

Meeting Minutes
August 24th, 1999
Inter-Agency Management Integration Team (IAMIT)

Approval: [Signature]
For J. E. Kinzer (T4-08)
RL IAMIT Representative

Date: 12/22/99

Approval: [Signature]
Douglas R. Sherwood (B5-01)
EPA IAMIT Representative

Date: 12/15/99

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Michael A. Wilson (B5-18)
Ecology IAMIT Representative

Date: 12/13/99
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Minutes Prepared by:

EDMC

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Date: 12/17/99

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* w/Attachments

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**Land Disposal Restrictions (LDR) Notice of Correction (NOC)
Tri-Party Agreement (TPA) Milestone M-26-00
(J. Augustenborg, M. Wilson, R. Stanley)**

Ecology issued a NOC to RL on June 3rd, 1999 that contained four alleged violations, thirteen concerns, and five corrective measures. However, DOE believes the NOC mixes issues of the TPA Primary Document comments with issues resulting from the 1998 compliance inspection.

Ecology believes that RL is taking exception to their ability to take enforcement, and that the TPA recognizes this ability. RL recognizes Ecology has regulatory rights under and outside of the TPA. RL's position is that the LDR report requirements were negotiated under the TPA and as such, deficiencies in the 1999 LDR report should be addressed under TPA provisions. In addition, RL believes that Ecology views the enforcement process as an alternative to the TPA dispute resolution process.

Ecology proposed that the primary document response clock be stopped for 21 days to allow for discussions to continue at the Project Manager Level. Following the 21-day delay, Ecology requested an additional 14-day delay. RL proposed that they would work with Ecology to resolve comments using the TPA dispute process and that Ecology withdraw the NOC. Ecology said that they would not withdraw the NOC. On August 13th, 1999, a Statement of Dispute was submitted to Ecology. During the IAMIT, a team was chartered to successfully resolve the issues raised in the NOC and a path forward. This team will consist of senior management from each of the three agencies. The team will report back to the October 26th, 1999 IAMIT. This team will also revisit the 1990-guidance document for the LDR for potential updating.

**M-32-06, 244-AR Vault Dispute Resolution
(J. Kinzer, M. Wilson, A. Valero)**

The 244-AR Vault has not received waste since approximately 1978 and has no future mission. DOE believes that Interim Milestone M-32-06 and Target Date M-32-06-T01 were included in the M-32-00 major milestone series only as "fail-safe" measures to prevent the use of the 244-AR Vault prior to the completion of a tank system integrity assessment. The Interim Milestone and Target Date have "prior to restart" completion dates. As the 244-AR Vault will never restart, DOE believes Interim Milestone M-32-06 and Target Date M-32-06-T01 no longer apply. Though Ecology recognizes this element, it has repeatedly raised additional and associated regulatory and environmental compliance concerns regarding the 244-AR Treatment Storage and Disposal (TSD) unit.

DOE proposed that the Interim Milestone and Target Date be deleted and a new interim milestone addressing stabilization activities for the 244-AR Vault be negotiated (most likely) under the M-45 milestone series. Ecology noted that it believes that negotiation of new commitments under the M-45 series would be the most appropriate way to move forward. DOE emphasized that it would not sign up to any specific field activities or due dates that do not have a planning basis to support them. DOE/LMHC proposed preparing a stabilization project plan for the 244-AR Vault as an initial activity under a new interim milestone. This stabilization project plan would then result in future activities and TPA completion dates. DOE emphasized that funding would have to be identified prior to the approval of new interim milestone. Ecology

agreed to work with DOE in an attempt to develop 244-AR Vault stabilization requirements for incorporation within the TPA. DOE's proposed new interim milestone would identify an actual completion date for the stabilization project plan and would have "TBD" completion dates for other stabilization activities. Under its proposal, "other" stabilization activities and their completion dates would be based on the stabilization project plan, once it was completed. This method would commit DOE to stabilization activities for the 244-AR Vault while allowing the completion dates on these activities to be inserted later based on the results of the stabilization project plan. The Parties expressed hope that the new change control form would be approved prior to the September 30th, 1999 completion date for milestone M-32-00.

Ecology restated its regulatory compliance concerns regarding the 244-AR vault, and its concern that vault stabilization and associated activities not be delayed. Ecology stated that, 1) the M-32-00 milestone would not be considered complete until the new interim milestone change control form was approved, 2) they did not intend to impact other DOE projects, and 3) that stabilization activities would not require a RCRA closure of the 244-AR Vault at this time (i.e., the 244-AR Vault will undergo RCRA closure with the SST system).

The IAMIT approved a 30-day extension, at the IAMIT Level, to the dispute resolution process. This issue should be resolved by mid-September. J. Kinzer, et al., are to report back to the IAMIT on September 28th, 1999.

Tank C-106 Status/Change Request Discussion **(W. Abdul, S. Dahl)**

Discussions continue on the C-106 Change Request. Most of the issues have been resolved. The definition of the terminology, "*end of sluicing*", is the last issue to be resolved.
