Preparing for Quarterly TPA Milestone Reviews and Monthly TPA Project Manager Meetings

Revision 1, Change 0

Published: 03/21/2013
Effective: 03/21/2013

Management System: Environmental Management ORP

Point of Contact: Trimberger, Bryan
Management System Procedure Owner: Trenchard, Glyn

Use Type: Administrative
Periodic Review Due Date: 03/31/2019
Rev. 1, Chg. 0

Change Summary

Description of Change
1.0 PURPOSE

This Implementing Procedure (IP) provides the process and required actions to prepare for the quarterly and monthly manager Tri-Party Agreement (TPA) meetings between the U.S. Environmental Protection Agency (EPA), the Washington State Department of Ecology (Ecology) and the Office of River Protection (ORP).

The TPA is a legally binding agreement among the U.S. Department of Energy (DOE), EPA, and the Ecology, which covers Hanford Site environmental compliance and cleanup activities. As such, the Tri-Party Agreement contains specified expectations in Article XLVIII, as well as Section 4.0 of its associated Action Plan for the contents of the monthly/quarterly reports and meetings. Implementation of the Tri-Party Agreement delineates the parameters of these meetings to include discussion of technical issues, scheduling, and project costs.

2.0 CANCELLATION OR RECORD OF CHANGE

<table>
<thead>
<tr>
<th>Revision</th>
<th>Revision Description</th>
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</thead>
<tbody>
<tr>
<td>0</td>
<td>A new IP was created to replace Office of Environmental Safety and Quality (ESQ) Desk Instruction 2.2, Preparing for Quarterly TPA Milestone Reviews in its entirety.</td>
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<tr>
<td>1</td>
<td>ESQ-EM-IP-05 was renamed to TRS-EM-IP-05 and updated to reflect organizational and editorial changes. In section 5.2, DOE TPA support staff was replaced with single point-of-contact TPA Coordinator to reflect current responsibilities. Minor updates to clarify section 7.0 flowchart actionees.</td>
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3.0 APPLICABILITY

This IP applies to all ORP staff having management/coordination responsibility arising under the Tri-Party Agreement. It specifically applies to the process for monthly manager TPA meetings between ORP and Ecology as the lead regulatory agency and the quarterly TPA meetings between DOE (ORP), EPA, and Ecology.

4.0 ACRONYMS AND DEFINITIONS

4.1 ACRONYMS

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Definition</th>
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<tbody>
<tr>
<td>CERCLA</td>
<td>Comprehensive Environmental Response, Compensation, and Liability Act</td>
</tr>
<tr>
<td>DOE</td>
<td>U.S. Department of Energy</td>
</tr>
<tr>
<td>ECD</td>
<td>Environmental Compliance Division</td>
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4.2 DEFINITIONS

Hanford Federal Facility Agreement and Consent Order (HFFACO) – Involving Ecology, DOE, and EPA, the Hanford Federal Facility Agreement and Consent Order (HFFACO), or Tri-Party Agreement (TPA), is an agreement for achieving compliance with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) remedial action provisions and with the Resource Conservation and Recovery Act (RCRA) treatment, storage, and disposal unit regulations and corrective action provisions. More specifically, the Tri-Party Agreement 1) defines and ranks CERCLA and RCRA cleanup commitments, 2) establishes responsibilities, 3) provides a basis for budgeting, and 4) reflects a concerted goal of achieving full regulatory compliance and remediation, with enforceable milestones.

Interagency Management Integration Team (IAMIT) – A committee of the Executive Managers from DOE, EPA, and Ecology. The Ecology-designated representative of the IAMIT is the Program Manager for Nuclear Waste. EPA’s member is the Program Manager, Hanford Project Office of EPA Region 10. The Assistant Managers for Tank Farms and the Waste Treatment and Immobilization Plant represent ORP. The IAMIT is the first level of formal dispute resolution of those issues which remain unresolved by the project managers. IAMIT responsibilities also include approval of changes to the Agreement and as an interface with the Hanford Advisory Board.

Implementing Procedure (IP) – Any procedure prepared within and for ORP that involves more than one organizational unit of ORP, either as performers or reviewers.

Lead Regulatory Agency – The agency (EPA or Ecology) which is assigned regulatory oversight responsibility with respect to actions under TPA regarding a particular Operable Unit, TSD Unit/Group, or Milestone pursuant to Section 5.6 of the Action Plan.

TPA Project Managers – Individuals designated by DOE and the respective lead regulatory agency for each operable unit, TSD group/unit, or specific milestone to be completed under the Agreement. TPA project managers are responsible for implementing the terms and conditions of the Agreement at the specific unit level on behalf of his/her respective Party and statusing milestone progress at monthly and quarterly TPA meetings as applicable.
TPA Monthly Report – The report generated for the Quarterly and Monthly TPA meetings. The TPA report is described in Article XLVIII, 149.I.4, as the Monthly Site Management System report and includes discussion of problems, reasons, anticipated delays, workarounds, accomplishments, monthly and cumulative budget, and actual monthly and cumulative costs and performance measurements.

5.0 RESPONSIBILITIES

Section 4 of the TPA Action Plan details responsibilities for the TPA quarterly and monthly manager meetings:

“Project managers for DOE and the lead regulatory agency shall meet to discuss progress (including the status of all key project tasks), address issues, and review near-term plans pertaining to their respective projects, milestones, operable units and/or TSD groups/units. For TSD groups and operable units, meetings shall be held monthly, unless the project managers agree that a meeting is not appropriate. The meetings shall emphasize technical issues and work progress. The assigned DOE project manager shall provide current work schedule information including project task element schedule status and associated "float" (defined as the projected number of days until a task becomes critical path), marked up schedules from the RI/FS work plan, closure plan, etc., and appropriate detailed near-term schedules prior to the meeting. The schedules shall address all ongoing activities associated with the milestones, operable unit or separate TSD groups/units, to include actions on specific units (e.g., sampling). These schedules will be provided to all parties and reviewed at the meeting. Any agreements and commitments (within the project manager's level of authority) resulting from the meeting will be prepared and signed by all parties as soon as possible after the meeting.”

5.1 ORP TPA Project Managers

The assigned ORP project manager shall provide current work schedule information including project task element schedule status and associated "float" (defined as the projected number of days until a task becomes critical path), marked up schedules from the RI/FS work plan, closure plan, etc., and appropriate detailed near-term schedules for incorporation into the TPA quarterly or monthly report. At the quarterly or monthly TPA meeting, ORP project managers (or project management representatives) shall address all ongoing activities associated with the milestones, operable unit, or separate TSD groups/units, to include actions on specific units (e.g., sampling). These items will be provided to all parties and reviewed at the meeting. Any agreements and commitments (within the project manager's level of authority) resulting from the meeting will be prepared and signed by all parties as soon as possible after the meeting.

5.2 ORP TPA Coordinator

The ORP TPA Coordinator supports ORP TPA project managers in updating the TPA report for TPA quarterly and monthly meetings and ensures that the TPA report is presented to Lead Regulatory agencies for comments. The ORP TPA Coordinator presents information about applicable TSD groups and operable units to Ecology and EPA at quarterly and monthly TPA meetings. ORP TPA Coordinator documents any agreements and commitments resulting from the meetings, and distributes them to project managers and others as appropriate.
6.0 PROCESS

Step 1: Request Internal Review for Updates

ORP TPA project managers for TPA activities coordinate with applicable TSD groups and operable units to provide updates to the TPA monthly manager report to the ORP TPA Coordinator. The request for updates is sent as soon as possible after a quarterly or monthly TPA meeting and no later than the 3rd of each month. Updates are to be in to the ORP TPA Coordinator or designee ten (10) days before the next quarterly or monthly TPA meeting.

Step 2: Receive Internal Comments and Draft TPA Report

The ORP TPA Coordinator or designee receives internal comments and updates from ORP TPA project managers and incorporates them into the draft TPA report.

Step 3: Provide Draft TPA Report to DOE, Ecology and EPA Project Managers and Contractors for Accuracy Review and Comments

The ORP TPA Coordinator or designee sends the draft report to appropriate ORP, Ecology and EPA project managers and contractors for accuracy review/comment. The draft report is provided electronically no less than seven (7) days prior to the next quarterly or monthly project managers meeting. Any agency comments are incorporated into the TPA report prior to the TPA quarterly or monthly meeting.

Step 4: TPA Coordinator Generates Quarterly or Monthly Manager Report for the TPA Quarterly or Monthly Manager Meeting

When final comments from TPA stakeholders are incorporated into the TPA monthly manager report, the final report is generated by the ORP TPA Coordinator or designee and sent electronically to the appropriate distribution list of DOE, contractor, Ecology, and EPA staff and interested stakeholders one (1) day prior to the scheduled quarterly or monthly project managers meeting.

Step 5: Quarterly and Monthly TPA Meeting Proceedings

During the quarterly and monthly project manager TPA meetings technical issues, work progress, current work schedules, milestones, critical elements, project costs, and other TPA applicable items are discussed by ORP, Ecology, and EPA. Action items arising from discussion of milestones will be assigned to the appropriate project manager. After the meeting is completed, the update and review cycle begins again for the next quarterly or monthly project managers meeting.

Note: The update and review process is iterative with opportunities for open communication and comments throughout the process among ORP and agency TPA project managers or designees. Changes to the TPA are detailed in ORP Implementing Procedure TRS-EM-IP-06, Change Control Process for the Tri-Party Agreement. Any issues/conflicts that cannot be resolved at the project manager level must go through the TPA Dispute Resolution Process for final resolution with the Interagency Management Integration Team (IAMIT). Please refer to ORP Implementing Procedure TRS-EM-IP-03, Dispute Resolution Process for the Tri-Party Agreement Under Article VIII for a full description of the TPA Dispute Resolution Process.
7.0 FLOWCHART

Figure 1 – Quarterly and Monthly Managers TPA Meeting Preparation Process

1. TPA Coordinator sends out call to TPA Project Managers for internal TPA monthly report updates, review, and comments by the 3rd of each month – to be completed 10 days before next quarterly or monthly project managers TPA

2. TPA Coordinator receives and incorporates internal comments into Draft TPA Report

3. TPA Coordinator provides Draft TPA Report to DOE, Ecology, and EPA Tri-parties 7 days prior to TPA meeting for factual accuracy and comments

4. TPA Coordinator generates final TPA report for the TPA meeting and issues 1 day prior to TPA meeting

5. Quarterly or monthly project managers TPA meeting is held

8.0 REFERENCES


9.0 RECORDS AND EXHIBITS

TPA Change Request records are detailed in ORP Implementing Procedure TRS-EM-IP-06, Change Control Process for the Tri-Party Agreement. Additionally, TPA Dispute Resolution records are detailed in ORP Implementing Procedure TRS-EM-IP-03, Dispute Resolution Process for the Tri-Party Agreement.

For the purposes of preparing for quarterly and monthly TPA milestone reviews, the following records shall be retained in a quality records management system:

<table>
<thead>
<tr>
<th>Record Description</th>
<th>QA Record Y/N</th>
<th>QA Record Retention L/NP</th>
<th>Site Form Number</th>
<th>Responsibility for Submittal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Official Correspondence sent to the TPA Regulatory Parties and other applicable stakeholders regarding TPA milestones (e.g. letters of milestone completion, notification of milestone issues, semi-annual reports, etc.)</td>
<td>Y</td>
<td>L</td>
<td>N/A</td>
<td>Line Management and TPA Project Managers</td>
</tr>
<tr>
<td>Final TPA Monthly Project Manager Reports</td>
<td>Y</td>
<td>L</td>
<td>N/A</td>
<td>TPA Coordinator</td>
</tr>
<tr>
<td>Final, Signed Quarterly and Monthly Meeting Minutes (includes any agreements, issues, and actions discussed at the quarterly and monthly meetings)</td>
<td>Y</td>
<td>L</td>
<td>N/A</td>
<td>TPA Coordinator</td>
</tr>
</tbody>
</table>

L = Lifetime  
NP = Non permanent  
N/A = Not Applicable

In addition to the QA record system above, ORP is required to comply with Section 9.0 of the TPA Action Plan, Documentation and Records. All records generated above shall also be maintained in the TPA Administrative Record and Public Information Repository (physically located at ORP and also maintained and publicly available online at: [http://www5.hanford.gov/arpir/](http://www5.hanford.gov/arpir/)).

Please consult with the ORP TPA Coordinator and appropriate Mission Elements matrix for support. Records shall be processed and maintained in accordance with the ORP Program for Records Management, TRS-QSH-IP-08, Records Management.