

**Meeting Minutes
Inter Agency Management Integration Team (IAMIT)
EPA Conference Room
712 Swift Blvd., Richland**

December 16, 1997

Appvl.: *Jackson Kinzer* Date: 1-27-98
 Jackson E. Kinzer, RL (S7-50)
 IAMIT Representative

Appvl.: *Douglas R. Sherwood* Date: 1/27/98
 Douglas R. Sherwood, EPA (B5-01)
 IAMIT Representative

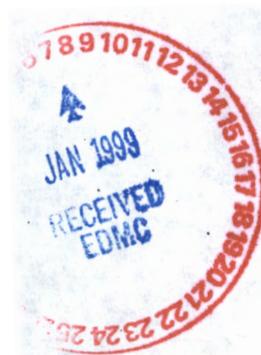
Appvl.: *Michael A. Wilson* Date: 1/27/98
 Michael A. Wilson, Ecology (B5-18)
 IAMIT Representative

Prepared by *Larry D. Arnold* Date: 1/27/98
 Appvl.: Larry D. Arnold (G3-27)
 Fluor Daniel Hanford, Inc.

Distribution

Arnold, L. D.	FDH	G3-27	Rewinkel, D.	FDH	S7-40
Blazek, M. L.	ODOE	Oregon	Saueressig, D.	LMHC	S8-05
Dahl, S. L.	Ecology	B5-18	Sautter, S.	ODOE	*
Faulk, D.	EPA	B5-01	Selby, M. A.	Ecology	B5-18*
Haass, C. C.	RL	A6-54	Sherwood, D. R.	EPA	B5-01*
Jackson, D. E.	RL	A5-15	Skinnarland, R.	Ecology	B5-28
Jackson, Z.	Ecology	B5-18	Sohn, C. L.	RL	S7-51
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McClure, G.	RL	A7-75	Williams, J. D.	FDH	S7-40
McClusky, J.	RL	S7-54	Wilson, M. A.	Ecology	B5-18*
McLaughlin, M. A.	FDH	G3-27	Yerxa, J. K.	RL	A5-15
Murphy, E. J.	FDH	B3-53	EDMC		H6-08
Rasmussen, J. E.	RL	A5-15			

* W/Attachments



IAMIT12.16



Tri-Party Agreement

48513
S.Z.4
241.C.103

December 16, 1997

**EXTENSION TO DISPUTE RESOLUTION FOR HANFORD FEDERAL FACILITY AGREEMENT AND
CONSENT ORDER MILESTONE M-40-07**

On April 9, 1997 the U.S. Department of Energy invoked the dispute resolution provisions of Tri-Party Agreement Article VIII concerning the State of Washington Department of Ecology assertions about completion of Interim Milestone M-40-07. The period during which the Department of Energy and Ecology Project Managers seek resolution of the dispute was previously extended through December 16, 1997. The dispute resolution period is hereby further extended through February 24, 1998 at the Project Manager level.

Jackson E. Kinzer
Assistant Manager,
Tank Waste Remediation System
U.S. Department of Energy
Richland Operations Office

Michael A. Wilson
Manager, Nuclear Waste Program
State of Washington
Department of Ecology

cc: L. D. Arnold, FDH
S. L. Dahl, Ecology
B. G. Erlandson, LMHC
C. C. Haass, DOE
D. H. Irby, DOE
A. B. Stone, Ecology
A. M. Umek, FDH
J. K. Yerxa, DOE
M. L. Blazek, OOE
D. Powaukee, Nez Perce
R. Jim, YIN
B. Burke, CTUIR
Administrative Record



Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

DEC 16 1997

97-MSD-299

Mr. Mike Wilson, Program Manager
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504

Dear Mr. Wilson:

STATEMENT OF DISPUTE FOR HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) MILESTONE M-41-22, "START INTERIM STABILIZATION OF 6 SINGLE-SHELL TANKS BY SEPTEMBER 20, 1997"

Attached is the U.S. Department of Energy, Richland Operations Office Statement of Dispute for Tri-Party Agreement Milestone M-41-22, "Start Interim Stabilization of 6 Single-Shell Tanks by September 30, 1997." This Statement of Dispute will be discussed at the Inter-Agency Management Integration Team Meeting on December 16, 1997.

If you have any questions, please contact Carolyn Haass on (509) 372-2731.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Sanders".

George H. Sanders, Administrator
Hanford Tri-Party Agreement

Attachment

cc w/attach:
S. L. Dahl, Ecology
L. D. Arnold, FDH
A. M. Umek, FDH
L. E. Hall, LMHC

STATEMENT OF DISPUTE

**HANFORD FEDERAL FACILITY AGREEMENT
AND CONSENT ORDER**

**MILESTONE M-41-22, "START INTERIM STABILIZATION OF 6
SINGLE SHELL TANKS, BY SEPTEMBER 30, 1997"
(CHANGE CONTROL FORM M-41-97-01)**

**U.S. DEPARTMENT OF ENERGY
RICHLAND OPERATIONS OFFICE**

December 16, 1997

STATEMENT OF DISPUTE

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER
MILESTONE M-41-22
CHANGE CONTROL FORM M-41-97-01

I. SUMMARY OF DISPUTE

Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Interim Milestone M-41-22 specifies "Start Interim Stabilization of 6 Single Shell Tanks" by September 30, 1997. Identification and control of emergent workplace safety problems resulted in unavoidable delays in performance of work required under this interim milestone. These emergent safety problems constitute the existence of "good cause" for delay in milestones as defined by the Tri-Party Agreement. On that basis, the U.S. Department of Energy (DOE) submitted a Tri-Party Agreement Change Control Form to the State of Washington, Department of Ecology (Ecology) proposing extension of Interim Milestone M-41-22 completion date. Ecology's refusal to agree that good cause exists, coupled with its formal rejection of DOE's tendered Change Control Form, are the basis of this dispute.

II. STATEMENT OF FACTS

A. Summary of Interim Stabilization Efforts to Date

In 1978, DOE initiated interim stabilization activities for one-hundred forty-nine single shell tanks (SSTs) located in the 200 Area of the Hanford Site central plateau. The purpose of interim stabilization is to reduce the amount of drainable liquids in SSTs in the event they begin to leak. To date, 118 of 149 SSTs have been interim stabilized. Current interim stabilization status is:

- ◆ Three tanks which were being interim stabilized are on hold until authorization basis or equipment issues are resolved (T-104, T-110, and SX-104);
- ◆ One SST is currently being evaluated for completion of interim stabilization criteria (BY-103); and
- ◆ Two tanks will begin interim stabilization activities in Fiscal Year 1998.

1 This will leave 28 SSTs to be interim stabilized and 25 of those SSTs which have not yet been initiated.

2 Though there are no determined actively leaking tanks at this point in time, 67 SSTs have, or are suspected
3 to have leaked in the past. Of these 67 tanks, 63 have already been interim stabilized or begun interim
4 stabilization. One of these 63 SSTs (SX-104) which has begun interim stabilization but has been put on
5 hold, is currently being re-evaluated with new data that it may have leaked again. Of the four remaining
6 known or suspected leakers, three will be begin interim stabilization this Fiscal year, with the fourth tank
7 being a unique technical challenge. Interim stabilization activities are the responsibility of DOE's Tank
8 Waste Remediation System (TWRS).

9 B. Summary of Flammable Gas Safety Problem.

10 In November, 1995, a safety problem was discovered that affected DOE's ability to interim stabilize SSTs;
11 it was determined that 176 of 177¹ Hanford tanks could contain potentially hazardous levels of flammable
12 gas. Previously, it was thought that the flammable gas safety problem applied only to 25 tanks. These
13 flammable gases are created by the decay of organic chemicals in the waste and radiolytic decomposition
14 of water. The magnitude of the hazard associated with flammable gas is dependent on the amount of gas
15 present and the potential for spark sources which could ignite the gas. Because of these hazards, interim
16 stabilization of SSTs and other key Tank Farm activities were suspended pending analysis and
17 determination of appropriate safety controls.

18 Footnote: ¹ - Only one Hanford tank is exempt from this discussion, double-shell tank SY-101. This tank
19 has a mixer pump installed in it to mitigate the flammable gas problem

1 In July 1996, as a worker health and safety precaution, Hanford's Prime Contractor proposed to DOE
2 expanding existing safety controls from 25 tanks to 176 of Hanford's 177 high level waste tanks, including
3 all of the SSTs (Attachment 1). Along with these new safety controls, Hanford's Prime Contractor also
4 proposed that an existing Unreviewed Safety Question (USQ) be expanded to include these same tanks.
5 On November 1, 1996, DOE completed their review and evaluation of the proposed expansion of the
6 safety controls and Flammable Gas USQ and declared expansion of the Flammable Gas USQ
7 (Attachment 2). The safety controls and Flammable Gas USQ were expanded to include all SSTs and 27
8 Double Shell Tanks (DSTs), as well as Double Contained Receiver Tanks (DCRTs) and Inactive
9 Miscellaneous Underground Storage Tanks (IMUSTs). All further activity in TWRS facilities was
10 subjected to the "Required Controls" included in the Flammable Gas USQ expansion declaration
11 (Attachment 2). This action continued the delay in Interim Stabilization, originally imposed in November
12 1995, pending the outcome of individual tank analysis.

13 The "Required Controls" classified all SSTs and DSTs into Facility Group 1, 2, or 3. Definitions for these
14 Groups are as follows:

- 15 ♦ Facility Group 1 consists of five double shell tanks that have undergone observed, significant Gas
16 Release Events (GREs). These tanks are conservatively postulated to have the potential for large
17 spontaneous and large induced GREs.
- 18 ♦ Facility Group 2 consists of the remaining DSTs (excluding SY-101) and 43 of the SSTs, as well as
19 a number of IMUSTs, all of which are conservatively postulated to have the potential for small
20 spontaneous and large induced GREs.
- 21 ♦ Facility Group 3 consists of the remaining SSTs not assigned to Facility Groups 1 or 2, as well as
22 additional IMUSTs and tank 244-AR TK-002. These tanks are conservatively postulated to have
23 the potential for small induced GREs only.

24 Preparations were made to implement the required controls, and in February 1997, DOE granted approval
25 to its contractor to begin interim stabilization in specific Facility Group 3 tanks utilizing continuous
26 flammable gas monitoring and other controls specified in Tank Farms Standing Order 97-01. The

1 Standing Order was subsequently replaced by the Basis for Interim Operation which also authorized
2 pumping in facility Group 3 tanks. The Facility Group 3 tanks remaining to be interim stabilized are either
3 being pumped or are in the final stages of preparation for pumping at this time.

4 It was determined that additional analysis and controls are required to assure appropriate operational
5 safety for Group 1 and 2 tanks. These safety controls and equipment significantly escalate the costs and
6 extend the schedules for all of the remaining interim stabilization activities. The escalation of costs to
7 pump each tank has led DOE to initiate a one year moratorium (Reference: Fiscal Year 1998 TWRS
8 Multi-Year Work Plan Guidance) on the start of interim stabilization of tanks beyond those for which
9 pumping had been initiated before July 24, 1997, except for the remaining Group 3 tanks. Interim
10 stabilization activities which will be completed during Fiscal Year 1998 will be the following:

- 11 ♦ Initiate interim stabilization of two SSTs;
- 12 ♦ Establishing the safety authorization basis for the remaining SSTs;
- 13 ♦ Continue interim stabilization of those SSTs for which pumping has initiated;
- 14 ♦ Updating emergency pumping capability plan to respond to a leaking tank within 30 days; and
- 15 ♦ Complete studies to reduce the cost per tank of interim stabilizing the remaining tanks.

16 This moratorium makes it necessary to revise and reschedule not only Interim Milestone M-41-22, but
17 also all of the subsequent M-41 series interim and target milestones and Major Milestone M-41-00, due
18 September 30, 2000.

19 C. Summary of the Impact of the Flammable Gas Safety Problem on Interim Stabilization Milestones.

20 Interim Milestone M-41-22 was created in September, 1996 by Ecology's approval of DOE's Tri-Party
21 Agreement Change Control Form M-41-96-02. In addition to creation of interim milestone M-41-22, the
22 changes approved under Change Control Form M-41-96-02 restructured other M-41 series interim
23 milestones and target dates, while retaining the Major Milestone M-41-00 completion date of September
24 30, 2000. The milestones adopted by approval of Change Control Form M-41-96-02 were based on an
25 interim stabilization schedule developed in July 1996.

1 On June 27, 1997 DOE submitted its proposed change request to Ecology to extend Interim Milestone M-
2 41-22 through Tri-Party Agreement Change Control Form M-41-97-01 (Attachment 3). The Change
3 Control Form stated that the delay to Interim Milestone M-41-22 was due to continuing issues in resolving
4 the flammable gas concerns for the Hanford tanks. Change Control Form M-41-97-01 proposed a six
5 month delay for completion of Interim Milestone M-41-22 to March 31, 1998. The Change Control Form
6 was automatically disapproved due to Ecology's failure to respond within the fourteen (14) calendar days
7 provided in the Tri-Party Agreement. DOE then pursued the denial of the change request for schedule
8 extension under the Dispute Resolution Provisions set forth in Article VIII of the Tri-Party Agreement
9 (Attachment 4). DOE invoked the dispute resolution provisions of the Tri-Party Agreement on July 16,
10 1997 and the dispute was subsequently extended once, through August 26, 1997, at the Project Manager's
11 Level (Attachment 5).

12 On August 26, 1997, the dispute was raised to the Inter Agency Management Integration Team (IAMIT)
13 level (Attachment 6) and has been subsequently extended twice, with the latest extension at the IAMIT
14 level to December 16, 1997 (Attachment 7 and 8). At the September 23, 1997 IAMIT meeting, DOE was
15 requested by the parties to write a letter requesting expansion of the discussions on the Change Control
16 Form to all of the M-41-00 Major Milestone (Attachment 9). That request was sent to Ecology and U.S.
17 Environmental Protection Agency on October 24, 1997 (Attachment 10) and was subsequently denied by
18 Ecology on November 27, 1997 (Attachment 11). A chronology of the Tri-Party Agreement dispute
19 process is included as Appendix A to this Statement of Dispute.

20 III. CONCLUSION

21 DOE requests that the current dispute be continued to allow further consideration by Ecology and DOE of
22 the dispute position statements developed by Ecology and DOE. Also, an amended Change Control Form
23 M-41-97-01, Revision 1, will be submitted by RL for approval by Ecology and is included in this package
24 as Attachment 12. M-41-97-01, Revision 1, will propose that Interim Milestone M-41-22 be changed to
25 "Start Interim Stabilization of 3 Single Shell Tanks," with a due date of March 31, 1998. This allows for
26 initiation of pumping for the remaining Group 3 tanks.

1 ATTACHMENT 1

2 LETTER, JULY 31, 1996: WHC TO DGE

3 JUSTIFICATION FOR CONTINUED OPERATION FOR

4 FLAMMABLE GAS UNREVIEWED SAFETY QUESTION



Westinghouse
Hanford Company

P.O. Box 1970 Richland, WA 99352

July 31, 1996

9653371

Mr. J. E. Kinzer, Assistant Manager
Office of Tank Waste Remediation System
U.S. Department of Energy
Richland Operations Office
Richland, Washington 99352

Dear Mr. Kinzer:

JUSTIFICATION FOR CONTINUED OPERATION FOR FLAMMABLE GAS UNREVIEWED SAFETY QUESTION

On July 30, 1996, the Westinghouse Hanford Company (WHC) Tank Waste Remediation System (TWRS) Plant Review Committee (PRC) determined the existence of an Unreviewed Safety Question (USQ TF-96-0433, Attachment 1). This USQ determination (USQD) was prepared in accordance with the U.S. Department of Energy (DOE) Order 5480.21 to update and consolidate the previous USQ determinations related to the generation of flammable gas by high level waste present in Hanford facilities managed and operated by WHC TWRS.

The USQD TF-96-0433 provides a comprehensive identification of flammable gas hazards and affected facilities commensurate with WHC's improved technical understanding and experience since the original declaration of the TWRS flammable gas USQ in 1990. With the exception of the Authorization Basis associated with tank 241-SY-101, the USQD concludes that flammable gas hazards, the controls to manage them, and the technical bases for these controls are not adequately analyzed and documented as part of the TWRS Authorization Basis.

Also on July 30, 1996, the WHC TWRS PRC approved a justification for continued operation (JCO) (WHC-SD-WM-JCO-007, Revision 0, Attachment 2) specifically addressing USQD TF-96-0433. The JCO provides detailed descriptions and data associated with the flammable gas hazards identified in USQD TF-96-0433. Based on the hazards identified in the USQ, work controls and equipment requirements have been developed and documented in the JCO. These controls and requirements are adaptations, expansions, and refinements to existing Authorization Basis controls and other administrative practices currently used by WHC TWRS to manage the flammable gas risk. Because some of the JCO controls differ from current practice, WHC TWRS is currently developing a JCO Implementation Plan to specify the activities and associated schedules required to implement the JCO controls. In the interim, it is the judgement of the WHC TWRS PRC that near term operations may continue consistent with current practices. It is also the WHC TWRS position, however, that flammable gas risk management will be improved by the expeditious approval and implementation of the JCO and its associated Implementation Plan.

RECEIVED

JUL 31 1996

DOE AL 000
196-TWR-592

Mr. J. E. Kinzer
Page 2
July 31, 1996

9653371

This letter transmits USQD TF-96-0433 and WHC-SD-WM-JCO-007, Revision 0. to U.S. Department of Energy, Richland Operations Office (RL). The associated WHC JCO Implementation Plan is in preparation and will be transmitted to RL by August 16, 1996. Note that one issue being addressed as part of the JCO Implementation Plan concerns the establishment of a formal review function which evaluates the appropriateness of initiating work activities in "Facility Group 1," as defined by the JCO document. This issue has been the subject of recent WHC interactions with RL and DOE-Headquarters. WHC is currently working with RL to establish the review group and define its charter.

WHC requests RL review and acceptance of the attached USQD TF-96-0433. WHC also requests that RL commence the review of the attached JCO document. Once the Implementation Plan is transmitted to RL, WHC will request that RL approve the JCO and the JCO Implementation Plan together, for purposes of supporting a necessary near term improvement in the TWRS Authorization Basis for tank farms activities in light of flammable gas hazards.

Very truly yours,



R. F. Bacon, Vice President and Manager
Tank Waste Remediation System

phd

Attachments (2)

RL - J. M. Gray
J. K. McClusky
J. C. Peschong
A. B. Sidpara
C. L. Sohn
A. H. Wirkkala (w/o attachments)

1

ATTACHMENT 2

2

LETTER, DATED NOVEMBER 1, 1996: DOE TO FDH

3

DEFINITION AND DELARATION OF FLAMMABLE GAS

4

UNREVIEWED SAFETY QUESTION



Department of Energy
 Richland Operations Office
 P.O. Box 550
 Richland, Washington 99352

NOV 1 1996

96-WSD-283

Mr. H. J. Hatch, President
 Fluor Daniel Hanford, Inc.
 Richland, Washington

Dear Mr. Hatch:

CONTRACT NUMBER DE-AC06-96RL13200; THE U.S. DEPARTMENT OF ENERGY (DOE), RICHLAND OPERATIONS OFFICE (RL), DEFINITION AND DECLARATION OF FLAMMABLE GAS UNREVIEWED SAFETY QUESTION (USQ)

RL has completed their review and evaluation of the proposed redefinition of the 1990 Flammable Gas USQ as proposed in Westinghouse Hanford Company's letter from R. F. Bacon, to J. Kinzer, RL, "Justification for Continued Operations for Flammable Gas Unreviewed Safety Question," dated July 31, 1996.

As a result of the RL review, the previously declared Flammable Gas USQ, (Lawrence 1990, as expanded by J. K. McClusky, 1996) is declared to be replaced. The Flammable Gas USQ is now defined to be the following:

- The flammability hazard is defined as any hazard posed in any tank, container, or receiver managed and operated by the Tank Waste Remediation System (TWRS), which may contain Hanford's mixed waste in a condition that permits generation, accumulation, retention, and/or release of flammable gas.
- The Flammable Gas USQ applicability is now broadened to include all Single-Shell Tank (SST), Double-Shell Tank (DST), or any engineered container or receiver managed and operated by TWRS, which may store or contain Hanford's mixed waste in a condition that permits generation, accumulation, retention, and/or release of flammable gas. These containers and receivers include Double-Contained Receiver Tanks, TWRS-managed Inactive Miscellaneous Underground Storage Tanks, Catch Tanks, and Facilities 204-AR, 244-AR, 242-S, and 242-T.
- The Flammable Gas USQ is not applicable to Tank 241-SY-101, for which an adequate authorization basis has been approved.

In order to assure the safety of Tank Farm Operations, Fluor Daniel Hanford, Inc. (FDH) is required to comply with the provisions of DOE Order 5480.21, "Unreviewed Safety Questions." The USQ declaration does not represent the approval of the previously submitted Justification for Continued Operation (JCO) which is being addressed by separate correspondence.

Mr. H. J. Hatch
96-WSD-283

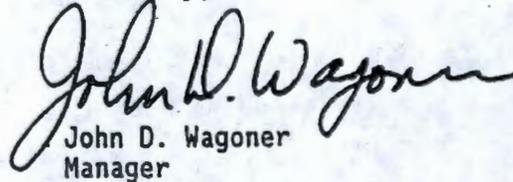
-2-

NOV 1 1996

Until the previously submitted JCO or an equivalent document is approved by RL, this correspondence represents the basis for continued operation for an interim period. On this basis, FDH may continue to conduct activities in the Hanford Tank Farms. This activity approval is, however, strictly subject to the implementation of the appropriate "Required Controls," Rev 2, dated October 31, 1996, (Attachment).

If you have any questions, please contact Carol L. Sohn, Director for Management Systems Division on 376-8523.

Sincerely,



John D. Wagoner
Manager

WSD:JMG

Attachment

cc w/attach:
M. Funderburke, BWHC
G. Johnson, DESH
S. Marchetti, FDH
F. DeLozier, LMHC
L. Hall, LMHC
J. Wicks, LMHC

REQUIRED CONTROLS
US DEPARTMENT OF ENERGY
RICHLAND OPERATIONS OFFICE

Rev 2.

October 31, 1996

1. APPLICABILITY

The following controls apply to TWRS operated facilities.

2. PURPOSE

To allow continued safe operation of TWRS facilities following the redefinition of the Flammable Gas Unreviewed Safety Question.

3. CHANGE CONTROL

These controls may not be altered in any manner without written approval of the Department of Energy (DOE):

4. EXPIRATION

These control requirements will not expire until specifically canceled by DOE in conjunction with the DOE approval of a Justification for Continued Operations or equivalent document.

5. SPECIFIC CONTROLS

The required controls consist of:

- A. Those controls identified in East Tank Farms Standing Order 96-36, rev 1., which incorporates the acceptability process.
- B. Those controls identified in West Tank Farms Standing Order 96-34, rev 1., which incorporates the acceptability process.

With these exceptions:

- 1) The value of 6250 ppm hydrogen will be utilized as 25% of the LFL when the measured concentration of hydrogen is used for this determination.
- 2) Move Tank S-106 to facility group 2.
- 3) Group Tanks TX-113 and TX-115 in Facility Group 2 only.
- 4) For waste intrusive work, monitoring is required for the vapor space of open ended objects (e.g. drillstring) inserted below the waste surface. Monitoring frequencies will be documented in the controlling work documentation.
- 5) Continue to conduct flushing operations in accordance with your current procedures.

6. IMPLEMENTATION

Specific activities may not begin or resume until the required controls have been implemented and verified by the appropriate contractor organization as being in effect.



Department of Energy
 Richland Operations Office
 P.O. Box 550
 Richland, Washington 99352

JUN 27 1997

97-EAP-530

Mr. Mike Wilson, Program Manager
 Nuclear Waste Program
 State of Washington
 Department of Ecology
 P.O. Box 47600
 Olympia, Washington 98504-7600

Dear Mr. Wilson:

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER CHANGE CONTROL FORM M-41-97-01, INTERIM MILESTONE M-41-22, "START INTERIM STABILIZATION OF 6 SINGLE SHELL TANKS"

Enclosed for your approval is a signed Hanford Federal Facility Agreement and Consent Order Change Control Form M-41-97-01, which changes the due date for Interim Milestone M-41-22 from September 30, 1997 to March 31, 1998. The reason for this extension is due to continuing issues in resolving the flammable gas concerns for the Hanford tanks.

If you have any questions on the enclosed Change Request, please call John M. Clark on (509) 376-4426 or Carolyn Haass on (509) 372-2731.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Sanders".

George H. Sanders, Administrator
 Hanford Tri-Party Agreement

EAP:JKY

Enclosure

cc w/encl:

L. D. Arnold, FDH
 L. M. Hall, LMHC
 A. M. Umek, FDH
 J. H. Wicks, LMHC
 B. D. Williamson, FDH
 N. T. Hepner, Ecology
 R. Jim, YIN
 D. Pawaukee, Nez Perce
 J. Wilkenson, CTUIR

Change Number M-41-97-01	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date June 10, 1997
Originator D. S. Rewinkel/M. A. McLaughlin		Phone (509)373-6229/376-4084
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Extend Completion Date of Milestone M-41-22, Start Interim Stabilization of 6 Single Shell Tanks.		
Description/Justification of Change Milestone M-41-22 currently is stated as follows: M-41-22 Start Interim Stabilization of 6 Single Shell Tanks. 9/30/1997 Milestone M-41-22 is changed to the following: M-41-22 Start Interim Stabilization of 6 Single Shell Tanks. 3/31/1998 (cont.)		
Impact of Change This change involves only Milestone M-41-22. There may be further impacts to the remaining M-41 interim milestones, but these impacts have not yet been established.		
Affected Documents Hanford Federal Facility Agreement and Consent Order, Rev. 4, Fifth and Sixth Amendments, Table D, Work Schedules.		
Approvals <div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="width: 30%;">  <small>DOE</small> </div> <div style="width: 20%;"> <u>6-26-97</u> <small>Date</small> </div> <div style="width: 40%;"> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved </div> </div>		
EPA _____ <small>Date</small>	_____ <small>Date</small>	_____ Approved Disapproved
Ecology _____ <small>Date</small>	_____ <small>Date</small>	_____ Approved Disapproved

Hanford Federal Facility Agreement and Consent Order
Change Control Form M-41-97-01
Page 2 of 2

Description/Justification (cont.)

Flammable gas issues for the Hanford Tank Farms have continued to impact the schedules for interim stabilization of the single shell tanks. A TPA Change Request (M-41-96-02) was approved by Ecology on September 23, 1996, which reflected a Recovery Plan for the M-41-00 Interim Stabilization Milestone. The Interim Milestones agreed to in the M-41-96-02 Change Request were based on the approval of a safety basis for operation of the tanks by September 30, 1996.

The Safety Assessment for pumping operations in tank 241-A-101, which is the bounding case for the flammable gas tanks, was approved on October 31, 1996. The approval, however, was subject to several contingencies, including resolution of the approval level for many of the specified process controls. Review and approval of the recommended set of controls for the tanks was completed on May 16, 1997. This allowed the contractor to move forward with the work for pumping of the tanks which are needed to meet Milestone M-41-22. However, because of the delays necessary to satisfy contingencies in the saltwell pumping authorization basis, the schedule for completing M-41-22 has slipped by six months.



Department of Energy
 Richland Operations Office
 P.O. Box 550
 Richland, Washington 99352
 JUL 16 1997

97-MSD-258

Mr. Mike Wilson, Program Manager
 Nuclear Waste Program
 State of Washington
 Department of Ecology
 P.O. Box 47600
 Olympia, Washington 98504

Dear Mr. Wilson:

INVOCATION OF DISPUTE RESOLUTION FOR HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) CHANGE CONTROL FORM M-41-97-01, INTERIM MILESTONE M-41-22, "START INTERIM STABILIZATION OF 6 SINGLE SHELL TANKS."

Reference: RL letter from G. Sanders, to M. Wilson, Ecology, "Hanford Federal Facility Agreement and Consent Order Change Control Form M-41-97-01, Interim Milestone M-41-22, 'Start Interim Stabilization of 6 Single Shell Tanks,'" dated June 27, 1997.

At the Tank Waste Remediation System Tri-Party Agreement Project Manager Meeting held on July 10, 1997, the State of Washington Department of Ecology (Ecology) indicated verbally that the Tri-Party Agreement Change Control Form M-41-97-01 would not be approved. In accordance with Section 12.3.3 of the Tri-Party Agreement, the U.S. Department of Energy, Richland Operations Office (RL) must now consider the change request disapproved.

RL still considers there to be good cause for changing the due date of Milestone M-41-22, "Start Interim Stabilization of 6 Single Shell Tanks." As stated in the above reference, the reason for this extension is due to the ongoing resolution of the flammable gas issues for all of the 177 Hanford double-shell and single-shell tanks. This letter is to notify Ecology that RL wishes to enter into dispute resolution on Change Request M-41-97-01, as provided in Article VIII of the Tri-Party Agreement.

RL looks forward to working with Ecology over the next 30 days to resolve this issue. If you have any questions, please contact John Clark on (509) 376-6888 or Carolyn Haass on (509) 372-2731.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Sanders".

George H. Sanders, Administrator
 Hanford Tri-Party Agreement

MSD:CCH

Mr. Mike Wilson
97-MSD-258

-2-

JUL 16 1997

cc: J. Wilkinson, CTUIR
D. Pawauke, Nez Perce Tribe
R. Jim, YIN
S. Dahl, Ecology
N. Hepner, Ecology
L. Arnold, FDH
A. Umek, FDH
B. Williamson, FDH
B. Erlandson, LMHC

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ATTACHMENT 5

2

EXTENSION OF DISPUTE RESOLUTION FOR HANFORD

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FEDERAL FACILITY AGREEMENT AND CONSENT ORDER,

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CHANGE CONTROL FOR M-41-97-01 , DATED 13, 1997



Tri-Party Agreement

August 13, 1997

EXTENSION TO DISPUTE RESOLUTION FOR HANFORD FEDERAL FACILITY AGREEMENT AND
CONSENT ORDER MILESTONE M-41-97-01

On July 16, 1997 the U.S. Department of Energy invoked the dispute resolution provisions of Tri-Party Agreement Article VIII concerning Tri-Party Agreement Change Request M-41-97-01. The U.S. Department of Energy is preparing a Recovery Plan for the Interim Stabilization of the remaining Hanford Single Shell Tanks. Additional time is needed to complete development of that plan and carry out discussions of the plan at the Project Manager level. The initial thirty (30) day period during which the Department of Energy and Ecology Project Managers seek resolution of the dispute is hereby extended through August 26, 1997.

Jackson E. Kinzer
Assistant Manager, Tank Waste
Remediation System
U.S. Department of Energy
Richland Operations Office

Michael A. Wilson
Manager, Nuclear Waste Program
State of Washington
Department of Ecology

cc: L. D. Arnold, FDH
S. L. Dahl, Ecology
B. G. Erlandson, LMHC
C. C. Haass, DOE
N. T. Hepner, Ecology
A. M. Umek, FDH
J. K. Yerxa, DOE
D. Powaukee, Nez Perce
R. Jim, YIN
B. Burke, CTUIR
Administrative Record

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ATTACHMENT 6

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LETTER, AUGUST 26 1997: DOE TO ECOLOGY

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ELEVATION OF DISPUTE RESOLUTION FOR HANFORD

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FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

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CHANGE CONTROL FORM M-41-97-01



Department of Energy
 Richland Operations Office
 P.O. Box 550
 Richland, Washington 99352

AUG 26 1997

97-MSD-271

Mr. Mike Wilson, Program Manager
 Nuclear Waste Program
 State of Washington
 Department of Ecology
 P.O. box 47600
 Olympia, Washington 98504

Dear Mr. Wilson:

ELEVATION OF DISPUTE RESOLUTION FOR HANFORD FEDERAL FACILITY AGREEMENT AND
 CONSENT ORDER (TRI-PARTY AGREEMENT) CHANGE CONTROL FORM M-41-97-01

- References:
1. Letter from G. H. Sanders, RL, to M. Wilson, Ecology, "Hanford Federal Facility Agreement and Consent Order Change Control Form M-41-97-01, Interim Milestone M-41-22, 'Start Interim Stabilization of 6 Single Shell Tanks'," dated June 27, 1997.
 2. Letter from G. H. Sanders, RL, to M. Wilson, Ecology, "Invocation of Dispute Resolution for Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Change Control Form M-41-97-01, Interim Milestone M-41-22, 'Start Interim Stabilization of 6 Single Shell Tanks'," dated July 16, 1997.
 3. Letter from G. H. Sanders, RL, to M. Wilson, Ecology, "Extension to Dispute Resolution for Hanford Federal Facility Agreement and Consent Order Milestone M-41-97-01," dated August 14, 1997.

On June 27, 1997, the U.S. Department of Energy, Richland Operations Office (RL) submitted Change Request M-41-97-01, requesting a change in the due date for Interim Milestone M-41-22, "Start Interim Stabilization of 6 Single Shell Tanks," from September 30, 1997, to March 31, 1998 (Reference 1). The basis for this change request was the continuing need to resolve flammable gas issues before making a final determination on the safe operation of interim stabilization activities for the tanks. Since approval was not received by July 11, 1997 the change request was, therefore, denied by the State of Washington Department of Ecology (Ecology). On July 16, 1997, RL invoked the Dispute Resolution provisions of the Tri-Party Agreement (Reference 2).

Since the Dispute Resolution provisions were invoked, RL and Ecology Project Managers have met to discuss the change request, but have been unable to reach agreement during the 30 day period provided for discussion at that level. An extension of the dispute at the Project Manager level through August 26, 1997, was requested and approved by Ecology on August 14, 1997 (Reference 3).

Mr. Mike Wilson
97-MSD-271

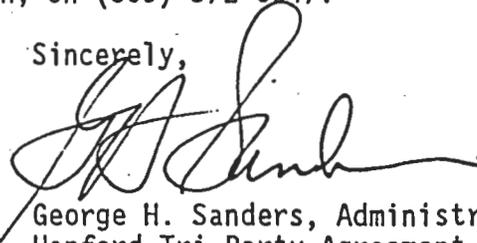
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AUG 26 1997

Due to Ecology's rejection of the M-41-97-01 Change Request and a verbal indication by Ecology on August 19, 1997, it is apparent that further extensions of this dispute at the Project Manager level will not be approved by Ecology. By this letter of objection, RL exercises its right under Tri-Party Agreement Article VIII, Section 30 A, to elevate this matter to the Interagency Management Integration Team (IAMIT) for further consideration.

We look forward to initiating IAMIT discussions concerning the resolution of the Tri-Party Agreement Change Request M-41-97-01 dispute. If you have any questions, please contact me on (509) 376-6888 or James K. McClusky, Director of the Waste Storage Division, on (509) 372-0947.

Sincerely,



George H. Sanders, Administrator
Hanford Tri-Party Agreement

cc: J. Wilkenson, CTUIR
D. Powaukee, Nez Perce Tribe
R. Jim, YIN
S. L. Dahl, Ecology
N. T. Hepner, Ecology
M. A. Selby, Ecology
D. R. Sherwood, EPA
L. D. Arnold, FDH
A. M. Umek, FDH
B. D. Williamson, FDH
B. G. Erlandson, LMHC

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ATTACHMENT 7

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EXTENSION OF DISPUTE RESOLUTION FOR HANFORD

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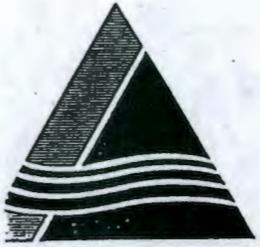
FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

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CHANGE CONTROL FORM M-41-97-01,

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DATED SEPTEMBER 23, 1997



i-Party Agreement

September 23, 1997

**EXTENSION TO DISPUTE RESOLUTION FOR HANFORD FEDERAL FACILITY AGREEMENT AND
CONSENT ORDER CHANGE REQUEST M-41-97-01**

On July 16, 1997 the U.S. Department of Energy invoked the dispute resolution provisions of Tri-Party Agreement Article VIII concerning Tri-Party Agreement Change Request M-41-97-01. The initial period during which the Department of Energy and Ecology Project Managers seek resolution of the dispute was extended through August 26, 1997. On August 26, 1997 the dispute was elevated to the Inter Agency Management Integration Team (IAMIT) for resolution, and the period during which the IAMIT seeks resolution of the dispute was extended through September 23, 1997.

Discussions between the Department of Energy and Ecology have indicated that the scope of the discussions on Change Request M-41-97-01 should be expanded to address impacts to the Major Milestone M-41-00, Complete Single Shell Tank Interim Stabilization. The time period for resolution of the dispute on Change Request M-41-97-01 is hereby extended through October 28, 1997 to allow time for further discussions between the Department of Energy and Ecology.

Jackson E. Kinzer
Assistant Manager, Tank Waste
Remediation System
U.S. Department of Energy
Richland Operations Office

Michael A. Wilson
Manager, Nuclear Waste Program
State of Washington
Department of Ecology

cc: L. D. Arnold, FDH
M. L. Blazek, OOE
S. L. Dahl, Ecology
B. G. Erlandson, LMHC
C. C. Haass, DOE
N. T. Hepner, Ecology
D. R. Sherwood, EPA
A. M. Umek, FDH
J. K. Yerxa, DOE

D. Powaukee, Nez Perce
R. Jim, YIN
B. Burke, CTUIR
Administrative Record

ATTACHMENT 8

**EXTENSION OF DISPUTE RESOLUTION FOR HANFORD
FEDERAL FACILITY AGREEMENT AND CONSENT ORDER
CHANGE CONTROL FORM M-41-97-01,
DATED OCTOBER 28, 1997**



Tri-Party Agreement

October 28, 1997

EXTENSION TO DISPUTE RESOLUTION FOR HANFORD FEDERAL FACILITY AGREEMENT AND
CONSENT ORDER CHANGE REQUEST M-41-97-01

On July 16, 1997 the U.S. Department of Energy invoked the dispute resolution provisions of Tri-Party Agreement Article VIII concerning Tri-Party Agreement Change Request M-41-97-01. The initial period during which the Department of Energy and Ecology Project Managers seek resolution of the dispute was extended through August 26, 1997. On August 26, 1997 the dispute was elevated to the Inter Agency Management Integration Team (IAMIT) for resolution. The period during which the IAMIT seeks resolution of the dispute was extended through October 28, 1997.

Discussions between the Department of Energy and Ecology have indicated that the scope of the discussions on Change Request M-41-97-01 should be expanded to address impacts to the Major Milestone M-41-00, Complete Single Shell Tank Interim Stabilization. The time period for resolution of the dispute on Change Request M-41-97-01 is hereby extended through December 16, 1997 to allow time for further discussions between the Department of Energy and Ecology.

Jackson E. Kinzer
Assistant Manager, Tank Waste
Remediation System
U.S. Department of Energy
Richland Operations Office

Michael A. Wilson
Manager, Nuclear Waste Program
State of Washington
Department of Ecology

cc: L. D. Arnold, FDH
M. L. Blazek, OOE
S. L. Dahl, Ecology
B. G. Erlandson, LMHC
C. C. Haass, DOE
D. R. Sherwood, EPA
A. M. Umek, FDH
J. K. Yerxa, DOE

D. Powaukee, Nez Perce
R. Jim, YIN
B. Burke, CTUIR
Administrative Record

ATTACHMENT 9

**HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT
ORDER INTER AGENCY MANAGEMENT INTEGRATION TEAM
DECISION/DETERMINATION/ACTION ASSIGNMENT 007,
"M-41-22 DISPUTE", DATED SEPTEMBER 24, 1997**

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

INTER AGENCY MANAGEMENT INTEGRATION TEAM (IAMIT)

DECISION / DETERMINATION / ACTION ASSIGNMENT

Number: 007

This form is intended to document the decisions and determinations made by the IAMIT within their authorities under the terms and conditions of the Hanford Federal Facility Agreement and Consent Order. This form is also intended to provide notification, to the affected persons, of the IAMIT's decisions / determinations or actions assigned.

SUBJECT

(Note the change request number, disputed subject or milestone addressed)

M-41-22 DISPUTE (IAMIT LEVEL) 9/23/97

DECISION / DETERMINATION / ACTION ITEM (Note the assignee and due date)

The Draft M41-22 recovery schedule M41-22 Dispute indicates a potential 3-year delay to the major milestone M41-00. EPA and Ecology have requested that the Senior Field Office Manager RL (Mr. John Wagoner) prepare and send to Ecology and EPA senior management a letter referencing DOE proposed TPA Milestone M41-00 extension and enter into formal Tri-Party Agreement negotiations on the M41-00 milestone series and incorporate the M41-22 dispute resolution into said negotiations.

Subject M41-22 Dispute 9/23/97 has been extended 30-days to 10/28/97.

IS THIS DECISION / DETERMINATION / ACTION ITEM

FINAL INTERIM (Further action to be taken)

IAMIT Member Approvals

DOE

Jackson King _____
Date 9-23-97

EPA

Michael A. Hill _____
Date 9/23/97

Ecology

Date

1

ATTACHMENT 10

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LETTER, DATED OCTOBER 24, 1997: DOE TO ECOLOGY/EPA

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HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT

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ORDER MILESTONE M-41-00, "COMPLETE SINGLE SHELL TANK

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INTERIM STABILIZATION"



Department of Energy
 Richland Operations Office
 P.O. Box 550
 Richland, Washington 99352

OCT 24 1997

97-MSD-289

Mr. Chuck Clarke
 Regional Administrator
 U.S. Environmental Protection Agency
 Region 10
 1200 Sixth Avenue
 Seattle, Washington 98101

Mr. Tom Fitzsimmons, Director
 State of Washington
 Department of Ecology
 P.O. Box 47600
 Olympia, Washington 98504

Dear Messrs. Clark and Fitzsimmons:

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT)
 MILESTONE M-41-00, "COMPLETE SINGLE SHELL TANK INTERIM STABILIZATION"

- References:
1. RL letter from G. Sanders to M. Wilson, Ecology, "Hanford Federal Facility Agreement and Consent Order Change Control Form M-41-97-01, Interim Milestone M-41-22, 'Start Interim Stabilization of 6 Single Shell Tanks'," 97-EAP-530, dated June 27, 1997.
 2. RL letter from G. Sanders to M. Wilson, Ecology, "Invocation of Dispute Resolution for Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement) Change Control Form M-41-97-01, Interim Milestone M-41-22, 'Start Interim Stabilization of 6 Single Shell Tanks'," 97-MSD-258, dated July, 16, 1997.
 3. Extension to Dispute Resolution for Tri-Party Agreement Change Request M-41-97-01, dated September 23, 1997.

On June 27, 1997, the U.S. Department of Energy, Richland Operations Office (RL) transmitted Tri-Party Agreement Change Control Form M-41-97-01 to the State of Washington Department of Ecology (Ecology) (Reference 1). The change control form requested a six-month delay in the due date for Milestone M-41-22, "Start Interim Stabilization of 6 Single Shell Tanks."

The change request was subsequently disapproved by Ecology's failure to respond within fourteen (14) days of RL transmitting the change control form. On July 16, 1997, RL notified Ecology that it was invoking the dispute resolution provisions of the Tri-Party Agreement (Reference 2). The dispute has subsequently been elevated to the Inter Agency Management Integration Team (IAMIT) for resolution and has been extended at that level through October 28, 1997 (Reference 3).

OCT 24 1997

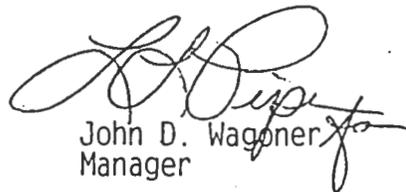
During this dispute resolution on Tri-Party Agreement Milestone M-41-22, RL has re-evaluated the status of completing Tri-Party Agreement Major Milestone M-41-00, "Complete Single Shell Tank Interim Stabilization" due September 2000." This evaluation indicated that the flammable gas issue associated with all 177 tanks and the Fiscal Year (FY) 1998 reduction in budget and scope for interim stabilization will cause a delay in the completion of the Tri-Party Agreement Major Milestone M-41-00. In addition, RL will be evaluating the process of how to reduce interim stabilization (saltwell pumping) costs. The present best cost estimate for saltwell pumping a tank is approximately \$2.5 million. However, substantial effort is being made to achieve a pumping process that will provide an interim stabilized flammable gas tank for less than \$1.0 million. The FY 1998 plan to achieve this cost reduction goal includes four major components:

- Perform cost efficiency studies on the saltwell pumping activities being performed in FY 1998. Specifically, the start of Tanks SX-104, BY-106, and AX-101 will be evaluated.
- Utilize field data as a major input into the re-engineering of the saltwell pumping process.
- Provide the contractor with a financial incentive to complete an effective re-engineering effort.
- Evaluate the presently defined safety envelope for saltwell pumping of flammable gas tanks and determine if older flammable gas data caused the envelope to be too conservative in response to the potential hazard.

With respect to the above information, RL proposes that the scope of the discussions on Change Control Form M-41-97-01 dispute be expanded to include the remainder of Tri-Party Agreement Major Milestone M-41-00. RL believes that a partnering effort similar to that of the Tri-Party Agreement Major Milestone M-44-00, Tank Characterization Program negotiations, would be appropriate in resolving the issues identified on this major milestone.

We look forward to working with you and your staff on this issue. If you have any questions regarding this letter, please contact Carolyn Haass, Management Systems Division, on (509) 372-2731 or George Sanders, Environmental Assurance, Permits, and Policy Division, on (509) 376-6888.

Sincerely,


John D. Wagoner
Manager

MSD:CCH

Messrs. Clarke and Fitzsimmons
97-MSD-289

-3-

OCT 24 1997

cc: J. R. Wilkinson, CTUIR
D. Powaukee, Nez Perce Tribe
R: Jim, YIN
S. L. Dahl, Ecology
M. A. Wilson, Ecology
R. Stanley, Ecology
D. R. Sherwood, EPA
L. D. Arnold, FDH
A. M. Umek, FDH
L. E. Hall, LMHC
M. Blazek, ODOE

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ATTACHMENT 11

**LETTER, DATED NOVEMBER 26, 1997: ECOLOGY TO DOE
“HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT
ORDER MILESTONE M-41-00, COMPLETE SINGLE-SHELL TANK
INTERIM STABILIZATION”**



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

P.O. Box 47600 • Olympia, Washington 98504-7600
(360) 407-6000 • TDD Only (Hearing Impaired) (360) 407-6006

November 26, 1997

Mr. John D. Wagoner, Manager
U. S. Department of Energy
Richland Operations Office
P. O. Box 550
Richland Washington 99352

Dear Mr. Wagoner:

HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) MILESTONE M-41-00, "COMPLETE SINGLE-SHELL TANK INTERIM STABILIZATION".

Please note that I have received your October 21, 1997 letter on the above subject (DOE# 97-MSD-289). Within your letter you propose "...that a partnering effort similar to that of the Tri-Party Agreement Major Milestone M-44-00, Tank Characterization Program negotiations, would be appropriate in resolving the issues identified on this major milestone." I do not believe that such negotiations are warranted. In addition, I note the increasingly apparent importance of removing these radioactive mixed wastes from Hanford's failing single shell tanks without delay. This importance is just now being underscored by Department of Energy (DOE) Resource Conservation and Recovery Act (RCRA) groundwater assessment reporting, which has confirmed that these extremely hazardous mixed wastes have begun to impact area groundwaters.

As you know, near term single-shell tank interim stabilization schedules under Tri-Party Agreement milestone M-41-22 (and associated outyear impacts) are currently the subject of dispute resolution proceedings between our respective staffs under Tri Party Agreement Article VIII. It would be inappropriate to simply abandon this agreed-to process, and begin renegotiating the entire major milestone series. In addition, I do not agree that this (interim stabilization) dispute is analogous to recently completed tank characterization program modifications. In that instance there was widespread recognition by the agencies and stakeholders that an entirely new (needs oriented) approach to waste characterization was warranted. This is not the case with interim stabilization.

John D. Wagoner
November 26, 1997
Page 2.

Consequently, adhering to our agreed-to Tri Party Agreement dispute resolution process provides the best means to achieving timely compliance with hazardous waste law and the Tri Party Agreement, and the removal of single shell tank liquid wastes in a safe and timely manner.

Respectfully,



for
Tom Fitzsimmons
Director

cc: Tanya Barnett, Office of the Attorney General
Mary Lou Blazek, ODOE
Chuck Clarke, EPA Region 10
L. M. Hall, LMHC
Russell Jim, YTN
Jackson Kinzer, DOE-RL
Donna Powaukee, Nez Perce Tribe
Marilyn Reeves, Hanford Advisory Board
George Sanders, DOE-RL
J. R. Wilkinson, CTU/R
Administrative Record

k:interim.doc

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ATTACHMENT 12

2

CHANGE CONTROL FORM M-41-97-01, REVISION 1

Change Number M-41-97-01 Rev. 1	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date December 12, 1997
Originator M. J. Royack/M. A. McLaughlin		Phone (509)376-4420/376-4084
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager		
Change Title Revise Milestone M-41-22, "Start Interim Stabilization of 6 Single Shell Tanks."		
Description/Justification of Change Milestone M-41-22 currently is stated as follows: M-41-22 Start Interim Stabilization of 6 Single Shell Tanks. 9/30/1997 Milestone M-41-22 is changed to the following: M-41-22 Start Interim Stabilization of 3 Single Shell Tanks. 3/31/1998 Flammable gas issues for the Hanford Tank Farms have continued to impact the schedules for interim stabilization of the single shell underground tanks. A Tri-Party Agreement (TPA) Change Control Form (M-41-96-02) was approved by Ecology on September 23, 1996, which reflected a Recovery Plan for the M-41-00 Interim Stabilization Milestone. The Interim Milestones agreed to by approval of the M-41-96-02 Change Control Form, including M-41-22, were based on the assumption that approval of a safety basis for operation of the tanks would be granted by September 30, 1996. (cont.)		
Impact of Change This change involves only Milestone M-41-22. DOE has reason to believe that there will be further impacts to the remaining M-41 milestones (M-41-23 through M-41-27 and the Major Milestone M-41-00), but these impacts have not yet been established.		
Affected Documents Hanford Federal Facility Agreement and Consent Order, Rev. 4, Fifth and Sixth Amendments, Table D, Work Schedules.		
Approvals DOE _____ Date _____ ___ Approved ___ Disapproved EPA _____ Date _____ ___ Approved ___ Disapproved Ecology _____ Date _____ ___ Approved ___ Disapproved		

Description/Justification (cont.)

The Safety Assessment for pumping operations in tank 241-A-101, which was expected to be the bounding case for the flammable gas tanks, was approved on October 31, 1996. The approval, however, was subject to several contingencies, including resolution of the approval level for many of the specified process controls. Review and approval of the recommended set of controls for tank 241-A-101 was completed on May 16, 1997. Analysis was underway to assure that other tanks were bounded by A-101. However, to minimize the cost and controls, the A-101 bounding work was suspended, with current efforts underway to incorporate the safety basis for saltwell pumping into the Basis for Interim Operation/Justification for Continued Operation (BIO/JCO). This will allow the contractor to move forward with the work for pumping of the tanks which are needed to meet Milestone M-41-22. Because of the delays necessary to satisfy contingencies in the saltwell pumping authorization basis, the schedule for completing M-41-22 continued to slip. Change Control Form M-41-97-01 was submitted to Ecology on June 27, 1997, requesting a six month delay in the Milestone due date. Change Control Form M-41-97-01 was not approved by Ecology and is currently in dispute.

Subsequent to the submittal of Change Control Form M-41-97-01, safety assessments carried out for the remaining tanks to be interim stabilized indicate that additional safety controls and equipment will be required to proceed with interim stabilization activities. The extensive analyses and the resulting mitigation measures have significantly extended the schedule to meet M-41-22 even further than anticipated when Change Control Form M-41-97-01 was originally submitted.

DOE has proposed a one year reengineering moratorium on initiation of pumping for additional tanks. Pumping of the tanks that were started earlier will continue in FY 1998, but pumping of only two additional tanks is planned in Fiscal Year (FY) 1998. Reengineering during FY 1998 will address reduction of saltwell pumping costs, enhancement of emergency pumping capabilities, and development of the most cost effective means of pumping tank 241-BY-105, which has a layer of cement commingled with the pumpable liquid in the tank.

This change adjusts Milestone M-41-22 to account for both the earlier delays in the milestone schedule due to flammable gas safety considerations and the fiscal constraints imposed by operating under controls necessary to address flammable gas safety considerations during FY 1998. Milestone M-41-22 was partially fulfilled in FY 1997. Pumping was started for tank 241-SX-104. Evaluation of a second tank, 241-BY-103, for stabilization was initiated when the pump failed upon attempted startup. The tank met the criteria for interim stabilization and was subsequently declared interim stabilized. Pumping of two additional tanks is planned in FY 1998. One of the tanks, however, is affected by pending amendments to the authorization basis.

Future M-41 interim milestones and target dates, including the major milestone, may also require adjustment and will be addressed in separate change requests.

STATEMENT OF DISPUTE

Washington State Department of Ecology
U.S. Environmental Protection Agency

December 16, 1997

The following Ecology/EPA statement has been prepared for consideration by the parties Inter-Agency Management Integration Team (IAMIT) pursuant to the provisions of the Hanford Federal Facility Agreement and Consent Order (Agreement) Article VIII.

SUBJECT: Extension request for M-41-22 (Start interim stabilization of 6 single-shell tanks, September 30, 1997).

INTRODUCTION

The single-shell tanks (SSTs) at Hanford are constructed of a steel liner inside a concrete structure, which provides only one barrier between the waste and the environment, in violation of the Resource Conservation and Recovery Act and the state Hazardous Waste Management Act. To date at Hanford at least 69 SSTs have leaked. The Interim Stabilization (IS) program under the Agreement is designed to remove easily pumped liquid waste from the tanks in order to prevent or mitigate tank leaks. To date about 119 SSTs have been interim stabilized.

The Department of Energy- Richland Operations Office (DOE) began interim stabilization of SSTs in the late 70's, and continued through the 80's. The original Agreement scheduled the 51 tanks that remained to be interim stabilized, (all tanks but two, C-105 and C-106, were to be completed by September 1995). The following is a brief summary of those Agreement changes that had the largest impact on schedules for the IS program. Not all changes are listed.

The first approved change package on the milestone occurred in September 1990, and revised the number of tanks scheduled for interim stabilization under M-05-02 (Interim stabilize an additional 5 SSTs by September, 1990). This change was made due to safety concerns on the tanks, notably flammable gas and ferrocyanide. The second approved change occurred in May 1991, when all the interim milestones were revised to delay work on most of the tanks, allowing time for safety reviews for flammable gas, ferrocyanide, and organic salts concerns.

In August 1993, the fifth approved change request delayed M-05-05 (Interim stabilize an additional 11 SSTs by September, 1993), and the IS program until the completion of TPA negotiations. The DOE had not been making progress towards meeting M-05-05, and was considering abandoning the IS program due to extensive safety and operational problems. During the 1993 negotiations DOE agreed to continue the IS program. The sixth approved change extended the major milestone date to September 2000. Interim

and major milestone schedules were revised to allow time for resolution of safety issues, including flammable gas, organic, and ferrocyanide. These milestones identified specific actions that DOE would take to resolve the safety issues for the IS program. Interim milestone M-41-07 required DOE to submit a report to Ecology and EPA that explained the results of safety studies on interim stabilization of watchlist¹ tanks. That report, submitted December 30, 1994, concluded that ferrocyanide tanks could be interim stabilized, that flammable gas tanks could be interim stabilized pending approval of safety documentation by the Assistant Secretary for Environmental Restoration and Waste Management (expected in 1995). Organic tanks were undergoing further study, with resolution strategies to be developed by early 1995.

The eighth approved change occurred on February 16, 1995. It revised the sequence of tank pumping to avoid tanks in the U farm which were still undergoing safety reviews, and to allow time for those reviews to be completed. It cited delays in completing safety analyses (flammable gas and organic) that would allow interim stabilization to move forward.

The twelfth approved change package occurred on September 4, 1996. This change completely revised all remaining interim and target milestones for the IS program. The justification of change stated: "The need to institute flammable gas controls on a number of single shell tanks before they can be pumped has led to a revision of the schedule for interim stabilizing the single shell tanks which have not yet been completed". DOE's justification cites the October 1995, Unreviewed Safety Question for flammable gas in the tank farms as the driver for these controls. Later in the text the justification concludes: "The schedule addresses the safety analysis requirements for the tanks, as well as the additional preparation time needed for the equipment and administrative controls due to the flammable gas concerns".

The latest approved change to the IS program, number thirteen, occurred on February 27, 1997, when the DOE requested a two month delay to interim milestone M-41-21. They cited continued difficulties in resolving flammable gas control requirements during interim stabilization. Notably, the change package copies language directly from the September 4, 1996, change package as justification for the change.

On June 27, 1997, the DOE notified Ecology of expected delays in meeting milestone M-41-22 (the subject of this dispute), and requested a six-month extension to the milestone (Change Request M-41-97-01). They cited the lack of definition of acceptable controls for flammable gas mitigation during interim stabilization. Ecology verbally denied this request at the TWRS TPA Project Manager's meeting on July 10, 1997. The DOE

¹ Watchlist tanks are those tanks that require special safety precautions because they may have a serious potential for release of high-level radioactive waste due to uncontrolled increases in temperature or pressure. Special restrictions have been placed on these tanks by "Safety Measures for Waste Tanks at Hanford Nuclear Reservation," Section 3137 of the National Defense Authorization Act for Fiscal Year 1991, November 5, 1990, Public Law 101-510, (also known as the Wyden Amendment).

invoked dispute resolution in a letter from George Sanders, DOE, to Mike Wilson, Ecology, dated July 16, 1997. In August 1997 the DOE submitted a Draft Recovery Plan for Interim Stabilization which identified potential delays to the program ranging from six months to three years. Since then DOE has also cited impacts to the stabilization program from budget cuts at the Hanford site. Required safety controls for interim stabilization have also been defined (although there appears to be some debate within DOE programs as to the need for these controls). During the summer of 1997 DOE's prediction for delays to the major milestone only reflected the requested six-month delay to M-41-22. New predictions anticipate a three-year delay to the major milestone. This three-year delay is evidently based on the increased cost of performing interim stabilization on tanks under the most recent safety requirements, and projections of DOE's budget for the IS program.

ISSUE: SHOULD THE DOE BE GRANTED AN EXTENSION TO THE M-41-22 MILESTONE IN ACCORDANCE WITH AGREEMENT ARTICLE XL.

PERCEIVED DOE POSITION:

The DOE has stated in the original change request that: "The reason for this extension is due to continuing issues in resolving the flammable gas concerns for the Hanford tanks". They have asked for a six-month extension on the M-41-22 milestone. The change would move the date for starting interim stabilization of six SSTs from September 30, 1997 to March 31, 1998. The justification for change goes on to state that: "However, because of the delays necessary to satisfy contingencies in the saltwell pumping authorization basis, the schedule for completing M-41-22 has slipped by six months".

ECOLOGY/EPA POSITION:

Ecology denied DOE's June 1997, request for extension on the grounds that it did not demonstrate good cause under the TPA. The reason cited for the requested delay was continued lack of definition of controls needed to mitigate concerns raised by the flammable gas issue. Ecology firmly believes in managing the waste at Hanford in a manner both conducive to worker safety and protective of the environment. Ecology has demonstrated patience and allowed ample time for DOE to resolve the safety issues during interim stabilization. This is demonstrated by the long history of acceptable change packages, delaying the project over the last 7 years. However, at this point Ecology is gravely concerned the Interim Stabilization Program is not being adequately managed. The recovery package submitted by the DOE in September 1996, was specifically designed to consider necessary safety controls on the tanks during interim stabilization, and to provide schedules that reflected these requirements. Less than one year later the DOE is claiming that they have not yet defined the required controls, and that they are unable to maintain the September 1996, schedule. Ecology has determined DOE has failed to manage the Interim Stabilization program to bring about resolution of the outstanding safety issues and has not placed sufficient emphasis on the public health and environmental impacts from leaking tank waste. This concern is increased by DOE's acknowledgement that tank wastes are already in the groundwater. Ecology is denying DOE's request for yet another delay to the IS program. DOE has not placed sufficient

emphasis upon resolving safety issues associated with the program, and the result has been further releases to the environment.

Further delays to the Interim Stabilization program are not acceptable. The primary concern with tank wastes is that they are escaping containment and entering the environment. The question with the single-shell tanks is not if they will leak, but when. Based on past failure rates at the site and the age of the Single-shell Tanks, new tank leaks will occur at any time. In fact, Ecology was recently notified that an additional 5,000-11,000 gallons is suspected to have leaked from tank SX-104 which was to have been interim stabilized years ago and which was most recently part of M-41-22. At the writing of this paper it is assumed that this tank continues to leak. The Interim Stabilization program is tasked with preventing, and minimizing the impact from leaks. Latest studies by the DOE show that the migration rate for tank leaks is much faster than previously estimated, and that leaks have now reached groundwater. Continual delays in Interim Stabilization increase the risk of environmental impact and health risks to the public, and of significant new leaks occurring in the tank farms. In fact, four of DOE's tanks have yet to be interim stabilized, even though they have leaked in the past. This situation of allowing tanks to leak while seeking further delays in interim stabilization is unacceptable.

The DOE has not shown an ability to create and maintain a schedule for the IS program. The many delays to the program, including the current delays in the baseline raise serious questions about DOE's ability to meet any proposed schedule. There is little reason for Ecology to believe that the new proposals will be met. In fact, the DOE has suggested in the path forward they present, that they may be able to change the safety requirements for IS over the next year. While these changes are intended to shorten the schedule, it indicates the flux within which the program continues to operate.

The decision by DOE to not provide adequate funding for the IS program does not reflect a good faith effort to meet the TPA requirements. During discussion on the creation of the Integrated Priority List² for the Hanford site, it was noted that IS was at risk of failing to meet milestones. Ecology made it clear during these discussions that lack of funding is not acceptable for the IS program, and that if DOE chose not to adequately fund the work they did so under risk of enforcement by Ecology.

The ongoing evolution of safety controls for TWRS activities has led several programs into the mire of poorly defined program requirements. For the past several years the DOE has assured various groups, including Ecology and the DNFSB, that appropriate controls were being implemented at the tank farms to address safety concerns. The reason that the DOE had to submit a revised schedule proposal for the IS program in

² The Integrated Priority List or IPL, contains a ranking of DOE Hanford Site activities. Each activity contains specific work scope. The IPL is used as a tool in developing the budget for the site. The cost of each item is added to the total, and used during discussion of which activities are within budget projections for the coming fiscal year.

M-41-22 Dispute IAMIT Position Paper

September 1996 was to meet newly imposed safety requirements. This process of constant imposition of new controls, schedule revisions, and then revised controls is wreaking havoc on TWRS programs, including IS. Ecology hopes that the newly adopted Basis for Interim Operations (BIO) will provide clear, consistent, and stable safety requirements for projects within the TWRS. However we have been advised by the IS program that they believe the controls required by the BIO for IS may be overly conservative, and subsequently drive up the costs for the program. They propose to investigate potential reductions in the scope and cost of safety controls during Fiscal Year '98. Until this work is completed and its conclusions assessed by the parties, the parties will not be able to assess impacts to milestones, other than M-41-22, which may or may not be justified.

BASED ON THE ABOVE ECOLOGY BELIEVES THE FOLLOWING COURSE OF ACTION IS APPROPRIATE:

Milestone M-41-22 will be credited as missed. Good cause for DOE's requested extension does not exist due to the management history of this project, and in that the schedule submitted in September 1996 was designed to address the very issues now raised by the IS program.

The major milestone (M-41-00), while clearly jeopardized by the current Fiscal Year '98 budget, DOE's current budget projections, and current safety requirements, **is not ripe for discussion at this time.** As always, we expect DOE to pursue cost efficiency for the IS program during FY '98, as well as continue to work towards initiating interim stabilization of the 17 tanks required by interim milestones M-41-23 (8 tanks by March 31, 1998) and M-41-24 (9 tanks by September 30, 1998). When DOE believes they have completed review of any streamlining options on safety controls, and identified budget requirements for the balance of the IS program, Ecology will be prepared to discuss the potential impact to the major milestone (M-41-00). The DOE must provide adequate funding for this activity in FY 98 and the coming years. Lack of necessary budget for this activity is not grounds for delay to TPA-required work.



Tri-Party Agreement

December 16, 1997

**EXTENSION TO DISPUTE RESOLUTION FOR HANFORD FEDERAL FACILITY AGREEMENT AND
CONSENT ORDER CHANGE REQUEST M-41-97-01**

On July 16, 1997 the U.S. Department of Energy invoked the dispute resolution provisions of Tri-Party Agreement Article VIII concerning Tri-Party Agreement Change Request M-41-97-01. On August 26, 1997 the dispute was elevated to the Inter Agency Management Integration Team (IAMIT) for resolution. The period during which the IAMIT seeks resolution of the dispute was extended through December 16, 1997.

Discussions between the Department of Energy and Ecology have not yet reached a mutually acceptable resolution of the issues. The time period for resolution of the dispute on Change Request M-41-97-01 is hereby extended through January 27, 1998 to allow time for further discussions between the Department of Energy and Ecology.

Jackson E. Kinzer
Assistant Manager, Tank Waste
Remediation System
U.S. Department of Energy
Richland Operations Office

Michael A. Wilson
Manager, Nuclear Waste Program
State of Washington
Department of Ecology

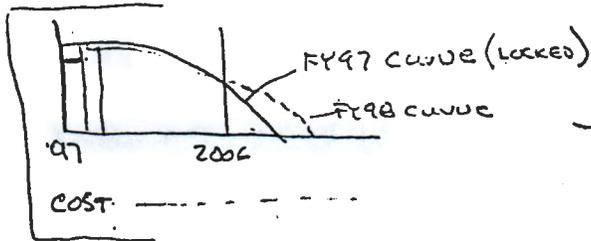
cc: L. D. Arnold, FDH
M. L. Blazek, OOE
S. L. Dahl, Ecology
B. G. Erlandson, LMHC
C. C. Haass, DOE
D. R. Sherwood, EPA
A. M. Umek, FDH
J. K. Yerxa, DOE

D. Powaukee, Nez Perce
R. Jim, YIN
B. Burke, CTUIR
Administrative Record

HANDI PROJECT MGT SCREENS

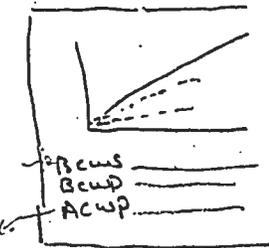
PBS (NATIONAL) - NOV/DEC

→ PBS (LOCAL)/MYWP - BASELINE AFTER DEC 18, 1997



- LIFE CYCLE CURVE
- WITH TABLE

POSSIBLE
←
SCHED
IRCA
CURVE



- EXECUTION YEAR
- PLANNED
- ACTUALS
- BCWP

- TECH REQ
- SCHEDULE - RL & ↑ MILESTONES
- COST TABLES
- PMs
- PAs

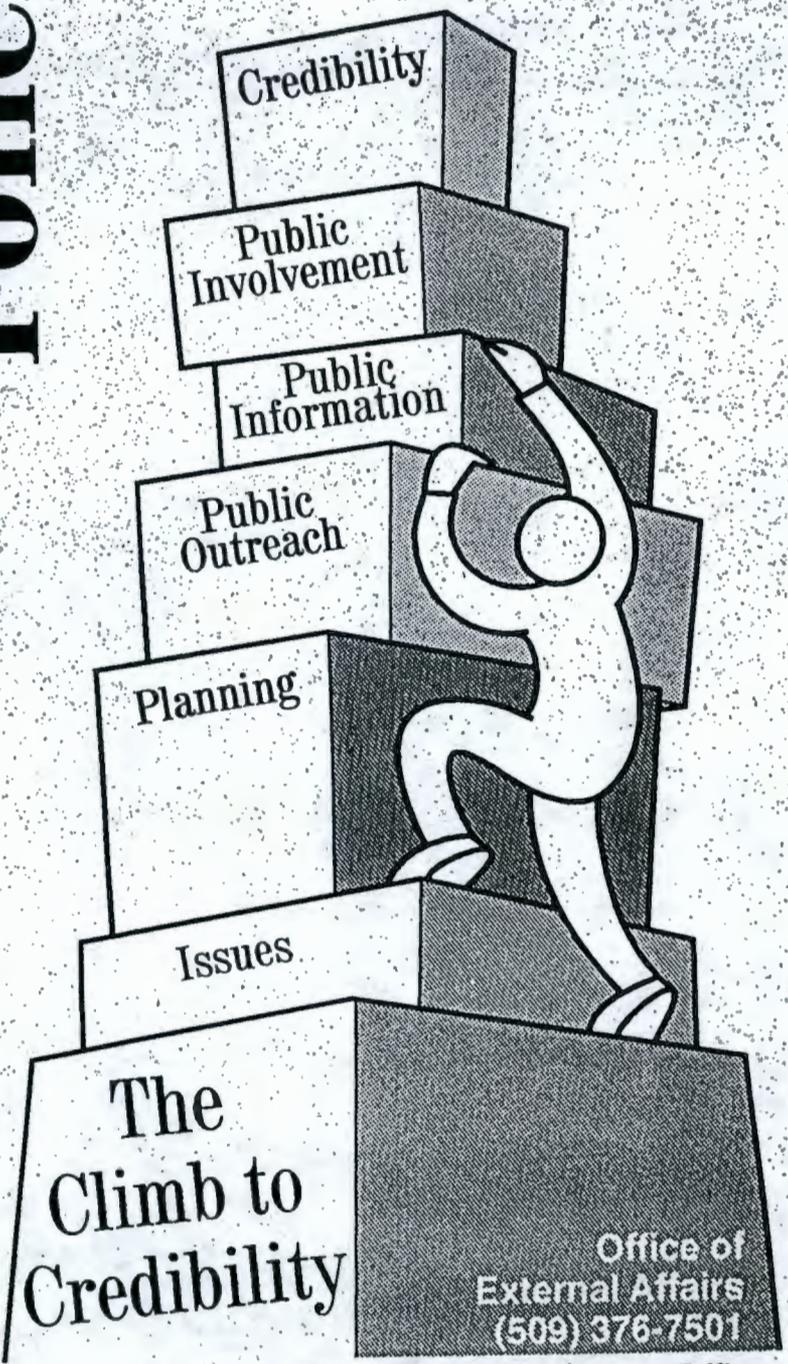
EXTRACT DATA FROM PBS (L) IF AVAILABLE

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- RAM

DATA REQUIRED THAT IS NOT IN PBS(N)

SETS
MYWP

Public Involvement Policy



A Message From The Hanford Site Manager



Public participation in government affairs is one of our nation's most treasured and vital civic processes. At the U.S. Department of Energy's (DOE) Hanford site, the resurgence of public involvement in the 1990s is the product of two forces: citizens' insistence on a role in Hanford cleanup and future mission decision-making, and DOE's willingness to open policy decision processes to public scrutiny and debate. The public is also interested in being

John D. Wagoner

involved in emerging technology development/transfer and economic transition activities.

By involving the stakeholders and Tribal governments in pre-decisional analysis, the U.S. Department of Energy Richland Operations Office (DOE-RL) and the regulators give up none of their decision-making authority and their accountability for those decisions. At Hanford, we've proven, again and again, that key cleanup decisions made openly, with full participation, produce better and more durable public policy.

This Public Involvement Policy guide has been produced by DOE-RL's Office of External Affairs (OEA). It is intended to help DOE-RL program managers understand our public and Tribal involvement obligations and the processes by which we will meet them.

Make no mistake. Open involvement in key decisions is not a passing fad. It is here to stay. At Hanford, we fully intend to make it a constant and priority element of the way we do business.

A handwritten signature in cursive script that reads "John D. Wagoner".

Stakeholder Vision For Hanford Cleanup

The following statements have been adapted from written comments and information about public involvement as provided by stakeholders (i.e. public comments, public meetings, Oregon report cards and Tri-Party Agreement meetings).

A Clean, Accessible and Healthy Environment that

- Protects the health and safety of the affected communities and the workers at the Site.
- Protects the Columbia River and the environment.
- Prepares the site for future productive uses and contributes to the economic transition away from the dominance of DOE-funded activities to those that are more privately sponsored.
- Fosters economic prosperity through scientific research and innovation in the development and testing of waste management approaches and cleanup technologies that can have benefits locally and worldwide.
- Respects the treaty rights of the affected American Indian Tribes.
- Assumes moving resolutely forward through use of existing technology and resources where solutions exist, and through focused research and development of solutions where they do not; and
- Acknowledges that cleanup work at Hanford will take longer than ten years.

Public Involvement Policy

Introduction

This policy is intended to ensure that public participation is an integral and effective part of DOE-RL activities and that decisions are made with the benefit and consideration of important public perspectives. This policy provides a mechanism for bringing a broad range of diverse viewpoints and values early into DOE-RL's decision-making processes. This early involvement enables DOE-RL to make more informed decisions, improve quality through collaborative efforts, build mutual understanding and trust between DOE-RL and the public it serves.

Public participation is open, ongoing, two-way communication, both formal and informal, between DOE-RL and its stakeholders, the regulators and Tribal governments¹. **Public information** is a means to keep the public informed of progress or to status ongoing activities and/or issues. For purposes of this reference, public participation and public information should follow similar processes and are labeled generically as **Public Involvement**.

Certain levels of public participation are required by various laws and regulations governing Hanford cleanup and the Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement).

¹See Tribal Government Consultation section.

This strategy is designed to increase effectiveness and meaningful opportunities for public involvement across many DOE-RL missions, activities and decisions. Many minds working together can often come up with better solutions for problems. In addition, if people can participate in decisions that affect them, they are more likely to support those decisions. Public involvement is not a vote or a popularity contest. Public involvement is a process to give officials the best information to make informed decisions while ensuring all concerned people an opportunity to be heard.

Public involvement is the responsibility of all DOE-RL managers and employees.

Tribal Government Consultation

Public involvement in this context is used as a generic term for various stakeholders and regulators, as well as Tribal Governments who are involved in our decision processes. However, Tribal Governments have a unique legal relationship with the United States government as set forth in the Constitution of the United States, treaties, statutes, and court decisions. The United States has committed to a government-to-government relationship with Indian tribes. Rather than seeking tribal participation through public forums, DOE-RL consults directly with Tribal Governments prior to taking the actions that may affect their rights and interests, as outlined in the DOE American Indian Policy. The goals, core values and principles of this public involvement policy, apply equally to stakeholders and affected Tribes alike.

Goals

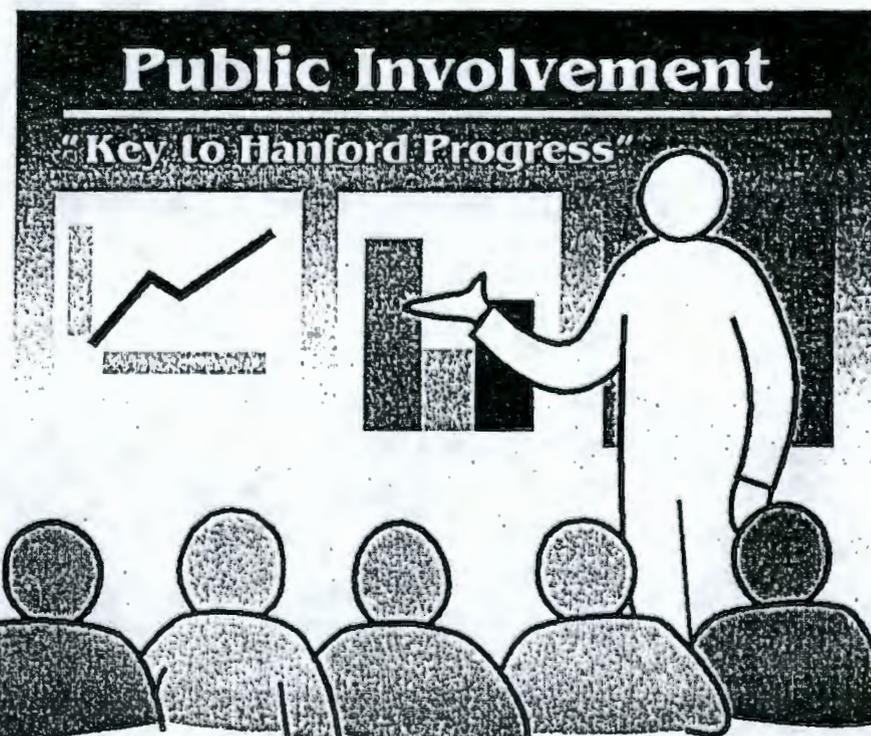
- To actively seek and consider public input; to incorporate or otherwise respond to the views of regulators, Tribes, stakeholders and general public in making decisions.
- To inform the public in a timely manner and provide the opportunity to have input in the decision-making processes, which are open and understandable.
- To clearly define access points for public input from the earliest stages of a decision process and provide adequate time for regulators, Tribes, stakeholders and general public to participate.
- To consistently incorporate credible, effective public participation processes into program operations, planning activities, and decision-making processes. Every employee shares responsibility to promote, practice, and improve public involvement.
- To keep the public informed of key decisions made, progress of ongoing activities, emerging technologies and opportunities for economic diversity.

Every employee shares responsibility to promote, practice, and improve public involvement.



Core Values

- **Accessibility:** DOE-RL managers will be available, approachable, and open.
- **Accountability:** DOE-RL managers will be responsible to the public for involvement in decisions and willing to provide explanations for the rationales behind decisions.
- **Accuracy:** DOE-RL managers and staff will be committed to the truth.
- **Communication:** DOE-RL managers and staff will actively seek open, two-way exchange of information, knowledge, and perspectives between DOE-RL and its stakeholders.



Scope

This policy is designed to provide a general framework for all DOE-RL offices and programs. Its specific intent is development and implementation of an effective public participation program at Hanford. This policy is not intended to affect legal requirements imposed by law, regulation, or contractual agreement; nor does it modify any legal rights available to the public under current law nor change how inherent government functions are performed.

Principles

DOE-RL recognizes that honesty and forthrightness in dealing with stakeholders, and consistent, credible, and quality performance are the bases upon which to build public understanding and trust.

Implementing Actions:

- DOE-RL officials are open, honest, and accurate in their public statements and accountable for diligent follow-up and timely results from the commitments they make.
- DOE-RL officials engage in an open and on-going communication process and listen, consider, and respond to suggestions made by the public. DOE-RL incorporates public input into its decisions where appropriate and feasible and provides feedback to the public on its reasoning.
- DOE-RL recognizes and rewards leadership and results in the area of public participation.

DOE-RL program development, planning, and decision-making processes are clearly defined, with regular, easily identified access points for public input.

Implementing Actions:

- Senior managers ensure that input from DOE-RL personnel, other Federal, State, and local officials, Tribes, and stakeholders is integrated into planning activities and decision-making processes as appropriate.

DOE-RL managers and contractors operate as an integrated team in planning local and regional public participation programs by combining resources, sharing information, and coordinating activities.

Implementing Actions:

- DOE-RL managers work with Headquarters' (DOE-HQ) counterparts and the OEA to ensure appropriate DOE-HQ and field coordination.
- DOE-RL managers and OEA staff, as those closest to affected communities and stakeholders will facilitate interactions between DOE and regional interests.
- Contractors support DOE-RL managers and OEA staff to implement this policy. Activities are coordinated between contractors to minimize costs and provide the most effective public participation program.
- All DOE-RL project and/or contractor public involvement activities should be discussed with

OEA prior to implementation to assure DOE-RL policy guidelines are followed.

DOE-RL managers and OEA staff are trained to conduct education and/or information programs to meet public participation needs, both internally and externally.

Implementing Actions:

- OEA and managers work together to determine the timing and content of staff training needs.

DOE-RL engages in candid information exchanges and ongoing two-way communication.

Implementing Actions:

- Whether formal or informal, all public involvement activities are conducted in a spirit of openness, respect for different perspectives, and a genuine quest for a diversity of information and ideas.
- DOE-RL provides reliable, timely information to the public through a variety of appropriate mechanisms.

Public Involvement Desk Reference

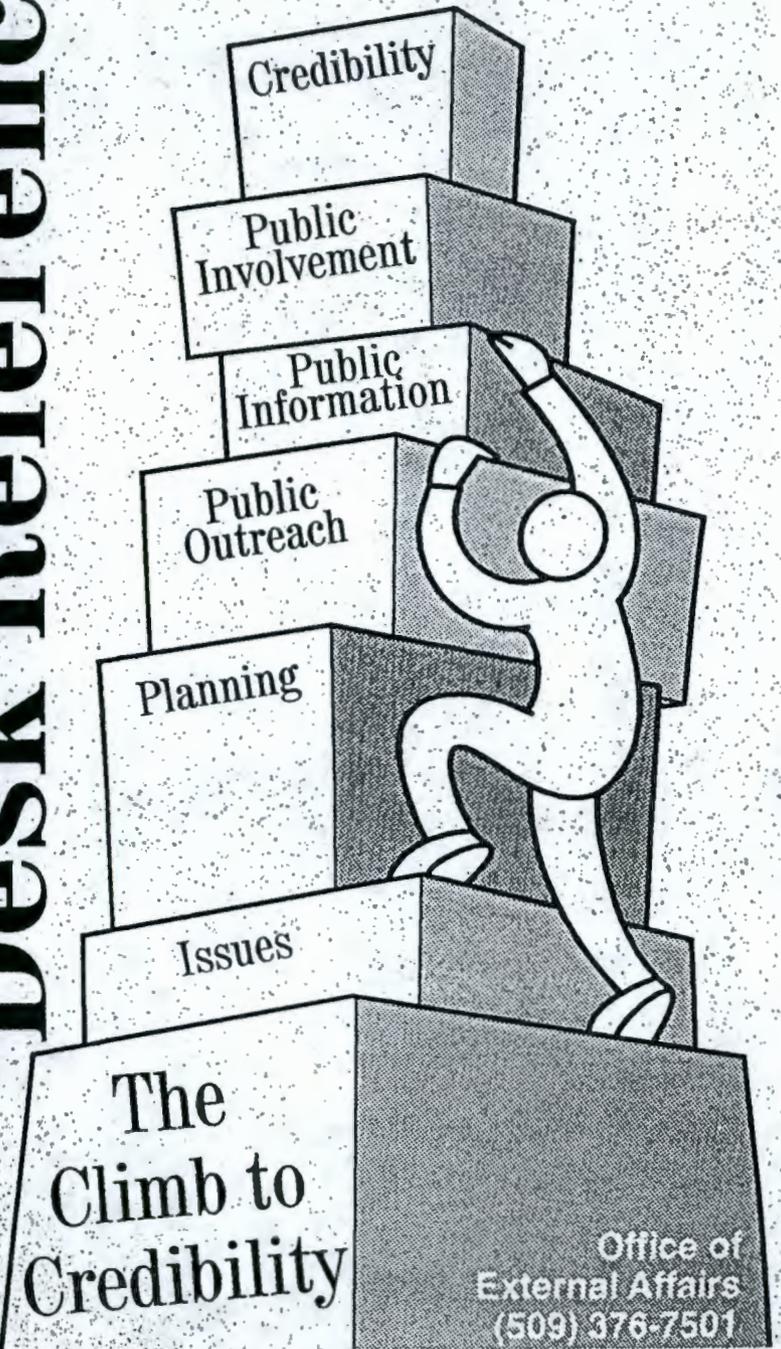


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Public Involvement Desk Reference

When To Do Public Involvement

There is no easy definition of when to do public involvement or provide the public with information¹. Managers need a working relationship with the Office of External Affairs (OEA) staff, who have daily contact with stakeholders and can provide information on the level of interest or concern related to a particular issue or activity. Projects should work with OEA to

- 1) Determine if there is a legal requirement to do public involvement; and/or,
- 2) Determine if an issue needs public involvement by using the checklist below.

If the need is clear:

- 3) Determine the appropriate type and level of public involvement and who should be involved.

¹Public participation is open, ongoing, two-way communication, both formal and informal, between DOE-RL and its stakeholders, the regulators, and Tribal governments. Public information is a means to keep the public informed of progress or to status ongoing activities and/or issues. For purposes of this reference, public participation and public information should follow similar processes and are labeled generically as PUBLIC INVOLVEMENT. (See also Tribal Government Consultation section).

Step One: Public Involvement Checklist

If you answer yes to any of the following questions, contact OEA for leadership, coordination and facilitation of public activities.

Will the decision be a better decision with public discussion?

Example: A decision on how the Hanford Site will be used in the future would better reflect a wide variety of opinions rather than DOE-RL making the decision.

If yes, explain:

Is the issue or activity already controversial? Are there already advocates of one outcome instead of another?

Example: The decision would result in importing spent fuel to Hanford for long term temporary storage.

If yes, explain:

Does the issue/decision impact one or more values? Does it imply a choice of one value over another?

Example: A decision to expand the 200 Area boundary to accommodate new waste conflicts with the stakeholder value "Do Not Contaminate New Ground."

If yes, explain:

Will the issue/decision be strongly opposed?

Example: A decision to not characterize the vadose zone flies in the face of many stakeholder's belief that the entire site should be restored to pristine condition.

If yes, explain:

Does the issue/decision affect worker safety, public health and safety or environmental protection?

Example: A decision to de-emphasize 100 Area cleanup conflicts with the stakeholder value, "Protect the Columbia River."

If yes, explain:

Does the issue/decision affect — positively or negatively — the Tri-Party Agreement¹?

Example: A decision to delay achieving a TPA milestone may conflict with the value, "Get On With Cleanup."

If yes, explain:

Does the issue/decision imply major and unexpected budget impacts?

Example: A decision to accelerate some activities may have major impacts on budgets already in the making.

If yes, explain:

¹Hanford Federal Facility Agreement and Consent Order, commonly termed the Tri-Party Agreement (TPA).

Does the issue/decision impact a site-wide planning assumption or previous program decision?

Example: The decision to drop grout required changing a program decision made in the Hanford Defense Waste Environmental Impact Statement.

If yes, explain:

Would the site benefit from greater public knowledge of an activity?

Example: The release for public enterprise of a Hanford developed technology.

If yes, explain:

Is public involvement required by the TPA or by other law?

Example: The TPA requires public involvement for specific activities, the Hanford Site Wide Resource Conservation and Recovery Act (RCRA) Permit requires public involvement, as does the National Environmental Policy Act (NEPA).

If yes, explain:

Your issue or activity not listed?

Contact OEA to help determine your needs.

Step Two: Implementation

To begin step two of the process, program managers need to contact OEA public involvement staff to provide leadership, coordination, and facilitation for public activities across the Hanford Site.

Some public involvement activities are ongoing, such as the Hanford Advisory Board, its subcommittees, and Tribal Nation interactions. Often, OEA or contractor public involvement staff attend or facilitate such meetings. OEA staff should be kept well informed of the flavor of these meetings to help other organizations and inform management of emerging global public perceptions or issues.

OEA and contractor public involvement staff can help project staff to

- Clarify expected outcome, and tailor the activity to meet the outcome.
- Identify the regulators, Tribes, stakeholders or general public likely to be affected or most concerned.
- Identify opportunities to coordinate public involvement activities across projects and cut costs.
- Identify a set of alternatives that show different ways of taking action. Every person affected should be able to see at least one alternative that includes measures to protect their interests.
- Make sure the persons affected understand the issue and can see how DOE-RL addresses their concerns.
- Incorporate input; refine and evaluate alternatives.

- Provide affected parties an opportunity to give feedback on whether the alternatives have been described and evaluated accurately and fairly.
- Change the alternatives if new information warrants.

This may seem like a long and complicated process. Sometimes it can be. The important thing is to determine the appropriate level of public involvement for a given issue and to make public involvement a natural way of doing things. It will save time in the long run.

When DOE-RL managers become involved in this way, communication will increase and strong relationships between the DOE-RL staff and members of the public result.

At Hanford, OEA will act as or appoint representatives to provide opportunities for DOE-RL managers to develop working relationships with opinion leaders or stakeholders (such as the Hanford Advisory Board, Tribal governments and congressional delegates) on a DOE-RL wide basis. In some cases, this is a natural development of existing relationships.

In addition to providing information, OEA can carry messages to and from public groups. In this way, OEA can also bring to management a much better understanding of public concerns.

During the process, managers need to maintain an ongoing relationship with OEA. OEA should be contacted when a change of direction on the project occurs. When an activity is determined to require public involvement, DOE-RL and contractor project managers should prepare a public involvement plan

using OEA and contractor public involvement staff as a resource. The public involvement plan should be no more than two to three pages and include the following information

- Objectives
- Strategy
- Approach
- Time line
- Expected outcome
- Audience
- Message
- Background
- Public concerns

The goal is an appropriate level of public involvement on a given issue or activity and the establishment of ongoing relationships between managers and stakeholders.

Tribal Government Consultation

Public involvement in this context is used as a generic term for various stakeholders and regulators, as well as tribal governments who are involved in our decision processes. However, tribal governments have a unique legal relationship with the United States government as set forth in the Constitution of the United States, treaties, statutes, and court decisions. The United States has committed to a government-to-government relationship with Indian tribes. Rather than seeking tribal participation through public forums, DOE-RL consults directly with tribal governments prior to taking the actions that may affect their rights and interests, as outlined in the DOE American Indian Policy. The goals, core values and principles of this public involvement policy, apply equally to stakeholders and affected Tribes alike.

Line Organization Roles and Responsibilities

Line organizations are responsible for planning, conducting and completing public involvement activities. Line organizations should

- Use the checklist (page 2) to determine the type and level of public involvement needed. This should be completed for all issues, regulatory activities (such as TPA), and to determine programmatic or mission public involvement needs.
- Prepare a public involvement plan, as needed.
- Utilize OEA's leadership, coordination and facilitation role.
- Establish and/or participate in ongoing Site public involvement activities.
- Prepare public involvement material.
- Conduct public involvement activities.
- Follow up on results, actions, status or decisions made.
- Assure contractors meet their contractual obligations for public involvement for project activities.

OEA Roles and Responsibilities

OEA is responsible for leadership of public involvement activities for the Hanford Site. This includes development of policies, guidelines, and

providing opportunities for public involvement activities. OEA will

- Establish DOE-RL policy on public involvement.
- Assist line organizations in assessing, planning and coordinating activities.
- Establish ongoing public involvement opportunities, such as the Hanford Advisory Board (HAB). OEA is responsible for coordination, facilitation, and oversight of these activities.
- Provide line organizations with services and expertise in public involvement.
- Coordinate with regulatory public involvement staff.
- Assure that contractor public involvement organizations are operating efficiently, meeting line organization needs, and complying with DOE-RL policy.

Public Involvement Staff Services

OEA and contractor public involvement staff can provide DOE-RL and contractor managers with a variety of services

- Public involvement planning, including message development, timing and activities.
- Presentation skills coaching.
- Assist in developing written materials that provide sufficient and factual information, including issue papers, fact sheets, newsletters, and newspaper ads.

- Assist in the development of presentations; review presentations.
- Assist with video production and photographic services.
- Provide graphic design services, including overheads, display, illustrations and slides.
- Review technical documents for public concerns.
- Conduct public opinion research.
- Review and edit comment response summaries.
- Develop and implement employee communication tools.
- Provide community outreach services, including partnerships in education, speakers bureau, site tours, and technical education programs.

OEA staff also help ensure there is timely and sufficient dissemination of factual information to employees, federal, state, and local officials, key stakeholders, media educators, interest groups and the public.

The OEA staff can help managers develop communication tools that foster dialogue between stakeholders and site management. There are many ways to do this. They include

- Public participation activities required by law.
- Focus Groups.
- Public Meetings.
- Personal Contacts.

- Printed and Audio-Visual Materials.
- Follow-up Actions.
- Hanford Advisory Board meetings or presentations.

Some of the techniques we are introducing at Hanford modify traditional public information techniques to make them more interactive. Some of those are

- Including in the Hanford Update (TPA newsletter) a summary of the status of studies and activities supporting various phases of TPA cleanup.

For example, a quarterly edition of the Update would discuss accomplishments and remaining problem areas. Another edition would discuss disposal options being considered for the site, even before the actual studies are underway. The Update should be both an employee and external communication tool. A monthly column will contain issues of interest and concern to Hanford communities and employees.

- Introducing a question-and-answer column in the Update.

With a question-and-answer column, the public will have a way to get information about the site without having to wait for a public meeting. The benefit for technical managers is that they get specific feedback quickly about site-related activities.

- Inviting the public to comment on ideas as a partner in brainstorming sessions. Think of these public sessions as scoping meetings. For example, if DOE decides to develop studies on various

treatment options, there would be a public work session to solicit ideas and feedback from stakeholders.

- Linking public involvement to the activities supporting the Hanford Advisory Board.

The Board should not be considered as the only group of stakeholders. While the Board's membership is a diverse and balanced representation of the major Hanford stakeholders, it cannot possibly represent all interests without becoming too large and unwieldy. Sharing information with other constituencies, particularly those not directly represented on the Board, guarantees that public participation is more than seeking consensus from the Board.

- Identify individuals who are capable presenters to a lay audience or who are willing to gain training for such presentations. Presentations can be evaluated by OEA staff for their level of understanding. Speakers Bureau training and speaking engagements for local and regional groups are available from OEA staff.

At Hanford, these communication techniques are developed with the goal of enhancing public involvement and providing accurate and timely feedback to managers.

Public Involvement/Outreach "How To" Guide

Above all, be proactive.

Identify potential need for public involvement early. Stakeholders must have 30-45 days notice prior to public involvement activities.

Know the goal of each public involvement effort. Do you need to

- Inform?
- Identify comments and concerns?
- Meet regulatory requirements?
- Gain support?

Use the answers to what your goals are to guide your public involvement design.

Make certain your meeting format matches the needs of your audience.

Identify what action is needed from the public. Don't use people's valuable time unless you have an identified need and plan for their input.

How to Meet Public Involvement/ Outreach Goals

Fact Sheets/Focus Papers — Keep them simple. Aim for a 10th grade reading level. OEA will edit fact sheets to assure ease of reading and consistency of format.

Be certain enough copies are available to meet the needs of the audience.

Focus Groups — When you want a dialogue with stakeholders.

- Focus groups should be made up primarily of community leaders and identified interested stakeholders. This includes: local elected officials, police or fire chiefs, school and college administrators, hospital administrators, business owners, church leaders and newspaper publishers. Local activist group members could also be invited to participate.
- Define a "product" for each group.
- Be prepared to tell people how they can influence decisions.
- Prepare informational materials and send to the focus group participants well before the focus group is conducted.
- Begin planning one to two months prior to conducting the meeting.
- Focus group facilitator should have a communications background or have demonstrated people skills.
- Maximum of two to three staff at each focus group.
- Be flexible — allow the focus group to discuss other, related issues if the discussion moves that way...but, ensure your goals are met.

Public Meetings — For legal requirements and/or substantial public interest.

- Use mainstream newspaper advertisements

sparingly to reduce costs. Plan advertising in alternative newspapers and newsletters.

- Use the following methods to promote the meetings
 - Editorial Board meetings.
 - Direct mail to Environmental Groups and other identified parties.
 - Newspaper calendar of events.
 - Talk radio.
 - Public Service Announcements.
 - Distribute flyers.
 - Radio ads (if cost is reasonable).
 - Internet calendar.
- Format should allow for considerable interaction. Presentation should be short to allow for early questions.
- Tape record instead of stenographer (unless transcripts of the meeting are legally required).
- Meetings should be held at public facilities (community colleges, public schools, state-owned buildings) if available and easily accessible, rather than hotels.
- Use some mechanism to let the public know their comments are being heard — such as flip charts, evaluation forms, opinion forms.
- Limit staff. Typically, a maximum of three DOE-RL/contractor staff and two regulator staff attend as active participants at each meeting.

Speakers Training — Training on how to avoid jargon, acronyms and how to make presentations simple and interesting. Several staff should be identified and

trained to act as speakers to represent the projects in public forums.

- OEA will target audiences such as
 - Schools.
 - Civic Organizations.
 - Employees.
 - State and Local Governments.

Civic Groups — To inform audiences about general issues or very specific easily understood issues. Could be used for gaining public reaction to a specific question and to enhance public awareness of DOE-RL activities and progress.

- This is an excellent forum to allow the transfer of information to a built in audience.
- Plan presentations well in advance to accommodate civic group calendars.
- Presentations should not exceed about 20 minutes. Make them visually interesting and easy to understand.
- Develop an on-going relationship with key civic groups in the region. As major activities occur, go back to these civic groups two to three times a year.
- Limit staff to a maximum of two.

Public Involvement Activities

To get people involved they must have a general understanding of the issues. They must know early how to access information and voice their opinions. And, they must know how their involvement made a difference in the decision process. Involving the public

will include interactions/discussions in a variety of forums.

Public Information - A critical component of public involvement is for early and accurate information to reach the public. That allows citizens to decide with which issues they choose to be involved. Making certain material is easy to understand and visually interesting is crucial.

Public Outreach - It is important to reach people who would be interested and involved if they were aware of or knew more about the issues. Outreach is most effective when you go where people are already assembled. Some examples are: schools, civic meetings, technical education programs, conferences, kiosks in public places (e.g., malls, libraries, etc.), presentations and tours (invited or requested).

Public Involvement

Hanford Advisory Board — The focus of the HAB is to provide major policy advice on issues affecting the Hanford Site. Only those issues which have been submitted to OEA for approval will be considered for submission to the full Board. Contractor or DOE-RL program contact with the Board will be through the HAB Coordinator.

Programs or contractors desiring to meet with the HAB committees will contact the HAB Coordinator requesting time on HAB or committee agendas. It is the responsibility of the projects and contractors to report all requests for information or input from the HAB, its committees, or members.

DOE-RL managers or contractors who have been

requested to make presentations will attend Board meetings. All attendance at HAB meetings is required to be reported under the Public Involvement Costs Quarterly Report compiled by OEA. DOE-RL and contractor employees are free to, and encouraged to, attend any and all Board meetings on their own time.

Public Meetings — Public meetings are for significant issues impacting the site mission or having legal requirements. Generally, public meetings will be constrained to pre-set dates for each quarter. One set of dates for the National Environmental Policy Act (NEPA) required public meetings will be set aside for each quarter.

One set of dates for all other public meetings for all other issues or requirements will also be set aside each quarter.

Scheduling will be done through OEA. All programs at DOE-RL and those representing Headquarters will be required to make a request to OEA to access these meeting dates. All meeting dates will be finalized by OEA in consultation with the regulatory agencies, the Board and stakeholders. Public meeting requests must be 45 days in advance of the time of the meeting.

Focus Groups — Focus groups allow for in-depth discussion and participant feedback on well defined topics. This interactive activity can be used to bring new players into the public involvement process. Participants can include any identified interested party. Additional participants could include community leaders. Some examples include the business community, city government, county government, the academic community, the field of medicine, agriculture, activist groups and religion.

Operational/Program Review Meetings — DOE-RL managers are strongly urged to conduct regularly scheduled bi-monthly or quarterly program review meetings with Tribes, HAB subcommittees, stakeholders, and the public. These meetings must be announced in advance and be open to the public. However, they do not carry the legal requirements of a formal public meeting. These meetings will be scheduled for the purpose of the review of technical, planning, and operational issues and concerns of the programs, the contractors, or the public.

Other Meetings — DOE-RL managers are encouraged to outreach directly to specific groups or individuals who have expressed strong interests in their specific program areas. Meetings with individuals or groups to develop personal relationships of understanding and credibility are an important form of public participation. They do not serve as a substitute for other public involvement activities.

Evaluating the Public Participation Process

Hanford will assess annually the effectiveness of its public participation efforts. Stakeholders will be included in the evaluation process.

OEA will coordinate the evaluation efforts and will provide copies of the final evaluation to the managers.

Public participation by definition is an open, ongoing, two-way communication, reflecting the local community of people and issues. It cannot be structured to any single "right model" or measured against any "one size fits all" set of criteria.

These criteria are not prescriptive; they provide only a starting point. OEA, with stakeholders and DOE-RL managers, will expand the criteria as necessary to identify where you are now and where you want to be next year. You should consider what has worked this past year, what adjustments are needed, and what new activities or approaches will be undertaken in the future.

Each assessment report should be brief (two-three pages), focused, and include names, telephone and fax numbers, and e-mail addresses for key contacts.

The goals are to share information about public participation successes, barriers, needs, and priorities.

The effectiveness with which each program implements Public Involvement will be assessed annually. These assessments must include the views and recommendations of stakeholders. Stakeholders will

also be invited to participate in the processes used to develop criteria and measures for judging effectiveness. The OEA will evaluate these annual assessments and recommend changes to improve the effectiveness of DOE-RL's public participation efforts.

While public participation processes must be tailored to meet specific, program, and stakeholder needs, the following broad guidance provides a framework to assist management in implementing this policy. Using the critical policy elements and implementing actions as a guide, managers should consult with stakeholders to develop appropriate public participation programs and activities.

Criteria

1. Quality of Information

- Clarity
- Timeliness
- Usefulness/adequacy
- Accuracy

2. Public Participation Structure

- Site contact(s) for general information/questions. Contacts should be well-known and readily available
- Access points for public comment on specific decision processes clearly defined and publicized on timely basis
- Atmosphere of openness, inclusion, and responsiveness

3. Productivity of Public Participation Activities

- Honest, two way dialogue
- Site self-assessment reports on effectiveness of public participation process

In this time of increasing demands on diminishing resources, we cannot afford new programs or more layers of work. Yet the work done to involve the public in our decision-making is in some cases a legal mandate. More importantly, when done well, an effective public involvement program can result in better decisions in a shorter time.

This process redirects the efforts already being invested in public involvement. The objective is to give DOE-RL managers the tools they need to be flexible, responsive, innovative and respectful in their public involvement efforts. DOE-RL managers will have the information they need to make immediate course corrections on public involvement activities. For instance, evaluation forms will be reviewed by OEA and summarized for those conducting the next public meeting. That meeting leader will include in his or her opening remarks some mention of "Here's what we heard from you at our last public meeting and here's what we've changed as a result."

The process includes

- An evaluation by the public of the public information/public involvement activities.
- An evaluation of program, process, and products by an on-going stakeholder group.
- An evaluation by DOE-RL managers.
- An evaluation by public involvement staff.

- An annual report summarizing lessons learned and actions taken in response to evaluations.
- Acknowledgment of innovations and successes by DOE-RL managers.

I. Evaluation by the Public

Evaluations (Appendix B1) will be collected at each public meeting. They will be reviewed and summarized by OEA. OEA will use the information to help the leader of the next public meeting refine his or her process. This information will be included in the Annual Report (see below).

II. Evaluation by Stakeholders

This is a group who agrees to "pay attention to" and "comment on" DOE-RL's public involvement efforts for a year. The group includes stakeholders representing diverse interests.

This group operates like a focus group without meetings. Their focus is to assess the effectiveness of the DOE-RL and TPA public involvement activities over the year. They answer the question: Did DOE-RL and the Tri-Parties do a good job getting and using public input for their decisions? They look at process rather than issues.

The names on this group will be added to the DOE-RL and Tri-Parties' public involvement lists so they receive all mailed materials. They complete the Stakeholder Evaluation Form (Appendix B2) quarterly.

This group does not require ongoing management (except a reminder to submit the quarterly reports and a big thank you at the end of the year). The biggest effort is setting up the group at the

beginning of the year. This requires a short-term but concentrated effort to make calls, write letters and confirm commitments.

OEA summarizes the stakeholder input for the annual report and for "course corrections" as with the public evaluations in Item I above.

III. Evaluation by Managers

DOE-RL managers are key to an effective public involvement program. They will be asked to complete a quarterly survey form (Appendix B3) which will be used by OEA for both immediate course correction (see Item I above) and the annual report (see Item V below). Feedback from managers will help measure if public involvement needs are met.

IV. Evaluation by Public Involvement Staff

The public involvement staff will be asked to complete a quarterly survey form (Appendix B4) which will be used by OEA for both immediate course correction (see Item I above) and the annual report (see Item V below).

V. Annual Report

The annual report is a compilation of

- Summary of comments from public evaluation forms.
- Changes made in response to those comments.
- Summary of comments from the Stakeholder quarterly reports.
- Summary of comments from program manager quarterly evaluations.

- Summary of comments from public involvement staff quarterly evaluations.
- A discussion of any changes in direction or institutional values.
- A detailed list of the best meeting rooms and community resources in communities where future meetings will be held.

The annual report on DOE-RL Public Involvement will be distributed to DOE-RL managers, the stakeholder "focus group," and an expanded group of stakeholders including the Hanford Advisory Board and the Oregon Hanford Waste Board.

The TPA Community Relations Plan also requires that an evaluation of public involvement activities be conducted. As appropriate, the annual report will contain information from the TPA evaluation and other feedback received from the public.

The report will be the basis for an annual communications workshop to evaluate and develop a proposed program for the next year. This may be a workshop dedicated to public involvement or part of an existing meeting that includes upper management, program managers, regulators, and stakeholders.

VI. Recognition

Annually, OEA will recommend one or two managers for special recognition. OEA will focus on managers who got good results during the year or who suggested or encouraged innovative ways to involve the public.

Sample Communications Plan

Example: A Cleanup Plan

Objective

The objective of this plan is to provide a framework for communicating with stakeholders and interested parties about key issues.

Audience

- Local residents.
- Local & County officials
- Regional Public Interest Groups
- Concerned Washington and Oregon state agencies
- Regional news media
- Hanford employees

Strategy

The overall strategy is to conduct focus groups with presentations emphasizing why the Cleanup Plan is necessary and how Hanford cleanup will be ensured over the coming years. The focus groups will be held from 4 to 6 p.m. on (a mutually agreed on time and date) at several public locations to reduce costs. There will be two DOE panelists: One to speak on the Cleanup Plan, and one to talk about public participation. The presentation time will be limited to allow the greatest flexibility in gaining public concerns and comments.

A flip chart will be used at the meeting to list general concerns expressed by participants. Specific or in-depth concerns can be audio recorded. Formal written comments will be accepted. The handouts include

- Cost/Budget Information.
- A fact sheet describing the proposal and the impact on Tri-Party Agreement milestones.
- The Hanford Site overview fact sheet.
- A schedule of public involvement activities.

Messages

- The public has ample opportunity to hear the issues and to voice concerns.
- Discussion of the process and how/why the Cleanup Plan was developed.
- High points of the Cleanup Plan.
- How the Cleanup Plan will be implemented.
- How people can stay involved in the process.

Approach

- Publicity will include a news release, notice in established environmental and Hanford related newsletters, advertisements in local newspapers if cost effective, notice in the Hanford Home Page and an invitation letter and telephone calls to key stakeholders.
- OEA will direct individual courtesy calls/briefings with members of the news media and key opinion leaders.
- OEA staff will arrange focus groups with their contacts.

- Public Service Announcements will be sent to the media.
- Employee publications will promote the focus groups and opportunities for staff comments.

Background

- There is a high level of stakeholder interest and concern. Stakeholders support escalated cleanup. However, they have serious concerns about continued funding for Hanford cleanup that cannot be accomplished in ten years. Final cleanup of tanks and groundwater are of particular concern.
- Employee interest and concern is high.
- Public outreach beyond the HAB and stakeholders should be considered.

Public Concerns

- People are concerned about tanks and groundwater plumes being left in place due to the lack of funding during the past ten years.
- Area residents are concerned about economic development and jobs in the short term and after ten years.

Stakeholder Evaluation

Meeting Date _____

Location _____

Please complete this evaluation form and leave it at the door. Or mail the form to the address on the back of this form. DOE-RL and/or TPA project managers will review your comments and use your ideas to improve our public involvement.

On a scale of 1 to 5 (5 being the highest), please rate the following

1. I received sufficient, advanced information to notify me of this meeting:

1 2 3 4 5

Use this space for your comments and suggestions:

2. The meeting location, time, and facility were appropriate for this meeting and topic.

1 2 3 4 5

Use this space for your comments and suggestions:

3. The materials provided at this meeting (including audio/visuals) were informative and easy to understand.

1 2 3 4 5

Use this space for your comments and suggestions:

4. The meeting format allowed me to exchange information with DOE-RL and/or TPA representatives.

1 2 3 4 5

Use this space for your comments and suggestions:

5. Throughout the meeting, my questions were answered to my satisfaction.

1 2 3 4 5

Use this space for your comments and suggestions:

6. I believe DOE-RL and/or TPA representatives listened to my ideas and will consider them in their decisions.

1 2 3 4 5

Use this space for your comments and suggestions:

Circle all that apply.....

7. The most effective way(s) to notify me of meetings like this is/are...

Newspaper advertisements	News stories
Radio advertisements	Direct mail
Hanford Update	Other

8. The length of the meeting was:
too long too short just right

9. Communication methods to help me better understand and comment on this issue are:

Fact sheets	Open houses	News articles
Videos	Focus Groups	Hanford tours
Workshops	Public Meetings	Civic Group
Presentations	Other	

Additional comments

Please give us your name and address if you've asked for a response or want to be on mailing lists for future issues:

If you prefer to mail your form, send it to DOE-RL, Office of External Affairs, Box 550, A7-75, Richland, WA 99352.

Thank you!

**Stakeholder Report on
Public Involvement**

Today's Date _____

Reporting for time period _____ to _____

Your Name _____

Address _____

Daytime Phone Number _____

Thank you for agreeing to observe and comment on the U.S. Department of Energy-Richland Operations Office (DOE-RL) and/or Tri-Party Agreement (TPA) public involvement activities. Please complete the following form, attach any clippings or examples you desire, and send them to the address shown at the end of the form by (insert desired date).

We'll use your observations to evaluate our on-going public involvement program.

On a scale of 1 to 5 (5 being the highest), please rate the following

1. Written materials from DOE-RL/TPA were mailed to you with enough time to review them and respond.

1 2 3 4 5

Do you have specific examples to help us understand your rating?

2. Written materials were visually interesting and easy to understand.

1 2 3 4 5

Do you have specific examples to help us understand your rating?

3. Did the written materials you received motivate you to attend a meeting or to contact DOE-RL or the Tri-Parties about an issue?

Yes No Don't know

4. Do you recall seeing meeting notices in newspapers, on radio, or on television about DOE-RL or the TPA public involvement in the last quarter?

Yes No Don't know

5. (If yes) The notices were visually interesting and easy to understand.

1 2 3 4 5

Do you have specific examples to help us understand your rating? Please note the name of the newspaper(s), radio or television station(s).

6. Did the ads motivate you to attend a meeting or to contact DOE-RL or the Tri-Parties about an issue?

Yes No Don't know

7. If you attended any public meeting(s), focus group(s) or other meeting(s):

A. The time, location and seating arrangement(s), were appropriate.

1 2 3 4 5

Do you have specific examples to help us understand your rating?

B. The written materials provided at the meeting(s) were informative and easy to understand.

1 2 3 4 5

Do you have specific examples to help us understand your rating?

C. The audio/visuals (overheads, slides, films) were informative and easy to understand.

1 2 3 4 5

Do you have specific examples to help us understand your rating?

D. DOE-RL or Tri-Party speakers used language and presentation styles that made their information understandable.

1 2 3 4 5

Do you have specific examples to help us understand your rating?

E. DOE-RL or Tri-Party speakers were responsive and sensitive to different views and opinions.

1 2 3 4 5

Do you have specific examples to help us understand your rating?

8. Other than this quarterly public involvement report, did you provide any ideas to DOE-RL or Tri-Parties on issues during this reporting period?
Yes No

If yes, do you believe DOE-RL or the Tri-Parties listened to your ideas and will consider them in their decisions? Please explain.

9. During the last quarter, were there Hanford issues you think DOE-RL or the Tri-Parties handled especially well (or handled badly)? Please explain.

10. What suggestions do you have for improving DOE-RL or TPA public information and involvement?

Mail to DOE-RL, Office of External Affairs, P.O. Box 550, A7-75, Richland, WA 99352.

Thank you!

Quarterly DOE-RL Managers Report on Public Involvement

Today's Date _____

Reporting for time period _____ to _____

Your Name _____

Address _____

Phone Number _____

How effective is our public involvement program from your perspective? Are you getting the support you need? Are the results worth the cost? Here's your chance to give us a piece of your mind.

On a scale of 1 to 5 (5 being the highest), please rate the following:

1. I got the public involvement support I needed to plan and carry out public involvement activities.
1 2 3 4 5

Do you have specific examples to help us understand your rating?

2. I got information and ideas from the public that resulted in a better outcome in my program, task or activity.

1 2 3 4 5

Do you have specific examples to help us understand your rating?

3. The amount I spent on public involvement was reasonable. Please explain.
Yes No Don't know

4. The results of public involvement in my program were worth the cost.
Yes No Don't know
Do you have specific examples to help us understand your rating.

5. If you answered no to #4, what results would make public involvement worth the cost?

6. Has your experience with public involvement activities changed your approach to program management? Please explain.
Yes No Don't know

7. What do you need to accomplish your goals in public involvement that you are not now getting?

8. What is the most successful public involvement activity you used or observed during this quarter?

9. What do you consider your most innovative or creative public involvement activity?

10. Have you participated in other public involvement activities as a member of the public? What indication do you have that your ideas were received and considered by the meeting leaders?

11. Did you discover any new community resources, meeting rooms, media outlets, nontraditional networks during this last quarter? Please list them here or attach a separate page. We'll share them with other DOE-RL public involvement staff.

12. During the last quarter, were there Hanford issues you think were handled especially well (or handled badly)? Please explain.

13. What suggestions do you have for improving public information and involvement?

Mail to DOE-RL, Office of External Affairs, P.O. Box 550, A7-75, Richland, WA 99352.

Thank you!

Quarterly Public Involvement Staff Report

Today's Date _____

Reporting for time period _____ to _____

Your Name _____

Address _____

Phone Number _____

How effective is our public involvement program from your perspective? Are the results worth the cost?

On a scale of 1 to 5 (5 being the highest), please rate the following:

1. Managers and program staff contacted me early in the process and were receptive to my participation in planning their public involvement/information activities.

1 2 3 4 5

Do you have specific examples to help us understand your rating?

2. Managers and program staff used public involvement staff effectively to plan and carry out public involvement activities.

1 2 3 4 5

Do you have specific examples to help us understand your rating?

3. Are there ways we can reduce our costs or get more/better public involvement for our investment?

Yes No Don't know

Do you have specific examples to help us understand your answer?

4. What is the most successful public involvement activity you used or observed during this quarter?

5. How do you measure "success" in public involvement? (Check those that apply)

Number of people at a meeting

Diversity of ideas/opinions expressed at a meeting

Quality of comments

Amount of discussion and interaction with public (dialogue vs. lecture)

Seeing new people participating

Making a change in response to public suggestion/ideas

People let you know they feel like they were heard

People continue to participate in public involvement activities

Other _____

6. What do you consider your most innovative or creative public involvement activity?

7. Did you discover any new community resources, meeting rooms, media outlets, nontraditional networks during this last quarter? Please list them here or attach a separate page. We'll share them with other DOE-RL public involvement staff.

8. During the last quarter, were there Hanford issues you think were handled especially well (or handled badly)? Please explain.

9. What suggestions do you have for improving DOE-RL or TPA public information and involvement?

Mail to DOE-RL, Office of External Affairs, P.O. Box 550, A7-75, Richland, WA 99352.

Thank you!

Summary of Public Involvement Recommendations

The most effective public participation begins with a commitment at high levels and continues with active encouragement and involvement of key decision makers. The following list of recommendations have been compiled from comments received from stakeholders, Tribal representatives, the general public and the Hanford Advisory Board for improved public involvement activities.

General

- Define the problem and the options that are available and feasible to solve or minimize it.
- Explain clearly what it is you want from the public. Define the purpose, significance and intended end result of each public involvement effort and evaluate the results. People need to know what happens as a result of their input.
- Ask for the public's opinion before the decisions are made.
- Be open and conversational rather than defensive or evasive.
- Meet regularly with interested parties.

Presentations

- Be open about alternative views.
- Develop short, concise and understandable presentations.
- Have flexible and creative presenters.

- Don't be afraid to make changes if something isn't working.
- Allow your presenters plenty of opportunity to "rehearse" the presentation before it is taken to the public — especially if it is a complex topic.
- Your presentation team should have a combination of strong communicators and technical expertise.
- Enlist the help of an impartial third party to moderate if major issues are expected.

Video Presentations

- Keep the video short (eight to 12 minutes maximum).
- Keep the message simple. Hit the highlights — and do it in an understandable manner. If you need written materials to support the video and to explain the technical issues in greater detail, use them.
- Take advantage of the medium — keep it visually interesting, well-paced, and varied in its use of video, graphics and animation.
- Use a professional narrator.
- Select your music with care and use it sparingly.
- To reduce costs, try to make use of archival footage.
- Make sure the video emphasizes the message, not who produced the video.

Seeking Community Opinions

- Have some method of "recording" the public's comments.

- Involve the local community in planning local public involvement activities.

Marketing/Promotions

- Use creative methods to inform the public.
- Work with established groups such as environmental or civic organizations, the League of Women Voters, and others to promote meetings.
- Be sparing in your use of newspaper display advertising. When you do use them make sure they are easy to understand and interesting to the eye. Use professionals to help design ads.
- Use the newspaper's Calendar of Events section.
- Consider other methods — such as cable access, World Wide Web sites, and posting informational flyers at schools and other high-traffic areas.
- Invite highly interested public to public meetings by phone.
- Use citizen groups to provide public notice for meetings and other public involvement activities.

News Media

- Try to interest editorial boards in writing about your project.
- Prepare well illustrated Hanford articles for use in regional newspapers.

Meeting Formats

- Use a variety of meeting formats.

- Be flexible, change the format if needed to meet the needs and comfort level of the public
- Use a friendlier format that is not so formal.

Civic Groups

- Develop on-going relationships with key civic groups.
- Make certain you have the equipment you will need for your presentation.

Focus Groups

- Keep them informal.
- Allow the discussion to include related topics if that's what the participants want to discuss.
- Confirm up to twice as many people as you want to help ensure sufficient attendance for your meeting.
- Rather than relying on newspaper advertisements to inform the public about the meetings, use other methods to communicate this information, such as: direct mail to environmental groups and other interested parties; the newspaper calendar of events; editorial boards and local talk radio; Public Service Announcements; distribute flyers; ask interested groups to allow a notice of the meeting in their newsletter.
- Use public buildings when available and appropriate. This can greatly reduce meeting room rental costs.
- Make certain meeting locations are well marked and easily accessible by public transportation if available in that community.

- If a "permanent" record of the meeting is required (but not a written transcript), consider tape recording the meeting instead of using a stenographer.

Video Meetings

- Market these meetings as heavily — if not more so — than other meetings.
- Allow for plenty of advance planning. Both the satellite time and the receive stations usually need to be reserved months ahead of time.
- Invite and confirm several participants at each receive site so that you will have a guaranteed audience.

**Inter Agency Management Integration Team
EPA Conference Room
712 Swift Blvd., Richland
December 16, 1997**

1. M-40-07

The M-40-07 Dispute was extended to February 24, 1998 by DOE and Ecology (Attachment 1). Ecology's position is that the milestone was missed and they are looking for a path forward. DOE is to set up a telecon with the Chemical Reactions Sub Tap Committee between December 17 and December 24, 1997, to discuss options to resolve this milestone impasse.

2. M-41-22

Carolyn Haass of DOE-RL, handed out DOE's position on the M-41-22 dispute (Attachment 2). S. Dahl, Ecology, handed out Ecology's position (Attachment 3). Ecology's 5 key points referenced in Attachment 3, describe why "just cause", does not exist. J. McClusky, DOE-RL, responded with the technical aspects of safety issues with TWRS Programs. Resolving safety issues takes time. C. Haass, DOE-RL presented the structure of DOE's Statement of Dispute for M-41-22. G. Sanders, DOE-RL, discussed options of a 30-day extension to review respective parties positions. Both parties agreed to extend the dispute process until the January 27, 1998 IAMIT Meeting (Attachment 4).

3. Site Management System

The Site Management System MOU Update was presented by Kerry Cameron, DOE-RL. No issues or action items were found.

4. Paragraph 148/149 (Update Site Management System)

Listed below are the Regulators who are currently on line:

Dave Einen, EPA 10/15/97

Gary Freeman, Ecology 12/16/97
Clark Couter (backup for Handi system)

The 10/1/97 FDH deliverable represents PHMC data only. DOE has moved from ADS basis to a lifecycle PBS basis. DOE requested feedback from Ecology and EPA with respect to the Handi System. A hand written handout (Attachment 5) was provided. A extension of the original Memorandum of Understanding covering SMS deliverables until September 30, 1998 was also proposed. Kerry Cameron will give an update at the March 1998 IAMIT Meeting.

5. CRCIA

The major CRCIA issue is to work out the management configuration of the team. Larry Gadbois, EPA has the lead in this effort.

6. Public Involvement

Dennis Faulk, EPA, presented two handbooks - Public Involvement Policy Evaluation (Attachment 6A), and Public Involvement Desk Reference (Attachment 6B), referenced in the CRP. DOE/EPA/Ecology will produce an annual evaluation report. PIO's will report during the February 1998 Public Meetings. The PIO's request to meet with the IAMIT during the last quarter of the calendar year. The "draft" report will be presented to the IAMIT for review and comment.

AGENDA
INTER AGENCY MANAGEMENT INTEGRATION TEAM (IAMIT) MEETING

December 16, 1997
1:00 PM - 3:00 PM

EPA CONFERENCE ROOM, 712 SWIFT BLVD., SUITE 5

(CHAIRPERSON: D. R. Sherwood)

- 1:00 pm MILESTONE M-40-07 (SST 241-C-103 VAPOR TREATMENT) DISCUSSION
(C. Haass, S. Dahl)
- 1:05 pm MILESTONE M-41-00 (SST STABILIZATION) PROPOSED NEGOTIATION
(J. McClusky, C. Haass, S. Dahl)
- 2:05 pm SITE MANAGEMENT SYSTEM MOU UPDATE AND REPORTING CHANGES
(K. Cameron)
- 2:20 pm CRCIA AND GROUNDWATER PROTECTION DISCUSSION
(R. Stewart, L. Bauer, A. Shorett)
- 2:40 pm PUBLIC INVOLVEMENT EVALUATION
(D. Faulk, G. McClure, Z. Maine-Jackson)
- 3:00 pm ADJOURN

NOTE: Due to room size considerations if you plan to attend please do so
only for your areas of responsibility.

IMAGENDA.DEC

ATTENDEES

INTER AGENCY MANAGEMENT INTEGRATION TEAM (IAMIT) MEETING

DATE: 12/16/1997

<u>NAME</u>	<u>ORGANIZATION</u>	<u>MAILSTOP</u>	<u>(✓) FOR ATTACHMENTS</u>
<u>Kenny D. Cennell</u>	<u>FDH/TPAL</u>	<u>G3-27</u>	
<u>DALE JACKSON</u>	<u>DOE-RL-EAP</u>	<u>A5-15</u>	
<u>JON YERXA</u>	<u>"</u>	<u>"</u>	
<u>MaryAnn McLaughlin</u>	<u>FDH/TPAI</u>	<u>G3-27</u>	
<u>Mike Wilson</u>	<u>Ecology</u>		✓
<u>Melodie Selby</u>	<u>"</u>	<u>B5-18</u>	✓
<u>Suzanne Dahl</u>	<u>Ecology</u>		
<u>Jackson Rutter</u>	<u>DOE-TWRS</u>		
<u>Jim McClusky</u>	<u>DOE-TWRS</u>		
<u>Carol L. Sohn</u>	<u>DOE-RL/TWRS</u>	<u>S7-51</u>	
<u>Dennis Faulk</u>	<u>EPA</u>	<u>B5-01</u>	
<u>James E Rasmussen</u>	<u>DOE-RL-EAP</u>	<u>A5-15</u>	
<u>DAVID SAUERESSIG</u>	<u>LMHC-TWRS</u>	<u>S8-05</u>	
<u>STEVE SAUTTER</u>	<u>Oregon Office of Energy</u>		✓

