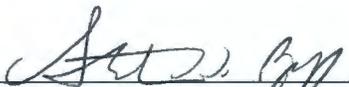


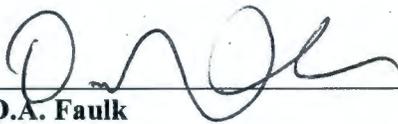
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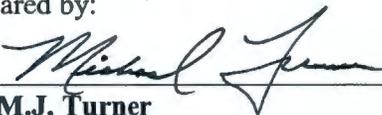
Tri-Party Agreement
Inter-Agency Management Integration Team (IAMIT)
Meeting Minutes
May 18, 2017

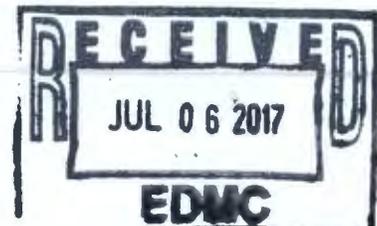
Approval:  Date: 6/2/17
A.K. Smith (J. Price, for)
Ecology IAMIT Representative

Approval:  Date: 06/13/2017
T.K. Teynor
DOE-RL IAMIT Representative

Approval:  Date: 6/8/2017
G.D. Trenchard (S. Pfaff, for)
DOE-ORP IAMIT Representative

Approval:  Date: 7/6/17
D.A. Faulk
EPA IAMIT Representative

Minutes Prepared by:
 Date: 6/7/17
M.J. Turner
Mission Support Alliance



**Inter-Agency Management Integration Team (IAMIT)
Meeting Minutes
May 18, 2017**

- 1) **Topic: Review IAMIT Action Tracking Table
(See Action Tracking Table)**

Table I. Actions Items:

- 1) Ecology stated that due to the recent event at the PUREX tunnels, the closure plan for PUREX is being reviewed internally. DOE-RL asked when Ecology would have a response. Ecology responded that the first meeting is scheduled to discuss DOE-RL response to the recently issued Administrative Order by Ecology. Ecology noted that its order requires three actions, and one of the actions includes updating the closure plans, documents and schedules for the PUREX tunnels. Ecology added that since the tunnels are associated with the PUREX canyon, or have always believed to be associated, Ecology thinks there is a tie between the tunnels and the canyon.

Ecology stated that initially it was believed there was a path forward on the update for the closure plan that would meet the requirements for DOE-RL and Ecology, but now there may be more work and information that will be needed in the closure plan. Ecology indicated that it will be a few months before a path forward is defined. This action remains open.

Table II. Status Updates

- 1) Ecology reported that a meeting was held with DOE-RL and Ecology's lawyer to discuss the 200-IS-1 OU waste site alignment, and the Parties are down to eight waste sites that still need resolution. DOE-RL has the action to provide Ecology with additional information so the parties can make a determination. Ecology stated that as soon as the information is received, if agreement cannot be reached, the issue will be elevated to senior management. DOE-RL concurred with elevating the issue if an agreement cannot be reached. This action remains open.
- 2) DOE-RL stated that the discussion under Action Item No. 1 covered this. This action remains open.
- 3) ORP stated that on May 15, 2017, the draft Tier 2 Closure Plan for WMA-C and the draft Tier 3 Closure Plan for the C-200 tanks were submitted on schedule per the TPA agreement. Ecology stated that this action could be closed because the TPA Change Control Form has been signed. This action was closed.

- 4) Ecology stated that it is waiting for DOE-RL to implement the upgrades to the Administrative Record (AR), and then Ecology will be willing to consider the change request. DOE-RL asked Ecology to define implement. DOE-RL noted that it has completed an alternatives study and selected an alternative via a new software package. Ecology responded that upgrades were identified during the Kaisen event, and Ecology will consider the change request after the actions from the Kaisen are implemented. DOE-RL pointed out that it may take another year before all of the upgrades are completed, and in the meantime, \$250 thousand is being spent to submit hard copies to the AR. Ecology stated that it is not willing to sign the change request until the upgrades are implemented. DOE retorted that this amounted to holding the all-electronic milestone Change Control Form/proposed milestone "hostage". This action remains open.
- 5) DOE-RL reported that the five-year TPA review and associated areas of change were identified, and the comments on the resulting TPA Change Control Forms are in the process of being resolved. DOE-RL indicated that EPA and Ecology concurred that the identified changes are not significant and a public review is not needed. Ecology stated that paragraphs 148/149 would need to go through public review. EPA noted that its legal review resulted in a tremendous amount of significant comments on 148/149. EPA stated that its recommendation is to leave 148/149 for further discussion and proceed with the other identified changes.

EPA stated its position is that public comment is not needed for the other changes. Ecology stated that it would confirm internally about not going out for public comment on the other changes if 148/149 are not included.

ORP asked if there is general agreement on the TPA change packages that are resulting from the five-year review process. Ecology responded that it is in agreement with most of the change packages, but Appendix H and Appendix I are on a different track that will take longer and require public comment.

MSA stated that there are 11 change requests that could probably go out for approval without public comment. MSA stated that there are currently five change requests in review, including 148/149 and three others. MSA noted that Ecology's lawyer had several comments on Section 4.1 (which defines the TPA project manager role), but a decision is not needed now on a declaration of significance. MSA stated that the plan is for the Tri-Parties to agree and state for the record which change requests have non-significant comments and do not require public comment.

MSA asked if there was any discussion on M-092 in relation to the public comment discussion. Ecology stated that the M-092 milestone is associated with the cesium/strontium capsules, sodium and the special case waste, and the comments on the cesium/strontium will likely be significant and require public comment. This action remains open.

- 6) Ecology stated that the WIDS procedure is low on the priority list and a review has not been done. DOE-RL agreed to send the information via email to EPA for its review of the WIDS procedure. This action remains open.

Table III. Recently Closed

- 1) The dispute regarding the PUREX surveillance and maintenance plan was closed March 30, 2017.

Inter-Agency Management Integration Team Decision Table/Action Tracking

May 18, 2017

Table I. Action Items

1. PUREX Closure Plan, Pt. A

Reference: DOE/RL-98-35, Rev. 3

Affected Milestones: N/A

Originated: 3/30/17

Status: Open

Dispute Extended: N/A

- Action:**
- 1) DOE-RL will send a letter to Ecology stating the agreement that the pre-closure plan will substitute for the closure plan until a closure plan template is developed. The letter will include other facilities that are operating under the same situation as PUREX.
 - 2) Ecology will respond to DOE-RL's letter accepting the agreement.
 - 3) Ecology will develop a template for the closure plan.
 - 4) DOE-RL will develop a draft CERCLA-linked closure plan to meet Rev. 9 permit requirements.
 - 5) DOE-RL will place the revised closure plan in the operating records to replace the existing pre-closure plan.

Comments: PUREX Dispute Closed, based on the actions above, on 3/30/2017 via declarative statement at the IAMIT. Meeting minutes are being routed for signature.

Closed: —

Inter-Agency Management Integration Team

Decision Table

May 18, 2017

Table II. Status Updates

1. 200-IS-1 OU waste site alignment in TPA Appendix C

Reference: C-13-01

Affected Milestones: —

Originated: 09/16/2014 with transmittal of change control form from RL to Ecology

Status: Open

Dispute Extended: N/A

Action: On 08/18/2016, Ecology committed to prepare a white paper on waste stored in 200-IS-1 prior to 08/1987 that remains in storage. WA Atty. General's office to brief ECY staff. The white paper has yet to be received by DOE.

Comments: Associated with M-15-13-02 dispute, which is extended at the PM level until 6/30/2017.

Closed: —

2. 200-IS-1 RFI Work Plan Dispute

Reference: M-15-13-02

Affected Milestones: M-015-112

Originated: 11/15/2013 with transmittal of change control form from RL to Ecology

Status: Open

Dispute Extended: 6/30/2017

Action: Project managers resolve dispute.

Comments: Pending resolution of C-13-01.

Closed: —

3. WMA-C Closure Requirements

Reference: M-45-15-03

Affected Milestones: M-045-82

Originated: 06/30/2015 with transmittal of M-45-15-03 from ORP to Ecology

Status: Open

Dispute Extended: Dispute Resolved via signing of Tentative Agreement

Action: Disposition/respond to public comments

Comments: Tentative Agreement signed by the Parties 11/22/16. Public comment period began January 30 and ended March 17, 2017. The Parties' official Response to Comment is being reviewed by Ecology and ORP. Note: Milestones in the original Tentative Agreement were moved out 45 days.

4. All Electronic Administrative Record

Reference: P-09-15-01

Affected Milestones: N/A

Originated: Draft provided to regulators

Status: Open

Dispute Extended: N/A

Action: DOE and Ecology to reach agreement path forward.

Comments:

Inter-Agency Management Integration Team
Decision Table
May 18, 2017

5. TPA Five-Year Review – Status

Reference: TPA Article XXXVIII
Affected Milestones: N/A
Originated: N/A
Status: Agency Review – closed (via IAMIT Determination / TPA update – on-going)
Dispute Extended: N/A
Action: Parties continue to meet on a regular basis
Comments: Meeting between the Parties held 5/11/17. Priorities established, actions assigned. TPA Change Control Forms drafted and in review.
Closed: —

6. TPA MP-14 WIDS Procedure – Status

Reference: TPA
Affected Milestones: N/A
Originated: N/A
Status: Agency Review
Dispute Extended: N/A
Action: Discuss, assign actions
Comments:

Table III. Recently Closed

1. PUREX Surveillance and Maintenance Plan Comment #8 Dispute

Reference: DOE/RL-98-35, Rev. 3
Affected Milestones: N/A
Originated: 10/3/2016 DOE invoked dispute
Status: Closed
Dispute Extended: 3/31/17
Action: IAMIT make a decision on how to proceed on the dispute. Extend, resolve, elevate to the Director.
Comments: Ecology requests that DOE maintain a closure plan as part of the PUREX operating record. DOE proposed a revision to the PUREX S&M Plan. SOD submitted to IAMIT on 11/02/2016.
Closed: March 30, 2017



*Tri-Party Agreement Interagency Management Integration Team Meeting
May 18, 2017*

<u>Name</u>	<u>Organization</u>
<u>Stephen H. Pfaff</u>	<u>DOE-ORP</u>
<u>Ross Kinnaland</u>	<u>ECY</u>
<u>Kathy Kase</u>	<u>court reporter</u>
<u>Rana Evans</u>	<u>ORP</u>
<u>John Price</u>	<u>ECY</u>
<u>Dennis Fallk</u>	<u>EPA</u>
<u>Michael Cline</u>	<u>DOE-RL</u>
<u>Tom Teynor</u>	<u>DOE-RL</u>
<u>Jane V. Borges</u>	<u>CHPRC</u>
<u>Stephanie Brasher</u>	<u>MSA</u>
<u>JOE AXTELL</u>	<u>DOE-RL</u>
<u>Cheryl Whalen</u>	<u>ECY</u>
<u>OB B PIRRO</u>	<u>MSA-TPA</u>
<u>Michael Turner</u>	<u>MSA-TPA</u>
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