TRI-PARTY AGREEMENT MILESTONE M-026-01
PROJECT MANAGER MEETING MINUTES

June 21, 2022

SIGNATURES:
In accordance with the Tri-Party Agreement Section 4.1, Project Manager Role, any agreements and commitments resulting from the meeting will be prepared and signed by all parties as soon as possible after the meeting. The undersigned indicate by their signatures (or their delegate's signature) that these meeting minutes reflect the actual discussion during this meeting. Signatures denote concurrence with the agreements and commitments resulting from this meeting and do not imply agreement with statements made during this meeting. Attachments to these meeting minutes are provided for informational purposes only.

Approval: MARK FRENCH Digitally signed by MARK FRENCH Date: 2022.07.19 11:18:30 -07'00' Date: _____

Mark S. French, Project Manager
U.S. Department of Energy,
Richland Operations Office

Approval: Mathey, Jared W. (ECY) 2022.07.14 16:11:47 -07'00' Date: _____

Jared W. Mathey, Project Manager
Washington State Department of
Ecology

TPA MILESTONE M-026-01 PROJECT MANAGER MEETING MINUTES
June 21, 2022

Attendees:

Ecology	DOE	HMIS
Jared Mathey	Ingrid Colton	Stephanie Brasher
Jonathan Rogers	Kelly Ebert	Cody Schrader
	Bryan Trimberger	
CPCCO		**WRPS**
Leonard Habel		Sean Scott

Attachment:

- Attachment 1 – Agenda

Minutes:

1. Status/Approval of Previous Meeting Minutes

HMIS completed incorporating redline changes received from the U.S. Department of Energy (DOE) and Washington State Department of Ecology (Ecology) in the May 12, 2022 Project Manager Meeting (PMM) Minutes. These minutes are currently being routed for DOE and Ecology approval.

2. Status of Tri-Party Agreement (TPA) Interim M-026-01 Milestones

2.1 Milestone M-026-01AD (CY 2019 LDR Full Report)

HMIS noted the TPA dispute resolution process at the Project Manager level was extended from May 20, 2022 to June 30, 2022. DOE and Ecology agreed that any updates to this milestone will be addressed at the scheduled dispute resolution meeting immediately following this PMM.

2.2 Milestone M-026-01AE (CY 2020 LDR Summary Report)

HMIS noted TPA Change Control Form M-26-22-02 was signed on June 13, 2022 extending the due date of interim Milestone M-026-01AE for submittal of the Calendar Year (CY) 2020 Land Disposal Restrictions (LDR) Summary Report from August 31, 2022 to September 30, 2022.

HMIS also noted that contractor edits of the draft CY 2020 LDR Summary Report are due back to HMIS by June 23, 2022 and redline changes should be incorporated into the report by June 29, 2022.

Ecology asked for an approximate date to review the draft CY 2020 LDR Summary Report. DOE commented that completion of 2020 redline changes are dependent on the outcome of the CY 2019 LDR Full Report dispute resolution process between DOE and Ecology. Ecology requested an opportunity to review the draft CY 2020 LDR Summary Report for issues outside of the scope of the CY 2019 LDR Full Report dispute. DOE agreed to provide Ecology a copy of the draft CY 2020 LDR Summary Report after the contractor redline changes were incorporated.

DOE also noted there are multiple redundancies within the CY 2020 LDR Summary Report format. DOE requested an opportunity to review these redundancies with Ecology in an effort to streamline the report and future summary reports going forward. DOE and Ecology agreed to schedule additional meetings outside the scope of the M-026-01 PMMs to discuss the summary report structure after Ecology has an opportunity to review the draft CY 2020 LDR Summary Report. HMIS took the action to submit the draft CY 2020 LDR Summary Report by June 30, 2022 and schedule additional meetings between DOE and Ecology to discuss the report structure.

Ecology added that in the event of possible litigation regarding the CY 2019 LDR Full Report dispute, an indeterminate timeline for dispute resolution will impact TPA milestones, which will affect the delivery of future summary reports. Ecology suggested one approach may be in modifying the milestone due dates to deliver multiple summary reports simultaneously as a possible solution to delayed report deliveries. Ecology referenced the capacity of the updated LDR database to store multiple years of data which would facilitate simultaneous delivery of multiple CY reports. HMIS confirmed the capacity for multiple years of data storage in the LDR database. Ecology commented that this suggestion was intended to get the project managers thinking about a path forward if a lengthy dispute process is anticipated.

3. Status of Previous Agreements and Commitments

3.1 Closure Process Summary of the Seven Underground Vault Tanks at the 325 Facility

HMIS referenced a meeting held on May 31, 2022 between DOE, Ecology, and Pacific Northwest National Laboratory (PNNL) during which DOE agreed to draft a write up describing the closure process and characterization and treatment schedule summary of the seven underground vault tanks at the 325 Facility.

DOE noted that they have completed language which is currently under review and will submit the language to Ecology for approval once DOE internal review is complete. Ecology agreed to take the action to review the proposed language once received from DOE and provide any comments via email back to DOE.

Ecology clarified that this is language to be added to the Potential Mixed Waste Table (PMWT) for updating CERCLA document schedules for characterization and treatment of the seven underground vault tank waste at the 325 Facility. DOE concurred with this clarification.

3.2 Update on Review of DOE Assessment Strategy Procedure

HMIS referenced an email sent on June 15, 2022 from Ecology to DOE stating Ecology had concluded their review of comparing the original agreed to Storage Assessment Procedures against the revised DOE procedure DOE-PRO-EM-50623, *Technical and Regulatory Support Mixed-Waste Storage Assessments*, Rev. 0, dated November 30, 2020.

Ecology indicated that the storage assessment procedures were functionally equivalent between the original DOE procedures developed for the CY 2000 LDR Report and the updated procedure. Ecology noted that the updated procedure does not include assessment procedures for Central Accumulation Areas (CAAs) and Satellite Accumulation Areas (SAAs) but this is appropriate and consistent with the 2002 Resolution of Dispute Pertaining to CY 2000 LDR Report which states that key facilities, CAAs, and SAAs are exempt from storage assessments.

Ecology also requested a review DOE procedure DOE-PRO-PAI-50085, *Integrated Oversight*, which is referenced in DOE-PRO-EM-50623. Ecology stated that reviewing this supplementary procedure is required in order to complete the review of the current DOE storage assessment procedure.

Ecology commented that the procedure, DOE-PRO-EM-50623, is appropriate for storage assessments related to waste identified in Appendix B of the CY 2019 LDR Full Report, which consists of all the known mixed waste on the Hanford Site for the report CY.

Ecology also commented that waste listed in the PMWT, which is waste that might be generated as mixed waste in the future, does not fit within the structure of this DOE storage assessment procedure as it applies requirements for interim status facility standards which does not apply for potential mixed waste (PMW).

Ecology referenced guidance in the 2002 Resolution of Dispute Pertaining to CY 2000 LDR Report on how to form storage assessments. Ecology is willing to discuss a path forward with DOE for matching PMW storage assessment procedures with the 2002 resolution of dispute guidance.

DOE informed Ecology that the requested procedure, DOE-PRO-PAI-50085, is currently in the clearance process and will be forwarded to Ecology for review once cleared for public release.

DOE made note of a possible request for two different sets of storage assessment procedures but will wait for Ecology to complete its review before providing additional comment.

4. Any New Agreements and Commitments

- HMIS took the action to submit the draft 2020 LDR Summary Report by June 30, 2022 and schedule additional meetings between DOE and Ecology to discuss the LDR summary report structure/redundancies.

- DOE took the action to submit the proposed language regarding the closure process and characterization and treatment schedule summary of the seven underground vault tanks at the 325 Facility that will be added to the Potential Mixed Waste Table of the LDR Report to Ecology.

- Ecology took the action to review DOE's proposed language regarding the closure process and characterization and treatment schedule summary of the seven underground vault tanks at the 325 Facility and provide comments to DOE via email.

- DOE took the action to clear DOE procedure DOE-PRO-PAI-50085, *Integrated Oversight* and provide it to Ecology for review.

5. Any Approved Changes

- TPA Change Control Form M-26-22-02, Extend Due Date of Interim Milestone M-026-01AE in TPA Action Plan, Appendix D, approved June 13, 2022

6. Documents to be Submitted to the Administrative Record (AR)

- M-026-01 PMM Minutes from May 12, 2022

7. Documents Submitted to the AR

- Extension at the PM Level for the TPA Dispute Regarding Disapproval of a Primary Document (CY 2019 LDR Full Report), approved May 19, 2022

8. Next Meeting

- Tuesday, July 19, 2022/10:00-11:00 am via Microsoft TEAMS Meeting (linked here)

ATTACHMENT 1 – AGENDA
M-026-01 PROJECT MANAGER MEETING
June 21, 2022/10:00-11:00 am
TEAMS Conference Call

M-026-01: HANFORD SITE MIXED WASTE LAND DISPOSAL RESTRICTIONS REPORT

1. Status/approval of previous meeting minutes

2. Milestone status

   2.1. M-026-01AD, CY 2019 Full Report due to Ecology June 30, 2022

   2.2. M-026-01AE, CY 2020 Summary Report due to Ecology September 30, 2022

3. Status of previous agreements and commitments

   3.1. DOE –

      3.1.1. Closure Process Summary of the Seven underground Vault Tanks at the 325 Facility

   3.2. Ecology –

      3.2.1. Update on Review of DOE Assessment Strategy Procedure

4. Any new agreements and commitments

5. Any approved changes

6. Documents to be submitted to the Administrative Record

7. Next meeting – Tuesday, July 19, 2022/10:00-11:00 am via Microsoft TEAMS Meeting (linked here)