

## **Interface Agreement**

# **Interface Agreement Among BEA, FLUOR, NRF, and Wastren Advantage, Inc.**



The INL is a U.S. Department of Energy National Laboratory operated by Battelle Energy Alliance.

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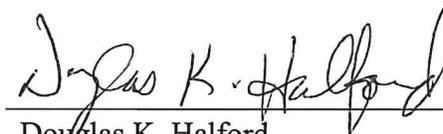
The parties involved have negotiated this agreement in good faith in order to clarify the responsibilities and interface for the production, review and certification of Environmental Reports.

  
 \_\_\_\_\_  
 Timothy A. Miller  
 Director, Environmental Support and Services, BEA

6-1-17  
 \_\_\_\_\_  
 Date

  
 \_\_\_\_\_  
 Scott L. Reno  
 Manager, Environmental Compliance, Fluor

5-24-2017  
 \_\_\_\_\_  
 Date

  
 \_\_\_\_\_  
 Douglas K. Halford  
 Manager, ESER Contractor

5/24/17  
 \_\_\_\_\_  
 Date

  
 \_\_\_\_\_  
 Chris Kent  
 Environmental Engineering Manager, NRF

5-31-17  
 \_\_\_\_\_  
 Date

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**1. INTRODUCTION**

This Interface Agreement (IA) among Battelle Energy Alliance, LLC (BEA), Fluor Idaho, LLC (Fluor), Bechtel Marine Propulsion Corporation (BMPC) - Naval Reactors Facility (NRF), and Wastren Advantage Inc. (ESER contractor) is intended to document an agreement among all parties that time critical environmental reports and other deliverables as required by Federal or State regulation will be completed in such a fashion as to be timely, true, accurate, complete and certifiable by all parties and the Department of Energy-Idaho Operations Office (DOE-ID). This agreement will remain in effect until the agreement is updated or until a change in contractor signatory to this agreement.

**2. PURPOSE**

Environmental reports are required by regulation to be submitted to either the State of Idaho Department of Environmental Quality (DEQ) or the U. S. Environmental Protection Agency (EPA) Region 10. A number of reports listed below are time critical in nature and must be compiled and certified by each individual contractor and the DOE-ID. Data must be compiled and reports must be completed by the Maintenance and Operations (M&O) contractor, BEA, or Fluor as applicable in time for a DOE-ID review prior to DOE-ID’s certification. Because of the time critical nature of these reports and submittals, this IA streamlines the request and responses from NRF to either BEA or Fluor. In preparation of the sitewide documents not listed in the appendix, BEA and Fluor will submit a letter to the Environmental Manager at BMPC requesting the data submission rather than having to transmit the request to DOE-ID to contact Naval Reactors who would then forward the request to NRF.

This interface agreement documents the responsibilities for coordination, schedules, reviews and certifications among BEA, Fluor, NRF, and ESER contractor for preparation of INL Environmental Reports.

Special instructions for contractor handling of the Site Treatment Plan are found in “Attachment A.” A full list of all environmental reports and due dates is found in “Attachment B.” Not all environmental reports are time critical, but none the less, have important due dates required by regulation. The purpose of providing a full list of environmental reports and due dates is to ensure all contributors are aware of those important dates so they do not become time critical due to lack of attention.

**3. ROLES, RESPONSIBILITIES, AND OBLIGATIONS**

**3.1 Battelle Energy Alliance (BEA) has responsibility for the following:**

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- Providing quality certifiable BEA data and information for applicable reports.
- Entering, reviewing, updating, and verifying the accuracy of any BEA report related information provided per the appropriate schedules.
- Satisfying the certification requirements as stated in the regulations for each report.
- Transmitting data calls and reports (via email, meeting, or letter) for review and concurrence by NRF, Fluor, and ESER contractor applicable per the attached schedule.
- Development and implementation of procedures for report preparation.
- Incorporation of NRF, Fluor, and ESER contractor data/submittals as applicable into applicable final reports.
- Incorporation of NRF, Fluor, and ESER contractor comments/corrections into the reports.
- QA/QC of reports for completeness and consistency.
- Transmitting of applicable site-wide reports to DOE or regulator as applicable.
- Obtaining applicable Integrated Waste Tracking System (IWTS) user training through Fluor's database training sessions, including updates.

**3.2 Fluor is responsible for the following:**

- Providing quality certifiable Fluor data and information for applicable reports.
- Entering, reviewing, updating, and verifying the accuracy of any Fluor report related information provided per the appropriate schedules.
- Satisfying the certification requirements as stated in the regulations for each report.
- Transmitting data calls and reports (via email, meeting, or letter) for review and concurrence by NRF, and BEA as applicable per the attached schedule.
- Development and implementation of procedures for applicable report preparation.
- Incorporation of NRF and BEA data/submittals as applicable into applicable final reports.
- Incorporation of BEA and NRF comments/corrections into the reports.

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- QA/QC of applicable reports for completeness and consistency.
- Transmitting of applicable site-wide reports to DOE or regulator as applicable.
- Maintenance and operation of the IWTS database.
- Development of training for database users and report reviewers. (Notify and provide NRF and BEA with the initial training and any updates.)

**3.3 NRF is responsible for the following:**

- Providing quality certifiable NRF data and information for applicable reports.
- Entering, reviewing, updating, and verifying the accuracy of any NRF report related information provided per the appropriate schedules.
- Satisfying the certification requirements as stated in the regulations for each report.
- Obtaining applicable IWTS user training through Fluor's database training sessions, including updates.

**3.4 ESER Contractor Responsibilities:**

- Providing quality certifiable ESER contractor data and information for applicable reports.
- Entering, reviewing, updating, and verifying the accuracy of any ESER contractor report related information per the applicable schedules.
- Satisfying the certification requirements as stated in the regulations for each report.
- Obtaining applicable database user training through BEA and Fluor's database training sessions, including updates.

**3.5 Schedule**

- Attachments to this IA provide a schedule agreed upon by Fluor, BEA, NRF, and ESER contractor for reviewing, updating, verifying, concurring with and/or certifying the reports. An agreement must be reached with BEA or Fluor as applicable prior to any proposed changes in schedules identified in this IA.

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**4. DISPUTE RESOLUTION**

The staffs of the BEA, Fluor, NRF, and ESER contractor shall use their best efforts to resolve any disputes under this IA. If a dispute cannot be resolved at staff level, it shall be brought to the attention of the managers of the respective environmental organizations within each company. If a dispute cannot be resolved by management, the issue will be coordinated through DOE-ID for a final determination.

**5. LIMITATIONS OF THIS AGREEMENT**

This IA is intended to allocate administrative responsibilities among Department of Energy contractors for site wide reports and correspondence. Nothing in this document is intended to limit, expand or otherwise affect any responsibilities of individual contractors to their respective DOE counterparts.

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**Attachment A**

**Special Instructions for the Site Treatment Plan**

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## STP Quarterly Meeting and Annual Update/Report Submittal Process

The Fluor Site Treatment Plan (STP) project lead (Fluor STP lead) coordinates the development of the quarterly meeting agenda as well as the annual update and annual report. The actions necessary to develop and finalize these documents, along with responsible parties, are detailed below. To ensure these documents are reviewed and finalized by the appropriate contractor and DOE personnel, the Fluor STP lead will maintain a list of appropriate DOE and contractor contacts. The list shall include:

- DOE-ID STP Project Manager
- DOE-ID Project Representative
- BEA/Fluor Waste Program Manager
- BEA/Fluor Designated STP Representative

### Quarterly Meeting Agenda

Quarterly meetings will be held the last Wednesday of the Quarterly Meeting Month (October, January, April, and July). In preparation for holding the quarterly meetings, the following will occur:

1. 4th Wednesday prior to the Quarterly Meeting. The Fluor STP lead will send out a reminder to the designated STP contractor representatives that quarterly meeting agenda information needs to be transmitted by the following Wednesday. The Fluor STP lead will also provide the designated STP contractor representatives the results of the IWTS query, where applicable, on waste stream volume changes.

Contractor representatives will provide the Fluor STP lead with information required for the meeting agenda, copying the DOE-ID STP Project Manager on associated emails. Information will include:

- Updates for the milestone, planning date, and new mixed waste stream status sections.
- Changes in covered waste streams section. Fluor will provide the necessary information.
- Updates for the proposed revisions and issues sections, including issues requiring action during the Quarterly Meeting (e.g., milestone extension, new waste streams, etc.), and any other information that needs to be shared (e.g., partial container treatment on waste treatment status updates received during the quarter and any roll over any appropriate status items from the previous meeting.)

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2. Third Wednesday prior to Quarterly Meeting. By close of business (COB), the Fluor STP lead will send the draft agenda out to the designated STP contractor representatives and the DOE-ID STP Project Manager for review. Contractors will review and make changes with the Fluor lead, then ensure that concurrence has been reached with the Fluor STP lead on the final agenda and provide concurrence by email, closed copying the DOE-ID Projects Representative and DOE-ID STP Project Manager no later than COB of the following Tuesday.
3. Second Wednesday prior to Quarterly Meeting. Fluor STP lead will forward STP agenda to DOE-ID Project manager no later than noon.
4. First Wednesday prior to quarterly meeting. DOE-ID STP Project Manager will forward approved STP agenda to DEQ.
5. Last Wednesday of Quarterly meeting month. DOE conduct STP Quarterly Meeting with DEQ.

### **Quarterly Meeting Minutes**

The Fluor STP lead will be responsible for taking minutes during the meeting.

1. Within one business day following the meeting, the Fluor STP lead will provide draft meeting minutes to the designated STP contractor representatives and DOE-ID STP Project Manager for review.
2. Within five days following the meeting, the representatives and DOE-ID will provide input on the draft meeting minutes to the Fluor STP lead.
3. Within six days following the meeting, the Fluor STP lead will forward the final meeting minutes to the designated contractor representatives. The designated contractor representatives will provide concurrence by email to the Fluor STP lead, closed copying the DOE-ID Projects Representative and DOE-ID STP Project Manager.
4. Within seven days following the meeting, the Fluor STP lead coordinator will forward the final meeting minutes to the DOE-ID STP Project Manager. The DOE-ID STP Project Manager will approve the minutes and forward to DEQ for review and concurrence.

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### **Annual Update and Report**

Per Sections 2.3.3 and 2.3.4 of the STP, respectively, an Annual Update and an Annual Report are to be submitted to DEQ by 15<sup>th</sup> of November each year. These documents provide a consolidation of the changes and progress that DOE has made in the previous year. To develop and finalize the Update and Report, the following will occur:

1. By the end of the last week of September, the Fluor STP lead will notify the designated STP contractor representatives that updates to the previous year's Annual Update and Annual Report need to be submitted by the end of the first week of October.
2. By the end of the first week of October, each designated STP contractor representative will submit updates to the Fluor STP project lead.
3. By the end of the second week of October, the Fluor STP lead will compile the updates provided and submit the revised update and report to the designated contractor representatives for review and concurrence (The Fluor STP lead will also submit to the DOE-ID STP Project Manager at this time for draft review).
4. By the end of the third week of October, the designated contractor representatives will provide concurrence by email to the Fluor STP lead, closed copying the DOE-ID Projects Representative and DOE-ID STP Project Manager.
5. By the Monday following the fourth week of October the Fluor STP lead will submit the update and report to the DOE-ID STP Project Manager for review, approval, and transmittal to DEQ.

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**Attachment B****Schedule for activities covered under this Interface Agreement**

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Title	Frequency	Coordinator	Contractor Input Date <sup>1 2</sup>	Due Date to DOE <sup>1</sup>	Due Date to Regulator	Site Facilities Included
EPCRA 312 Annual Report	Annually	BEA	1/25/YYYY	02/14/YYYY	03/01/YYYY	BEA Fluor NRF
EPCRA 311 Quarterly Reports	Quarterly	BEA	03/07/YYYY, 6/07/YYYY, 9/07/YYYY, 12/07/YYYY	03/15/YYYY, 6/15/YYYY, 9/15/YYYY, 12/15/YYYY	4/01/YYYY, 7/01/YYYY, 10/01/YYYY, 01/01/YYYY	BEA Fluor NRF
EPCRA 313 Threshold Report	Annually	DOE	NA	3/20/YYYY	NA	BEA Fluor NRF
EPCRA 313 Annual Report	Annually	DOE	NA	06/01/YYYY	7/01/YYYY	BEA Fluor NRF
Toxic Exemption Air Pollutant Report	Annually	BEA	3/01/YYYY	04/01/YYYY	5/01/YYYY	CWI BEA
Title V Semi-Annual Monitoring Report	Annually	BEA	Fourth Monday of July	8/11/YYYY	8/31/YYYY	BEA Fluor NRF
Title V Annual Compliance Certification	Annually	BEA	Third Monday of January	2/08/YYYY	2/28/YYYY	BEA Fluor NRF
Annual NESHAPS Radioactive Emission Report	Annually	BEA	3/30/YYYY	05/31/YYYY	6/30/YYYY	BEA Fluor NRF
Air Emission Invent. & An. Fee Registration	Annually	DOE	Third Monday of February	2/28/YYYY	4/01/YYYY	BEA Fluor
Annual NESHAPS Asbestos Reporting	Annually	BEA	01/07/YYYY	01/15/YYYY	01/31/YYYY	BEA Fluor

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Title	Frequency	Coordinator	Contractor Input Date <sup>1 2</sup>	Due Date to DOE <sup>1</sup>	Due Date to Regulator	Site Facilities Included
Annual NESHAPS Asbestos Notification	Annually	BEA	11/15/YYYY	12/01/YYYY	12/21/YYYY	BEA Fluor
TSCA Document Log & Annual Inventory	Annually	BEA	4/01/YYYY	06/01/YYYY	7/01/YYYY	BEA Fluor NRF
TSCA Radioactive Waste Inventory	Annually	BEA	4/01/YYYY	06/01/YYYY	7/01/YYYY	BEA Fluor NRF
Fees for Construction of Ground Water Monitoring Wells	Annually	BEA	11/25/YYYY	01/15/YYYY	01/30/YYYY	BEA Fluor NRF
Comprehensive Well Inventory and the Annual Water Use Report	Annually	BEA	3/12/YYYY	05/28/YYYY	6/28/YYYY	BEA Fluor NRF
Annual Groundwater Monitoring Plan	As Needed	BEA	Anticipate 01/30/2019	Per the INL CDRL	NA	BEA Fluor USGS
INL RCRA Part B Permit Condition II.J.4/II.N.4 Pollution Prevention Plan	Every 4 years	Fluor	Last Submitted 1/15/2015	Last Submitted 02/10/2015	Last Submitted 03/17/2015	BEA Fluor NRF
INL RCRA Permit Condition II.J.3. Biennial Waste Report and Idaho Annual Hazardous Waste Generator Report	Annually	Fluor	1/15/YYYY	02/01/YYYY	03/01/YYYY	BEA Fluor NRF
INL RCRA Part B Permit Condition II.J.2, Waste Minimization Program Certification	Annually	DOE	NA	02/01/YYYY	03/01/YYYY	BEA Fluor NRF
Volume 3 - General Information	Annually	Fluor	6/1/YYYY	6/30/YYYY	7/30/YYYY	BEA Fluor NRF
Environmental Monitoring Plan Updates	As Needed	BEA	Last Submitted August 2014	Per the INL CDRL	NA	BEA Fluor ESER Contractor
40 CFR 98 Mandatory GHG Emissions Annual Report	Annually	BEA	2/15/YYYY Each contractor maintains records. Will only send letter if significant	03/01/YYYY Will only send letter if significant change to operations (i.e., 50% increase)	04/01/YYYY We would only to submit to EPA if we trigger a threshold again.	BEA Fluor NRF

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Title	Frequency	Coordinator	Contractor Input Date <sup>1 2</sup>	Due Date to DOE <sup>1</sup>	Due Date to Regulator	Site Facilities Included
			change to operations (i.e., 50% increase)			
Annual FY Site Sustainability Plan and FY Dashboard	Annually	BEA	11/01/YYYY	12/06/YYYY	NA	BEA Fluor
RCRA Treatability Study Report	Annually	Fluor	02/01/YYYY	2/15/YYYY	03/15/YYYY	BEA Fluor NRF
Annual Site Environmental Report	Annually	ESER Contractor	05/01/YYYY	05/01/YYYY	NA	BEA Fluor
Site Treatment Plan Quarterly mtg Agenda	Quarterly	Fluor	4-th Wed prior to STP Quarterly 01/xx/YYYY, 4/xx/YYYY, 7/xx/YYYY, 11/xx/YYYY	2-nd Wednesday prior to STP Quarterly 01/xx/YYYY, 4/xx/YYYY, 7/xx/YYYY, 11/xx/YYYY	1st Wednesday prior to STP Quarterly 01/xx/YYYY, 4/xx/YYYY, 7/xx/YYYY, 11/xx/YYYY	BEA Fluor NRF
STP Annual Update and Report	Annually	Fluor	10/14/YYYY	10/28/YYYY	11/7/YYYY	BEA Fluor NRF

1. Due dates may vary from year to year. If the due date is not on a work day, it may be as early as three days before the weekend nearest the due date.

2. Contractor input is certified as applicable according to regulation.