

Internal Memorandum

DATE: April 13, 2015
TO: Colleen Cripps, Administrator
FROM: Christine Andres, Chief, Bureau of Federal Facilities **COft-**
SUBJECT: Quarterly Report: January 1, 2015 to March 31, 2015

FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (FFACO) QUARTERLY REPORT

AGREEMENT IN PRINCIPLE (AIP) QUARTERLY REPORT

FFACO Functional Areas Discussion

Industrial and Soils Activity Sites

Industrial Sites

As of the end of March 2015, there were 1958 Corrective Action Sites (CASs) (out of 1970 total) that have been closed, with two CASs in Corrective Action Unit (CAU) 114 and four CASs in CAU 575, all in various stages of active investigation, and six CASs in CAU 572 held for future work.

Soils Activity Sites

At the end of December 2014, there were 119 CASs (out of a total of 134) that have been closed, with 14 in various stages of active investigation and one held for future work.

During this quarter, Bureau of Federal Facilities (BFF) staff participated in the process of document review, project evaluation, planning meetings, and site inspection for four CAUs:

Document Review:

CAU 411 – Double Tracks Plutonium Dispersion (Nellis) – BFF staff reviewed the Draft Streamlined Approach for Environmental Restoration (SAFER) Plan and submitted comments to be addressed in the final document.

CAU 411 – Double Tracks Plutonium Dispersion (Nellis) – Staff reviewed and approved the Final SAFER Plan after all previous comments had been adequately addressed.

CAU 412 – Clean Slate I Plutonium Dispersion (Tonopah Test Range (TTR)) – Staff reviewed the Draft SAFER Plan and submitted comments to the National Nuclear Security Administration/Nevada Field Office (NFO) to be addressed in the final document.

CAU 550 – Smokey Contamination Area – Staff reviewed and approved the Final Corrective Action Decision Document/Closure Report (CADD/CR) after all previous comments had been adequately addressed.

Meetings:

CAU 550 – Smoky Atmospheric Test – Staff participated in a meeting to review NFO's responses to BFF comments on the CAU 550 CADD/CR.

CAU 411- Double Tracks Plutonium Dispersion (Nellis) – Staff participated in a meeting to discuss comment resolution for the Draft SAFER Plan.

Soils Quarterly Meeting – Staff participated in a meeting at NFO that provided an overview of CAU 413 (Clean Slate II) waste removal progress and additional information on plutonium variability in soil.

Security Briefing and Badging – Staff received a special security briefing and were issued badges providing access to the Nevada Test and Training Range/Tonopah Test Range (NTTR/TTR) Range Complex before site inspections of CAUs 411, 412, 413, and 414.

Site Inspections:

BFF staff, together with NFO and NFO-contractor staff, participated in a one day visit to CAU 411 (Double Tracks Plutonium Dispersion) on NTTR. Also visited were CAU 412 (Clean Slate I Plutonium Dispersion), CAU 413 (Clean Slate II Plutonium Dispersion), and CAU 414 (Clean Slate III Plutonium Dispersion) on TTR.

Document Preparation:

Request for Proposal – RFP-1401 was re-released in February 2015 because no formal proposals for the RFP were received by the first deadline of November 4, 2014. One vendor proposal was received after the re-release of RFP-1401 to procure technical services for Risk Management of Radiologically Contaminated Soils. The proposal/bid was opened and recorded on March 25, 2015. Evaluation and review of the proposals was begun and will be completed by the designated review committee during the beginning of the next quarter. Any award will be made by the end of next quarter.

Underground Testing Area (UGTA)

There are five UGTA CAUs, all of which are in various stages of active investigation or model evaluation.

During this quarter, BFF staff participated in the process of document review, project evaluation, meetings and/or site visits for all five of the CAUs:

Document Review and Letters:

CAU 97 – Yucca Flat – Staff: (1) notified NFO of their review of planned sampling locations for this quarter; (2) received and reviewed the Final External Peer Review report; (3) issued a Notice of Completion to NFO for meeting the Peer Review milestone; (4) approved a Record of Technical Change for the Corrective Active Investigation Plan (CAIP); and, (5) approved a final well-specific fluid management strategy letter for Well 2-1.

CAU 98-Frenchman Flat – UGTA staff issued a Notice of Completion for NFO's presentation on Use Restriction and Regulatory Boundaries this quarter. The NFO also requested some milestone title changes and their request was granted.

CAU 99 – Rainier Mesa I Shoshone Mountain – The NFO notified BFF staff of their planned sampling locations for this quarter and issued a Record of Technical Change for the CAIP. Both these documents were approved.

CAU 1011102 – Pahute Mesa – BFF staff: (1) notified the NFO of their review of planned sampling locations for this quarter; (2) approved a final well-specific fluid management strategy letter for Well 20-1; (3) approved a Record of Technical Change for the CAIP; and, (4) approved some milestone title changes.

Quality Assurance -BFF staff reviewed the UGTA Fiscal Year 2014 Annual Quality Assurance Report and the Draft UGTA Quality Assurance Plan, Revision 2.

Background Reading – Staff reviewed various approaches to modeling fractures and faults that might be used in modeling at Pahute Mesa.

Meetings:

CAU 97 – Yucca Flat – UGTA staff attended the Yucca Flat path forward meeting. Staff also attended a day-and-a-half meeting as members of the Pre-emptive Review and Guidance committees to discuss model evaluation and well siting.

CAU 98 – Frenchman Flat – UGTA staff attended the Frenchman Flat CAU Presentation on Use Restriction and Regulatory Boundaries by DOE and their contractors, a milestone deadline, and gave DOE input on the UGTA closure outline. A Notice of Completion was issued for meeting the milestone deadline.

CAU 1011102 – Pahute Mesa – UGTA staff met with DOE staff and contractors to discuss the new well location in the proximity of Well PM-3. A preemptive review committee meeting was also held to discuss the hydrologic framework model for this CAU.

Conference Calls:

CAU 97 – Yucca Flat – UGTA staff participated in three conference calls as members of the Yucca Flat Pre-emptive Review and Guidance Committees to continue discussion of model evaluation and well siting.

Site Visits:

CAU 1011102 – Pahute Mesa – Site visits were made to Well ER-EC-6.

Nevada Off-Sites

There are four Nevada Off-Sites CAUs, two Surface CAUs (CAU 416 and 417) and two Subsurface CAUs (CAU 443 and 447). CAU 416 has been clean-closed. CAU 417 is in Post-Closure Monitoring. CAUs 443 and 447 are in the Corrective Action Decision Document/Corrective Action Plan Stage and are undergoing further site evaluation.

During this quarter, BFF staff participated in the process of document review and project evaluation for the three active CAUs:

Document Review:

CAU 417 – Central Nevada Test Area, Surface – BFF staff accepted the Final Annual Post-Closure Inspection and Monitoring Report and reviewed and commented on the Path Forward for Future Post-Closure Inspection and Monitoring of the Surface Corrective Action Unit at this site.

CAU 443 – Central Nevada Test Area, Subsurface – BFF staff reviewed and commented on the Draft 2014 Groundwater Monitoring Report for this subsurface corrective action unit. A final will be received next quarter.

CAU 447 – Project Shoal Area – BFF staff reviewed and commented on the Draft 2014 Groundwater Monitoring report for this CAU. All comments were satisfactorily addressed in the final and BFF accepted the Final Report.

Meetings:

UGTA staff attended a meeting with the Department of Energy/Office of Legacy Management (DOE/OLM) project manager to discuss the status of the Nevada Off-Sites projects.

Conference Calls:

UGTA staff participated in a conference call between the DOE/OLM project manager and contractors for further discussion on the status of the Nevada Off-Sites projects.

Miscellaneous

Meetings:

The annual FFACO meeting was held between the BFF and the Department of Energy.

The Bureau Chief attended the Division Staff Meeting in Carson City on February 9, March 9 and 23, 2015. The meetings on January 12 and February 23 were participated in via conference call. The Bureau Supervisor participated in the January 26 meeting via conference call. While in Carson City for the meetings, various other bureau business was conducted.

The BFF chief gave a presentation on the Roles and Responsibilities of the Bureau and participated in the NSSAB meeting on January 21, 2015. The bureau supervisor and chief participated in the UGTA groundwater open house and NSSAB meeting in Beatty, NV on February 18, 2015. The Chief attended the March 25 NSSAB meeting.

The Chief participated in meetings with the DCNR Director, DEP Administrator and/or Deputy Administrator and the Chair and Vice-Chair of the NSSAB, DOE personnel and or city and county personnel from Nye and Clark Counties.

The Bureau Chief and all Las Vegas Office supervisors met to discuss office operations. The Deputy Administrator and Chief held meetings with Building Management to discuss several office conditions in regards to lease requirements.

Training:

Staff completed their four hour online section of the 8-hour Hazwoper Refresher training.

A staff member was re-certified as Rad Worker II.

BFF staff continued cross-training activities for other BFF projects.

General:

An UGTA staff member, as requested by a BCA staff member, reviewed an aquifer test analysis for a BCA project and gave comments to the BCA staff.

All Work Performance Standards for Bureau personnel were revised and finalized through several meetings with staff.

Agreement in Principle (AIP) Functional Areas Summary

Functional Area Discussion

1. On-Site Discharges

Water Pollution Control

Document Review:

Water Pollution Control Permit GNEV 93001 – The October 1 through December 31, 2014 Quarterly Discharge Monitoring Report for the quarter was reviewed. Bureau of Federal Facilities (BFF) staff noted a continuing problem with the high volume to the DAF lagoon. The National Nuclear Security Administration/Nevada Field Office (NFO) and BFF are working together to identify all of the influencing factors to cause the excess flow and a path forward. BFF does not view this as an egregious problem as the lagoons are functioning properly in spite of the excess flow. BFF sent a letter stating it was otherwise compliant.

Water Pollution Control Permit NEV 96021 – BFF staff reviewed the E-tunnel Waste Water Disposal System Quarterly Discharge Monitoring Report for the Permit and sent a letter stating it was compliant.

Meetings:

Staff participated in the quarterly Water Meeting held on February 12, 2015 with NFO personnel and their contractors.

Site Visits:

There was one site visit for this quarter.

Spill Report:

NFO reported a spill to the Nevada Division of Environmental Protection (NDEP) of 42 gallons of transformer oil in the Area 6 Transformer Yard. NFO's contractor, NSTec, remediated the site and requested on the behalf of NFO the closure of this spill site. BFF responded with a letter approving the closure.

2. Ground Water Monitoring

There was no activity in this category during the quarter.

3. Air Quality Monitoring

There was no activity in this category during the quarter.

4. Low Level and Mixed Low Level Waste Oversight

Document Preparation:

Request for Proposal – RFP-1402 was re-released in February 2015 because no formal proposals for the RFP were received by the first deadline of November 4, 2014. Two vendor proposals were received after the re-release of RFP-1402 to procure technical services for radiological subject matter expertise. Both vendor proposals/bids were opened and recorded on March 25, 2015. Evaluation and review of the proposals were begun and will be completed by the designated review committee during the beginning of the next quarter. Any award will be made by the end of next quarter.

Meetings:

BFF staff met with NFO personnel on March 5, 2015 for a presentation of the Performance Assessment (PA) Annual Review Process. An overview of the PA review process, including a discussion on un-reviewed disposal questions (UDQ) and Special Analysis (SA), was provided.

BFF staff participated in a waste generator surveillance at Hill Air Force Base in Salt Lake City February 23 and 24, as well as, Radioactive Waste Generator Facility Evaluations conducted by the NFO at both the Paducah Gaseous Diffusion Plant in Paducah, Kentucky, February 23-26, 2015 and the PANTEX Plant in Amarillo, Texas, March 9-12, 2015. Staff also observed waste packaging at the Idaho National Laboratory using the macrobags January 6-8, 2015, as well as, the off-loading of such waste at the NNSS.

Department and Division staff participated in the Waste Management Symposium held annually in Phoenix, AZ. The DCNR Director and BFF Chief gave presentations and/or sat as panel members in four different sessions.

Discussions on the Fee Agreement continued with the DOE.

A waste profile flow chart was developed by the DOE's Manager for Field Operations and BFF's Bureau Chief.

Conference Calls:

Staff participated in weekly Waste Acceptance Review Panel (WARP) meetings in person or via teleconference; meetings are now moderated by a new contractor, Navarro, which assumed management of NFO's Radioactive Waste Acceptance Program on March 1, 2015; panel meetings were held on January 7, 14, 21, 28, February 4, 11, 18, 25, and March 4, 11, 25, 2015. Review Panel members discussed waste profile comments and waste-specific compliance issues

for generator-submitted low-level and mixed low-level radioactive waste profiles as they pertain to NNSSWAC, Rev. 10. As applicable, BFF staff reviewed and provided comments on low-level radioactive waste and mixed waste profiles (for compliance with NNSSWAC, Rev. 10) submitted by all currently-approved LLW and MLLW generators.

5. Waste Management

RCRA Part B Permit Program Activities and Various Solid Waste Landfill Activities:

The Bureau received detailed descriptions of post-closure monitoring inspections and repairs performed by DOE's contractor, Navarro, on March 25 and 26, 2015 at RCRA Part B Landfill Sites CAUs 91 (Area 3), 92 (Area 6), 110 (Area 3), 111 (Area 5), and 112 (Area 23).

Staff conducted quarterly post-closure monitoring inspections and also accompanied a new employee on an orientation tour of the RWMS at the NNSS.

Discussions were held with DOE personnel throughout the quarter on the mixed low-level waste cell permit renewal; the need for a new mixed low-level waste cell; asbestos disposal; and, acceptance of classified matter/waste.

NFO continues to implement recommendations in an attempt to vegetate the cover on CAU 111. In January, the NFO purchased rabbit fencing and installed it in February. If vegetating is unsuccessful by October 2015, meetings will be held between NFO and BFF to decide on future actions at the site.

6. Major Program Proposals

A new process for approving Asbestiform transportation to the NNSS Area 5 is in the planning stages.

7. Historic Preservation

Funding has been provided to the SHPO for historic reviews at DOE and/or the NNSS during the year.

8. Environmental Monitoring Program and Report

There was no activity in this category during the quarter.

9. Sampling

No sampling activities were conducted by the Bureau during the quarter.

10. Safe Drinking Water

Document Review:

NDEP had no Safe Drinking Water documents to review this quarter.

Meetings:

Staff participated in the quarterly Water Meeting held on February 12, 2015 with NFO personnel and their contractors.

Site Visits:

There was one site visit for this quarter.

Fiscal Analysis

Estimate of personnel resources used (FTE or hours)

The Bureau of Federal Facilities is made up of a Bureau Chief, two supervisors, seven technical staff and an administrative assistant. Currently one supervisor and two sanitary engineer positions are vacant. The AIP grant funds activities for each of these individuals. For the quarter, that represents approximately 4.5 FTE based on a review of grant related activities.

Total expenditures for each task area

A total of \$92,023 was spent last quarter for AIP work. This is the most current figure available at this time and includes personnel, operating, information services, DOD and DOE oversight and purchasing costs.

Comparison of estimate to budgeted expenses

Expenses this quarter were within the legislatively-approved spending limits.

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