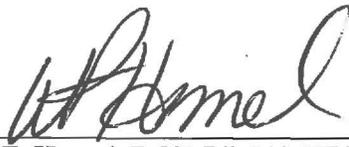


**Inter-Agency Management Integration Team Meeting Minutes
August 25, 2020**



SIGNATURES:

Approval:  Date: 9/28/2020
W.F. Hamel, DOE-RL IAMIT Representative

Approval: Robert G. Hastings Digitally signed by Robert G. Hastings
Date: 2020.09.23 15:02:02 -07'00' Date: _____
R.G. Hastings, DOE-ORP IAMIT Representative

Approval:  Digitally signed by Smith, Alex (ECY)
Date: 2020.09.24 08:45:50 -07'00' Date: _____
A.K. Smith, Ecology IAMIT Representative

Approval:  Digitally signed by DAVID EINAN
Date: 2020.09.24 09:37:02 -07'00' Date: _____
D.R. Einan, EPA IAMIT Representative

Inter-Agency Management Integration Team Meeting Minutes
August 25, 2020

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 1 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 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 Operable Unit Landfills”

On July 30, 2020, DOE and Ecology signed the M-091 Agreement in Principle (AIP), extending the M-091 series milestone negotiations through August 31, 2020. However, during the initial M-091 negotiations in July 2020, the Parties agreed to remove milestone M-015-93C from these negotiations and negotiate it with the Budget and Representative Analogous Waste Site Coordinating Agency Liaisons (RASCAL) AIP that was approved on August 25, 2020, just prior to this IAMIT meeting. The Parties will begin the Budget/RASCAL negotiations and plan to conclude by January 15, 2021 with a Tentative Agreement (see Section 2.2.2 below).

EPA stated the M-015-93C milestone is still in dispute and the signed Budget/RASCAL AIP does not resolve this dispute. The dispute would be resolved when the Parties conclude negotiations successfully with a signed Tentative Agreement; until then, this milestone will remain in dispute.

This item will continue to 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 continues to meet, is working on the draft Principles and Parameters document (DOE/RL-2019-46), and has drafted a change control form that will add the Principles and Parameters document into TPA Appendix F, “Supporting Technical Plans and Procedures”.

The Principles and Parameters Working Group is aiming to provide drafts of the Principles and Parameters document and change control form and brief the IAMIT in September. This action will be tracked at the IAMIT level in the interim.

Inter-Agency Management Integration Team Meeting Minutes
August 25, 2020

2.1.3 Changes/Updates to TPA Paragraphs 148/149

On July 30, 2020, the Parties approved an extension to the AIP, which enables negotiations to continue through January 15, 2021. The Parties held two negotiation sessions this month and will continue to meet. Following successful conclusion of these negotiations, the Parties will document the changes/updates to TPA paragraphs 148/149 with a signed Tentative Agreement. This item will be tracked at the IAMIT level in the interim.

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

There was no update provided this month. 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. This item will be tracked at the IAMIT level in the interim.

2.1.5 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.

DOE stated a meeting was held with Ecology to discuss this further; however, not all applicable Ecology staff members were able to attend. Therefore, DOE indicated the meeting would need to be rescheduled to include the appropriate Ecology staff in these discussions.

DOE also noted the WMA C milestones are part of the ongoing "Hanford tank waste mission holistic discussions" being conducted between DOE and Ecology.

This item will be tracked at the IAMIT level in the interim.

2.1.6 IAMIT Determination – Temporary Suspension of TPA Article XXXIII, Notification Requirements

On July 30, 2020, the Parties signed IAMIT Determination 2020-009, extending the temporary suspension of the notification requirements. This allows for email delivery and electronic signature of documents in lieu of hard copy delivery due to COVID-19 through January 15, 2021.

MSA asked the Parties if this item could be removed from discussions at the IAMIT level and agreed this could be removed. This item will no longer be tracked at the IAMIT level.

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.

Inter-Agency Management Integration Team Meeting Minutes
August 25, 2020

2.2.2 Agreement in Principle for the Negotiations of HFFACO Revisions in Response to Federal Fiscal Year (FFY) 2018 Appropriation and FFY 2019 President's Budget

On August 25, 2020, the Parties signed the AIP for the Negotiation of Hanford Federal Facility Agreement and Consent Order (HFFACO) Revisions in Response to FFY 2018-2020 Appropriations in Conjunction with the RASCAL Recommendations (IAMIT Determination 2020-006) for Expediting Remedial Cleanup on the Hanford Central Plateau. These negotiations are currently scheduled to conclude on January 15, 2021. This item will be tracked at the IAMIT level in the interim.

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

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.

Ecology stated the Parties will be mediating the M-035-09K dispute on September 28 and 29, 2020. This item will be tracked at the IAMIT level in the interim.

3.0 UPCOMING TOPICS/ACTION ITEMS FOR FUTURE IAMIT MEETINGS

3.1 Update on Ecology Request to Enter Into a Structured "Kaizen" for Streamlining Comment and Response Process, and Apply to WMA-A/AX Closure

At the June 18, 2020 IAMIT meeting, Ecology stated they received feedback during a working group meeting about the efficiency and effectiveness of the primary document review and comment process and proposed doing a Kaizen between DOE and Ecology on DOE-ORP documents to improve the process and make it more effective.

At the July 16, 2020 IAMIT meeting, both DOE and Ecology requested EPA participation in the Kaizen.

DOE reiterated that to accomplish the Kaizen, EPA needs to be involved.

EPA asked why they needed to participate in the Kaizen for streamlining comment response documents as they apply to the closure of A/AX when Ecology is the lead regulatory agency for WMA A/AX closure.

DOE responded by saying EPA's process is more streamlined and having EPA share their lessons learned would allow the Parties to find a better solution collectively.

EPA requested time to discuss this with their staff and has the action to get back to DOE-ORP on their participation in the Kaizen. This action will be tracked at the IAMIT level in the interim.

Inter-Agency Management Integration Team Meeting Minutes
August 25, 2020

3.2 Discussion on Recording of “Non-TPA” Meetings

Ecology wanted to discuss a previous agreement made for TPA mandated meetings (i.e., Project Manager Meetings) where the Parties agreed in the absence of a court reporter or someone that can officially transcribe TPA meetings, the TPA meetings could be recorded to ensure the accuracy of the meeting minutes, with the recordings being destroyed once the meeting minutes are approved (reference IAMIT Determination 2020-001, Deletion of Audio Recordings after TPA Meeting Minutes are Signed/Approved, approved on June 1, 2020). Ecology stated that this process is not for non-TPA related meetings and wanted to make sure the Parties discussed and agreed to a process.

EPA stated that they have made it clear when it is a non-TPA meeting, they may provide feedback if something is not captured correctly in the meeting minutes, and there should not be a signature page on anything that is not a TPA mandated meeting. EPA added they are not signing or agreeing to the content of the meeting minutes, as they should only be used as a reminder of what was discussed.

The Parties agreed no audio recordings or signed formal meeting minutes would be produced for non-TPA related meetings. This item will not be tracked at the IAMIT level.

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 8/25/20 IAMIT Meeting
1	Possible Adoption of the Principles and Parameters in Regulatory Documents	The Principles and Parameters Working Group is aiming to provide drafts of the Principles and Parameters document, change control form and brief the IAMIT in September.
2	Potential Agreement in Principle to Begin Negotiations on Waste Management Area (WMA) C Closure Milestones	DOE and Ecology need to reschedule another meeting to include the appropriate Ecology staff in these discussions.
3	Update on Ecology Request to Enter Into a Structured “Kaizen” for Streamlining Comment and Response Process, and Apply to WMA-A/AX Closure	EPA requested time to discuss this with their staff and has the action to get back to DOE-ORP on their participation in the Kaizen.

The next IAMIT meeting is scheduled for September 17, 2020.

Inter-Agency Management Integration Team Meeting Minutes
August 25, 2020

5.0 LIST OF ATTENDEES

Bergman, Theresa	CHPRC
Brasher, Stephanie	MSA
Cameron, Craig	EPA
Capron, Jason	DOE
Cline, Michael	DOE
Einan, Dave	EPA
French, Mark	DOE
Hamel, Bill	DOE
Hastings, Rob	DOE
Higgins, Kathy	DOE
Lobos, Rod	DOE
Smith, Alex	Ecology
Turner, Michael	MSA
Welsch, Kim	Ecology



Inter-Agency Management Integration Team (IAMIT) Meeting
Tuesday, August 25, 2020
1:30-2:30 p.m.

*Meeting held via Teams video/teleconference

Agenda

No	Time	Lead / Org	Topic
1	1:30– 1:32 p.m.	Michael Turner, MSA	Welcome and Meeting Logistics/Format
2	1:32 – 1:50 p.m.	Michael Turner, MSA/ IAMIT and attendees	Review IAMIT Action Tracking Table
3	1:50 – 1:55 p.m.	R. Hastings, DOE-ORP	Update on Ecology Request to Enter Into Formal TPA Negotiations on Closure Milestones for WMA-C
4	1:55– 2:00 p.m.	R. Hastings, ORP	Update on Ecology Request to Enter Into a Structured “Kaizen” for Streamlining Comment and Response Process, and Apply to WMA-A/AX Closure
5	2:00 – 2:15 p.m.	A. Smith, ECY (for J. Price) IAMIT members	Discussion: Recording of “Non-TPA” Meetings
6	2:15 – 2:20 p.m.	IAMIT members	New Topics for Upcoming IAMIT Meetings
7	2:20 – 2:25 p.m.	Michael Turner, MSA/ IAMIT and attendees	Review of Today’s Actions
8	2:25 p.m.	Adjourn	

Inter-Agency Management Integration Team Decision Table/Action Tracking

August 25, 2020

TABLE I. ACTION ITEMS¹

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”*

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,

¹ *New information shown in blue.

Inter-Agency Management Integration Team Decision Table/Action Tracking

August 25, 2020

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 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 to conclude negotiations with a signed Tentative Agreement by 01/15/2021.](#)

Closed: ---

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
Status: Open
Dispute Extended: N/A

Inter-Agency Management Integration Team Decision Table/Action Tracking

August 25, 2020

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 will let the working group know when they are ready to continue discussions. At the 05/26/20 IAMIT, Ecology asked that the small</p>

Inter-Agency Management Integration Team Decision Table/Action Tracking

August 25, 2020

working group continue to meet while it assesses its internal practices. Ecology also proposed the use of a facilitated “kaizen” to work through this issue, particularly as it will have ramifications on the next Waste Management Area closure process (WMA-A/AX). DOE is considering the kaizen approach. 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 early September. Draft TPA Change Control Form F-20-01 is under review by the agencies, and the group’s view is that an IAMIT Determination may not be necessary.

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 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,

Inter-Agency Management Integration Team Decision Table/Action Tracking

August 25, 2020

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 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. Meetings were held on August 5 and 18, 2020, as](#)

Inter-Agency Management Integration Team Decision Table/Action Tracking

August 25, 2020

the parties continue to negotiate the proposed changes to paragraphs 148/149. The next meeting is scheduled for 9/02/20.

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 07/16/20 IAMIT.](#)

Closed: ---

5. *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).

Inter-Agency Management Integration Team Decision Table/Action Tracking

August 25, 2020

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.](#)

Closed: ---

6. *IAMIT Determination – Temporary Suspension of TPA Article XXXIII, Notification Requirements*

Reference: TPA Article XXXIII “Notification Requirements”

Affected Milestone: N/A

Originated: 04/20/20 IAMIT Meeting

Status: Open

Dispute Extended: N/A

Action: Parties are being asked to sign an IAMIT Determination extension to allow for a temporary suspension of the requirement for physical signatures and hard-copy delivery of TPA-related documents, due to restrictions stemming from the Covid-19 pandemic. The current IAMIT Determination is valid through 07/31/20.

Comments: The Parties had discussed potentially making permanent changes to TPA Paragraphs 108/109 of Article XXXIII (and tying the potential changes to TPA Section 9.4 “Hard Copy Requirements/Hanford Administrative Record as a change to put before public comment), however, with the next TPA Five-Year Review approaching, it was decided to deal with the potential changes at that time. Proposing to the IAMIT to close this action as it will be a topic for the Parties to discuss during the TPA Five-Year review, which will begin next year. [On 07/30/20, the Parties signed an extension to the temporary suspensions of the Notification Requirement \(IAMIT Determination 2020-009\) and AR Hard Copy Requirement \(IAMIT Determination 2020-008\) until 01/15/21.](#)

Inter-Agency Management Integration Team Decision Table/Action Tracking

August 25, 2020

Closed: ---

Inter-Agency Management Integration Team Decision Table/Action Tracking

August 25, 2020

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 Hanford tank waste mission “holistic” discussions. At the 07/16/20 IAMIT, there was no change in status.
Closed:	---

Inter-Agency Management Integration Team Decision Table/Action Tracking

August 25, 2020

2. Agreement in Principle for the Negotiation of HFFACO Revisions in Response to Federal Fiscal Year (FFY) 2018 Appropriation and FFY 2019 President's Budget

Reference: N/A

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) and corresponding Tentative Agreement (TA) has been drafted

Dispute Extended: N/A

Action: Sign Agreement in Principle, enter into negotiations

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 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

Inter-Agency Management Integration Team Decision Table/Action Tracking

August 25, 2020

current status and path forward to negotiations. (See also item above regarding M-015-93C.) 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 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

Inter-Agency Management Integration Team Decision Table/Action Tracking

August 25, 2020

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. The Budget/RASCAL AIP was signed 08/25/20, with plans to conclude negotiations with a signed Tentative Agreement by 01/15/2021.

Closed ---

3. *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

Inter-Agency Management Integration Team Decision Table/Action Tracking

August 25, 2020

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 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.

Closed:

Inter-Agency Management Integration Team Decision Table/Action Tracking

August 25, 2020

TABLE III. RECENTLY CLOSED/OTHER AGREEMENTS

1. [None](#)