

## Internal Memorandum

DATE: January 15, 2015  
TO: Colleen Cripps, Administrator  
FROM: Christine Andres, Chief, Bureau of Federal Facilities   
SUBJECT: Quarterly Report: October 1, 2014 to December 31, 2014

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### **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 December 2014, 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 91 CASs (out of a total of 134) that have been closed, with 43 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, planning meetings, and site inspection for five CAUs:

##### *Document Review:*

**CAU 575 - Area 15 Miscellaneous Sites** - Staff reviewed the Draft Streamlined Approach for Environmental Restoration (SAFER) Plan, and approved the Final SAFER plan for this CAU when all draft comments were satisfactorily addressed.

**CAU 550 – Smokey Site** - NDEP requested a timeframe extension for submission of review comments on the Draft Corrective Action Decision Document/Closure Report (CADD/CR) from

December 21, 2014 to January 16, 2015; this included, if necessary, equivalent deadline extensions for submittal of subsequent documents.

Meetings:

**CAU 567 – Miscellaneous Soil Sites** – Staff participated in a conference call with NNSA/NFO personnel concerning five (5) Corrective Action Sites in Areas 1, 3, 5, 20, and 25 of the NNSS which comprise this CAU. During this call, NDEP gained a better understanding of the currently active Counter Terrorism Operations Support (CTOS) field training facility located in the CAU. Also, related to this call, NDEP reviewed the Draft Corrective Action Decision Document/Closure Report (CADD/CR) for CAU 567 and provided written comments which will be addressed in the final CADD/CR.

**CAUs 411 and 412** – The Bureau Chief participated in a meeting with DOE and Air Force personnel on these two CAUs in Washington, D.C. in November.

Document Preparation:

**Request for Proposal** – An Amendment was issued to RFP-1401 to procure technical services to support NDEP oversight of radiologically-contaminated soil sites under the Soils Activity FFACO framework. The amendment provided clarifying information about procurement which was requested by one vendor. No formal proposals for the RFP were received by deadline of November 4, 2014.

**Underground Testing Area (UGTA)**

There are four 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 four of the CAUs:

Document Review and Letters:

**CAU 97 – Yucca Flat** – Staff approved DOE's request to reset this CAU's Peer Review Completion deadline because the Peer Review Committee had additional questions that needed to be addressed.

**CAU 98 – Frenchman Flat** – UGTA staff reviewed and commented on the Final Model Evaluation Report Rev. 1. Various Pre-emptive review documents were also completed. NDEP also acknowledged with letters that DOE had completed all requirements in the CADD/CAP Stage, accepted their request to move to the Closure Stage and negotiated Decision Point #7 of the UGTA Strategy.

**Background Reading** – Reviewed presentations on Risk Analysis and Decision-Making Under Uncertainty and paper on total integrated system approach.

Meetings:

**CAU 97 – Yucca Flat** – UGTA staff attended the Yucca Flat External Peer Review wrap-up meeting with DOE and their contractors and the External Peer Review members.

**CAU 98 – Frenchman Flat** – UGTA staff met twice with DOE to discuss Use Restriction and Regulatory Boundaries and their impact on the Frenchman Flat Closure.

**CAU 101/102 – Pahute Mesa** – UGTA staff met with DOE staff to discuss Well PM-3.

Site Visits:

**CAU 101/102 – Pahute Mesa** – Site visits were made to Wells ER-20-8 and 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 two of the active CAUs:

Document Review:

**CAU 417 – Central Nevada Test Area** – Final 2014 Post-Closure Inspection and Monitoring Report for Surface Corrective Action Unit 417 at the Central Nevada Test Area, Nevada Site was received and reviewed. All comments on the draft document were satisfactorily addressed and the Final was approved.

**CAU 447 – Project Shoal Area** – Drilling of three new wells was completed and the milestone met.

Miscellaneous

UGTA staff completed their annual OSHA Physical Exam.

UGTA staff completed their four hour online section of the 8-hour Hazwoper Refresher training. An UGTA staff member attended the two day meeting of the Interagency Steering Committee on Performance and Risk Assessment Community of Practice Annual Technical Exchange Meeting with DOE headquarters staff, State Regulators and DOE contractors from various DOE sites.

The Bureau Chief attended the Division Staff Meeting in Carson City on November 3. The meeting on October 6 was participated in via conference call. While in Carson City for the meeting, various other bureau business was conducted.

The Bureau Chief continued to speak with DCNR's PIO regarding the BFF and its activities and submitted information to enhance the Bureau's webpage. She also participated in a meeting with the entire WEB team of DCNR.

The Chief attended the NSSAB Orientation and participated in a tour of the NNSS for new NSSAB members. The BFF supervisor participated in the NSSAB meeting on November 19, 2015.

The Chief participated in a meeting with the Administrator, Chair and Vice-Chair of the NSSAB and DOE personnel.

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

The Bureau Chief and Deputy Administrator attended the NGA FFTF meeting in New Orleans, LA.

Interviews were completed for an Environmental Scientist III position.

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.

Some Bureau staff submitted comments on their work performance standards to the Chief and continued cross-training activities for other BFF projects.

## **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 July 1 through September 30, 2014 Quarterly Discharge Monitoring Report for the quarter was reviewed. NDEP staff noted a high volume to the DAF lagoon. NNSA/NFO notified NDEP that this has to do with a new digital flow meter and the manner the software manipulates the flow readings. NNSA/NFO will have the manufacturer correct it in the near future. NDEP sent a letter stating it was otherwise compliant.

**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 November 6, 2014 with NFO personnel and their contractors.

###### *Site Visits:*

There were three site visits for this quarter; two for the Annual Sewage Lagoon inspections, and one for the E-Tunnel Discharge Sampling event.

#### **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** – An Amendment was issued to RFP-1402 to procure technical services for radiological subject matter expertise. The amendment provided clarifying information about procurement which was requested by one vendor. No formal proposals for the RFP were

received by the deadline of November 4, 2014.

Meetings:

Staff participated in a Radioactive Waste Generator Audit conducted by NFO at Los Alamos National Laboratory in New Mexico, October 27-30, 2014.

Staff attended the Radioactive Waste Generators Workshop, held by NFO, December 3, 2014. The Bureau Chief made a presentation on the recent changes within the Bureau.

Staff attended a Performance Assessment Technical Exchange held at Desert Research Institute, December 11-12, 2014.

Staff continued to meet 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 October 1, 8, 15, November 5, 12, 19, 26, and December 10, 17, 23, 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, by both NDEP and DOE conducted on December 10, 2014, have been prepared and are filed.

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

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

**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 November 6, 2014 with NFO personnel and their contractors.

*Site Visits:*

NDEP staff conducted the annual Sanitary Water Surveys of the water haulers.

**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 \$154,175.89 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 completed their annual OSHA Physical Exam.

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

UGTA staff member attended the two day meeting of the Interagency Steering Committee on Performance and Risk Assessment Community of Practice Annual Technical Exchange Meeting with DOE headquarters staff, State Regulators and DOE contractors from various DOE sites.

Two staff members attended the week-long McCoy training.

The Bureau Chief attended the Division Staff Meeting in Carson City on November 3. The meeting on October 6 was participated in via conference call. While in Carson City for the meeting, various other bureau business was conducted.

The Bureau Chief continued to speak with DCNR's PIO regarding the BFF and its activities and submitted information to enhance the bureau's webpage. She also participated in a meeting with entire WEB team of DCNR.

The Chief attended the NSSAB Orientation and participated in a tour of the NNSS for new NSSAB members. The BFF supervisor participated in the NSSAB meeting on November 19, 2015.

The Chief participated in a meeting with the Administrator, Chair and Vice-Chair of the NSSAB and DOE personnel.

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

The Bureau Chief and Deputy Administrator attended the NGA FFTF meeting in New Orleans, LA.

Interviews were completed for an Environmental Scientist III position.

Staff took part in a NNSS site tour briefing with Carson City personnel. Some Bureau staff submitted comments on their work performance standards to the Chief and continued cross-training activities for other BFF projects.