



Scoping Summary for the Update of the Environmental Compliance & Area Completion Projects Regulatory Document Handbook (ERD-AG-003, Revision 17, June 2012) (U)

SRNS-RP-2022-00348

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and
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List of Acronyms and Abbreviations

ARAR	applicable or relevant and appropriate
BRA	Baseline Risk Assessment
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CM	contaminant migration
CMI	Corrective Measures Implementation
CMS	Corrective Measures Study
COC	constituent of concern
CSM	conceptual site model
DG	data grouping
DP	data processing
EC&ACP	Environmental Compliance and Area Completion Projects
ECO	ecological
ED	exposure dose
EMR	Effectiveness Monitoring Report
ESD	explanation of significant difference
EPC	exposure point concentration
FFA	Federal Facility Agreement
FS	Feasibility Study
HH	human health
HQ	hazard quotient
LUC	Land Use Controls
LUCAP	Land Use Control Assurance Plan
LUCIP	Land Use Control Implementation Plan
OU	operable unit
PER	Performance Evaluation Report
PTSM	principal threat source material
RAIP	Remedial Action Implementation Plan
RCRA	Resource Conservation and Recovery Act
RFI	Remedial Facility Investigation
RGO	remedial goal option
RI	Remedial Investigation
RME	reasonable maximum exposure
SCDHEC	South Carolina Department of Health and Environmental Control
SME	subject matter expert
SRNS	Savannah River Nuclear Solutions, LLC
SRS	Savannah River Site
TRV	toxicity reference value
USDOE	United States Department of Energy
USEPA	United States Environmental Protection Agency
USC	Unit Specific Constituent

1.0 Background

The purpose of this scoping summary is to develop and implement a strategy for updating the regulatory document formats and technical protocols located in the Savannah River Site (SRS) Environmental Compliance and Area Completion Projects (EC&ACP) Regulatory Document Handbook (ERD-AG-003, Revision 17, June 2012). The proposed strategy includes involvement from the Core Team (i.e., representatives from the United States Department of Energy [USDOE], United States Environmental Protection Agency [(USEPA) Region 4, South Carolina Department of Health and Environmental Control [SCDHEC]), and Savannah River Nuclear Solutions (SRNS) contractor personnel.

Environmental clean-up activities have been ongoing at SRS under a Federal Facility Agreement (FFA) since 1993. As the program matured, the FFA project managers recognized that meeting FFA milestones was overshadowed by ineffective decision making that resulted in project rework, major document revisions, and project delays. In June 1999, the USDOE, USEPA, and SCDHEC agreed to a “time-out” on a number of Remedial Investigation/Feasibility Study (RI/FS) projects to support an initiative to evaluate the approach to RI/FS decision making. Through this initiative, the following issues were identified:

- Unclear problem definition (e.g., inadequate RI/baseline risk assessment [RI/BRA] documentation leads to difficulties transitioning from the RI/BRA to the Corrective Measures Study/FS [CMS/FS]);
- Ineffective CMS/FS scoping; and
- Inadequate CMS/FS documentation.

A multi-disciplinary team comprised of representatives from the USEPA, SCDHEC, and USDOE (i.e., Core Team) and the SRS contractor was established to reach agreement on solutions to these problems that would be effective, acceptable, and implementable. The team employed the *Principles of Environmental Restoration* throughout the process and developed a new approach to RI/FS projects that focused on Core Team communication (i.e., project scoping) followed by agreement on the project direction prior to preparing the regulatory documentation. The significant Core Team agreements and project direction are documented in project-specific scoping summary documents throughout the life of the project.

A key factor to determine the technical direction of RI/FS projects and acceptance of the technical results is Core Team agreement on the technical processes employed. The USEPA publishes guidance for data processing, human health and ecological risk assessments, fate and transport modeling, groundwater modeling, etc., in addition to guidance for the content and format of regulatory documentation. However, the USDOE, USEPA, and SCDHEC recognized that subject matter experts (SMEs) may differ on how published guidance is applied to individual waste units and/or facilities for decommissioning.

During the FFA program “time-out”, the USDOE, USEPA, and SCDHEC agreed to a process to promote consistency in application of published guidance in the preparation and review of RI/FS documents. The three agencies developed technical Design Teams represented by SMEs from the

USDOE (and contractor), USEPA, and SCDHEC. Each Design Team developed technical protocols to support consistent execution of the technical scope in SRS RI/FS projects. The technical protocols are not intended to replace or contradict federal or state regulations or published guidance materials. Rather, the technical protocols provide program-level agreement on standard processes so that baseline steps do not require renegotiation for each RI/FS project unless there is an identified need to deviate from the agreed upon protocols (i.e., site-specific conditions, regulatory driver, etc.).

The Design Teams also developed regulatory document formats to provide a standard basis for the preparation of RI/FS and remedial decision documents and to promote consistency in the review of those documents. The standard document formats and technical protocols are assembled in the EC&ACP Regulatory Document Handbook which serves as a comprehensive list of Core Team guidance material for evaluation of SRS waste units and decommissioning facilities. These document formats and technical protocols are used by the USDOE (and contractor) to evaluate waste units and prepare scoping materials and regulatory documentation. They are employed by the SCDHEC and USEPA (and contractors) to scope and review RI/FS, remedial decision, and related documents. These consensus protocols were developed and are intended for use only on the SRS FFA cleanup program.

2.0 Problems Warranting Action

A regulatory document handbook was first published in 1999. Although some regulatory document formats and technical protocols have been updated, there is a need to perform a comprehensive handbook review and update to incorporate lessons learned by the Core Team from the past two decades.

Secondly, there is a need to reflect the revision status of the handbook and its contents more accurately. Individual document formats and technical protocols are identified by an individual revision number and date. The current EC&ACP Regulatory Document Handbook is updated with a new handbook revision number when any individual document format or technical protocol is revised. The handbook is currently identified as Revision 17, June 2012, although some protocols and document formats have not been updated since 1999.

3.0 Scope of the Problem

The current EC&ACP Regulatory Document Handbook (ERD-AG-003, Revision 17, June 2012) contains 17 document formats and 36 technical protocols, all of which require review and revision (or cancellation). SRS has also identified the need for 9 new document formats, 3 new technical protocols, and the inclusion of a facility decommissioning documentation protocol. Refer to Table 1 for the comprehensive list of document formats and technical protocols.

4.0 Objectives

The first objective of the scoping meeting is to develop a strategy and schedule with the Core Team that allows for the review and revision, creation, or cancellation of the individual document formats and technical protocols assembled in the EC&ACP Regulatory Document Handbook.

A second objective of the scoping meeting is to reach Core Team agreement on how to represent the revision status of the EC&ACP Regulatory Document Handbook and the individual document formats and technical protocols.

5.0 Response

In collaboration with the Core Team, SRS will update the EC&ACP Regulatory Document Handbook (ERD-AG-003, Revision 17, June 2012) to revise (or cancel) individual document formats and technical protocols and develop new document formats and/or technical protocols as shown in Table 1. SME participation in Design Teams is not anticipated but may be implemented for specific technical protocols if needed. All document formats and technical protocols in the revised handbook require review and approval by the Core Team.

The current EC&ACP Regulatory Document Handbook will be reformatted to better align the protocols in subject specific modules and to reorder the technical protocols to follow the RI/FS process more logically as described below. Refer to Table 1- EC&ACP Regulatory Document Handbook Proposed Format for more details.

- **Part I. RCRA/CERCLA Document Formats:** SRS will update existing document formats and develop new document formats as shown in Table 1.
- **Part II. Protocols**
 - **Module 1 – Data Grouping (DG) Module.** Protocols in this module were formerly located in Module 1 General Information in the EC&ACP Regulatory Document Handbook, Rev. 17. SRS will update new Module 1 as shown in Table 1.
 - **Module 2 – Data Processing (DP) Module.** Protocols in this module were formerly located in Module 1 in the EC&ACP Regulatory Document Handbook, Rev. 17. SRS will update new Module 2 as shown in Table 1.
 - **Module 3 – Unit Specific Constituents (USC) Module.** SRS will update Module 3 as shown in Table 1.
 - **Module 4 – ARARs Module.** SRS will update Module 4 as shown in Table 1.
 - **Module 5 – Contaminant Migration (CM) Module.** SRS will update Module 5 as shown in Table 1.
 - **Module 6 – Human Health (HH) Risk Assessment Module.** SRS will update Module 6 as shown in Table 1. Core Team agreement on the update to the human health risk protocols was reached in 2009 and documented in the *Scoping Summary for the Area Completion Projects Risk Assessment Program* (ERD-EN-2009-0001, Final, June 2009). Although SRS implemented the 2009 agreements in the RI/FS program, the revision to the EC&ACP Regulatory Document Handbook was postponed due to a USEPA administrative hold. Former Protocol P.10.1 HH Evaluation of Source Material at SRS Waste Units (i.e., PTSM protocol) will be relocated to Module 6 and renumbered Protocol HH-7.
 - **Module 7 – Ecological (ECO) Risk Assessment Module.** SRS will update Module 7 as shown in Table 1. An updated approach to ECO risk assessments has been implemented in recently approved RI/FS documents (e.g., Lower Three Runs Integrator OU RI/BRA, G-Area Oil Seepage Basin OU RI/BRA/CMS/FS), but the ECO module protocols have not been updated in the EC&ACP Regulatory Document Handbook.

- **Module 8 – Constituents of Concern (COC) Refinement Process Module.** Groundwater modeling protocols were formerly located in Module 8 in the EC&ACP Regulatory Document Handbook, Rev. 17, and will move to Module 9 in the revised handbook. The COC Refinement Process protocol addresses the uncertainties for HH, ECO, and CM. New Module 8 to include the COC Refinement Process protocol will logically follow the HH, ECO, and CM modules.
- **Module 9 Groundwater (GW) Modeling Module.** Groundwater modeling protocols were formerly located in Module 8 in the EC&ACP Regulatory Document Handbook, Rev. 17, and will move to Module 9 in the revised handbook. SRS will update new Module 9 as shown in Table 1.
- **Module 10 – Decommissioning Module.** New protocol D-1, *Core Team Protocol for Review and Concurrence on Facility Decommissioning Evaluations and Decommissioning Project Final Reports, Revision 0* was approved by the USEPA and SCDHEC in February 2021. An update to the protocol is underway, and the Revision 1 protocol will be included in new Module 10 of the revised handbook.

Design Team Interaction

Design Team activity for the revision of existing technical protocols or development of new ones is not anticipated. In the event that SMEs are needed to address specific technical issues, USEPA, SCDHEC, and USDOE are responsible for identifying SMEs to represent their respective agency. Any SME interaction will likely consist of email exchanges and conference calls between the Design Team SMEs. The SRNS Design Team lead will be the focal point for the team and will coordinate all team activities, meeting agendas, and schedules.

Document Revisions

Currently, each document format and technical protocol in the EC&ACP Regulatory Document Handbook has an individual revision number and revision date. Any change to an individual document format or technical protocol results in a new revision number to the complete handbook. For example, the current handbook has a Revision 17 status even though some individual protocols have never been revised.

SRS proposes to change the revision process for the EC&ACP Regulatory Document Handbook similar to the revision process used for the *SRS Land Use Control Assurance Plan (LUCAP)* (WSRC-RP-98-4125, Revision 1.1, August 1999) and associated appendices. The cover page of the LUCAP reflects the revision number and revision date of the comprehensive document (Revision 1.1, August 1999). The LUCAP is updated to include OU-specific Land Use Control Implementation Plans (LUCIPs) with their individual document number and revision date. When an OU-specific LUCIP is added to the LUCAP, the LUCAP revision number and date do not change but the cover page reflects an “updated date” (i.e., updated February 2018).

The update to the Revision 17 EC&ACP Regulatory Document Handbook will begin with a new document number (SRNS-RP-2022-00330), Revision 0 status, and date. The following items will also be included.

- An Introduction section will be added to explain the history and purpose of the handbook and the revision process.

- The handbook Table of Contents will include the list of the document formats and technical protocols and the individual format/protocol revision dates and revision numbers.
- An appendix will be added to identify when a revision to an individual document format and/or technical protocol is made or when new document formats and/or technical protocols are added to the handbook, including the rationale for the change/addition.
- When an update to any document format and/or technical protocol is made, the handbook cover page will reflect the updated date similar to the LUCAP document numbering process.

6.0 Strategy

Core Team Review/Approval Process

The updated EC&ACP Regulatory Document Handbook (SRNS-RP-2022-00330, Revision 0a), containing all of the revised and new individual document formats/technical protocols, will be transmitted to the Core Team for final review and approval. SRS will provide written responses to comments received from the Core Team, and comment resolution meetings will be scheduled as needed. SRNS anticipates submittal of the Revision 0 document for review by the end of calendar year 2022. The review and approval process is based on a 60/30/30 review cycle.

An electronic copy of the approved EC&ACP Regulatory Document Handbook will be provided to the Core Team and available in the SRS Administrative Record File and on the SRS external web page.

Table 1. EC&ACP Regulatory Document Handbook Proposed Format

Regulatory Document Handbook, Revision 17			Proposed New Handbook Format	
Protocol #	Protocol Name	Recommendation	Protocol #	Protocol Name
PART I RCRA/CERCLA Document Format				
F-0	Site Evaluation Report Format	Minor revision.	F-1	Remedial Site Evaluation Report Format
F-1	RFI/RI Work Plan Format	Moderate revision.	F-2	RFI/RI Work Plan Format
F-2	Data Usability Report Format	Replace with current working template ¹ .	F-3	RFI/RI/BRA Format
F-3	RFI/RI/BRA Format	Major revision.	F-4	Corrective Measures Study/Feasibility Study Format
F-4	Corrective Measures Study/Feasibility Study Format	Replace with current working template. Minor revision.	F-5 (new)	Combined RFI/RI/BRA/CMS/FS Format
F-5	Sampling and Analysis Plan Format	Replace with current working template. Minor revision.	F-6	Statement of Basis/Proposed Plan Format
F-6	Cancelled		F-7	Statement of Basis/Proposed Plan Fact Sheet Format
F-7	Cancelled		F-8	Record of Decision Format
F-8	Cancelled		F-9	Land Use Control Implementation Plan Format
F-9	Cancelled		F-10	Corrective Measures Implementation Plan/Remedial Action Implementation Plan Format
F-10	Cancelled		F-11	Post-Construction Report
F-11	Post-Construction Report Format	Replace with current working template. Minor revision.	F-12	Corrective Measures Implementation Report/Remedial Action Completion Report Format
F-12	Corrective Measures Implementation/Remedial Action Completion Report Format	Replace with current working template. Minor revision.	F-13	Post-Construction Report/Corrective Measures Implementation Report/Remedial Action Completion Report Format
F-13	Comment Response Format	Minor revision.	F-14	Sampling and Analysis Plan Format
F-14	Ecological Risk Assessment Process Annotated Outline	Major revision. Consider including in RFI/RI/BRA template.	F-15	Data Usability Report Format
F-15	Corrective Measures Implementation/Remedial Action Implementation Plan Format	Replace with current working template. Minor revision.	F-16 (new)	Performance Evaluation Report (PER) Format
F-16	Cancelled		F-17 (new)	Effectiveness Monitoring Report (EMR) Format
F-17	Conceptual Site Model Development	Minor revision. Need to update receptors	F-18 (new)	Removal Site Evaluation Report Format

¹ SRNS maintains “working document templates” that align with the document formats published in the EC&ACP Regulatory Document Handbook. The working templates are updated real-time with minor changes and editorial corrections based on regulatory comments received from document reviews.

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Regulatory Document Handbook, Revision 17			Proposed New Handbook Format	
Protocol #	Protocol Name	Recommendation	Protocol #	Protocol Name
		and combine with exposure pathways in Module 1.		
F-18	Statement of Basis/Proposed Plan Format	Replace with current working template. Minor revision.	F-19 (new)	Removal Site Evaluation Report/Engineering Evaluation/Cost Analysis Format
F-19	Statement of Basis/Proposed Plan Fact Sheet Format	Replace with current working template. Minor revision.	F-20 (new)	Removal Action Design Plan Format
F-20	Record of Decision Format	Replace with current working template. Minor revision.	F-21 (new)	Removal Action Report Format
F-21	Post-Construction Report/Corrective Measures Implementation Report/ Remedial Action Completion Report Format	Replace with current working template. Minor revision.	F-22	Comment Response Format
F-22	Land Use Control Implementation Plan Format	Replace with current working template. Minor revision.	F-23 (new)	Facility Decommissioning Evaluations
			F-24 (new)	Decommissioning Project Final Reports
PART II Protocols				
Module 1 – General Information			Module 1 - Data Grouping (DG)	
P.1.1	RFI/RI/BRA Document Guide	Obsolete. Delete.	DG-1	Development of Exposure Groups
P.1.2	Cancelled		DG-2	Exposure Pathways/Conceptual Site Model
P.1.3	Cancelled		DG-3	Addressing the Combined Surficial Risks from Adjacent Units
P.1.4	Development of Exposure Groups	Minor revision. Reference SRS Background Soils Report.		
P.1.5	Exposure Pathways	Minor revision. Combine with CSM protocol.		
P.1.6	Cancelled			
P.1.7	Addressing the Combined Surficial Risks from Adjacent Units	Minor revision.		
P.1.8	Electronic Data Deliverable Format Requirements for RCRA/CERCLA Documents	Obsolete. Delete.		
P.1.9	Constituents of Concern (COC) Refinement Process	Minor revision. Add Area Use Factors for ECO risk. Move to new Module 8.		

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Protocol #	Protocol Name	Recommendation	Protocol #	Protocol Name
P.1.10	Groundwater Monitoring Reports	Delete. Replace with new PER and EMR templates.		
P.1.11	Development, Review and Approval of Pre-Work Plan Sampling and Analysis Plan (Internal)	Not needed. Delete.		
P.1.12	Groundwater Modeling in the RCRA/CERCLA Process	Minor update. Move to new Module 9 and renumber GW-1.		
Module 2 – Data Processing			Module 2 – Data Processing (DP)	
P.2.1	Unit Source Data Processing	Minor update. Reference EPA ProUCL software.	DP-1	Unit Source Data Processing
P.2.2	Unit Background Data Processing	Minor update. Reference SRS Background Soils Report.	DP-2	Unit Background Data Processing
P.2.3	Surrogates for Non-Detects	Minor update.	DP-3	Surrogates for Non-Detects
Module 3 – Unit Specific Constituents			Module 3 – Unit Specific Constituents (USC)	
P.3.1	Unit Specific Constituents	Minor update. Reference SRS Background Soils Report.	USC-1	Unit Specific Constituents
Module 4 – ARARs			Module 4 – ARARs	
P.4.1	ARAR Constituents of Concern	Minor update. Add thresholds for PCBs and lead.	ARAR-1	ARAR Constituents of Concern
P.4.2	Cancelled		ARAR-2	ARAR Preliminary Remedial Goals
P.4.3	ARAR Remedial Goal Options (RGOs)	Minor update. RGO term changed to Preliminary Remedial Goals.		
Module 5 – Contaminant Migration (CM)			Module 5 – Contaminant Migration (CM)	
P.5.1	CM Constituents of Potential Concern	Delete. Discuss in CM-2.	CM-1 (new)	CM Model (VZCOMML)
P.5.2	CM Constituents of Concern	Minor update.	CM-2	CM Constituents of Concern
P.5.3	CM Remedial Goal Options	Minor update. RGO term changed to Preliminary Remedial Goals.	CM-3	CM Preliminary Remedial Goals
P.5.4	CM Cumulative Contaminant Migration	Delete. Rarely needs consideration and is addressed in CSM.		

Regulatory Document Handbook, Revision 17			Proposed New Handbook Format	
Protocol #	Protocol Name	Recommendation	Protocol #	Protocol Name
Module 6 – Human Health (HH) Module			Module 6 – Human Health (HH)	
P.6.1	HH Constituent of Potential Concern	Design Team input received in 2009.	HH-1 (new)	HH Sources of Screening Values
P.6.2	HH Receptors and Scenarios	Design Team input received in 2009. Add IOU receptor descriptions.	HH-2	HH Receptors and Scenarios
P.6.3	HH Exposure Parameters – RME	Design Team input received in 2009. Update based on revised exposure assumptions.	HH-3	HH RME Exposure Parameters
P.6.4	Cancelled		HH-4	HH Constituents of Potential Concern
P.6.5	HH Constituents of Concern	Minor update. Design Team input received in 2009.	HH-5	HH Constituents of Concern
P.6.6	HH Remedial Goal Options	Minor update. Design Team input received in 2009. RGO term changed to Preliminary Remedial Goals.	HH-6	HH Preliminary Remedial Goals
			HH-7	HH Evaluation of Principal Threat Source Material (PTSM) at SRS Waste Units
Module 7 – Ecological Risk Module			Module 7 – Ecological Risk (ECO)	
P.7.1	Ecological Screening Values (ESVs)	Major revision. Revise to be consistent with recently approved ECO risk assessments. Reference EPA-Region 4, LANL and SCDHEC thresholds. Align w/ HH protocols to the extent practical.	ECO-1 (new)	ECO Sources of Screening Values
P.7.2	Ecological Constituents of Potential Concern Selection Process		ECO-2	ECO Receptors and Measurement/Assessment Endpoints
P.7.3	Terrestrial Toxicity Reference Values (TRVs) [Including Exposure Dose (ED) and Hazard Quotient (HQ) Calculations]		ECO-3	ECO Constituents of Potential Ecological Concern
P.7.4	Bioaccumulation and Bioconcentration Screening		ECO-4	ECO Constituents of Potential Concern / Constituents of Concern
P.7.5	Ecological Risk-Based Remedial Goal Options		ECO-5	ECO Site-Specific Data/Studies
P.7.6	Aquatic Toxicity Reference Values (TRVs)		ECO-6	ECO Preliminary Remedial Goals

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Regulatory Document Handbook, Revision 17			Proposed New Handbook Format	
Protocol #	Protocol Name	Recommendation	Protocol #	Protocol Name
			Module 8 – Constituents of Concern (COC) (new module)	
			COC-1	Constituents of Concern (COC) Refinement Process
Module 8 – Groundwater Modeling Module			Module 9 – Groundwater Modeling (GW)	
P.8.1	Evaluating Hydrogeological and Hydrochemical Data for Groundwater Modeling	Revise and move to new Module 9 and renumber GW-2.	GW-1	Groundwater Modeling in the RCRA/CERCLA Process
P.8.2	Determining the Level of Groundwater Modeling Required	Revise and move to new Module 9, and combine in GW-3	GW-2	Developing the Hydrogeological Conceptual Model
P.8.3	Groundwater Model Design and Application	Revise and move to new Module 9, and combine in GW-3	GW-3	Groundwater Model Selection, Design, and Application
P.8.4	Sensitivity and Uncertainty Analyses for RCRA/CERCLA Groundwater Modeling Protocol	Revise and move to new Module 9, and renumber GW-4.	GW-4	Sensitivity and Uncertainty Analyses for RCRA/CERCLA Groundwater Modeling
			GW-5	Process for Use of Monitored Natural Attenuation and Groundwater Mixing Zone Application
Module 9 – Groundwater Mixing Zone Module				
P.9.1	Groundwater Mixing Zone Guideline - Process for Use of the Natural Attenuation (Groundwater Mixing Zone) Alternative	Revise and move to new Module 9 and renumber GW-5.		
Module 10 – Principal Threat Source Material/Low Level Source Material Module			Module 10 – Decommissioning (new module)	
P.10.1	Evaluation of Source Material at SRS Waste Units	Move to Module 6 and renumber HH-7. Reference EPA RSL and PRG websites.	D-1	Core Team Protocol For Review and Concurrence on Facility Decommissioning Evaluations and Decommissioning Project Final Reports, Rev. 1
PART III Document Control				
N/A	Document Control 1. Numbering 2. Distribution 3. Revision/Changes	Delete. Addressed by SRNS procedures.		

Table 2. Record of Core Team Agreements²

Date	Description of Agreement
<i>6/16/2022</i>	<i>Core Team agreed to proceed with the recommended update and format for the Regulatory Document Handbook as discussed at the 6/16/2022 Microsoft Teams scoping meeting and as presented in this scoping summary.</i>

² Core team agreements are documented at each phase of project scoping and retained for each successive phase in order to maintain a comprehensive list of agreements for the life of the project.