

Office of River Protection
Tri-Party Agreement Project Managers Meeting Minutes

May 2, 2019

2440 Stevens Center
Richland, Washington

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CONCURRENCE SIGNATURES

The undersigned TPA Project Managers (or their delegates) indicate by their signatures that these meeting minutes reflect the actual occurrences of the above-dated Tri-Party Agreement Project Managers' Meeting.



Wahed Abdul, DOE-ORP

Date: 7/1/19



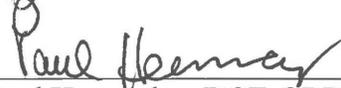
Kaylin Burnett, DOE-ORP

Date: 7/11/19



Janet Diediker, DOE-ORP

Date: 7/18/19



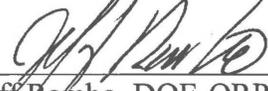
Paul Hernandez, DOE-ORP

Date: 7/16/19



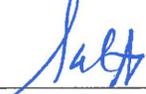
Rod Lobos, DOE-ORP

Date: 7/23/19



Jeff Rambo, DOE-ORP

Date: 7/22/2019



Sahid Smith, DOE-ORP

Date: 7/22/19



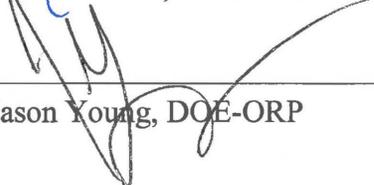
Dustin Stewart, DOE-ORP

Date: 7/18/19



Richard Valle, DOE-ORP

Date: 7/18/2019



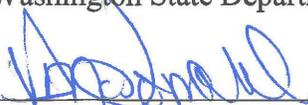
Jason Young, DOE-ORP

Date: 7/10/19



Jeff Lyon, Project Manager
Washington State Department of Ecology

Date: 7/23/19



Dan McDonald, Project Manager
Washington State Department of Ecology

Date: 7-29-19



Stephanie Schleif, Project Manager
Washington State Department of Ecology

Date: 7/30/19

TERMS

BBI	Best Basis Inventory
BOF	Balance of Facilities
CD	Consent Decree
CD-3B	critical decision
CERCLA	<i>Comprehensive Environmental Response, Compensation and Liability Act</i>
DFLAW	direct feed low-activity waste
DOE	U. S. Department of Energy
DST	double-shell tank
Ecology	Washington State Department of Ecology
EIS	Environmental Impact Statement
EM-1	DOE Office of Environmental Management, Assistant Secretary
EMF	Effluent Management Facility
EPA	U.S. Environmental Protection Agency
ERSS	Extended Reach Sluicer System
ETF	Effluent Treatment Facility
EVMS	earned value management system
FY	fiscal year
IAMIT	Inter-agency Management Integration Team
IMUST	Inactive Miscellaneous Underground Storage Tanks
IQRPE	Independent Qualified Registered Professional Engineer
LAW	Low-activity waste
LBL	LAW Facility, Balance of Facilities and Lab
LERF	Liquid Effluent Retention Facility
MUST	Miscellaneous Underground Storage Tank
ORP	U. S. Department of Energy, Office of River Protection
PA	Performance Assessment
PMM	project manager meeting
POC	Point of contact
PT	Pretreatment
RAD	Radiation absorbed dose
RCRA	<i>Resource Conservation and Recovery Act</i>
SST	single-shell tank
TC&WM	Tank Closure and Waste Management
TPA	Tri-Party Agreement
TSCR	tank-side cesium removal
TWRWP	tank waste retrieval work plan
UT	Ultrasonic Test
WMA-C	Waste Management Area C
WRPS	Washington River Protection Solutions LLC
WTP	Waste Treatment and Immobilization Plant

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TRI-PARTY AGREEMENT MONTHLY REPORT

1.0 ADMINISTRATIVE ITEMS/MILESTONE STATUS

Upcoming Meetings

The next Department of Energy-Office of River Protection (ORP) Tri-Party Agreement Project Managers' meeting is June 6, 2019 at 2440 Stevens Center.

Recent Items Entered Into the Hanford Administrative Record

The Office of River Protection Tri-Party Agreement and Consent Decree monthly reports for the period of March 1 - March 31, 2019, was entered on April 23, 2019.

Tri-Party Agreement Milestone Status

ORP stated all Tri-Party Agreement (TPA) milestones reported on were either on schedule or in abeyance (see pgs. 3-5 of the ORP monthly TPA report).

Tri-Party Agreement Issues and Action Items

For reference, see attached: "ORP/Ecology TPA and CD Agreements, Issues and Action Items."

Issue No. 3: ORP considers this issue ("USDOE agrees that the Composite Analysis for the TC&WM EIS is what was, and is being used for the WMA-C PA") closed. Ecology agreed, and the issue was closed.

Action No. 1 (TF-16-11-04): ORP noted there was no change in status. Action remains On Hold.

Action Item No. 2 (TF-18-07-01): ORP stated there was no change in status. Action remains Open.

Action Item No. 3 (TF-18-10-01): ORP noted a proposed meeting on the subject was rescheduled, so the action remains Open.

Action Item No. 4 (TF-18-10-02): ORP stated there was no change in status. Action remains Open.

Action Item No. 5 (TF-19-01-01): ORP stated and Ecology agreed this action was closed on 03/11/19. The action will be removed from next month's list.

Action Item No. 6 (TF-19-01-02): ORP stated and Ecology agreed this action was closed on 05/02/19. The action will be removed from next month's list.

Action Item No. 7 (TF-19-02-01): ORP stated and Ecology agreed this action was closed on 04/04/19. The action will be removed from next month's list.

Action Item No. 8 (TF-19-04-01): ORP stated the list of Inactive Miscellaneous Underground Storage Tanks was not yet complete and they will furnish the list to Ecology when it is available.

TRI-PARTY AGREEMENT MONTHLY REPORT

Action Item No. 9 (TF-19-04-02): ORP stated the reports are still pending, and when available, they will furnish them to Ecology.

Action Item No. 10 (TF-19-04-03): ORP stated there was no change in status. Action remains Open.

After Issues/Actions, there was a brief discussion on the possible cancellation of the ORP Quarterly meeting, which was being discussed at the Inter-agency Management Integration Team (IAMIT) level. The IAMIT is deciding whether the quarterly meeting is/is not needed and the status quo will continue until they make their decision.

2.0 SYSTEM PLAN

ORP reported negotiations on System Plan, Rev. 8 are ongoing, with negotiations scheduled to continue until May 17, 2019.

ORP reported scenario-development for System Plan, Rev. 9 has begun and the parties are meeting biweekly.

3.0 ACQUISITION OF NEW FACILITIES

ORP reported there has been no change in this activity and all milestones continue in Abeyance.

4.0 SUPPLEMENTAL TREATMENT AND PART B PERMIT APPLICATIONS

ORP reported there was no change in the status of the Supplemental Treatment and Part B Permit Applications and all milestones continue in Abeyance.

5.0 TANK-SIDE CESIUM REMOVAL SYSTEM

Significant Past Accomplishments

ORP reported they have begun the 60% design reviews for the ion-exchange column storage pad and the 90% design review of the TSCR and waste feed delivery system. In addition, ORP reported that the 90% review of the tank farm infrastructure had begun.

Significant Planned Actions in the Next Six Months

ORP reported the 90% design review for the TSCR ion-exchange storage pad was to begin in June, but may actually begin in May.

Issues

ORP noted there was basically no change in status, but that in regard to emissions going back to the tank system, ORP added sampling equipment into the 60% and 90% TSCR design.

TRI-PARTY AGREEMENT MONTHLY REPORT

6.0 242-A EVAPORATOR STATUS

ORP reported no change to the status of campaign EC-10, which is on schedule for June 2019. The campaign will consist of a cold run followed by a short hot run.

Significant Past Accomplishments

ORP reported the re-build of the spare PB-1 pump was complete, and that mechanical and electrical testing was now being performed.

Significant Planned Actions in the Next Six Months

ORP stated the 60% design review for the 242-A slurry line replacement was actually past the 60% stage. ORP also noted the replacement slurry line can be used, should either the primary slurry line or the feed line fail.

Issues

ORP reported it had provided Ecology with a second round of responses to Ecology comments on the Independent Qualified Registered Professional Engineer (IQRPE) Integrity Report in April 2019. Ecology confirmed it had received the response.

7.0 LIQUID EFFLUENT RETENTION FACILITY AND 200 AREA EFFLUENT TREATMENT FACILITY

Significant Past Accomplishments

There was no change to the total volume processed at LERF for FY 2019.

Significant Planned Actions in the Next Six Months

ORP noted it was working to remove a small "heel" in Basin 44 that will be transferred to Basin 42, thus allowing the replacement project at Basin 44 to occur. ORP pointed out a larger than normal amount of mixed waste trench leachate was recently sent to Basin 43, which ORP attributed to the abnormal snowfall levels during the past winter.

ORP projected a 2 million gallon reduction at Basin 42 this FY.

Work continues on the surge pump replacement, with ORP projecting completion in May 2019.

ORP expects to complete remaining fieldwork for the ETF integrity assessment.

Issues/Other Items:

ORP acknowledged they had received an Ecology letter regarding leak detection in the WTP transfer lines and that ORP is discussing that letter internally.

TRI-PARTY AGREEMENT MONTHLY REPORT

8.0 TANK SYSTEM UPDATE

8.1 Double-Shell Tank Integrity

Significant Past Accomplishments

ORP reported on the annual comprehensive inspection of tank 241-AY-101 annulus, completed in January 2019 and on the completion of ultrasonic testing (UT) inspections done on tanks 241-AP-107 and 241-AP-108. Air-slot inspection of 241-AP-108 was also completed, and all inspections had favorable results. ORP reported that there are two remaining tanks left for UT inspection, 241-AP-102 and -106. ORP also noted it had completed enhanced visual inspection of tank 241-AZ-101, but it was ahead of the reporting period.

ORP reported it had completed visual inspections underneath tanks 241-AP-107 and -108, which were the first double-shell tanks (DST) to be inspected underneath. Results of the inspections revealed favorable conditions.

Significant Planned Actions in the Next Six Months

ORP reported planned UT inspections for tanks 241-AP-102 (annulus floor only), 241-AN-102, and 241-AP-106 (annulus floor only).

ORP is in the process of procuring the annulus floor cleaner for tank 241-AY-101 and a design of a primary tank bottom volumetric inspection system to be deployed in the DSTs. Ecology asked for clarification on the term “volumetric,” and ORP explained it related to not just a visual of the tank metal, but to the whole tank structure.

8.2 Single-Shell Tank Integrity

Significant Past Accomplishments

ORP reported it had completed visual inspections for eight tanks in FY 2019: 241-B-102, 241-B-103, 241-BX-104, 241-B-110, 241-B-111, 241-B-112 and 241-SX-114.

Significant Planned Actions in the Next Six Months

ORP has visual inspections planned for eight tanks: 241-SX-115, 241-U-101, 241-U-106, 241-U-109, 241-T-103, 241-T-108, 241-T-202 and 241-TY-106, as well as three miscellaneous underground storage tanks: Catch tank 204-AR-TK-1, 241-A-302-A, and 242-A-302-B.

ORP plans to perform TFC-ENG-CHEM-D-42, *Tank Leak Assessment Process* on tanks 241-T-101 and -103, though it was reported that 241-T-101 had been completed as of the date of today’s meeting.

Issues/Other Items

Ecology inquired about the schedule for all single-shell tank (SST) integrity inspections, to which ORP reported that a draft TPA change control form with schedules/milestones had been drafted and was being reviewed internally before being shared with Ecology.

TRI-PARTY AGREEMENT MONTHLY REPORT

Ecology asked if there was contamination found on the floor of tank 241-AY-101 after cleaning was done. ORP replied that it had found no contamination, but there was a considerable amount of rust and debris found, which will need to be vacuumed. Ecology also asked to see the design of the vacuum that will be cleaning the debris in that tank.

Ecology asked for more information on the selection process for the miscellaneous underground storage tanks planned for visual inspection and the results of those inspections. ORP agreed to do so.

Ecology asked for a briefing on results of the TFC-ENG-CHEM-D-42, *Tank Leak Assessment Process* completed on tank 241-T-101. ORP will provide.

8.3 Independent Qualified Registered Professional Engineer Activities

Double-Shell Tank System

ORP noted no changes from last month's reporting.

Single-Shell Tank System

ORP noted no changes from last month's reporting.

242-A Evaporator

ORP reported it was awaiting a draft IQRPE report in the summer and a final report by the end of the FY. Ecology asked that it be provided that report. ORP also stated that although the IQRPE recommended assessments be completed every 15 years, it agreed to do them every 10 years – as is already stated in the RCRA permit.

ETF

ORP stated it was working with WRPS, who submitted technical material and support to the IQRPE project team. ORP is still awaiting the IQRPE draft report, which was the same status reported last month.

219-S Tank System

ORP stated it was working with WRPS, who submitted technical material and support to the IQRPE project team. ORP is still awaiting the IQRPE draft report, which was the same status reported last month.

Issues/Other Items

Ecology asked that its responses and recommendations be included in the IQRPE reports. ORP agreed to do so, but pointed out the draft TPA change control form it would be submitting to Ecology reflected their recommendations.

TRI-PARTY AGREEMENT MONTHLY REPORT

9.0 IN-TANK CHARACTERIZATION AND SUMMARY

9.1 Reports Completed or Released

ORP reported no new reports were completed in March 2019 (the reporting period). Twelve reports have been released between January 31 and February 28, 2019 (see March TPA monthly report for list).

9.2 Tank Sampling

Significant Past Accomplishments

ORP reported grab sampling was completed on tank 241-SY-102 and samples were sent to be analyzed.

Significant Planned Actions in the Next Six Months

ORP highlighted the planned core sampling of tank 241-AY-101, noting a core sample had not been obtained from that tank in some years. Ecology asked why the tank had been selected and for a copy of the sampling plan. ORP responded that it would like to see and analyze the chemistry near the bottom of the tank and the supernatant therein, and agreed to provide Ecology with the sampling plan.

9.3 Best-Basis Inventory Updates

Significant Past Accomplishments

ORP reported 10 BBI's were completed in March 2019 – more than usual, to make up for lost time due to recent bad weather (for a full listing of the BBI's, see the March TPA Report).

Significant Planned Actions in the Next Six Months

ORP reported one BBI is scheduled to be completed in April.

10.0 SINGLE-SHELL TANK CLOSURE PROGRAM

Milestone Update

ORP noted no changes from last month's reporting.

Significant Past Accomplishments

ORP noted no changes from last month's reporting.

Significant Planned Activities in the Next Six Months

ORP noted no changes from last month's reporting.

Issues

ORP noted there had been ongoing discussions at the IAMIT level about the dispute resolution process regarding the denial of request for waiver for TPA Waste Retrieval Criteria for SST 241-C-106.

TRI-PARTY AGREEMENT MONTHLY REPORT

11.0 SINGLE-SHELL TANK RETRIEVAL PROGRAM

ORP reported on milestone M-045-86 – the tank 241-C-105 retrieval data report is on schedule and is expected to be completed in June 2019.

Significant Past Accomplishments

Refer to Consent Decree section of these meeting minutes.

Significant Planned Activities in the Next Six Months

Refer to Consent Decree section of these meeting minutes.

Issues

Refer to Consent Decree section of these meeting minutes.

12.0 TANK OPERATIONS CONTRACT OVERVIEW

Note: This section was skipped in the interest of time. The data can be viewed in the March 2019 ORP TPA Monthly Report on pages 26-27.

5.01 - Base Operations

The data can be viewed in the March 2019 ORP TPA Monthly Report on pages 28-29.

5.02 – Retrieve and Close Single-Shell Tanks

The data can be viewed in the March 2019 ORP TPA Monthly Report on pages 30-31.

5.03 - Waste Feed Delivery/Treatment Planning

The data can be viewed in the March 2019 ORP TPA Monthly Report on pages 32-33.

5.05 – Treat Waste

The data can be viewed in the March 2019 ORP TPA Monthly Report on pages 34-35.

CONSENT DECREE MONTHLY REPORT

1.0 CONSENT DECREE MILESTONES/ADMINISTRATIVE ACTIONS

Consent Decree Milestones

ORP reported all milestones are either On Schedule or Under Analysis.

Consent Decree Issues and Action Items

For reference, see attached: "ORP/Ecology TPA and CD Agreements, Issues and Action Items."

Action No. 1 (WTP-19-04-01): ORP and Ecology had a general discussion on the closure of the remaining technical issues, specifically T4 and T5. ORP stated that T5 was closed, but T4 is not. Ecology asked about a definitive path forward for the technical issues (T4 aside), and whether ORP knows for sure that systems are not going to change. ORP responded that it knows what the technical resolution requires, specifically in relation to T6, and does not need to wait for the Defense Nuclear Facilities Safety Board(DNFSB) to dictate design change. However, ORP is not starting on those design changes yet, knowing that there may be additional changes as work evolves. ORP stated that it could do a design based on a standardized vessel, but they know they will eventually need to produce a full flow sheet, based on ongoing studies and design changes. For T5, ORP stated that design changes would not necessarily be needed, but material changes may be required. Ecology asked if technical resolution would result in contract changes. ORP responded that contract changes were not being considered at this point.

ORP reported that other than technical issue resolution, a focus is procurement suspension as a result of awaiting technical issue resolution and resulting potential design changes. ORP stated there were 50 procurements in suspension since work was halted in 2012. ORP also noted a shift in funding priorities to other areas like direct-feed low-activity waste (DFLAW), and the impact of that.

2.0 SINGLE-SHELL TANK RETRIEVAL PROGRAM

Significant Accomplishments during the Prior Month

Efforts to remove the stuck shield plug in the AX-102 02B pit have been unsuccessful and ORP is terminating efforts to remove it. This led to a modification of the tank waste retrieval work plan (TWRWP) for tank 241-AX-102.

ORP reported the following:

- Completed installation of caustic and water piping system from POR496 to the AX tank farm.
- Completed installation of the hose-in-hose transfer lines steel shield plates and hose barns tank AX-102 pits, A, B and C.
- Removed the top section of tank AX-103 R7C thermocouple.
- Set all six sections of the A tank farm exhauster system manifold on the pad.
- Completed installation of two boreholes at tanks A-104 and A-105, and taken samples of one borehole.
- Completed tank A-103 pit inspection.

CONSENT DECREE MONTHLY REPORT

Ongoing Activities

ORP reported the following:

- Electrical infrastructure installations continue in A tank farm – trenches being dug for power to exhausters.
- Field activities continue for long-length equipment removals at tank AX-103.
- Installation of retrieval equipment at tank AX-102.
- Power and control for exhausters being installed for A tank farm ventilation system.
- Installation of ventilation manifold – anchoring and grouting for A tank farm.
- Installation of duct work supports for A tank farm.
- Removal of tank A-101 riser 2 thermocouple.
- Installation of the high-resolution resistance leak detection monitoring system.
- Continuing design of waste retrieval for A tank farm (tanks 101, 102, 103, and 106 – design for 104 and 105 is pending).

Significant Planned Activities in the Next Month

ORP reported on the following planned activities:

- Completion of Phase II of the AX-102/AX-104 tanks control trailer installation.
- Start of Construction Acceptance Tests and Operational Acceptance Tests to support tank AX-102 retrieval operations, however a water line failed and now repairs are needed.
- Complete the placement of A tank farm ventilation system exhaust manifold and supports.
- Complete the removal of tank AX-103 R7C thermocouple.

Issues/Other Items

ORP reported it would be forced to go with two Extended Reach Sluicer System's (ERSS) in tank 241-AX-102 instead of three, which may put retrieval dates in jeopardy.

Ecology requested a schedule of all dates for start of and completion of Consent Decree tank retrievals. ORP agreed to provide, but stated that the schedule would be very general. Ecology did not view the schedule as 'enforceable' but more for informational purposes.

ORP reported the removal of the AX-103 R7C thermocouple has resulted in higher than expected dose rates, so ORP is employing more robust shielding measures.

The State of Oregon asked about potential budget and schedule ramifications from the stuck shield plug in the AX-102 02B pit. ORP acknowledged that there will likely be cost and schedule impacts, but as a result, ORP is looking at potentially cutting new risers in tanks to avoid this type of problem in future tank retrievals.

3.0 TANK WASTE RETRIEVAL WORK PLAN STATUS

Significant Planned Activities in the Next Month

ORP is modifying RPP-RPT-58933 to update schedule and vapor-monitoring sections.

4.0 RETRIEVE AND CLOSE SINGLE-SHELL TANKS

CONSENT DECREE MONTHLY REPORT

WBS 5.02 EVMS Data

ORP reported unfavorable cost and schedule variances, primarily due to impacts from a prolonged period of adverse weather.

5.0 WASTE TREATMENT AND IMMOBILIZATION PLANT PROJECT

Project Schedule and Cost Variance Performance

This section was not covered in the meeting. Please refer to the March 2019 ORP Consent Decree Monthly Report, pages 12-13.

6.0 PRETREATMENT FACILITY

ORP and Ecology continued a high-level discussion stemming from the “Issues and Action Tracking” item on closing the technical issues at the Pretreatment Facility (PT) and its future mission, which could be impacted by funding decisions. ORP committed to provide Ecology with a draft “flow sheet” that maps out potential changes to the PT.

7.0 HIGH-LEVEL WASTE FACILITY

ORP reported that the RLD vessels, 7 and 8 would be arriving in June or July 2019.

ORP reported staffing had increased exponentially, from single digits in January 2019, to 100 presently, and a projected 200 personnel by the end of September 2019.

ORP reported it expects a slight budget increase in FY 2020, from the current level of about \$60 million a year to \$80 million.

In response to a question from Ecology on vessels and historical poor quality assurance, ORP responded that Bechtel had been sending inspection teams to the vendor. Ecology also asked about storing the vessels for an extended period of time, to which ORP responded that the vessels would ideally be stored on top of the facility, but if that could not be accommodated, the vessels would be stored at a marshalling yard.

8.0 LOW-ACTIVITY WASTE FACILITY

ORP reported the turnover of 55 of 94 systems from construction to startup.

ORP reported that a National Electrical Code (NEC) issue had caused de-energization of the low-activity waste (LAW) facility, but that LAW had passed an NEC inspection and was once again energized.

ORP reported the LAW facility is on the critical path, schedule-wise, with much of the delay attributed to the construction of the active gas analyzer in room 304G, which is a small space where a large amount of construction activities are taking place.

ORP noted there have been improvements in procurement and quality control, particularly with structural steel and anchor bolts, electrical systems, and software traceability.

CONSENT DECREE MONTHLY REPORT

Ecology asked about items remaining on the Documented Safety Analysis list. ORP stated there were some design changes for the off-gas system, as well as new design packages for the C2 and C3 ventilation systems. ORP reported that it held discussions about improvements in this area and as a result, an Accelerated Response Team had been formed, which meets daily to address items on the list.

Also on the C2 and C3 ventilation systems, ORP reported that it was still looking at the design of HEPA filters in relation to how much moisture they would absorb, and if a new design is needed or the original design could still be used.

Ecology asked ORP about software keeping up with continual design and other changes, to which ORP noted that it has a simulator building to test software and instrumentation and to train operators.

9.0 BALANCE OF FACILITIES

ORP reported 51 of 57 systems have been turned over from construction to startup, and the main focus is on testing of the steam plant.

ORP reported construction is progressing well on the Effluent Management Facility (EMF), but is still behind schedule because of a shift in resources to LAW.

ORP reported two large vessels (repurposed PT vessels) arrived at the Port of Benton and are now on site. They will be installed along with three more vessels at EMF.

Ecology commended ORP and its contractor for its recovery on the underground waste transfer lines project and for working with the pipe fabricator.

10.0 ANALYTICAL LABORATORY

ORP reported the primary focus at the Analytical Lab (LAB) was ventilation balancing, which is being done with the assistance of the Mississippi State University (MSU). MSU personnel were on site for a number of weeks, and worked with Washington State Department of Health staff on HEPA filter testing.

ORP noted the design phase for the LAB was essentially complete and construction is progressing. ORP added that the low-point drain was complete, along with the slab cover above it, and construction crews were working seven-day shifts.

ORP/Ecology TPA and CD Agreements, Issues, and Action Items –May 2, 2019

Agreements:

1. Per an Ecology standing request (4/21/2016), ORP agrees to include any written directives given by DOE to the contractors for work required by the CD in future quarterly CD Reports (see CD Section IV-C-1-e).
2. The ORP and Ecology PMs have developed, signed, and entered an outline for the CD Tank Completion Certification into the TPA Administrative Record. A briefing to senior management will occur if any follow-on actions arise.
3. Ecology and ORP have agreed to move the TPA/CD PMM meeting to the first Thursday of the month starting in January 2019. The TPA and CD monthly reports distribution will occur by the end of December via link to the Admin Record. This will be the format for report distribution and monthly meetings going forward for calendar year 2019.

Issues:

1. Appendix H step 2b, has not been completed. USDOE have submitted Single-Shell Tank (SST) WMA (Waste Management Area)-C Closure Plans without any indication of the role and participation for Nuclear Regulatory Commission (NRC), or a plan for completing this step.
2. Appendix I – USDOE has presented an inaccurate process for closure of the Tank Farms, and of WMA-C. Appendix I has defined the expectations of the Tri-Parties, and a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) decision has not been an assumption from any of the Tri-Parties.
 - a. Appendix I, Section 3.1 states: “Ecology¹ is the lead regulatory agency responsible for the closure of the SST system. EPA² is the support regulatory agency providing oversight of the state’s authorized program.”; “The Parties’ expect that this Agreement Appendix I will incorporate Agreement Section 5.5 processes to provide a mechanism for avoiding duplicative regulation between Ecology and the EPA through the lead agency concept.”; “EPA will evaluate the need to provide additional comments based on its review of proposed modifications to WMA closure action plans, and issue additional comments to Ecology as necessary.”
 - b. Appendix I, Section 3.2 states: “A consistent groundwater monitoring, protection, and risk assessment methodology will also be realized through close integration of activities, as described in the Hanford Site Groundwater Strategy (DOE/RL-2002-59). Consistent application of the requirements of this Appendix I will serve to aid the Parties in ensuring cost effective and consistent cleanup on the Central Plateau.”
 - c. Section 5.5 of the TPA (Action Plan): ”The information necessary for performing RCRA³ closures/post-closures within an operable unit will be provided in various RFI⁴/CMS⁵ documents. The initial work plan will contain a Sampling and Analysis Plan (SAP) for the associated RCRA units and it will outline the manner in which RCRA closure/post-closure plan requirements will be met in the work

¹ Washington State Department of Ecology

² Environmental Protection Agency

³ Resource Conservation & Recovery Act

⁴ RCRA Facility Investigation

⁵ Corrective Measure Study

ORP/Ecology TPA and CD Agreements, Issues, and Action Items –May 2, 2019

plan and subsequent documents. The selected closure/post-closure method and associated design details will (unless otherwise agreed to by the parties) be submitted as part of the CMS report at a later date, as specified in the work plan.” “In any case, the parties agree that CERCLA remedial actions and, as appropriate, HSWA⁶ corrective measures will comply with ARARs⁷.”

- d. Section 5.6: “The EPA and Ecology have selected a lead regulatory agency approach to minimize duplication of effort and maximize productivity. Either the EPA or Ecology will be the lead regulatory agency for each operable unit, TSD⁸ group/unit or milestone. The lead regulatory agency for a specific operable unit, TSD group/unit or milestone will be responsible for overseeing the activities covered by this action plan that relate to the successful completion of that milestone or activities at that operable unit or TSD group/unit, ensuring that all applicable requirements are met.”
3. USDOE has stated in the recent WIR⁹ public meeting, that the Composite Analysis was being worked on now, and that it would be released (in draft) in 2020. USDOE had previously stated that the TC&WM¹⁰ EIS¹¹ would be sufficient for use as a composite analysis for the WMA- C PA¹². The State of Washington is in agreement that the TC&WM EIS is adequate for this purpose, and has been working with that assumption. Ecology does not have any knowledge of the development of the “Composite Analysis”, and as indicated in Appendix I section 3.2, the Tri-Parties have agreed that there will be “close integration of activities” and a “consistent application of the requirements of Appendix I”. Ecology is the lead agency for SST Closure and will expect USDOE to apply the TC&WM EIS as the “Composite Analysis” for closure of WMA-C, until USDOE closely integrates the development of a new risk assessment methodology.

USDOE agrees that the Composite Analysis for the TC & WM EIS is what was and is being used for the WMA-C PA.

*****April 4, 2019: DOE considers Issue 3 closed and would like to remove from the list***.**

⁶ 1984 Hazardous and Solid Waste Amendments

⁷ Applicable or Relevant and Appropriate Requirements

⁸ Treatment, Storage, and/or Disposal

⁹ Waste Incidental to Processing

¹⁰ Tank Closure and Waste Management

¹¹ Environmental Impact Statement

¹² Performance Assessment

ORP/Ecology TPA and CD Agreements, Issues, and Action Items –May 2, 2019

#	Action ID Start Date	Action	Updates / Needs for Closure	Actionee(s)	Status/ Date Closed
1	TF-16-11-04 11-17-16	ORP to provide Ecology the T-112 work plan	In legal review. (07/19/2018) No change (01/03/2019)	Dusty Stewart	On Hold
2	TF-18-07-01 07/19/18	Integrate the ground water modeling for WMA-C PA with BP-5 remedial design for pump and treat at WMA-C (Jeff Lyon)	Held several meetings with RL/ORP on this and other integration issues in July and August. RL has the lead for groundwater monitoring program. ORP proposes closing. (10/18/2018) Ecology wants clarification when BP-5 Interim Record of Decision (IROD) is expected to be issued and that there is action from RL to address technetium-99 contamination. Action item to remain open (10/18/2018) No change (01/03/2019)	Rod Lobos	Open
3	TF-18-10-01 10/18/18	Follow up meetings for discussion and resolution of tank-side cesium removal (TSCR) related activities.	Schedule a meeting to further discuss concerns related to crystalline silicotitanate (CST) compatibility with HLW glass, long term storage, ion exchange column design, potential for resolution concepts (in the early stage). ORP will schedule first meeting within the next couple of weeks. Additionally Ecology would like a invite to witness the tall column test. 4-4-19: ORP expects the meeting to occur prior to the end of April. Dan will provide list of Ecology names and available dates. The meeting should be scheduled for a couple of hours. Ecology would like clarification regarding the resin extracted from the column, which is purposed to be put in the high level waste stream. Currently there is no study to validated compatibility/treatment via HLW. Clarify disposition of the physical hardware.	Sahid Smith	Open

ORP/Ecology TPA and CD Agreements, Issues, and Action Items –May 2, 2019

#	Action ID Start Date	Action	Updates / Needs for Closure	Actionee(s)	Status/ Date Closed
4	TF-18-10-02 10/18/18	Ecology and DOE to meet to discuss Ecology email (see Updates)	The HFFACO is the current working agreement and Ecology is confident that the HFFACO has adequately described our expectations for WMA-C Closure. USDOE and Ecology will meet and discuss the areas where USDOE have not fulfilled the TPA requirements for SST Closure or are inconsistent with Tri-Party agreements and understanding. USDOE and Ecology will agree to a resolution to those deficiencies where USDOE have not fulfilled the TPA Requirements. If USDOE has concerns regarding the HFFACO, then our respective senior managers should provide direction to the TPA Project Managers for resolving those concerns. (Email Jeff Lyon, Oct 22, 2018) Meeting between ORP and Ecology occurred on 11 Dec 2018 to discuss these issues. ORP is preparing a response for Ecology.	Rod Lobos	Open
5	TF-19-01-01	Slurry line replacement schedule	Provide a slurry line replacement schedule. (01/03/2019) ORP provided preliminary schedule for SL-167 and SL-168 replacement at the 242-A Evaporator. Closed per Ecology email dated March 11, 2019.	Paul Hernandez	3-11-19
6	TF-19-01-02	Dump valve usage for cold/hot test may not be compliant with RCRA permit.	Meeting with Ecology scheduled for February 14 th (01/24/19). Meeting held on February 28 th due to adverse weather shut downs. Follow on meeting has been set for March 18 th . Ecology concerns are not with 242-A Evaporator RCRA permit but with the DR-335 integrity/fit for use rating. March 18, 2019 email from Ecology identified EC-10 actions are compliant with 242-S Evaporator RCRA	Paul Hernandez/Rana Evans	3-18-19

ORP/Ecology TPA and CD Agreements, Issues, and Action Items –May 2, 2019

#	Action ID Start Date	Action	Updates / Needs for Closure	Actionee(s)	Status/ Date Closed
			permit. Additionally, Ecology concurred that DR-334 and DR-335 are compliant with 40 CFR 265.191. ORP considers this action closed.		
7	TF-19-02-01	Provide briefing and invite Jeff Lyon, Steve Lowe, Dan McDonald and Jay Decker	Briefing on the tank integrity program and schedule. Clarify the tank testing activities that are in place to ensure integrity of tanks that will be significant to DFLAW operation. Briefing is planned for early March 2019.	Dusty Stewart	Closed 4-4-19
8	TF-19-04-01	Provide list of IMUSTs	Oregon and Ecology would like to see the list.	Rana Evans/Dusty Stewart	4-4-19
9	TF-19-04-02	Provide the FY2018 DST Visual Inspection (Enhanced Visual Inspections) Reports to Ecology (Steve Lowe)	Reports are still pending.	Dusty Stewart	4-4-19
10	TF-19-04-03	Demonstrate compliance with Appendix I for SST closure. (Jim Alzheimer)	Clarify how integration between RL and ORP is being coordinated for consistent action and compliance related to closure for CERCLA/RCRA and rad on similar type tanks. Clarify if this is captured in Tier 1, Tier 2 or Tier 3 closure plans. How are the separate closure documents providing compliance with Appendix I How is EPA involved?	Rod Lobos	4-4-19

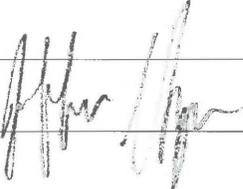
ORP/Ecology TPA and CD Agreements, Issues, and Action Items –May 2, 2019

#	Action ID Start Date	Action	Updates / Needs for Closure	Actionee(s)	Status/ Date Closed
1	WTP-19-04-01	Ecology request a briefing on the current status and schedule on all tech issue resolution		Wahed Abdul	Open
2					
3					

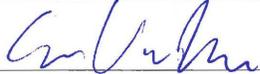
May 2, 2019
Office of River Protection
Tri Party Agreement Consent Decree Meeting

PRINT NAME	SIGN NAME	ORG
Abdul, Wahed		ORP
Alzheimer, Jim		ECY
Barnes, Mike		ECY
Beehler, Steve		ORP
Brasher, Stephanie		MSA
Burnett, Kaylin		ORP
Cameron, Craig		EPA
Carlson, Annette		ECY
Cimon, Shelley		OR State
Decker, Jay		ECY
Diediker, Janet		ORP
Einan, Dave		EPA
Evans, Rana		ORP
Fletcher, Tom		ORP
Gao, Tracy		ECY
Hall, Katie		ECY
Harkins, Brian		ORP
Hastings, Rob		ORP
Hernandez, Paul		ORP
Irwin, Mat		ORP
Johnson, Jeremy		ORP
Jones, Mandy		ECY
Joyner, Jessica		WRPS

May 2, 2019
Office of River Protection
Tri Party Agreement Consent Decree Meeting

PRINT NAME	SIGN NAME	ORG
Keith, Colleen		ORP
Kemp, Christopher		ORP
Lobos, Rod		ORP
Lopez, Maria		WRPS
Lowe, Steven		ECY
Lucatero, Yoana		ECY
Lyon, Jeffery		ECY
Martell, John		DOH
Mathey, Jared		ECY
McDonald, Dan		ECY
Menard, Nina		ECY
Mulkey, Charles		WRPS
Parker, Dan		WRPS
Pfaff, Stephen H		ORP
Pomiak, Andrew		ECY
Price, John		ECY
Qualheim, Jane		MSA (note taker)
Rambo, Jeffrey		ORP
Rochette, Beth		ECY
Schleif, Stephanie		ECY
Schmidt, John		DOH
Serafin, Shane		ORP
Skorska, Maria		ECY

May 2, 2019
Office of River Protection
Tri Party Agreement Consent Decree Meeting

PRINT NAME	SIGN NAME	ORG
Smith, Sahid		ORP
Stewart, Dustin		ORP
Trimberger, Bryan		ORP
Turner, Michael		MSA
Turner, Vanessa		ORP
Utley, Randell		DOH
Valle, Richard		ORP
Van Mason, Eric		WRPS
Walmsley, Mign		ECY
Wang, Oliver S		ECY
Whalen, Cheryl		ECY
Whitelely, Craig		ORP
Yasek, Donna		BNI
Young, Jason		ORP
Schroder, Laura	Laura Schroder	ECY