiation of HFFACO Revisions in Response to FFY 2018-2020 Appropriation in Conjunction with the RASCAL Recommendations \(IAMIT Determination 2020-006\) for Expediting Remedial Cleanup on the Hanford Central Plateau \(or Budget/RASCAL AIP\).](#)

2. Possible Adoption of the Principles and Parameters in Regulatory Documents

Reference: DOE/RL-2004-60, REV.1, DOE/RL-2019-46
Affected Milestone: N/A
Originated: 05/16/19

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Status:	Open
Dispute Extended:	N/A
Action:	Parties are being asked to consider adopting the Principles and Parameters for use as a standard in producing regulatory documents.
Comments:	<p>IAMIT has agreed to discuss this topic as a “core” IAMIT meeting. No meeting date set. On 6/20/19, Ecology stated they needed to discuss this internally and discuss and would report status at the 07/18/19 IAMIT meeting. At the 07/18/19 IAMIT meeting the parties agreed to refer to this topic as the “Principles and Parameters” and the parties agreed to add this topic to a future regularly scheduled IAMIT meeting to discuss further. At the 08/15/19 IAMIT meeting, the parties agreed to address this issue in a stand-alone, topic-specific IAMIT meeting. MSA took the action to schedule that meeting. Parties have yet to agree on a date for this meeting. At the 10/17/19 IAMIT, the agreed to discuss this subject and path forward at the November IAMIT. The parties also discussed the possibility of assembling a small group to evaluate the principles and parameters and then bring a recommendation back to the IAMIT. At the 11/21/19 IAMIT, the parties agreed to form a small working group, made of up of each agency’s subject matter experts to discuss and eventually bring their conclusions to the IAMIT. At the 12/19/19 IAMIT, the agencies were asked to identify SME’s to form a small working group. Agencies have identified SME’s, the team will consist of:</p> <ul style="list-style-type: none">- Craig Cameron, EPA- John Price, ECY- Doug Hildebrand, RL- Rod Lobos, ORP <p>First meeting of the group occurred 01/23/20. Affected milestones and work plans were discussed as well as a potential IAMIT Determination to document conclusions. Second meeting of the group was held 03/09/20. At that meeting, Ecology handed out a draft letter that parameters (cleanup standards) be applied to Waste Management Areas through the CERCLA and RCRA/MTCA processes. Parties met again on 4/09/20 and are still developing a path forward. At the 4/16/20 IAMIT, the Parties agreed the small working group would be on a temporary hold while ECY took the action to examine their internal processes and</p>

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will let the working group know when they are ready to continue discussions. The working group continues to meet to agree to a version of DOE/RL-2019-46, which if approved, would be added to TPA Appendix F (“Supporting Technical Plans and Procedures”). An IAMIT Determination (2020-007) to accompany DOE/RL-2019-46 has also been drafted and is in review at the staff-level. Ecology is drafting TPA Change Control Form F-20-01 to add the documents to TPA Appendix F. Working group last met on 08/18/20 and is very close to finalizing the document. Targeted completion is September. Draft TPA Change Control Form (CCF) F-20-01 is under review by the agencies, and the group’s view is that an IAMIT Determination is not necessary. The group is very close to finalizing DOE/RL-2019-46 and CCF F-20-01. Latest round of comments provided by Ecology Legal. [At the 09/17/20 IAMIT, the Working Group reported it was looking at comments on the document provided by Ecology’s legal team, and was hoping to have the document and corresponding change control form ready for signature by the 10/15/20 IAMIT. DOE is currently reviewing latest comments from Ecology.](#)

Closed: ---

3. Changes/Updates to TPA Paragraphs 148/149

Reference: Tri-Party Agreement Legal Agreement, paragraphs 148/149
Affected Milestone: N/A
Originated: 05/16/19
Status: Open
Dispute Extended: N/A
Action: Parties are being asked to revise and update TPA paragraphs 148/149 (see also “Status Updates, item #1 below)
Comments: IAMIT has agreed to discuss this update and potentially change the TPA Legal Agreement. The parties have been discussing potential changes for a number of years. History and background have been provided. IAMIT is being asked to meet as a “core” team to discuss changes and eventually recommend to the Executive Managers signing a TPA Change Control Form to document those changes. Meeting was held on 06/27/19, with the parties’ subject matter experts and legal teams to discuss the

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history and rationale for proposed changes. DOE is reviewing paragraphs 148/149 to look at simplifying the proposed changes and will provide to regulators for review. At the 07/18/19 IAMIT, the parties agreed that a kick-off meeting should be scheduled to sign the AIP and start negotiations. At the 08/15/19 IAMIT meeting, MSA agreed to work with DOE to schedule a kick-off meeting. Parties have yet to agree to a date for the meeting. On 09/09/19, DOE-RL provided to Ecology via letter 19-AMRP-0074, a timeline of efforts made to update the language in 148 and 149 and offered to schedule joint meetings to accomplish this task. At the 10/17/19 IAMIT, DOE noted they would not take further action at this time without further discussion and buy in from the parties to perform a meaningful exercise to revise paragraphs 148 and 149. DOE stated they are committed to following federal law and the TPA and will continue to do so whether these paragraphs are revised or not. At the 11/21/19 IAMIT, the parties agreed an update to reflect current mechanisms of the federal budgeting process is needed and to perform this update via TPA negotiations. MSA took the action to draft an Agreement in Principle (AIP). That AIP would set a March 31, 2020 date for completing negotiations. The parties also expressed the need for their respective lawyers to be included in negotiations. At the 12/19/19 IAMIT, DOE-RL noted they were reviewing the draft AIP. The draft AIP was provided to the regulators for review with comments requested by COB 01/22/2020. EPA and Ecology comments were received on 01/23/20. DOE is currently reviewing the AIP. On 3/23/20, the Parties signed the AIP to begin negotiations, which are currently scheduled to conclude 07/31/20. On 4/07/20, Tri-Party attorneys met to discuss federal budget process and path forward to update these paragraphs. DOE provided responses to ECY/EPA attorney comments made during this meeting for their review. Action remains with ECY/EPA legal to respond back to DOE. No meetings are currently scheduled. At the 05/26/20 IAMIT, the Parties once again agreed that paragraphs 148/148 needed updating, but EPA and Ecology are still unclear of the overall desired outcome of those updates. DOE took the action to reconvene the technical staff and attorneys to continue negotiations. DOE Legal forwarded the embargoed budget guidance to the regulator attorneys and DOE

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is awaiting a response. On 07/30/20, the Parties signed an extension to the AIP, which will allow negotiations to continue until 01/15/21. Negotiation sessions were held on 08/05/20 and 08/18/20, as the Parties continue to negotiate the proposed changes to paragraphs 148/149. [At the 09/17/20 IAMIT, the Parties agreed to temporarily suspend negotiations until the Tank Mission Holistic Negotiations progresses further.](#)

Closed: ---

4. Potential Agreement in Principle to Begin Negotiations on WMA-C Closure Milestones

Reference: Draft TPA Change Control Form M-45-17-01

Affected Milestone: N/A

Originated: 06/18/20 IAMIT Meeting

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to consider signing an Agreement in Principle to begin negotiations on TPA milestones for closure of Waste Management Area-C (WMA-C).

Comments: At the 06/18/20 IAMIT meeting, Ecology asked DOE-ORP (and by extension, all three TPA parties) if would be willing to sign an AIP and enter negotiations regarding TPA milestones for closure of WMA-C. Ecology. Draft TPA change control forms have been exchanged between Ecology and DOE-ORP since 2017, with no agreement reached. At the 07/16/20 IAMIT meeting, the Parties discussed possibly entering into negotiations. However, there was some feedback from the holistic negotiations that this topic may be included. DOE-ORP requested to meet with Ecology to discuss what might be subject to negotiations. At the 08/25/20 IAMIT, DOE stated a meeting was held with Ecology to discuss potential milestones and topics to be included in a draft Agreement in Principle; however, not all applicable Ecology staff were able to attend. DOE indicated the meeting would need to be rescheduled to include the appropriate Ecology staff in these discussions. [At the 09/17/20 IAMIT, the Parties agreed that these negotiations could wait until the conclusion of the Tank Waste Mission Holistic Negotiations; however Ecology requested a meeting with ORP to discuss the WMA-C mega barrier specifically. Meeting was held](#)

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10/05/20. Ecology is now reviewing preliminary specifications and other details of the proposed barrier and will provide comments to ORP.

Closed: ---

TABLE II. STATUS UPDATES

1. Draft Agreement in Principle: Revising and Updating TPA Appendices H and I

Reference: Tri-Party Agreement Action Plan, Appendices H and I
Affected Milestone: M-042-00 and M-045-00 series
Originated: 05/16/19
Status: Open
Dispute Extended: N/A
Action: Parties are being asked to review the draft TPA Agreement in Principle for entering into formal negotiations to revise and update TPA Appendices H and I.
Comments: The parties agree that TPA appendices H and I are outdated and in need of change. Though attempts have been made and proposals for changing have been shared by the parties, no change has occurred. In light of the current 241-C-106 Waiver Request Denial Dispute, the parties are agreeing to enter formal TPA negotiations. At the 6/20/19 IAMIT, the Parties agreed to schedule a kick-off meeting and share the draft AIP, meeting has yet to be scheduled. At the 07/18/19 IAMIT, the parties agreed that an AIP was necessary to enter into negotiations for updates to Appendices H & I in a two-phased approach, first being the easy updates and then proceed to the more challenging updates. The parties also agreed to add TPA section 11.8 (ORP Critical Path) as part of these negotiations. At the 08/15/19 IAMIT, MSA took the action to revise the draft Appendix H, I AIP to include TPA section 11.8. Ecology noted that the TPA dispute over retrieval criteria for SST 241-C-106, currently before the Washington State Pollution Control Hearings Board could delay discussions. *Note: the PCHB dispute was dismissed on 04/07/20. At the 10/17/19 IAMIT, the parties agreed revisions to Appendices H and I should be placed on hold pending the path forward determined from the

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Hanford tank waste mission “holistic” discussions. [At the 09/17/20 IAMIT, there was no change in status.](#)

Closed: ---

2. *Modifications to TPA Section 9.4, “Administrative Record,” to Eliminate Hard Copy Requirements*

Reference: TPA Section 9.4
Affected Milestone: N/A
Originated: 11/15/18 (re-opened)
Status: Open – Change Control Form P-09-18-01 has been drafted.
Dispute Extended: N/A
Action: Sign Change Control Form
Comments: Change Control Form P-09-18-01 in draft, proposes eliminating the requirement to maintain hard-copy files in the Hanford Administrative Record (AR). DOE upgraded the Administrative Record website to enhance search and retrieval capabilities, allow multi-field filtering, provide canned and ad hoc reporting, enable electronic document submittal, and improve system response time. At the December 20, 2018 IAMIT meeting, Ecology indicated they would be ready to sign this change control form when the AR upgrade is complete. The system upgrade was completed in June 2019. At the 07/18/19 IAMIT meeting, Ecology stated they wanted a “validation and verification” meeting to assess the AR upgrades. On 8/28/19, a validation meeting was held. Ecology took the action to propose a new TPA Change Control Form or make changes to the existing (P-09-18-01). On 9/03/19, Ecology stated they would like DOE to prepare AR indexes at regular intervals and will draft a CCF with proposed language to modify Section 9 of the TPA and provide to DOE/EPA for review. Ecology also requested additional functionality in the AR for replicating the RCRA Permit at any given point in time. At the 10/17/19 IAMIT, it was noted this action is currently with Ecology to draft the change control form with the proposed modifications to Section 9 of the TPA, to include the Administrative Record indices Ecology has requested from DOE. At the 11/21/19 IAMIT, Ecology noted the progress made on the AR upgrade, but still had concerns about documents being removed from the AR and a lack of procedure for doing so. At the

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12/12/19 IAMIT, Ecology took the action to discuss what they propose at the 01/23/20 IAMIT – including draft changes to the TPA. On 01/28/20, Ecology sent the draft TPA Change Control Form to the Parties for review. At the 02/20/20 IAMIT, the Parties agreed to suspend this discussion until the M-035-09K and M-035-09L disputes are settled, though it will still be tracked at the IAMIT level. At the February 20, 2020 IAMIT meeting, DOE noted the proposed changes to Section 9.4 have some nexus to the M-035-09K dispute. The Parties agreed this item should be placed on hold pending the M-035-09K dispute that is with the Washington State Pollution Control Hearings Board. At the 08/25/20 IAMIT, Ecology stated the Parties will be mediating the M-035-09K dispute on September 28-29, 2020. [Mediation session was held on September 28-29, 2020. This item will be tracked at the IAMIT level in the interim.](#)

Closed: ---

3. *Waste Management Area A/AX Closure Process “Kaizen”*

Reference: TPA Section 9.4

Affected Milestone: TBD

Originated: 06/18/20

Status: Open –

Dispute Extended: N/A

Action: Schedule and participate in kaizen

Comments: At the 06/18/20 IAMIT meeting, Ecology suggested ORP and Ecology participate in a structured Kaizen to improve the comment/response process between the two agencies and then applying those improvements to the Waste Management Area A/AX regulatory closure. At the 07/16/20 IAMIT meeting, both DOE and Ecology requested EPA participation in the Kaizen. EPA questioned the need to participate as Ecology is the lead regulatory agency for WMA A/AX closure. ORP replied that EPA’s closure process is more streamlined and having EPA share their lessons learned would allow the Parties to find a better solution collectively. EPA has agreed to participate in the Kaizen, which will be limited to no more than three sessions, with each session being no longer than three hours. The parties are working with MSA to identify its participants and to find schedule openings.

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ORP stated it wanted to wait until the start of the 2021 Fiscal Year (10/01/20) to conduct the Kaizen. [At the 09/17/20 IAMIT meeting, the Parties agreed to wait until January 2021 to conduct the Kaizen. MSA has the action to coordinate the logistics and schedule the Kaizen in January 2021.](#)

Closed:

4. Gaps in Deactivation, Decommissioning, Decontamination and Demolition (D4) Planning

Reference: ECY letter NWP-20-201 and DOE letter 20-PFD-0013

Affected Milestone: N/A

Originated: 01/23/20 IAMIT Meeting

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to evaluate DOE's proposed lifecycle soil usage versus D4 versus time.

Comments: Correspondence on "Gaps in Planning Deactivation, Decommissioning, Decontamination and Demolition Projects" was added at the 1/23/20 IAMIT. DOE took the action to brief EPA and ECY at the March 2020 IAMIT (to be timed with the RASCAL Team briefing). This will address lifecycle soil usage versus D4 versus time. The IAMIT scheduled for 3/19/20 was cancelled. DOE-RL briefed the IAMIT on 4/16/20, in that briefing, DOE said the on-going Covid-19-related work posture, and pending Hanford prime contract changes may affect this issue and pledged to provide updates. [There was no change in status provided at the 09/17/20 IAMIT.](#)

Closed: ---

TABLE III. RECENTLY CLOSED/OTHER AGREEMENTS

- 1. Tri-Party Agreement Dispute (IAMIT Level) Milestone M-015-93C / TPA Change Control Form M-15-18-03 – "Initiate Characterization Field Work for 200-SW-2 OU Landfills"**

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Reference: Ecology letter 18-NWP-096; DOE letter 19-SGD-0008, Statement of Dispute (AR-01073)

Affected Milestone: M-015-93C

Originated: Dispute initiated at the Project Manager level 7/09/18. Elevated to the IAMIT level on 03/14/19.

Status: Open

Dispute Extended: The Parties had until 04/30/19 to resolve dispute at the IAMIT level (latest extension signed on 04/04/19). On 05/16/19, the Parties agreed not to issue the Director's Determination extension and work resolution via the Budget/RASCAL AIP.

Action: Parties are being asked to resolve dispute through the Budget/RASCAL AIP.

Comments: At the 4/24/19 IAMIT meeting, Ecology noted that the TPA-prescribed due date for a Final (Director's) Determination may have lapsed and proposed extending the dispute at the IAMIT level. DOE took the action to set up a meeting to discuss Federal Fiscal Years 2018, 2019 budgets. DOE-RL stated that this milestone is now different from the other milestones in the Agreement in Principle (AIP) and Tentative Agreement (TA) and needs to be addressed separately (Ecology elevated it from the PM level to the IAMIT level). On 05/16/19, the Parties agreed not to issue the Director's Determination extension and work resolution via the budget AIP and TA. A draft AIP and TA which includes M-015-93C, is in review by the Parties. If signed, the AIP and TA including M-015-93C would resolve this dispute. On 07/03/19 Ecology noted it would not sign the AIP until it received a response to its letter of 07/10/19 (19-NWP-109). At the 08/15/19 IAMIT meeting, Ecology stated that the AIP remains on hold until it gets a reply to its 07/10/19 letter. DOE said it was still coordinating its response with DOE Headquarters. EPA also requested to see the DOE response when issued. On 09/09/19, DOE-RL requested Ecology's reconsideration in approving the AIP to begin negotiating the milestones impacted by the FFY 2018 and 2019 budget via letter 19-AMRP-0074. At the 11/21/19 IAMIT, Ecology noted they have requested a briefing from DOE on the FY20 Continuing Resolution (CR) impacts (in accordance with TPA Legal Agreement, paragraph 149.F). DOE reported they have scheduled the FY19 year-end accomplishments briefing and then will schedule an Integrated Priorities List follow-on briefing which will include FY20 CR impacts. At the 12/19/19 IAMIT, Ecology suggested coordinating milestone M-015-93C (Characterize field

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work for 200-SW-2 Operable Unit) with the M-091 milestone for retrievals. DOE is currently evaluating options, including scheduling a meeting with Ecology to discuss. The agencies have agreed to remove this milestone from the budget AIP. DOE met with the Carlsbad Field Office (WIPP) in late February and will schedule a meeting with Ecology to discuss options and a potential path forward. At the 04/16/20 IAMIT, DOE committed to scheduling a meeting with Ecology to provide the latest status. At the 05/26/20 IAMIT, Ecology noted there is an M-091 milestone due 09/30/20 and reminded DOE of their 90-day notification requirement on that milestone. Ecology indicated they would like to talk about the M-015-93C dispute at the same time as the M-091 milestones. DOE agreed to take M-015-93B and M-015-93C, out of the “budget” negotiations and add them to the M-091 milestone negotiations. At the 06/18/20 IAMIT, the parties agreed to move Milestone M-015-93C into the scope of the M-091 negotiations. However, during negotiations, the Parties decided the M-015-93C and -93B milestones should be negotiated with the Budget/RASCAL AIP. The M-091 AIP extension approved on 7/30/20 removed these milestones from being negotiated with the M-091 series milestones. This milestone was included in the Budget/RASCAL AIP, which was signed 08/25/20, and plans are to conclude negotiations by 01/15/2021. Note, this milestone is currently “in abeyance” and the dispute will be resolved when the Parties conclude negotiations successfully with a signed Tentative Agreement. [At the 09/17/20 IAMIT, the Parties agreed to combine any future discussions regarding the TPA dispute on Milestone M-015-93C/Change Control Form M-15-18-03 with the AIP for the Negotiations of HFFACO Revisions in Response to FFY 2018 Appropriation and FFY 2019 President’s Budget, which is now referred to as the AIP for the Negotiation of HFFACO Revisions in Response to FFY 2018-2020 Appropriation in Conjunction with the RASCAL Recommendations \(IAMIT Determination 2020-006\) for Expediting Remedial Cleanup on the Hanford Central Plateau. Refer to Action #1 in Table 1 above.](#)

Closed: (09/17/20)