

***Office of River Protection
Tri-Party Agreement Project Managers Meeting Minutes***

October 3, 2019

2440 Stevens Center
Richland, Washington

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CONCURRENCE SIGNATURES

The undersigned TPA Project Managers (or their delegates) indicate by their signatures that these meeting minutes reflect the actual occurrences of the above-dated Tri-Party Agreement Project Managers' Meeting.



Wahed Abdul, DOE-ORP

Date: 1/2/20

N/A

Kaylin Burnett, DOE-ORP

Date: _____

N/A

Janet Diediker, DOE-ORP

Date: _____



Brian Harkins, DOE-ORP

Date: 2/13/20



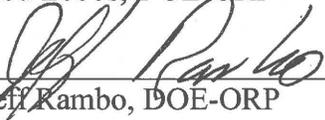
Paul Hernandez, DOE-ORP

Date: 2/12/20



Rod Lobos, DOE-ORP

Date: 2-12-2020



Jeff Kambo, DOE-ORP

Date: 2/12/2020

NA

Sahid Smith, DOE-ORP

Date: N/A

N/A

Dustin Stewart, DOE-ORP

Date: N/A

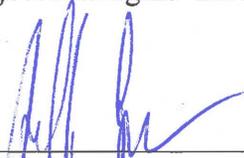


Richard Valle, DOE-ORP

Date: 2/12/2020

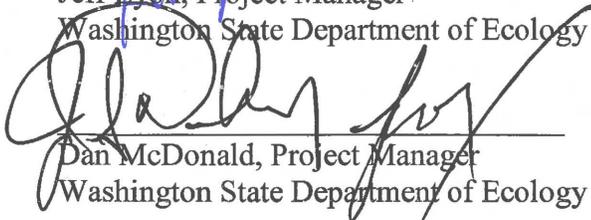
CONCURRENCE SIGNATURES (continued)

The undersigned TPA Project Managers (or their delegates) indicate by their signatures that these meeting minutes reflect the actual occurrences of the above-dated Tri-Party Agreement Project Managers' Meeting.



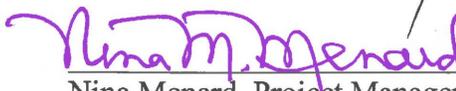
Jeff Lyon, Project Manager
Washington State Department of Ecology

Date: 2/26/20



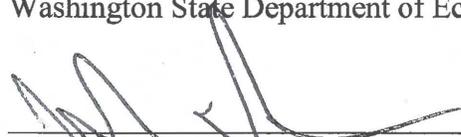
Dan McDonald, Project Manager
Washington State Department of Ecology

Date: 2/18/20



Nina Menard, Project Manager
Washington State Department of Ecology

Date: 2/21/2020



John Femple, Project Manager
Washington State Department of Ecology

Date: 2/18/20

TERMS

BBI	Best Basis Inventory
BOF	Balance of Facilities
CD	Consent Decree
CD-3B	critical decision
CERCLA	<i>Comprehensive Environmental Response, Compensation and Liability Act</i>
DFLAW	direct feed low-activity waste
DOE	U. S. Department of Energy
DST	double-shell tank
Ecology	Washington State Department of Ecology
EIS	Environmental Impact Statement
EM-1	DOE Office of Environmental Management, Assistant Secretary
EMF	Effluent Management Facility
EPA	U.S. Environmental Protection Agency
ERSS	Extended Reach Sluicer System
ETF	Effluent Treatment Facility
EVMS	earned value management system
FY	fiscal year
IAMIT	Inter-agency Management Integration Team
IMUST	Inactive Miscellaneous Underground Storage Tanks
IQRPE	Independent Qualified Registered Professional Engineer
LAW	Low-activity waste
LBL	LAW Facility, Balance of Facilities and Lab
LERF	Liquid Effluent Retention Facility
MUST	Miscellaneous Underground Storage Tank
ORP	U. S. Department of Energy, Office of River Protection
PA	Performance Assessment
PMM	project manager meeting
POC	Point of contact
PT	Pretreatment
RAD	Radiation absorbed dose
RCRA	<i>Resource Conservation and Recovery Act</i>
SST	single-shell tank
TC&WM	Tank Closure and Waste Management
TPA	Tri-Party Agreement
TSCR	tank-side cesium removal
TWRWP	tank waste retrieval work plan
UT	Ultrasonic Test
WMA-C	Waste Management Area C
WRPS	Washington River Protection Solutions LLC
WTP	Waste Treatment and Immobilization Plant

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TRI-PARTY AGREEMENT MONTHLY REPORT

1.0 ADMINISTRATIVE ITEMS/MILESTONE STATUS

Upcoming Meetings

The next U.S. Department of Energy-Office of River Protection (ORP) Tri-Party Agreement Project Managers' meeting is scheduled for November 7, 2019, at 2440 Stevens Center.

Recent Items Entered Into the Hanford Administrative Record

The Office of River Protection Tri-Party Agreement and Consent Decree monthly reports for the period of August 1 - August 31, 2019, were entered into the Administrative Record on September 25, 2019.

Tri-Party Agreement Milestone Status

ORP stated all Tri-Party Agreement (TPA) milestones reported on were either Complete, On Schedule, or In Dispute resolution (for details on specific milestones, see pages 3-5 of the August 2019 ORP TPA Monthly Report).

Tri-Party Agreement Issues and Action Items

For reference, see attached, "ORP/Ecology TPA and CD Agreements, Issues and Action Items – October 2019 Meeting."

Action No. 1 (TF-16-11-04): ORP reported no change in status. Action remains On Hold.

Action No. 2 (TF-18-10-01): ORP reported no change in status. Action remains Open.

Action No. 3 (TF-18-10-02): ORP reported it is awaiting Ecology's concurrence to formally close this action. Action remains Open.

Action No. 4 (TF-19-04-03): ORP stated that both Ecology and ORP have attempted to reach out to the U.S. Environmental Protection Agency (EPA) for engagement and will continue trying. Ecology stated an email was sent from Ecology, addressed to EPA on July 30, 2019, subject: A request and follow up regarding Single-Shell Tank (SST) Performance Assessment and SST Closure. Ecology also stated, because EPA had yet to respond to the email, Ecology wanted the email added as part of the TPA record, which was attached to the August 1, 2019 ORP Project Manager Meeting minutes. Ecology stated that the issue was larger than just including EPA. Action remains Open.

(Not Formally Added to Actions)

Ecology requested meeting minutes from the Tank Integrity Expert Panel (TIEP) meeting(s) and an invitation to upcoming meetings. ORP said the minutes from the August TIEP have not been produced yet and that it would send an email to the TIEP Coordinator asking them to invite Ecology to upcoming meetings.

TRI-PARTY AGREEMENT MONTHLY REPORT

2.0 SYSTEM PLAN

ORP reported that Ecology had tentatively agreed to the System Plan 9 planning scenarios and negotiations are expected to begin in the first or second quarter of FY20. ORP also noted that the soon-to-start “holistic” negotiations between the regulators and DOE will inform System Plan 9 negotiations.

ORP is also still waiting on Ecology to issue a fact sheet for the public that details the outcome and resulting TPA milestones from the concluded System Plan 8 negotiations.

3.0 ACQUISITION OF NEW FACILITIES

ORP reported there has been no change in this activity.

4.0 SUPPLEMENTAL TREATMENT AND PART B PERMIT APPLICATIONS

ORP reported there has been no change in this activity.

5.0 LOW-ACTIVITY WASTE PRETREATMENT SYSTEM

ORP reported this activity is on schedule.

6.0 TANK-SIDE CESIUM REMOVAL SYSTEM

Significant Past Accomplishments

ORP reported that Critical Decisions 2 and 3 would likely be moved out until the end of January 2020, but that the schedule for the Tank-Side Cesium Removal System (TSCR) was still showing a start-up well in advance of the need for supplying waste for LAW.

ORP reported that tall-column, gas generation with the ion-exchange media, and ion-exchange media drying was completed in July at the Pacific Northwest National Laboratory.

ORP also reported the 90 percent design review for the TSCR spent ion-exchange column storage pad was completed in August 2019, and the report would be released soon.

Significant Planned Actions in the Next Six Months

ORP reported the TSCR System design and Tank Farm Upgrades final design is complete and expected to be released soon. TSCR system fabrication continues and is expected to be completed by the end of calendar year 2020.

Issues/Other Items

ORP also reported it will soon be meeting with Ecology on the ion-exchange cesium removal process, and will show factory acceptance testing, along with other similar results from DOE sites in Nevada and South Carolina.

TRI-PARTY AGREEMENT MONTHLY REPORT

ORP noted the ambient air boundary could impact TSCR, along with other projects.

7.0 242-A EVAPORATOR STATUS

Significant Past Accomplishments

ORP reported it had finished the annual electrical preventative maintenance outage at the 242-A Evaporator, and the contract for fabrication of the PB-1 spare pump had been awarded.

Significant Planned Actions in the Next Six Months

ORP reported it will be procuring new PB-1 and PB-2 pumps. ORP noted that it just finished design of the evaporator air instrument dryer and will be starting the air dryer upgrade this fiscal year.

ORP reported that it had just completed the 60 percent design for the transfer line replacement (still shown as to-be-completed in the August TPA monthly report), and that the replacement of the raw-water sock filters was also complete.

Issues/Other Items

The State of Oregon Department of Energy asked ORP about the duration and gallon quantity of the recent “hot” and “cold” evaporator campaigns. ORP replied there were about 30,000 gallons processed over 2 days.

8.0 LIQUID EFFLUENT RETENTION FACILITY AND 200 AREA EFFLUENT TREATMENT FACILITY

ORP reported three new milestones now appearing in the Liquid Effluent Retention Facility (LERF)/Effluent Treatment Facility (ETF) section this month as a result of the recently concluded System Plan 8 negotiations. All of those milestones are reported as “On Schedule” and work is actively being done to meet them.

Significant Past Accomplishments

ORP reported LERF Basin 42 volumes for the month ending August 2019 as 3.25 million gallons processed, and at the end of the fiscal year, that total will have reached 3.44 million gallons processed. ORP noted that once it meets its processing goal, it will initiate clean-out activities at ETF.

ORP reported that, as of the date of this meeting, fieldwork for repair of ETF verification Tank B had been completed, and that it planned to complete repairs of the two remaining verification tanks in FY20 and FY21.

ORP also reported that it was near completion on the efforts to replace the LERF leachate pumps and level detection system at LERF Basin 42.

TRI-PARTY AGREEMENT MONTHLY REPORT

Significant Planned Actions in the Next Six Months

ORP reported it was upgrading the facility stairs and ladders to improve personnel safety and ergonomics, and hoped to be completed with the project by the end of October 2019. ORP reported it would begin ETF cleanout at the completion of LERF Basin 42 processing.

Issues/Other Items

ORP reported that during the process of preparing for LERF Basin 44 cover replacement, the emergence of a solid was discovered, causing work to be paused on the project. ORP is hoping to release an evaluation of the issue in October and still plans to conduct the Basin 44 replacement in FY20. ORP also offered that Basin 41 could be put into services, and that permitting activities for that could begin in the fall.

Ecology asked how ORP was monitoring leachate levels if no system was in place to do so. ORP said they installed a temporary pump and monitoring equipment. ORP said it would get more detail on the temporary measures to Ecology. Ecology questioned if the new leak detection system needed to be permitted. ORP said the existing one was not, but committed to get details to Ecology on whether the replacement was technically a replacement in-kind or a completely new system. ORP also noted it believed it had a Class II RCRA Permit modification in process for the 242-A Evaporator leak detection system.

9.0 TANK SYSTEM UPDATE

9.1 Double-Shell Tank Integrity

Significant Past Accomplishments

ORP reported ultrasonic testing (UT) inspections have been done on five tanks so far in FY19: 241-AP-106, 241-AP-107, 241-AP-108, 241-AN-102, and 241-AP-102 (annulus floor UT testing only; air slot inspection). ORP also reported completion of the enhanced annulus visual inspections on all nine planned tanks for FY19.

Significant Planned Actions in the Next Six Months

ORP noted the status of the following activities:

- Procure a design of the annulus floor cleaning technology to clean the annulus floor of Tank AY-101 is on schedule. Vendor completed testing at the end of August 2019 and ORP has received the cleaner.
- Procure a design of a primary tank bottom volumetric inspection system is on schedule, to be deployed into the annulus double-shell tanks (DST) and used to characterize regions of the primary tank system bottom.
- Procure and install a retractable corrosion-monitoring probe in Tank AY-101 by end of FY19. ORP reported the probe was received, installed, and is operating in AY-101.

TRI-PARTY AGREEMENT MONTHLY REPORT

Issues/Other Items

ORP had no issues to report.

Ecology requested a briefing from ORP on the liquid level in the annulus of Tank AY-102.

9.2 Single-Shell Tank Integrity

Significant Past Accomplishments

ORP reported it had completed visual inspections for all planned 15 tanks in FY 2019: 241-B-102, 241-B-103, 241-BX-104, 241-B-110, 241-B-111, 241-B-112, 241-SX-114, 241-SX-115, 241-T-103, 241-T-108, 241-T-202, 241-U-101, 241-U-106, 241-U-109, and 241-TY-106.

ORP reported that it had released and transmitted RPP-RPT-55202, *Dome Survey Report for Hanford Single-Shell Tanks*, Rev. 3, to Ecology in August satisfying TPA milestone M-045-91E3.

Significant Planned Actions in the Next Six Months

ORP plans to complete the TFC-ENG-CHEM-D-42, *Tank Leak Assessment Process* on tanks 241-T-101 (complete) and 241-T-103 (reported as complete at the time of this meeting, but still noted as ongoing in the August monthly report).

Ecology asked ORP if it could be receive meeting notes from the Tank Integrity Expert Panel meeting in June 2019.

Issues/Other Items

ORP had no issues to report.

9.3 Independent Qualified Registered Professional Engineer Activities

Double-Shell Tank System

ORP noted no changes from last month's reporting - the inspection report was completed in 2016.

Single-Shell Tank System

ORP noted no changes from last month's reporting - the inspection report was completed in 2018.

242-A Evaporator

ORP noted no changes from last month's reporting - the inspection report was completed in 2018.

ETF

ORP stated they continue to work with the Independent Qualified Registered Professional Engineer (IQRPE) and are expecting a final report within the next two weeks. ORP will provide Ecology with that report.

TRI-PARTY AGREEMENT MONTHLY REPORT

219-S Tank System

ORP stated fieldwork is continuing, notably, visual inspections of the sample gallery and 2B hood 16 were completed on July 17, 2019. Both areas inspected appeared to be clean with little sign of corrosion or degradation. Work also continues on the accompanying report.

Issues/Other Items

ORP noted no changes from last month's reporting.

10.0 IN-TANK CHARACTERIZATION AND SUMMARY

10.1 Reports Completed or Released

(See page 20 of the August 2019 TPA monthly report for the full list).

10.2 Tank Sampling

Significant Past Accomplishments

ORP reported Tank 241-AY-101 core sampling was performed from August 8, 2019, through August 14, 2019. Nine core samples were received at the laboratory. ORP noted that preliminary results of the sampling were good, showing little chemistry inhibition.

Significant Planned Actions in the Next Six Months

ORP reported future tank sampling is scheduled to be performed as identified below:

- Tank 241-C-301 catch tank grab sampling is planned for October 2019.
- Tank 241-A-104 sampling is planned for September 2019 (Note: uses the off riser sampling system.)
- Tank 241-AP-106 repurposing grab sampling is planned for the first quarter of FY 2020.

10.3 Best-Basis Inventory Updates

Significant Past Accomplishments

ORP reported best-basis inventory updates were completed in August for tanks 241-AW-103, 241-B-101, 241-TX-118, and 241-U-103.

Significant Planned Actions in the Next Six Months

ORP reported that best-basis inventory updates for the following tanks are planned to be completed in September 2019:

- 241-AN-106
- 241-AW-102
- 241-AX-102
- 241-AZ-102
- 241-B-104

TRI-PARTY AGREEMENT MONTHLY REPORT

- 241-BX-102
- 241-TX-109
- 241-U-106
- 241-U-103.

11.0 SINGLE-SHELL TANK CLOSURE PROGRAM

Significant Past Accomplishments

ORP reported it was near completion on TPA milestone M-045-92AC (Submit to Ecology for Approval a Maintenance and Performance Monitoring Plan for Interim Barriers) and milestone M-045-92W (Submit to Ecology, Design for Barrier 3 in 241-TX Farm), both due October 31, 2019.

Significant Planned Activities in the Next Six Months

ORP reported it was still working with Ecology to resolve comments on the Waste Management Area C (WMA-C) Tiers 1, 2, and 3 RCRA Closure Plans.

Issues/Other Items

ORP reported that it completed TPA milestone M-045-92V (Complete Construction of Barriers 1 (North) and 2 (South) and Expansion Barrier in 241-SX Farm) in May 2019 and wanted to change the status to “complete,” and would be sending correspondence to Ecology to document.

Ecology wanted to know how and when the discussion on new interim tank farm surface barriers would continue (ORP had disapproved a TPA change control form where Ecology proposed additional barriers). ORP responded that it believed that would be a topic in the upcoming holistic talks between DOE and the State. Ecology questioned if it was a topic for the scoping for the talks or not.

ORP requested that Ecology provide more clarity on the regulatory authority under which it was proposing new tank farm surface barriers, as well as the terminology it was using. ORP said several terms were being used, such as “interim measure” or “interim corrective action.” Ecology committed to providing an answer at a later date.

ORP asked Ecology for a timeframe for when it believed it would send or resolve formal comments on the WMA-C closure process. Ecology replied it was expecting ORP to submit a schedule for putting WMA-C into the RCRA Permit Modification 8C. ORP said it had sent a schedule a long time ago. Ecology believed that schedule was out of date and it has asked for an updated version.

Regarding TPA milestone M-045-99 (Submit to Ecology the Preliminary Performance Assessment/Closure Analysis), Ecology wanted to meet to discuss the progress being made and its expectations. ORP said it had sent correspondence on that issue – noting specifically that

TRI-PARTY AGREEMENT MONTHLY REPORT

ORP agreed to bundle three volumes of the Performance Assessment (PA), but would submit the volume done under DOE Order 435.1 separately.

12.0 SINGLE-SHELL TANK RETRIEVAL PROGRAM

ORP reported it had begun work on TPA milestone M-045-93 (Submit Report for Description, Analysis and Technology for Removing Drainable Liquids from SSTs).

Significant Past Accomplishments

Refer to the Consent Decree (page 9, section 2.0 below of these meeting minutes).

Significant Planned Activities in the Next Six Months

Refer to the Consent Decree (page 9, section 2.0 below of these meeting minutes).

Issues

Refer to the Consent Decree (page 9, section 2.0 below of these meeting minutes).

13.0 TANK OPERATIONS CONTRACT OVERVIEW

The earned value data can be viewed in the August 2019 ORP TPA Monthly Report on pages 27-35.

WBS 5.01 – Base Operations

The earned value data can be viewed in the August 2019 ORP TPA Monthly Report on page 29.

WBS 5.02 – Retrieve and Close Single-Shell Tanks

The earned value data can be viewed in the August 2019 ORP TPA Monthly Report on page 31.

WBS 5.03 – Waste Feed Delivery/Treatment Planning

The earned value data can be viewed in the August 2019 ORP TPA Monthly Report on page 33.

WBS 5.05 – Treat Waste

The earned value data can be viewed in the August 2019 ORP TPA Monthly Report on page 35.

CONSENT DECREE MONTHLY REPORT

1.0 CONSENT DECREE MILESTONES/ADMINISTRATIVE ACTIONS

Consent Decree Milestones

ORP reported milestones as On Schedule, At Risk, or Under Analysis (see pages 3-4 of the August 2019 ORP Consent Decree Monthly Report).

Consent Decree Issues and Action Items

For reference, see attached "ORP/Ecology TPA and CD Agreements, Issues and Action Items."

Action No. 1 (WTP-19-19-01): ORP reported it had scheduled a briefing with Ecology for October 24, 2019. Action remains Open.

2.0 SINGLE-SHELL TANK RETRIEVAL PROGRAM

Consent Decree Milestones

ORP reported Consent Decree milestone D-16B-03 is on schedule, D-16-B-01 is complete, and D-16B-02 is under analysis.

Significant Accomplishments during the Prior Month

See pages 6-7 of the August 2019 ORP Consent Decree Monthly Report.

Ongoing Activities

See page 7 of the August 2019 ORP Consent Decree Monthly Report.

Significant Planned Activities in the Next Month

See page 7 of the August 2019 ORP Consent Decree Monthly Report.

Issues/Other Items

ORP reported a slow-down in the pace of retrieval at Tank 241-AX-102, due to problems with the Extended Reach Sluicing System, particularly with a leaking nozzle connection and the slucier being bent. ORP said it was working on recovery plans.

ORP reported work in A Tank Farm has transitioned from Self-Contained Breathing Apparatus (SCBA) to cartridge-based air supply.

The other issues can be viewed in the August 2019 ORP Consent Decree Monthly Report on pages 7-8.

3.0 TANK WASTE RETRIEVAL WORK PLAN STATUS

Significant Planned Activities in the Next Month

ORP reported no new activity.

CONSENT DECREE MONTHLY REPORT

4.0 RETRIEVE AND CLOSE SINGLE-SHELL TANKS

WBS 5.02

The earned value data can be viewed in the August 2019 ORP Consent Decree Monthly Report on page 10.

5.0 WASTE TREATMENT AND IMMOBILIZATION PLANT PROJECT

Project Schedule and Cost Variance Performance

The earned value data can be viewed in the August 2019 ORP Consent Decree Monthly Report on page 15.

ORP reported the baseline data was for July 2019 and shows an unfavorable schedule variance of \$2.5 million and a cost variance of \$8.3 million. ORP attributed these variances, in part, to delays in piping installation at the LAW Facility and shortages of electricians. ORP did say, however, that improvements in the electrical program at LAW were showing favorable results.

ORP reported improvements in the construction of the Effluent Management Facility (EMF), but was still showing unfavorable schedule variances, due to procurement issues with piping and structural steel.

6.0 PRETREATMENT FACILITY

ORP reported that it had sent a letter to Ecology on September 4, 2019, notifying Ecology that a serious risk exists in ORP's meeting Consent Decree milestones for completion of the High-Level Waste Facility (HLW) and Pretreatment Facility (PT). Pursuant to this, an Analysis of Alternatives team has been formed (with Ecology participation) and is meeting to address these issues.

ORP reported it had completed the resolution of all technical issues (T1-T8) for PT and it had sent a closeout letter to Ecology noting.

ORP reported progress on PT would be stagnant for the time being as the ORP awaits results from the resolution of the PT technical issues and the Analysis of Alternatives (AoA) findings, but some activities, such as limited procurement, would continue.

The earned value data can be viewed in the August 2019 ORP Consent Decree Monthly Report on page 19.

7.0 HIGH-LEVEL WASTE FACILITY

ORP noted the radioactive liquid waste disposal (RLD) system vessels 7 and 8 are in the final stages of fabrication for expected delivery by the end of calendar year 2019. ORP also reported the 60 percent design review of the RLD system was complete.

CONSENT DECREE MONTHLY REPORT

ORP said it has found cost efficiencies by bringing certain equipment onsite, eliminating long-term storage costs at vendor sites.

ORP said its contractor Bechtel National was planning for a major increase in engineering support for HLW.

ORP stated it was working on allotments of funding between PT and HLW, trying to balance those allotments accordingly between the facilities.

The earned value data can be viewed in the August 2019 ORP Consent Decree Monthly Report on page 22.

8.0 LOW-ACTIVITY WASTE FACILITY

ORP noted that 78 percent of the LAW facility systems had been turned over from Construction to the Startup organization, and 27 percent of those systems had been accepted by Plant Management/Operations. Also notable was the turnover of the plant cooling water system (to Startup).

ORP reported the procurement of seven out of eight LAW melter power-supply bus duct adapters (now installed), the LAW secondary offgas/vessel vent process vacuum breakers, and the melter "crush pads."

ORP reported construction progress is limited, based on changes to the Design Safety Analysis (DSA). Notably, there was a change to the gas analyzer, making it "safety significant."

The earned value data can be viewed in the August 2019 ORP Consent Decree Monthly Report on page 25.

9.0 BALANCE OF FACILITIES

ORP noted the main activity at the Balance of Facilities (BOF) was installation of electrical systems at the EMF.

The earned value data can be viewed in the August 2019 ORP TPA Monthly Report on page 27.

10.0 ANALYTICAL LABORATORY

ORP reported the focus at the Analytical Laboratory was on startup and turnover to Plant Management/Operations.

ORP noted that the testing and balancing for the ventilation systems is continuing, with a possible completion of December 2019.

CONSENT DECREE MONTHLY REPORT

The earned value data can be viewed in the August 2019 ORP TPA Monthly Report on page 30.

ORP/Ecology TPA and CD Agreements, Issues, and Action Items –October 2019 Meeting

#	Action ID Start Date	Action	Updates / Needs for Closure	Actionee(s)	Status/ Date Closed
3	TF-18-10-02 10/18/18	Ecology and DOE to meet to discuss Ecology email (see Updates)	The HFFACO is the current working agreement and Ecology is confident that the HFFACO has adequately described our expectations for WMA-C Closure. USDOE and Ecology will meet and discuss the areas where USDOE have not fulfilled the TPA requirements for SST Closure or are inconsistent with Tri-Party agreements and understanding. USDOE and Ecology will agree to a resolution to those deficiencies where USDOE have not fulfilled the TPA Requirements. If USDOE has concerns regarding the HFFACO, then our respective senior managers should provide direction to the TPA Project Managers for resolving those concerns. (Email Jeff Lyon, Oct 22, 2018) Meeting between ORP and Ecology occurred on 11 Dec 2018 to discuss these issues. ORP is preparing a response for Ecology. No Change 09/20/2019	Rod Lobos	Open
4	TF-19-04-03	Demonstrate compliance with Appendix I for SST closure. (Jim Alzheimer)	Clarify how integration between RL and ORP is being coordinated for consistent action and compliance related to closure for CERCLA/RCRA and rad on similar type tanks. Clarify if this is captured in Tier 1, Tier 2 or Tier 3 closure plans. How are the separate closure documents providing compliance with Appendix I How is EPA involved? No Change 09/20/2019	Rod Lobos	Open

ORP/Ecology TPA and CD Agreements, Issues, and Action Items –October 2019 Meeting

#	Action ID Start Date	Action	Updates / Needs for Closure	Actionee(s)	Status/ Date Closed
1	TF-16-11-04 11-17-16	ORP to provide Ecology the T-112 work plan	In legal review. (07/19/2018) No change (09/20/2019)	Dusty Stewart	On Hold
2	TF-18-10-01 10/18/18	Follow up meetings for discussion and resolution of tank-side cesium removal (TSCR) related activities.	<p>Schedule a meeting to further discuss concerns related to crystalline silicotitanate (CST) compatibility with HLW glass, long term storage, ion exchange column design, potential for resolution concepts (in the early stage). ORP will schedule first meeting within the next couple of weeks. Additionally Ecology would like a invite to witness the tall column test.</p> <p>4-4-19: ORP expects the meeting to occur prior to the end of April. Dan will provide list of Ecology names and available dates. The meeting should be scheduled for a couple of hours. Ecology would like clarification regarding the resin extracted from the column, which is purposed to be put in the high level waste stream. Currently there is no study to validated compatibility/treatment via HLW. Clarify disposition of the physical hardware.</p> <p>30 May 2019: Meeting held on May 20th. ORP recommends closing this action.</p> <p>6 June ORP Actions</p> <ol style="list-style-type: none"> 1. Provide Ecology with a copy of the Factory Acceptance Test (FAT) test plan once released. (TARGET Completion: October 2019) 2. Provide the opportunity for Ecology to observe the FAT once the FAT has commenced. (TARGET Completion: November 2019) <p>Updated 09/20/2019</p>	Sahid Smith	Open

ORP/Ecology TPA and CD Agreements, Issues, and Action Items –October 2019 Meeting

plan and subsequent documents. The selected closure/post-closure method and associated design details will (unless otherwise agreed to by the parties) be submitted as part of the CMS report at a later date, as specified in the work plan.” “In any case, the parties agree that CERCLA remedial actions and, as appropriate, HSWA⁶ corrective measures will comply with ARARs⁷.”

- d. Section 5.6: “The EPA and Ecology have selected a lead regulatory agency approach to minimize duplication of effort and maximize productivity. Either the EPA or Ecology will be the lead regulatory agency for each operable unit, TSD⁸ group/unit or milestone. The lead regulatory agency for a specific operable unit, TSD group/unit or milestone will be responsible for overseeing the activities covered by this action plan that relate to the successful completion of that milestone or activities at that operable unit or TSD group/unit, ensuring that all applicable requirements are met.”

⁶ 1984 Hazardous and Solid Waste Amendments

⁷ Applicable or Relevant and Appropriate Requirements

⁸ Treatment, Storage, and/or Disposal

ORP/Ecology TPA and CD Agreements, Issues, and Action Items –October 2019 Meeting

Agreements:

1. Per an Ecology standing request (4/21/2016), ORP agrees to include any written directives given by DOE to the contractors for work required by the CD in future quarterly CD Reports (see CD Section IV-C-1-e).
2. The ORP and Ecology PMs have developed, signed, and entered an outline for the CD Tank Completion Certification into the TPA Administrative Record. A briefing to senior management will occur if any follow-on actions arise.
3. Ecology and ORP have agreed to move the TPA/CD PMM meeting to the first Thursday of the month starting in January 2019. The TPA and CD monthly reports distribution will occur by the end of December via link to the Admin Record. This will be the format for report distribution and monthly meetings going forward for calendar year 2019.

Issues:

1. Appendix H step 2b, has not been completed. USDOE have submitted Single-Shell Tank (SST) WMA (Waste Management Area)-C Closure Plans without any indication of the role and participation for Nuclear Regulatory Commission (NRC), or a plan for completing this step.
2. Appendix I – USDOE has presented an inaccurate process for closure of the Tank Farms, and of WMA-C. Appendix I has defined the expectations of the Tri-Parties, and a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) decision has not been an assumption from any of the Tri-Parties.
 - a. Appendix I, Section 3.1 states: “Ecology¹ is the lead regulatory agency responsible for the closure of the SST system. EPA² is the support regulatory agency providing oversight of the state’s authorized program.”; “The Parties’ expect that this Agreement Appendix I will incorporate Agreement Section 5.5 processes to provide a mechanism for avoiding duplicative regulation between Ecology and the EPA through the lead agency concept.”; “EPA will evaluate the need to provide additional comments based on its review of proposed modifications to WMA closure action plans, and issue additional comments to Ecology as necessary.”
 - b. Appendix I, Section 3.2 states: “A consistent groundwater monitoring, protection, and risk assessment methodology will also be realized through close integration of activities, as described in the Hanford Site Groundwater Strategy (DOE/RL-2002-59). Consistent application of the requirements of this Appendix I will serve to aid the Parties in ensuring cost effective and consistent cleanup on the Central Plateau.”
 - c. Section 5.5 of the TPA (Action Plan): “The information necessary for performing RCRA³ closures/post-closures within an operable unit will be provided in various RFI⁴/CMS⁵ documents. The initial work plan will contain a Sampling and Analysis Plan (SAP) for the associated RCRA units and it will outline the manner in which RCRA closure/post-closure plan requirements will be met in the work

¹ Washington State Department of Ecology

² Environmental Protection Agency

³ Resource Conservation & Recovery Act

⁴ RCRA Facility Investigation

⁵ Corrective Measure Study

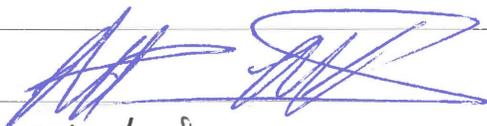
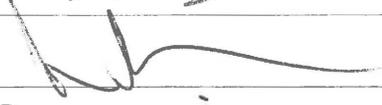
ORP/Ecology TPA and CD Agreements, Issues, and Action Items –October 2019 Meeting

#	Action ID Start Date	Action	Updates / Needs for Closure	Actionee(s)	Status/ Date Closed
1	WTP-19-09-01	Briefing to Ecology	DOE will make a presentation related to the Design and Operability (D&O) Report	Wahed Abdul	Open
2					

October 3, 2019
Office of River Protection
Tri Party Agreement Consent Decree Meeting

PRINT NAME	SIGN NAME	ORG
Abdul, Wahed	Wahed Abdul	ORP
Alzheimer, Jim	James Alzheimer	ECY
Barnes, Mike		ECY
Becky, Blackwell		ORP
Beehler, Steve	Steve Beehler	ORP
Brasher, Stephanie	Stephanie Brasher	MSA
Burnett, Kaylin		ORP
Cameron, Craig		EPA
Carlson, Annette		ECY
Cimon, Shelley	Shelley Cimon	OR State
Decker, Jay	Jay Decker	ECY
Diediker, Janet		ORP
Evans, Rana		ORP
Fletcher, Tom		ORP
Gao, Tracy		ECY
Hall, Katie	Katie Hall	ECY
Harkins, Brian	Brian C. Harkins	ORP
Hastings, Rob		ORP
Hernandez, Paul	Paul Hernandez	ORP
Irwin, Mat		ORP
Johnson, Jeremy		ORP
Jones, Mandy		ECY
Joyner, Jessica		WRPS

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PRINT NAME	SIGN NAME	ORG
Kemp, Christopher		ORP
Lobos, Rod		ORP
Lopez, Maria	Maria Lopez	WRPS
Lowe, Steven	Steve Lowe	ECY
Lucatero, Yoana		ECY
Lyon, Jeffery		ECY
McDonald, Dan		ECY
Menard, Nina	Nina M. Menard	ECY
Mulkey, Charles		WRPS
Parker, Dan		WRPS
Pfaff, Stephen H		ORP
Pomiak, Andrew		ECY
Price, John		ECY
Rambo, Jeffrey		ORP
Serafin, Shane		ORP
Skorska, Maria		ECY
Smith, Sahid		ORP
Stewart, Dustin		ORP
Temple, John		ECY
Trimberger, Bryan	B - T	ORP
Turner, Michael		MSA
Turner, Vanessa		ORP
Valle, Richard		ORP

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PRINT NAME	SIGN NAME	ORG
Van Mason, Eric		WRPS
Walmsley, Mign		ECY
Wang, Oliver S		ECY
Whitelely, Craig		ORP
Yasek, Donna		BNI
Young, Jason		ORP