

Office of River Protection
Tri-Party Agreement Quarterly Milestone Review Meeting Minutes

Department of Ecology
Richland, Washington

November 15, 2018

Office of River Protection

Tri-Party Agreement Quarterly Milestone Review

Meeting Minutes

November 15, 2018

Approval: 

Date: 2/5/19.

J. B. Price (for A.K. Smith)

Ecology IAMIT Representative

Approval: 

Date: 1/30/19

B.A. Harkins (for R.G. Hastings)

DOE IAMIT Representative

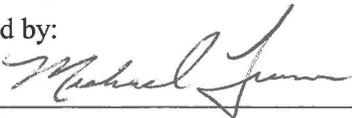
Approval: 

Date: 1/31/19

C.E. Cameron (for D.R. Einan)

EPA IAMIT Representative

Minutes Prepared by:



Date: 12/2/18

M.J. Turner

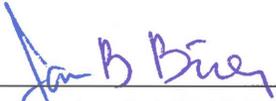
Mission Support Alliance

PROJECT MANAGERS CONCURRENCE SIGNATURES

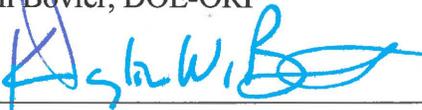
The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Tri-Party Agreement Quarterly Milestone Review Meeting.



Wahed Abdul, DOE-ORP Date: 4/2/19



Jan Bovier, DOE-ORP Date: 12/6/2018



Kaylin Burnett, DOE-ORP Date: 12/27/2018



Paul Hernandez, DOE-ORP Date: 12/6/18



Steve Pfaff, DOE-ORP Date: 12/20/2018



Jeff Rambo, DOE-ORP Date: 12/10/18



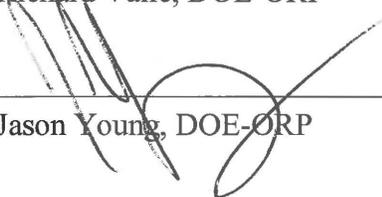
Sahid Smith, DOE-ORP Date: 12/16/2018



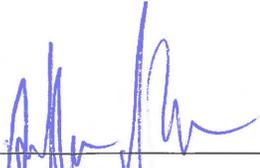
Dustin Stewart, DOE-ORP Date: 12/11/18



Richard Valle, DOE-ORP Date: 12/07/2018

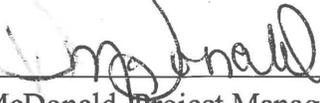


Jason Young, DOE-ORP Date: 12/31/18



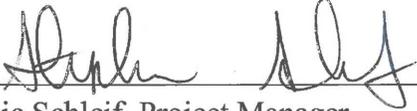
Jeff Lyon, Project Manager,
Washington State Department of Ecology

Date: 2/22/14



Dan McDonald, Project Manager,
Washington State Department of Ecology

Date: 1-4-19



Stephanie Schleif, Project Manager,
Washington State Department of Ecology

Date: 1/28/19

TRI-PARTY AGREEMENT MILESTONE REVIEW AND MONTHLY SUMMARY REPORT

1.0 ADMINISTRATIVE ITEMS/MILESTONE STATUS

Upcoming Meetings

The next ORP quarterly milestone review is scheduled for Thursday, February 21, 2019, at the Ecology office in Richland, Washington. The next ORP project managers meeting (PMM) is scheduled for Thursday, January 3, 2019, from 9:00 a.m. to 11:30 a.m. at the ORP office in Richland, Washington. The December 2018 PMM was canceled. Note that the new schedule for the ORP PMM starts in January 2019, and will be held the first Thursday of each month to allow the Consent Decree report to be available for the meeting. The ORP PMMs will increase from eight to 12 meetings per year, and will also be held during the month the ORP quarterly milestone review is scheduled.

Recent Items Entered/To Be Entered into the Administrative Record

U.S. Department of Energy (DOE), Office of River Protection (ORP) provided the monthly Tri-Party Agreement (TPA) report, which will be submitted to the Administrative Record (AR). The Consent Decree (CD) report has not been issued, but ORP will provide updates on the status of the CD milestones and the Waste Treatment Plant (WTP) project.

Tri-Party Agreement Milestone Status

See pgs 3, 4 and 5 in the TPA monthly summary report.

Office of River Protection/Washington State Department of Ecology Tri-Party Agreement and Consent Decree Agreements, Issues and Action items – November 2018

(See agreements, issues and action items table).

Issues: ORP noted that three issues were added (highlighted in blue) to the agreements, issues and action item table. The issues were provided by Ecology via email. Ecology indicated that the location of the issues on the table was satisfactory.

Ecology initiated a discussion regarding Issue No. 2. Ecology stated that the tank closure process was defined in Appendix I, and reiterated that EPA was involved in the process at one time and then there was a time when EPA was not involved. Ecology stated that the aim is for EPA to be involved and provide comments on the Performance Assessment (PA) and the closure plans. Ecology noted that it is not mandatory or required for EPA to be involved, and it is a decision that is made by the EPA office. Ecology suggested that if EPA was interested, a meeting could be scheduled to discuss the closure process and PA review under Appendix I. EPA responded that it is anticipated additional FTEs will be hired, which would provide support for the integration activities. Ecology suggested that further discussion could be held during the EPA/Ecology coordination meeting scheduled for November 26, 2018.

Action No. 1 (TF-16-11-04)

ORP stated that this action is being worked internally, and the intent is to change the status from on hold to completed regarding the legal review of the T-112 work plan. This action remains on hold.

Action No. 2 (TF-17-04-01)

ORP stated that there is no schedule yet for removal of the 242-A Evaporator diesel generator. Ecology stated that there was a brief internal discussion, and an email will be sent to ORP before the next PMM regarding the request to remove this action item. This action remains open.

Action No. 3 (TF-18-11-03)

ORP reported that a meeting has been scheduled with Ecology on November 27, 2018 to discuss the HNF-3484 DST pumping guide. ORP noted that a meeting was recently held with WRPS, and a preliminary plan has been prepared to present to Ecology during the meeting. This action remains open.

Action No. 4 (TF-18-07-01)

ORP stated that a discussion is needed with DOE-RL for more clarification regarding this action. This action remains open.

Action No. 5 (TF-18-10-01)

Ecology stated that ORP has not scheduled a meeting yet. Ecology noted that it did witness the tall column test, as requested. Ecology requested that ORP spell out the acronym CST. ORP responded that CST is crystalline silicotitanate and it will be spelled out in the future. This action remains open.

Action No. 6 (TF-18-10-02)

ORP stated that this action is associated with the three new issues that Ecology sent over via email, which are listed on the first page of the action table. ORP suggested scheduling a meeting with Ecology the week of November 26, 2018. Ecology agreed to send ORP available times for scheduling a meeting. This action remains open.

2.0 SYSTEM PLAN

ORP stated that negotiations are continuing on a weekly basis with Ecology regarding M-062-45, and the negotiations were extended to February 15, 2019.

3.0 ACQUISITION OF NEW FACILITIES

ORP noted that the milestones are in abeyance pending completion of the negotiations associated with the System Plan, and there were no changes to report.

4.0 SUPPLEMENTAL TREATMENT AND PART B PERMIT APPLICATIONS

See status of Acquisition of New Facilities.

5.0 TANK SIDE CESIUM REMOVAL (TSCR)

Significant Past Accomplishments

ORP stated that the 30 percent design reviews for TSCR were completed on September 25, 2018. ORP noted that although it is not specifically reflected in the monthly summary report, there is more than just TSCR as part of the Direct Feed Low Activity Waste (DFLAW) effort, which includes the transfer lines and other parts of the infrastructure. ORP stated that the 30 percent design review for DFLAW is scheduled in the January 2019 time frame, and Ecology will be included in all of the design review activities.

Significant Planned Actions in the Next Six Months

ORP stated that the 60 percent design review for TSCR is planned for the January 2019 time frame.

6.0 242-A EVAPORATOR STATUS

Significant Past Accomplishments

ORP noted that the spare PB-1 pump was relocated from the loadout room to the tent that had been installed for the purpose of rebuilding the spare PB-1 pump. ORP clarified that the spare PB-1 pump was a broken pump that had been removed and stored in the loadout room. ORP stated that the decision was made to remove the spare PB-1 pump from the loadout room because the test bed initiative (TBI) was planned to be done in the loadout room, but there has been a change in plans for the TBI and the spare PB-1 pump may be brought back into the loadout room to be rebuilt.

Significant Planned Actions in the Next Six Months

ORP stated that a cold run, followed by a hot run, is planned for the 242-A Evaporator to avoid the need to perform a readiness assessment, which is required if the facility has not operated for more than a year. ORP noted that the facility was last operated in June 2018, and the cold and hot runs are planned for June 2019. ORP pointed out that the facility is staffed 24 hours a day, and there is a simulator adjacent to the facility, which allows the operators to maintain their proficiency by continuously training on the simulator. ORP noted that one of the reasons for a readiness assessment is because the operators might not maintain their proficiency if the facility hasn't been operated for more than a year. ORP added that the operators continue their training as part of their required proficiency, and it is part of the business for how they operate.

ORP explained that the cold and hot runs would involve filling up the pot with water and heating it up, adding some feed through the feed line and bringing it to the required specific gravity (SPG), and then dumping it back into the AW-102 feed tank via dump valves. ORP noted that there is an issue with the slurry lines, and they will not be used for the cold and hot runs, unless

the issue has been resolved. ORP stated that the dump valve is connected to a separate transfer line and is not normally used except for emergencies.

Ecology asked about 242-A Evaporator campaigns in 2019 and 2020. ORP responded that the cold and hot runs planned for 2019 are not considered campaigns in terms of waste volume reduction, but they represent techniques for demonstrating operator proficiency and resets the clock for the next year's time for a readiness assessment. ORP stated that running a campaign in 2019 is dependent on the SL-167 slurry line passing the encasement test, and there is a strong possibility that a campaign would not be run if the slurry line does not pass the test. ORP added that it is possible there would be no campaigns in 2020 if the slurry lines aren't operable or until new slurry lines are installed (see issues).

ORP stated that spare parts are being purchased to rebuild the spare PB-1 pump, which is scheduled for completion in February 2019. The rebuilt PB-1 pump would then be installed, using the same casing and piping, and the rebuilt pump will allow the cold and hot runs planned for June 2019. ORP noted that if the issue with the SL-167 slurry line gets resolved and the encasement passes the leak check, an evaporator campaign could be done in June 2019. A new PB-1 pump is also being procured, which will take about 14 months, and it will provide a working spare pump.

Issues – ORP provided an update on the issue regarding the SL-167 slurry line. ORP stated that the encasement tightness is questionable for SL-167, and it is suspected that one of the test risers along the route of the slurry line is leaking. Due to the configuration inside the piping where a vertical pipe joins a horizontal pipe, it is difficult to seal the junction. ORP stated that a specific tool is being developed to stop the leaking in the area where one of the risers meets the encasement and is welded, and that will be followed by one more encasement test. A parallel path for a long-term fix to the slurry line is being planned to replace the two slurry lines (SL-167 and SL-168), and they will be in compliance with the current regulations. ORP noted that replacement of the slurry lines has been added to the list of activities when the additional \$95 million was appropriated for FY19.

Ecology asked if ORP has considered the work packages needed for replacing the SL-167 slurry line. ORP responded that WRPS has been requested to submit a proposal to map out the design for the slurry lines. Ecology asked if WRPS has considered the design of SL-167 regarding its attachment to the valve pit as a potential for leaking. ORP responded that the encasement does not go through the pit wall, and there is a drain line and a valve inside the pit that allows the encasement to drain. ORP asked if the area Ecology was referring to as a source of the leak was where the encasement joins the pit but doesn't go all the way through. Ecology responded that ORP's description is the area it was inquiring about, and whether that area had been considered as a source for leaking. ORP responded that water was put behind the valve and pressurized, and nothing came through the valve. ORP noted that the same thing was done to the SL-168 backup slurry line, and water did come through, which confirmed that SL-168 has a bad drain encasement valve.

ORP stated that it is not known if SL-167 could be leaking from the encasement itself outside the pit wall. ORP added that that area has been considered as the leak source, but no test has been devised to specifically test it, and digging it out to visually inspect it is not considered to be a viable option. Ecology expressed the opinion that the way the slurry lines are attached to the

valve pit, they could easily expand and corrode, and the connections could easily fail after being in the ground for 50 years.

ORP stated that WRPS has conducted an analysis on the impacts of the 242-A Evaporator not being operational for 30 months, and so far the indications are that it will not impact the tank volume limits. ORP noted that WRPS is delivering the analysis this week, and more details will be provided during the next PMM.

ORP pointed out that the maintenance effort to rebuild the PB-1 pump is important from the standpoint that the tempo for DFLAW operations will be much higher, and the team will need to be creative in terms of ensuring systems are maintained and restored to service. ORP noted that if there has to be a down time due to the slurry line issue, it is better to have it now, while the repairs are being done to the Evaporator, than in a few years.

7.0 LIQUID EFFLUENT RETENTION FACILITY/200 AREA EFFLUENT TREATMENT FACILITY (LERF/ETF)

Significant Past Accomplishments

ORP stated that Basin 42 is still out of service, and the intent is to place Basin 42 back in service so the contents of Basin 44 can be transferred into Basin 42 and be processed. ORP noted that the cover replacement was recently completed on Basin 42. Ecology asked if Basin 42 was on track to get back into service. ORP responded that the plan was to have Basin 42 back in service by this weekend, and an email will be sent to Ecology when that occurs.

ORP stated that no waste has been processed since the fiscal year started October 1, 2018, and no processing is expected during the first quarter of the fiscal year while other activities are ongoing. ORP noted that the goal for waste volume reduction in FY19 is four million gallons.

ORP stated that the camera visual inspection conducted for the first reverse osmosis feed tank was in support of the integrity project at ETF.

Planned Actions in the Next Six Months

ORP stated that the camera visual inspections will continue in support of the integrity project at ETF, and more details will be discussed under the Independent Qualified Registered Professional Engineer (IQRPE) section of today's monthly summary report

ORP reported that the required annual RCRA tank inspections will be conducted, and the secondary waste receiving Tank A inspection is currently under way.

ORP stated that emptying the contents of Basin 44 into Basin 42 will support the remaining Basin 44 cover replacement project, which will begin next spring.

ORP reported that the plant cleanout and corrective maintenance outage will continue during the first quarter of FY19. The local backlog in the tanks within the facility will be processed and solidified into powder, which is the final step of processing at ETF.

ORP referred to page 13 of today's monthly summary, which shows the scope of work to be performed at ETF in FY19, and stated that three activities will require permit modifications: the brine stabilization design and permitting; the load-in drain system upgrade; and the 310/311-PL transfer line upgrade. Ecology referred to the list of activities and asked how many are independent and how many need to be accomplished to ensure that other projects will function as well, and if there are any tie-ins to other projects. ORP responded that the activities are not tied to other projects, but they will tie into the volume production operations of the facilities. ORP added that most of the activities are independent.

Ecology asked if the verification tank recoating was being done one at a time to allow operations to continue. ORP responded that it will be done one tank at a time, and it will be done over the next three years, recoating one tank each year. Ecology asked why the tanks are being recoated. ORP responded that the tanks are very large 700,000 gallon tanks, and inspections are done at the required frequency. The inspections have shown that the coating at the top of the tanks is failing, and the opportunity is being taken to recoat the tanks. Ecology noted that a new caustic tank will be purchased. ORP responded that the union of the tank to the piping has been leak prone, and the engineering methods for tightening to safe limits have been exhausted, so the plastic tank will be replaced with a stainless steel tank.

8.0 TANK SYSTEM UPDATE

Field Activities

Significant Past Accomplishments

ORP noted that most of the field activities listed have been done in the double-shell tank (DST) farms during the last year and not necessarily in October 2018, which is the start of fiscal year 2019. ORP stated that the AP-02A jumper was removed and the connector head was rebuilt, which had been leaking. ORP pointed out a major activity was the mockup training with pump removal tools for AP-02D pump removal. ORP stated that the pump removal will be done by a subcontractor that has not done other pump removals in the farm and they needed training, which went well.

Significant Planned Actions in the Next Six Months

Ecology inquired about the installation of the cross-site transfer line permanent power. ORP responded that a substantial amount of work on the cross-site transfer lines has been planned, and the first activity needed is to get power out to the diversion box that is just to the east of SY Farm where the pumps are located. ORP stated that the diversion box has both the supernate and the slurry line running through it. ORP stated that at the high point in the cross-site transfer line, which is about halfway between East and West Farm, there is a vent station that is used for the ability to drain back and break the vacuum. ORP noted that the supernate and the slurry lines also run through the vent station. ORP stated that it has been a long period of time since the power was installed out to those facilities, and the line in service will be restored and the permanent power will be replaced. Ecology asked if installation of permanent power will include an upgrade or changes to the vent station. ORP responded that the power going into the vent station will be upgraded.

Ecology asked if the diversion box or the vent station will be entered. ORP responded that an entrance will be made, and the diversion box and vent station are designed for entering with stairs and shielding in place for high radiation during transfers. ORP added that both of the buildings can be entered if the lines have been flushed.

Double-Shell Tank Integrity

Significant Past Accomplishments

ORP stated that all of the enhanced annulus visual inspections were completed for FY18, and reports will be issued with updated results. ORP noted the ultrasonic testing (UT) that was completed on three tanks in FY18, and these activities will be removed from the monthly summary report.

Significant Planned Actions in the Next Six Months

ORP stated that three tanks are planned for UT in FY19, and AY-101 was completed this week. ORP noted that a fourth tank may be added for UT in FY19. ORP stated that the enhanced annulus videos planned for FY19 will start with the single-shell tanks (SSTs), which are underway, and will be followed with the double-shell tanks (DST) in spring 2019.

ORP stated that an annulus floor cleaning technology will be procured in FY19 for AY-101, which has debris on the floor, and moving the debris will allow UT on the annulus floor.

Secondary Liner Integrity

ORP reported that visual inspection of the AP-102 annulus floor was completed. The AP-102 annulus floor will undergo UT this fiscal year, five years after UT was done for the first time, where one pit was found to have 70 percent thinning.

Single-Shell Tank Integrity

Significant Past Accomplishments

ORP reported that the SST IQRPE integrity assessment was completed, and a letter was sent to Ecology on September 26, 2018, transmitting the IQRPE report. ORP stated that the IQRPE recommends conducting the next integrity assessment in 16 years, and noted that the last one was done 16 years ago (2002).

ORP stated that a briefing was provided to Ecology a few weeks ago regarding the S-104 CHEM-D-42 leak assessment, and the recommendation was to change the tank from an assumed leaker to a sound tank.

Significant Planned Actions in the Next Six Months

ORP noted that the visual camera inspections are under way in the SSTs, and two of the 12 planned inspections have already been completed.

Ecology inquired about which miscellaneous underground storage tanks (MUSTs) will undergo visual camera inspections. ORP responded that it would provide Ecology the three MUSTs. Oregon Department of Energy (ODOE) asked if the inactive miscellaneous underground storage tanks (IMUSTs) list still includes the junction boxes. ODOE noted that at one time the list was more than just the tanks and included the junction boxes where piping came together. ORP stated that when a diversion box is located in an isolated area, it has to have a catch tank to catch any leaking that could result from inside the tank, which could then be considered an IMUST, and that is how a diversion box or junction box could tie into the list of tanks. Ecology stated that the latest RCRA Part A form has multiple tables, and one table has the MUSTs, but the other components are captured on other tables.

Independent Qualified Registered Professional Engineer (IQRPE) Activities

Significant Past Accomplishments

ORP pointed out that the section listing the IQRPE's was revised to list the five main IQRPE's that are being done. ORP noted that the SST integrity assessment was completed and sent to Ecology on September 26, 2018. ORP also noted that the parenthetical under SST that states "see next section" should be deleted since the next section that had been in the monthly summary has been removed. ORP stated that the 242-A Evaporator assessment report was completed and provided to Ecology in January 2018, and the next assessment has not yet been scheduled.

ORP pointed out a minor correction to the text under the ETF IQRPE. ORP noted that the IQRPE has not been selected yet, and the text should state that the ultrasonic inspection results for ETF will be released *for* the IQRPE instead of *to* the IQRPE. Ecology stated its understanding that the IQRPE would oversee some of the activities. ORP responded that the IQRPE would not oversee UT inspection, and the results are provided if requested. ORP noted that some of the IQRPE information was just added and was not in the draft monthly summary report.

Ecology stated that there will have to be discussions in the future about the schedule of integrity assessments because ORP's practice of following the IQRPE recommendation is not what the regulation states. ORP responded that there have been discussions about the schedule, which will continue. ORP noted that the SST integrity assessment does not list the IQRPE recommendation, and the 242-A Evaporator states the next assessment is yet to be scheduled. ORP added that Ecology had requested a section for IQRPEs, and the staff will continue to revise and update the section.

ORP reported that the 219-S integrity assessment is under way, and two of the three tanks have undergone static leak testing, and UT and visual inspections will be done in the near future. Ecology asked if the IQRPE (Meier Architecture) is overseeing the static leak test. ORP responded that Meier is not overseeing the testing, but the information is available in realtime.

Ecology noted that the integrity assessment plan for AY-102 had identified hold points to allow the IQRPE the option to witness certain activities. ORP responded that the integrity assessment plan details what the IQRPE will witness, and noted that the IQRPE had the opportunity to observe whatever they requested during the double-shell tank assessment report (DSTAR). Ecology stated that the closure plans have a specific section that identifies the role of the IQRPE,

and suggested that might be a point of discussion. ORP responded that when there are certain activities at ETF that require an IQRPE outside of integrity, such as a permit-related activity, there are hold points when it's appropriate for the IQRPE. ORP added that field work has hold points for the IQRPE when it's called out in the regulation.

9.0 IN-TANK CHARACTERIZATION SUMMARY

Significant Past Accomplishments

ORP noted that there weren't very many accomplishments to report for October 2018, which is typical for the start of the fiscal year. ORP stated that two reports were completed and none were released during October, and there was no tank sampling and no best-basis inventory (BBI) to update. Ecology referred to the Data Quality Objective (DQO) revision and asked what is revised in the DQO. ORP stated that it would provide Ecology a copy of the DQO and follow up with a response about the revision to the DQO.

Significant Planned Actions in the Next Six Months

ORP stated that several samples are planned to be done and seven BBIs will be completed in November 2018. Ecology inquired about the large volume grab sample for AW-102. Ecology noted that the tank was sampled prior to the last 242-A Evaporator campaign, and that more samples were taken when the Test Bed Initiative (TBI) was going to be done in the Evaporator. ORP responded that the sample is associated with some of the testing being done with PNNL relative to glass formulation. ORP stated that about a gallon will be taken and run through PNNL's Radiological Process Laboratory (RPL), and then it will go through the glass formulation process to compare it to the AP-107 work that was done last year. ORP stated that the waste products from AW-102 and AP-107 are nominally about 25 percent different, and the purpose of the testing is to understand the quality of glass relative to the overall tank farm versus what was done with just the single tank AP-107. Ecology suggested that the AW-102 sample should be identified as supernate for clarification purposes.

Ecology asked if there is a test plan for the sampling of the supernate and the glass formulation effort that is being done with PNNL. ORP responded that there was a test plan developed at the time, but the test plan for AW-102 has not been fully finalized and a follow-up inquiry would be made.

Ecology asked if the work is under the samples for AP-107 in phase 1 and phase 2. ORP responded that that work is also planned, and it is to validate the tank feed. ORP noted that the RPL facility will have the same filter that the TSCR unit is expected to have. The same ion-exchange column process will be used to simulate the feed delivery process at the RPL facility and to validate that first feed from AP-107 through the exact process that is expected at TSCR versus the preliminary process that was done similar to just an ion exchange and filter that was more generic. ORP stated that the testing platform is to validate the filter compared to the past process with what is expected in TSCR to ensure the glass formulation can still be executed.

Ecology asked if more sampling of AP-107 is planned in the future to support the LAW startup. ORP responded that the waste characterization sampling has been done that would support meeting the waste acceptance criteria in the Waste Treatment Plant (WTP) LAW facility. ORP added that this sampling effort is different, and it supports taking the sample all the way through

to glass formulation, as close to a mockup as possible. ORP stated that in a sense, it supports the LAW facility in the hot commissioning phase, but not necessarily in prepping the feed to go through the WTP Pretreatment facility.

Ecology noted that there has been discussion about putting a TBI into SY-101, and suggested adding an update on the TBI in the monthly summary report. ORP responded that it would follow up internally to determine what information to provide and whether the monthly summary report is the appropriate forum. ORP added that a briefing would be provided to Ecology on the TBI being considered for SY-101. ORP noted that at the time the monthly summary report was being written, there was not a definitive plan for a TBI in SY-101, and it is very recent information. Ecology suggested including information on the chemistry and design and construction of the TBI. ORP noted that SY-101 will be sampled to support the TBI.

10.0 SINGLE-SHELL TANK CLOSURE PROGRAM

ORP stated that there were no changes to the milestones. Ecology referred to TPA milestone M-045-84 and asked if ORP's intent is to establish A/AX Farm as the second WMA to be retrieved. ORP responded that it would follow up with Ecology's inquiry and verify that A/AX Farm will be the next WMA. Ecology stated that if ORP's intent is to select A/AX Farm, negotiations can be initiated. Ecology clarified that it had initially proposed U Farm as the next WMA, and ORP had counter proposed A/AX Farm.

Significant Past Accomplishments

ORP reported that all of the punch list items were completed for the north and south barriers at the SX Farm. ORP stated that it is preparing comments in response to Ecology's comments on the Tier 2 and Tier 3 closure plans. ORP noted that the Tier 1 closure plan comments are being discussed in the SST permitting meetings.

Issues

Ecology inquired about the status of the Clean Closure Practicability Demonstration. ORP responded that the appendix is in concurrence and Ecology should be receiving the document in the near future.

11.0 SINGLE-SHELL TANK RETRIEVAL PROGRAM

ORP stated that the retrieval data report (RDR) for C-105 is being prepared and should be issued in January 2019. ORP noted that a slight amount of rework and recalculations on the samples that were taken had to be done, and the RDR will be completed when that has been incorporated. Ecology asked when AX-102 retrieval is scheduled. ORP responded that AX-102 retrieval will probably occur in July 2019, and one of the first extended reach sluicer systems (ERSS) will be installed in AX-102, depending on events. (*See Consent Decree section for SST Closure Program Accomplishments and EVMS data*).

12.0 TANK OPERATIONS CONTRACT OVERVIEW

ORP reported that base operations (5.01) completed more work than planned in September 2018, but it cost more money. ORP stated that the descriptions for the variances catch the highest level

variances, and noted there are always several variances in a large account, such as base operations, that spends around \$45 million a month. ORP stated that part of the schedule and cost variances were associated with installation of the AW-103 transfer pump replacement, the ETF campaign, the vapor monitoring and detection system upgrades, and additional resources needed for maintenance and testing at ETF.

ORP reported that Waste Feed Delivery (contract line item 5.03) accomplished almost all of what had been planned and spent relatively less than planned, with an SPI of 0.98 and a CPI of 1.13 for the fiscal year. ORP noted that there was a positive schedule variance for the month of September, and an unfavorable cost variance, due to additional resources that were needed.

ORP stated that contract line item No. 5.05 for Treat Waste is where the DFLAW efforts have been partly captured, especially the Low Activity Waste Pretreatment System (LAWPS) and the TSCR project. ORP reported that more work was completed than planned for September 2018, and the work cost less than projected, resulting in a positive schedule and cost variance. The 30 percent design review for TSCR was completed ahead of schedule, including comment resolution. The positive cost variance was associated with ramping down the activities related to the more permanent cesium removal facility portion of LAWPS, and those ramp-down activities were completed at the end of FY18 and cost less than planned.

CONSENT DECREE MONTHLY SUMMARY REPORT REVIEW

1.0 CONSENT DECREE MILESTONE STATISTICS/STATUS - CONSENT DECREE REPORTS/REVIEWS

(See Agreements, Issues and Action Items Table):

Action No. 1 (WTP-18-07-01)

This action was closed on 10/18/18 and will be removed from the table next month.

Action No. 2 (WTP-18-08-01)

This action was closed on 10/18/18 and will be removed from the table next month.

Action No. 3 (WTP-18-09-01)

This action was closed on 10/18/18 and will be removed from the table next month.

2.0 SINGLE-SHELL TANK RETRIEVAL PROGRAM

Significant Past Accomplishments

ORP reported that the hose-in-hose transfer line installations were completed in the diversion box into tank AX-104. The asbestos gasket abatement was completed on a number of thermocouples that passed the lift test, and those thermocouples will be pulled out to install lights and cameras for retrieval operations. Riser investigations were completed in tanks AX-101 and AX-103, and two of the thermocouples were stuck. The system will be redesigned to use alternate risers for the lights and cameras in AX-101 and AX-103. ORP noted an important accomplishment was the A Farm exhausters POR518 and POR 519 were recently placed on the pad.

Ongoing Activities

ORP stated that the electrical infrastructure, power control systems, and conduit are being installed, and the crew will be starting to pull the wiring. The installation of retrieval equipment at AX-102 continues, and one riser is clear, but the other riser is stuck that the crew is working to remove. Direct-push sampling continues at A-104 and A-105, and two of the boreholes will be installed. Installation of wiring is under way for the control room trailers for AX-102 and AX-104.

Significant Planned Activities in the Next Six Months

The hose-in-hose transfer line hose barn shielding going to AX-102 and AX-104 will be completed in the next month. Excavations will be completed for the diversion box to the A, B, C and D pits at AX-104, and some of the conduit will be completed on the east/west electrical system.

3.0 TANK WASTE RETRIEVAL WORK PLAN STATUS

ORP stated that there were no changes to report on the tank waste retrieval work plans.

4.0 SINGLE-SHELL TANK RETRIEVAL MONTHLY FISCAL YEAR EARNED VALUE MANAGEMENT SYSTEM (EVMS) DATA

ORP reported that for the month of September 2018, the schedule performance index (SPI) was 0.76 and the cost performance index (CPI) was 0.71. The fiscal year SPI was 0.92 and the CPI was 0.90. ORP stated that in September 2018, there was an unfavorable schedule variance of approximately \$4.3 million, and the primary driver was due to the barrier work in SX Farm being completed in August when it was scheduled for September. The unfavorable cost variance for September 2018 of \$5.4 million was due to the expenditure of a significant amount of overtime to complete the SX Farm barrier. There was also additional overtime to recover schedule for installation of infrastructure in support of AX Farm retrievals associated with excavation and conduit installation, pulling and cleaning risers, and checking thermocouples.

5.0 WASTE TREATMENT AND IMMOBILIZATION PLANT (WTP) PROJECT

ORP stated that the EVMS data presented today is from September 2018, and the accomplishments are from October 2018. ORP reported that as of September 2018, the WTP project was 55 percent complete overall, with engineering design at 87 percent complete, procurement at 53 percent complete, and construction at 40 percent complete. ORP stated that the LAW, BOF and LAB (LBL) facilities were at 68 percent complete overall, with engineering design at 92 percent complete, procurement at 80 percent, and construction at 84 percent complete. ORP noted that the numbers reflected based on total dollars spent.

WTP Earned Value Management System

ORP reported that there was an overall negative schedule variance of \$10.3 million, primarily driven by a few major factors at the LAW facility in the month of September 2018. There was a delay with procurement for the programmable protection system, delays with a documented safety analysis related to piping and electrical scope, and a delay with some of the procedure development due to resource availability.

ORP reported that there was a favorable schedule variance in the Balance of Facilities (BOF) with some of the small subcontractor work, but there was an unfavorable schedule variance with startup testing delays within the chiller compressor plant. ORP stated that a delay was reported in the planned receipt of the fuel oil at the fuel oil facility, which could be confusing since it was reported that the fuel oil tank was recently filled at the diesel fuel oil facility, but it was due to where the activity was scheduled in the EVMS data. Ecology asked if the delays with the chiller compressor plant are actual delays. ORP responded that there are delays, which have been reported for several months, and more details will be provided during the update on BOF.

ORP stated that there was an overall favorable cost performance of about \$3.1 million during September 2018, although most of it was due to Level of Effort (LOE) accounts that have not been fully staffed. ORP noted that it has been working with BNI to reduce the number of LOE accounts and align the dollar value scheduled to be spent with the personnel needed for the current work scope. ORP added that once the replan gets incorporated into the EVMS numbers,

the LOE accounts will be right-sized. ORP reiterated that the replan effort was done to restructure the activities within the overall project milestones, and there are no changes to project milestone dates or contract deliverables. ORP noted that it had discussed several times in the past during this meeting about the importance of the replan effort with regard to the Effluent Management Facility (EMF) and the schedule variances due to rescheduling the waste transfer pipeline in the right portion of the project.

ORP stated that there was a favorable performance with many of the commodities at the EMF, resulting in both cost and schedule benefits with the buildouts. ORP stated that the LAW facility reported an unfavorable cost variance due to some of the equipment component failures, which is fairly typical at the beginning of the startup scenario. ORP stated that it is challenging to maintain the cost variances while working through the startup sequence, and it is similar to what occurred during startup in BOF.

Ecology asked if any trends are being noted with component failures. ORP responded that for BOF there wasn't a trend in equipment failures, but as equipment has been sitting in facilities for some time, components both large and small either fail or require refurbishment or replacement. ORP added that with equipment that is a couple generations old, it can be a challenge for procurement to quickly replace a component or piece of equipment. Ecology noted that equipment and components have been sitting for a long time in all the facilities, and not just LAW and BOF, and asked if a longer view has been taken of potential contingencies and risks where a more proactive approach could be taken rather than reacting to the component failures. ORP responded that an activity was initiated about two years ago during startup in BOF, and it has been an ongoing activity that was regularly reported through the entire BOF startup chain. ORP cited an example that the breakers were identified as an issue, and a proactive approach was taken to repair the breakers in several other facilities in advance of startup throughout BOF.

ORP pointed out that there is an enormous number of systems that are somewhat unique, and a lot of the failure that has occurred is with that type of equipment. ORP added that there are some basic things that can be done proactively. Ecology acknowledged what was done in BOF, but asked if ORP is looking at component failure from a larger perspective. ORP noted that the aging and obsolescence programs were implemented two years ago, and the equipment is continuously being looked at to identify what is aging and needs to be changed or what is obsolete and needs to be replaced. ORP stated that a separate vendor is in place to look at the equipment and determine whether it is still being manufactured or if parts are available, and then make recommendations about what needs to be done with a component or piece of equipment. ORP added that the vendor has nearly completed its evaluation. ORP noted that even when an assessment is done, a different issue may arise during startup. ORP added that the vendor is looking at the potential to replace items, and it doesn't necessarily account for the number of failures that are encountered, but there is the assessment about whether an item can be replaced that has been sitting for a long period of time. ORP noted that a certain amount of obligation for aging and obsolescence is captured in the contracts for Bechtel and ORP, along with the risk base for the project.

Ecology noted that the scope of equipment failure isn't very well known, and asked if an allowance for cost has been made in the cost and schedule performance. ORP responded that minimal allowance has been made, and the scope for failure is not directly scheduled and the cost resides in some of the risks. Ecology noted that in the past, ORP had indicated that the costs

were within the risk allowances, and asked if that was still continuing. ORP responded that it was still continuing, and noted that far less than planned has been spent from an aging and obsolescence perspective. ORP stated that the contractor is obligated for the first \$29 million, and the government is responsible for cost incurred beyond that amount. ORP noted that Bechtel has spent less than half of the \$29 million, and there are only a couple of key components remaining to start up in BOF. Ecology stated that no direct allowance has been made in the schedule, and that would be where most of the impacts are felt. ORP agreed with Ecology's statement, adding that although there have been delays in the startup schedule for BOF, it has not reached a point where any of the follow-on systems have been impacted. ORP pointed out that the purpose of starting up BOF is to support the startup waterfall for the LAW facility, and the needed resources have been available for the LAW facility startup in spite of the challenges.

ORP stated that several systems in the schedule for startup testing completion have a lot of schedule float, although there are a few critical systems that do not have float. Ecology asked if any of the BOF utility systems are the critical path for startup in LAW or for other systems. ORP responded that the Non-Radioactive Liquid Waste Disposal System (NLD) facility and the plant service air system were critical path supports for the LAW startup, and both systems were able to be started up in advance of LAW startup. ORP stated that at this point, the critical path changes quite frequently, and currently a lot of the critical path evaluations are procurement-based. ORP noted that BOF support has not appeared on the critical path and has not been for quite some time.

Ecology asked when reporting against the new baseline will be seen. ORP responded that November 2018 data will be the first month that is reported against the new baseline, but it will be looking to January 2019 data to evaluate the progress as part of the replan from ORP's perspective. ORP noted that January 2019 data will be reported in March 2019.

6.0 PRETREATMENT FACILITY

ORP referred to the U.S. Army Corps of Engineers (USACE) evaluation report that had previously been reported under the PT and HLW facilities, and noted that the status is now being reported in the WTP section. ORP stated that the USACE report is in review by the Office of Project Management at DOE-Headquarters. ORP noted that there are routine workshops with Ecology at the senior management level to discuss key risks and schedule float associated with the USACE report.

ORP reported that the erosion/corrosion technical issue (T5) resolution has been completed, and the Defense Nuclear Facilities Safety Board (DNFSB) was briefed about three weeks ago. ORP is waiting to hear if the DNFSB has a response to the briefing before sending the letter on T5 to the DNFSB, but the plan is to send the letter in December 2018 whether or not comments are received. ORP added that if significant comments are received, it will follow up with any modifications that may be needed. Ecology noted that a status update on T5 was received from ORP senior management about two weeks ago, and suggested a meeting to discuss the status of T5 around the time the letter is sent to the DNFSB or when the DNFSB has closed the T5 issue with ORP. ORP pointed out that the DNFSB will inform ORP if it has a major issue, but it won't necessarily indicate that it has closed out the issue. Ecology suggested scheduling a meeting around the first of 2019 to discuss T5. ORP agreed that a meeting could be scheduled at that time.

ORP stated that the main issue associated with the pulse-jet mixing technical issue (T4) has been settled for high solids vessel, but validation of the method and formula for the low solids vessel has been delayed. ORP noted that since the independent reviewers have gotten involved, the comment process has been extended, but it is anticipated that the comment resolution will be completed in December 2018.

ORP stated that the routine preventative maintenance is continuing in the PT facility.

7.0 HIGH-LEVEL WASTE FACILITY

ORP stated that resources were planned to be increased by 80 staff in December 2018, but it has been delayed due to engineering resources that were going to be transferred are needed to continue working at the DFLAW project. As a result, Bechtel is in the process of hiring outside engineering staff for HLW.

ORP stated that key work that was planned and is under way is the evaluation of the hydrogen generation issue and validation of the change resulting from the Preliminary Documented Safety Analysis (PDSA) that the agitator will meet the requirements and the sparger is not needed. ORP stated that those efforts are being done by the nuclear safety and engineering team, and the work is expected to be completed in the March/April 2019 time frame.

ORP stated that the Radioactive Liquid Waste Disposal (RLD) system completion and the feed process system efforts will slowly ramp up as resources become available.

8.0 LOW-ACTIVITY WASTE FACILITY

ORP noted that the discussions regarding the long-standing quality assurance issues have been going well and are nearing closure. ORP stated that Bechtel implemented the Specialized Requirement Verification Matrix pilot program, which was developed to track procurement requirements and ensure they are meeting the current Documented Safety Analysis (DSA). Review of the pilot program has been under way, and Bechtel has projected completing the program late next year, although ORP is pushing for completion earlier in the spring of 2019.

ORP reported that it will be jointly rolling out with Bechtel a new quality culture message that quality has equal priority with safety. The new message will allow a quality issue to be raised to senior management if it is not resolved in a timely manner at a lower level. ORP stated that it will be a top priority for Bechtel, and it was supposed to be rolled out this week, but it may be delayed until after Thanksgiving. ORP stated that Bechtel was citing the need for cost estimates and the size of the effort for the delay.

ORP noted that construction has experienced some delays due to changes from the DSA.

ORP reported that turnover to startup is routinely occurring in LAW, and in general it is progressing per schedule. ORP noted that there are a few issues with startup testing and completion.

ORP stated that the key critical path is procurement, and one of the items is the melter power supply. ORP reported that the melter No. 1 power supply has been refurbished and is expected to be delivered next week. The melter No. 2 power supply is expected to be delivered later in

December 2018. ORP stated that the melter power supply has passed the critical path completion date, and Bechtel has been working to mitigate the issue. ORP noted that it will take three to four months to install and test the melter power supply, and Bechtel has cut down 20 days on the installation planning and is identifying work that can be done in parallel.

ORP stated that another key procurement, which is not critical path but is close, is the polypropylene glycol (PPG) hardware. ORP stated that procurement of the pressure regulator valve that has been designated as NQA-1 by the DSA has posed a challenge with locating a vendor.

Significant Planned Activities in the Next Month

ORP stated that review of the commercial grade dedication of the LAW offgas process and the secondary offgas should be completed in the next two months. ORP stated that several procurement items are anticipated in the coming month, and noted that procurement of the process gas analyzer is getting close to the critical path. ORP stated that three-week walk-downs will be conducted on the C2 ventilation system, the breathing service air system, and the container pour handling system in preparation for turnover to startup.

ORP reported that the startup testing is delayed for the instrument air system and some valves. ORP stated that it had previously reported on the instrument air system that needed to be cleaned out, and loop 1 and loop 2 have been completed. The crew is currently on elevation 48, and the instrument air system should be completed this month. ORP stated the issue with the valves is the seat was not removed when the valve was welded to the pipe. ORP added that the extent of the issue is not known, and the affected valves will be inspected. ORP noted that all of the valves are accessible to be inspected and verified.

9.0 BALANCE OF FACILITIES

ORP stated that the engineering and construction efforts are focused on completing the Effluent Management Facility (EMF). Engineering's focus is with the design in support of procurement activities as well as field support for BOF startup activities. The current construction focus is with pipe rack installation, piping installation, and heating and ventilation system ducting installation as well as some major equipment installation.

Significant Accomplishments During the Prior Month

ORP reported that the primary reboiler, the pump and the feed filter and associated platform have been placed in the C5 cell at EMF, which is where the evaporator sits. ORP noted that the evaporator has been placed in C5. The cell is full of racks and equipment, and a night shift crew is getting ready to start up to do pipefitter work on the buildout of the racks, platforms and valve installation, along with the day shift pipefitter crew that will be doing the same work. Currently a night shift crew is working on completion of the C5 roof assembly. ORP noted that the C5 roof was constructed off to the side of the facility in the same manner as the C3 roof, which helped to accelerate the schedule for placing the C5 roof and getting the C5 cell weathered in before winter. ORP added that building the C5 roof on the ground significantly minimized the impact between work above and below in the cell and eliminated the need to shut down work in the cell for about a month.

ORP stated that placement of the secondary reboiler was completed in the C3 cell. ORP noted that when the C3 roof was installed, an opening was left to allow the reboiler to be set in place. The installation of the roof assembly for the C3 area was completed and all of the B decking was installed, and tarping will be put in place to weather in the area.

ORP stated that protective coatings were completed for the low point drain vessel area, and the next step will be to build out the stair structure and structural steel interior, to be followed by vessel placement. ORP added that turnover was completed for the low voltage electrical system that supports the ammonia system.

Significant Planned Activities in the Next Month

ORP noted that placement of the C5 roof over the C5 evaporator cell was planned for November 2018, and the roof was placed last weekend.

ORP stated that the current focus is working through completion of the chiller compressor plant. The chillers have been up and running for some time, but they have not been fully loaded and won't be until the melters heat up. The chillers have been tested to about 60 percent by placing the unit in an exhaust gas recycle mode. It was noted that some of the startup in LAW may be impacted by the BOF chiller system not being completely turned over yet. ORP stated that it will follow up with the potential issue, adding that BOF has the ability to provide chilled water.

ORP stated that the next step within the chiller compressor plant is to get the rotary screw air compressors up and operational, and a vendor will be coming out in early December 2018 to assist with the process. ORP noted that the chiller units and the cooling tower need to be up and operational before getting the rotary screw air compressors operational. ORP stated that the cooling tower will provide cool water to allow the air compressors to run. ORP noted that when the air compressors are running compressed air they generate a lot of heat, and as the compressed air goes through the air drying units, chilled water is needed to cool the area.

ORP stated that there will be a lot of testing involved when the chilled water and air systems become operational, and it represents integrated system operations with several different building systems being involved that have to work well together. ORP stated that each of the systems have been tested on a limited basis, with the exception of startup of the compressors. ORP noted that once the compressors are started, it will be starting up another key piece of large equipment that has been sitting for a while. ORP added that this will allow use of the main compressors to pressurize the receiver flasks and the underground header, although the underground header has been pressurized by the temporary system. ORP stated that the goal is to get the system pressurized using the permanent plant equipment by the end of December 2018.

ORP stated that efforts are under way to clean up some of the systems within the steam plant in preparation for startup. ORP added that the diesel fuel oil facility is up and running. ORP stated that initial startup of the steam plant, which is planned for the early part of 2019, will be a challenge, although no major issues are anticipated. ORP stated that boilers need to be up and running and making quality steam. Water chemistry over a range of temperatures can be a challenge, and water chemistry is crucial for steam plant operations.

10.0 ANALYTICAL LABORATORY

ORP reported that during the last month, Bechtel completed turnover of the argon, helium and nitrogen bottled gas systems, and other startup testing continues within the Analytical Laboratory (LAB). ORP noted that the focus on LAB for this past year has been turnover and startup testing of systems, and 31 of the 35 LAB systems have been turned over. ORP reported that efforts continue with the methods and procedure development at the offsite laboratory.

Significant Planned Activities in the Next Month

ORP stated that testing will continue in the LAB. Some of the equipment will be moved into the LAB in an effort to be able to start some of the methods development, testing and training in the offsite lab as well as in LAB.

Ecology asked what systems remain to be turned over. ORP responded that the ASX and ventilation systems have been turned over, and the communication systems are the remaining systems to be turned over. ORP noted that from a startup testing perspective, the focus is the ventilation system, which is in testing. ORP stated that as energized testing has gotten under way with the ventilation system and no major mechanical failures have been incurred. ORP added that to date, none of the ventilation fans have needed replacement or major refurbishment.

Ecology asked when the waste transfer lines will be backfilled. ORP responded that there will be a delay with backfilling the waste transfer lines. ORP stated that the waste transfer lines in question go from the tank farms to the WTP, go over the top of the EMF low point drain vessel and over to the LAW facility, and then there is a line that goes back from LAW to EMF. ORP noted that the lines are double-wall pipe. ORP stated that during an evaluation of the vendor documents, it was discovered that the vendor had used an inappropriate specification when doing the testing of the coating materials at the joints.

ORP explained that the pipe gets an initial coating and is then wrapped in foam and encased in a PVC outer shell. ORP stated that the end needs to be left open at the weld points, and after the weld is completed a coating is applied. The coating is tested, and the foam is applied and the pipe is wrapped in the PVC outer shell. ORP stated that the voltage used during testing after the first coating was applied was too low. As a result, if there were any imperfections in the inner coating that was applied, they potentially would not be detected. ORP noted that the specification was a change that occurred in the vendor's procedure post contract award and post some of the early piping that was done. The areas that were used as a connection will have to be inspected, and any installation of that piping is on hold. ORP stated that the piping that is currently in the ground will be excavated, and Holiday testing will be performed and evaluated. ORP stated that the process will be a major impact, and there are at least 200 connections that need to be checked.

ORP/Ecology TPA and CD Agreements, Issues, and Action Items –November 2018

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 SST WMA-C Closure Plans without any indication of the role and participation for 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 CERCLA decision has not been an assumption from any of the Tri-Parties.
 - a. Appendix I, Section 3.1 states: “Ecology is the lead regulatory agency responsible for the closure of the SST system. EPA 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 TPA: “The information necessary for performing RCRA closures/post-closures within an operable unit will be provided in various RFI/CMS 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 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, HSWA corrective measures will comply with ARARs.”
 - 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, TSD group/unit or milestone. The

ORP/Ecology TPA and CD Agreements, Issues, and Action Items –November 2018

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.”

3. USDOE has stated in the recent WIR public meeting, that the Composite Analysis was being worked on now, and that it would be released (in draft) in 2020. USDOE had previously stated that the TC&WM EIS would be sufficient for use as a composite analysis for the WMA-C PA. The State of Washington is in agreement that the TC&WM EIS is adequate for this purpose, and has been working with that assumption. Ecology does not have any knowledge of the development of the “Composite Analysis”, and as indicated in Appendix I section 3.2, the Tri-Parties have agreed that there will be “close integration of activities” and a “consistent application of the requirements of Appendix I”. Ecology is the lead agency for SST Closure and will expect USDOE to apply the TC&WM EIS as the “Composite Analysis” for closure of WMA-C, until USDOE closely integrates the development of a new risk assessment methodology.

ORP/Ecology TPA and CD Agreements, Issues, and Action Items –November 2018

#	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)	Dusty Stewart	On Hold
2	TF-17-04-01 4-20-17	ORP to provide Ecology with schedule updates on the removal of the 242-A Evaporator diesel generator.	Provide layout of phased plan to include short and long-term activities. No schedule has been established yet. (07/19/2018). ORP asked to remove this issue. Andrew (Ecology) will discuss internally and let Paul know response via email (10/18/2018)	Paul Hernandez	Open
3	TF-18-11-3 12-1-17	ECY requests ORP to meet on HNF-3484 Double Shell Tank Pumping Guide	Schedule meeting in October 2018 to initiate discussion. There will be an internal DOE meeting in October and soon after, Ecology meeting will be set up. (10/18/2018)	Jeremy Johnson	Open
4	TF-18-07-01 07/19/18	Integrate the ground water modeling for WMA-C PA with BP-5 remedial design for pump and treat at WMA-C (Jeff Lyon)	Held several meetings with RL/ORP on this and other integration issues in July and August. RL has the lead for groundwater monitoring program. ORP proposes closing. (10/18/2018) Ecology wants clarification when BP-5 IROD is expected to be issued and that there is action from RL to address technetium-99 contamination. Action item to remain open (10/18/2018)	Jan Bovier	Open
5	TF-18-10-01 10/18/18	Follow up meetings for discussion and resolution of TSCR related activities.	Schedule a meeting to further discuss concerns related to 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 the tall column test.	Sahid Smith	Open

ORP/Ecology TPA and CD Agreements, Issues, and Action Items –November 2018

#	Action ID Start Date	Action	Updates / Needs for Closure	Actionee(s)	Status/ Date Closed
6	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)	Jan Bovier	Open

ORP/Ecology TPA and CD Agreements, Issues, and Action Items –November 2018

#	Action ID Start Date	Action	Updates / Needs for Closure	Actionee(s)	Status/ Date Closed
1	WTP-18-07-01 07/19/18	ORR Strategy briefing to Ecology (Jay Decker)	Delmar's group will coordinate.	Wahed Abdul	Closed 10/18/18
2	WTP-18-08-01 08/16/18		FY 2019 HLW Spend Plan. Identify any changes in execution sequence.	Wahed Abdul	Closed 10/18/18
3	WTP-18-09-01 09/19/18	Ecology to provide ORP with information at a level appropriate to inform ORP for formal approval of WTP commissioning		Dan McDonald	Closed 10/18/18

November 15, 2018
Office of River Protection
Tri Party Agreement Consent Decree Meeting

PRINT NAME	SIGN NAME	ORG
Joyner, Jessica		WRPS
Keith, Colleen		ORP
Kemp, Christopher		ORP
Knox, Kathy	<i>Kathy Knox</i>	Court Reporter
Lowe, Steven	<i>Steve Lowe</i>	ECY
Lucatero, Yoana	<i>[Signature]</i>	ECY
Lyon, Jeffery	<i>[Signature]</i>	ECY
Martell, John		DOH
Mathey, Jared		ECY
McDonald, Dan	<i>[Signature]</i>	ECY
Menard, Nina		ECY
Mulkey, Charles		WRPS
Parker, Dan		WRPS
Pfaff, Stephen H	<i>[Signature]</i>	ORP
Pomiak, Andrew	<i>[Signature]</i>	ECY
Price, John	<i>[Signature]</i>	ECY
Rambo, Jeffrey	<i>[Signature]</i>	ORP
Richardson, John		ECY
Rochette, Beth		ECY
Schleif, Stephanie		ECY
Schmidt, John		DOH
Serafin, Shane		ORP
Skorska, Maria	<i>[Signature]</i>	ECY

November 15, 2018
Office of River Protection
Tri Party Agreement Consent Decree Meeting

PRINT NAME	SIGN NAME	ORG
Abdul, Wahed	<i>Wahed Abdul</i>	ORP
Alzheimer, Jim	<i>Jim Alzheimer</i>	ECY
Barnes, Mike		ECY
Beehler, Steve	<i>Steve Beehler</i>	ORP
Bovier, Jan	<i>Jan B Bovier</i>	ORP
Brasher, Stephanie	<i>Stephanie Brasher</i>	MSA
Brown, Dennis		ORP
Burnett, Kaylin	<i>Kaylin W. Burnett</i>	ORP
Cameron, Craig	<i>Craig Cameron</i>	EPA
Carlson, Annette		ECY
Cimon, Shelley	<i>Shelley Cimon</i>	OR State
Decker, Jay	<i>Jay Decker</i>	ECY
Diediker, Janet		ORP
Einan, Dave		EPA
Evans, Rana	<i>Rana Evans</i>	ORP
Fletcher, Tom		ORP
Gao, Tracy		ECY
Grindstaff, Joni		ORP
Hall, Katie	<i>Katie Hall</i>	ECY
Hastings, Rob		ORP
Hernandez, Paul		ORP
Johnson, Jeremy		ORP
Jones, Mandy		ECY

November 15, 2018
Office of River Protection
Tri Party Agreement Consent Decree Meeting

PRINT NAME	SIGN NAME	ORG
Smith, Alex		ECY
Smith, Sahid		ORP
Stewart, Dustin		ORP
Trimberger, Bryan		ORP
Turner, Michael		MSA
Turner, Vanessa		ORP
Utley, Randell		DOH
Valle, Richard		ORP
Van Mason, Eric		WRPS
Walmsley, Mign		ECY
Wang, Oliver S		ECY
Whalen, Cheryl		ECY
Whitelely, Craig		ORP
Wold, Kristi		ECY
Yasek, Donna		BNI
Young, Jason		ORP
<i>Hankins, Brian</i>	<i>Brian Hankins</i>	<i>ORP</i>