

Internal Memorandum

DATE: October 15, 2014
TO: Colleen Cripps, Administrator
FROM: Christine Andres, Chief, Bureau of Federal Facilities *CDA*
SUBJECT: Quarterly Report: July 1, 2014 to September 30, 2014

FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (FFACO) QUARTERLY REPORT

AGREEMENT IN PRINCIPLE (AIP) QUARTERLY REPORT

FFACO Functional Areas Discussion

Industrial Sites

As of the end of September 2014, there are 1958 Corrective Action Sites (CASs) (out of 1966 total) that have been closed, with two CASs in Corrective Action Unit (CAU) 114 in various stages of active investigation and six CASs in CAU 572 held for future work.

Soils Activity Sites

At the end of September 2014, there are 86 CASs (out of a total of 134) that have been closed, with 47 in various stages of active investigation and one held for future work.

During this quarter, BFF staff participated in the process of document review, project evaluation, and site inspection for five Soils CAUs:

Document Review:

CAU 541 – *Small Boy* - Reviewed the Draft Corrective Action Implementation Plan (CAIP) and provided written comments to National Nuclear Security Administration/Nevada Field Office (NNSA/NFO). NDEP approved the final CAIP when all draft comments were satisfactorily addressed.

CAU 550 – *Smokey Site* - NDEP approved an NFO request for a deadline extension for submittal of the draft Corrective Action Decision Document/Closure Report (CADD/CR) from September 30, 2014 to February 16, 2015.

CAU 571 – Area 9 Plutonium – NDEP reviewed the Draft Corrective Action Decision Document and Closure Report (CADD/CR) and provided written comments. NDEP approved the final CADD/CR when all draft comments were satisfactorily addressed.

CAU 575- Misc. Sites – Granted request from NFO to move CAU 575 from FFACO Appendix II to Appendix III.

CAUs 411 and 412 - Double Tracks Plutonium Dispersion (Nellis) and Clean Slates 1 (Tonopah Test Range) – NDEP approved the NFO request for deadline extensions under Streamlined Approach for Environmental Restoration (SAFER) plan milestones. NNSA/NFO and U.S. Air Force have recently agreed upon land use scenarios for both CAUs and comment resolution for both preliminary draft SAFER Plans have been discussed.

Meetings:

CAU 567 – Miscellaneous Soil Sites – Staff attended the Corrective Action Alternatives meeting for five Corrective Action Sites in Areas 1, 3, 5, 20, and 25 of the NNSS which comprise this CAU on September 16, 2014.

Quarterly Soil Activity Meeting – NDEP participated in the quarterly meeting on the Soil Activity FY 14 look back and FY 15 look ahead on September 16, 2014. Desert Research Institute, NSTec, Navarro-Interra, and NNSA presented topics of relevance.

Document Preparation:

Request for Proposal - A RFP to procure technical services to support NDEP oversight of radiologically-contaminated soil sites under the Soils Activity FFACO framework was issued this quarter. Proposals are due November 4, 2014.

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, and for the five CAUs:

Document Review:

CAU 97 – Yucca Flat – NDEP acknowledged receipt of a final Record of Technical Change for the Final CAIP. NDEP also approved a NFO request to correct a CAS description for this CAU. A milestone deadline for the External Peer Review was also extended 90 days.

CAU 98 – Frenchman Flat – UGTA staff reviewed and commented on the draft Model Evaluation Report, including that the requirements to re-survey wells in the CAU have been met and Attachment B External Review Comments and subsequent comment responses are satisfactory and issued a Notice of Completion for this deadline milestone. Various Pre-emptive review documents were also completed.

CAU 99 – Rainier Mesa / Shoshone Mountain – Pre-emptive review member completed review of, and commented on, a USGS chapter on RM/SM conceptual models and the compilation of review committee's comments.

CAU 101/102 – Pahute Mesa – Pre-emptive review members began review of the Well PM-3 Sampling Report and its implications for the Pahute Mesa Flow Model.

Distribution of FY 2014 + 1 Milestone Chart and Listing of Modifications to FFACO – NDEP reviewed the chart and sent a letter to the NFO stating all milestones were correct.

Background Reading – Four papers on the topics of MODFLOW, water level responses to pumping and statistical analysis.

Meetings:

CAU 97 – Yucca Flat – UGTA staff met to discuss progress concerning the Yucca Flat External Peer Review and attended a Peer Review analysis meeting with DOE.

CAU 98 – Frenchman Flat – UGTA staff met with DOE to discuss Regulatory Boundaries and their impact on the Frenchman Flat Closure, as well as, participated in a Frenchman Flat classified briefing by DOE contractors.

CAU 101/102 – Pahute Mesa – UGTA staff attended the Multiple Well Aquifer Test Milestone Presentation and sent a Notice of Completion for this milestone deadline. A letter was also sent by NDEP stating that the objectives for conducting multi-well aquifer tests for this CAU were met.

NNSS – A DOE UGTA Technical Information Exchange was attended by staff.

Site Visits:

CAU 98 – Frenchman Flat – Sampling activities were observed at well WW-5A in July.

CAU 101/102 – Pahute Mesa – Various aquifer testing and sampling activities were observed during three different site visits in July, three in August and one in September.

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, project evaluation, and site inspection for the two Subsurface CAUs:

Document Review:

CAU 443 – Central Nevada Test Area – Received Well Completion Report for MV-6 at the end of June. This is a Supplemental Document and its receipt was acknowledged in early July.

CAU 447 – Project Shoal Area – Path Forward: 2014 Short-Term Data Acquisition Plan for Project Shoal Area was received and reviewed late last quarter. Approval letter was sent early July after draft document comments were satisfactorily addressed. The Shoal Site Specific Fluid management Plan was reviewed and accepted. UGTA staff received and reviewed the daily progress reports on the drilling of two new wells and deepening of one existing well at the site.

Site Visits:

CAU 447 – Project Shoal Area – In July, staff conducted one site visit to observe well sighting activities. Three site visits were conducted in August and three in September to observe drilling of monitoring wells.

Miscellaneous

An UGTA staff member attended a presentation by Dr. Leonard Konikow on the use of solute transport models in complex systems.

UGTA staff members attended the Technical Information Exchange presented by the UGTA activity sub-contractors.

The Bureau Chief attended the Division Staff Meeting in Carson City on July 7, 21, August 18 and September 8 and 22. The meeting on August 4 was participated in via conference call. While in Carson City for the meetings, various other bureau business was conducted.

The Bureau Chief spoke with DCNR's PIO regarding the BFF and its activities and submitted information to enhance the bureau's webpage.

The Chief attended a NSSAB meeting on July 16 and September 10.

A Bureau Staff Meeting was held in July and two were held in September.

The Bureau Chief held a meeting with all Las Vegas Office supervisors to discuss the Office Manager position duties.

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 April 1 through June 30 2014 Quarterly Discharge Monitoring Report for the quarter was reviewed. Letter stating it was compliant sent.

Water Pollution Control Permit NEV 96021 – The E-tunnel Waste Water Disposal System Quarterly Discharge Monitoring Report for the Permit was reviewed and found to be compliant. A letter was sent.

Meetings:

Staff participated in the quarterly Water Meeting held on August 28, 2014 with NFO personnel and their contractors.

Site Visits:

No sites visit took place this quarter.

2. Ground Water Monitoring

No activity this quarter.

3. Air Quality Monitoring

Meetings:

Nevada National Security Site (NNSS) – A show cause meeting was held to discuss the Air regulation violation that was self-reported by NFO.

4. Low Level and Mixed Low Level Waste Oversight

Document Preparation:

Screening Checklist – Met with NFO and NSTec personnel to discuss modifications to both agencies' radioactive waste profiles screening checklist.

Request for Proposal - A RFP to procure technical services for radiological subject matter expertise was issued this quarter. Proposals are due November 4, 2014.

Meetings:

Staff met with NFO and NSTec on August 13, 2014 for a wastestream-specific presentation/demonstration pertaining to the Area 5 Performance Assessment.

Staff attended the Radioactive Waste Conference held September 3-5, 2014 in Summerlin, NV.

Staff met to discuss and construct a Fee Schedule for future waste coming to Area 5.

Conference Calls:

Staff participated in weekly Waste Acceptance Review Panel (WARP) meetings via teleconference; meetings were held on July 2, 9, 16, 23, 30; August 6, 13, 20, 27; and September 3, 10, 17, 24, 2014. 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, NDEP 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:

Nevada National Security Site (NNSS) RCRA Part B Landfill Sites CAUs 91 (Area 3), 92 (Area 6), 110 (Area 3), 111 (Area 5), and 112 (Area 23) were visually inspected. All sites were found to be in good condition. Detailed descriptions of the latest inspections (on September 25, 2014) are being prepared for file.

New suggestions are to be made by NNSA in order to successfully vegetate the cover on CAU 111. The first attempts have not demonstrated adequate vegetative growth to allow for the desired protection capabilities.

An NNSA request for disposal of Beryllium waste into the Area 9, U10c Class III Solid Waste Disposal Site (Permit SW 13 097 03) was agreed to by NDEP. NDEP also submitted a clarification of the monitoring and reporting requirements for this permit.

NNSA requested an Emergency Treatment Permit to dispose of potentially explosive waste that had been created at the Nonproliferation Test and Evaluation Center (NPTEC). NDEP accepted the plan and the waste was disposed.

Continuation of the Temporary Closure for the Underground Storage Tank (UST) 6-CPHP-1, for the Area 6 of the NNSS, was agreed to.

A Semiannual Solid Waste Disposal Report was submitted by NNSA and was accepted by NDEP. The report was complete, was in accordance with the permit, and was submitted in a timely manner.

6. Major Program Proposals

There was no activity in this category during the quarter.

7. Historic Preservation

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

The Bureau Chief spoke with SHPO employees in regards to CAU 550, the Smoky site and its historical significance.

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 received the letter from the NFO concerning the completion of the Area 25 RCP Storage Tank Refurbishment Water Project. Since the project was compliant with all NACs and commitments with the State, NDEP recorded this water project completed

Meetings:

Staff participated in the quarterly Water Meeting held on August 28, 2014 with NFO personnel and their contractors.

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 environmental scientist 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 \$128,435.23 was spent this quarter for AIP work. This amount 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.

Miscellaneous

UGTA staff attended a presentation on the Performance Assessment Model Demonstration for waste issues.

The DCNR Director, NDEP Administrator, Deputy Administrator and BFF Chief attended a Tabletop Exercise put on by DOE for first and emergency responders around the NNSS.

The Bureau Chief attended the Division Staff Meeting in Carson City on July 7, 21, August 18 and September 8 and 22. The meeting on August 4 was participated in via conference call. While in Carson City for the meetings, various other bureau business was conducted.

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