

Internal Memorandum

DATE: April 11, 2014
TO: Colleen Cripps, Administrator
FROM: Tim Murphy, Chief, Bureau of Federal Facilities TM
SUBJECT: Quarterly Report: January 1, 2014 to March 31, 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 March 2014 there are 1958 Corrective Action Sites (CASs) (out of 1966 total) that have been closed, with two in various stages of active investigation and eight held for future work. During this quarter BFF staff did not participate in the process of document review and/or evaluation regarding any Industrial Sites Corrective Action Unit (CAU). However, the following status updates are provided:

CAU 111 – Area 5 WMD Retired Mixed Waste Pits – The cover is being re-vegetated as the initial seeding did not establish vegetation and thus the required protection was not being provided. The vegetation progress is being monitored on a monthly basis. To date, no progress has been noted but is expected as the Spring season progresses. Irrigation is being provided.

Changes continue to be requested to Use Restriction status of CAUs with Use Restrictions previously placed on them.

Soils Project Sites

At the end of March 2014 there are 86 CASs (out of a total of 130) 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, and site inspection for five Soils Project Sites CAUs.

CAU 105 – Area 2 Yucca Flat Atmospheric Test Sites – BFF approved the final Corrective Action Decision Document / Closure Report (CADD/CR) as the additional comments generated subsequent to the review of the draft document were satisfactorily addressed. Because of the issuance of a CADD/CR, the CAP milestone in the FFACO was deleted.

CAU 366 – Area 11 Plutonium Valley Dispersion Sites – During this quarter, BFF staff received, reviewed and approved the final Closure Report.

CAU 367 – Area 10 Sedan, Ess and Uncle Unit Craters – BFF was notified of the completion of erosion repairs at this CAU, per earlier agreement with DOE.

CAU 415 – Project 57 No. 1 Plutonium Dispersion (NTTR) – BFF received and approved a request to promote this CAU from FFACO Appendix II to Appendix III and to establish a Streamlined Approach for Environmental Restoration (SAFER) Plan deadline date. BFF also received a draft SAFER document which is in the process of review.

CAU 550 – Smoky Contamination Area – See Meetings section below. A request for FFACO deadline extension and change to document submittal was provided by DOE and approved by BFF.

CAU 568 – Area 3 Plutonium Dispersion Sites – A final Corrective Action Investigation Plan (CAIP) was received, reviewed and approved by BFF staff.

A final Soils Risk-Based Corrective Action Evaluation Process document (revision 1) was submitted by DOE and approved by BFF. Comments generated in the review of the draft document were satisfactorily addressed.

Meetings

BFF Staff met with DOE and Contractor personnel on January 8, January 28, and February 12 to discuss Corrective Action Alternatives (CAA) for CAU 550 – Smoky Contamination Area using a refined CAA process to allow for better information sharing and stakeholder participation. Agreement still could not be reached regarding disposition of lead bricks at ground zero, and what impact Historic Site Preservation issues would have on ultimate closure of this site. Discussion/negotiation is ongoing.

A Soils Activity Update Meeting was held this quarter on February 11, 2014, and was attended by BFF staff.

BFF staff attended the Annual FFACO meeting on February 12, 2014.

Bureau Chief attended NSSAB meeting on March 19, 2014; bi-weekly staff meetings held throughout the quarter; and meetings with NDEP Administrator(s) in Carson City.

Underground Testing Area (UGTA)

Background: The NNSA/NFO sent a letter on December 30, 2013, *Request to Advance to External Peer Review on Corrective Action Unit (CAU) 97: Yucca Flat/Climax Mine*, seeking NDEP's concurrence to move forward with an External Peer Review, a FFACO requirement.
Current: The BFF sent concurrence to proceed to External Peer Review on January 6, 2014.

UGTA staff attended an External Dry Run Peer Review, conducted by DOE and its contractors, from February 24-28, 2014, including a day-long field trip to the NNSS, and provided comments to DOE on the entire week of presentations.

On January 29, 2014, the NNSA/NFO sent a letter to the NDEP entitled, *Request for Approval that Requirements Have Been Met to Re-Survey Wells in Corrective Action Unit (CAU) 98: Frenchman Flat*. The BFF's UGTA staff requested a meeting with NNSA/NFO and contractor personnel to discuss this request. The meeting was held February 6, 2014. In a February 11, 2014 letter, the BFF stated that while the NDEP was in agreement that the accuracy of fourteen of the twenty-three Frenchman Flat wells cannot be improved through re-surveying, it did have three questions/comments that were generated from the review of the January 29, 2014 letter. These questions/comments are to be addressed in a re-submittal of the letter and amended, attached memorandum. The NDEP expects this re-submittal during the next quarter.

During the February 6, 2014 meeting, discussions were also held regarding a needed Record of Technical Change to the Frenchman Flat CADD/CAP.

The UGTA geologist attended CAU 98, Frenchman Flat pre-emptive review meetings on January 7 and March 12, 2014 and reviewed a number of geo-hydrologic documents during this quarter as a member of the pre-emptive review committee.

Background: On April 25, 2013, a BFF UGTA staff member attended the preemptive review committee kickoff meeting for the review of the Rainier Mesa/Shoshone Mountain (CAU 99) Draft Flow and Transport document. The Draft document was received on May 6, 2013 and underwent review by the staff member, as did two white papers that were deemed relevant to the Flow and Transport document which were received on May 20, 2013. Numerous meetings and conference calls took place in a previous quarter (May 17 and 31 and June 13 and 18, 2013) between the NNSA/NFO and the NDEP and/or the preemptive review committee in regards to the Draft Flow and Transport document, the presentation of the New Strategy for CAU 99 in the Flow and Transport document and contents of the White Papers. The meetings and discussions continued the following quarter as the BFF staff member attended White Paper presentations by the two authors, pre-emptive review group meetings to discuss the papers, submitted comments on the papers, and attended presentations, and submitted comments, on the Flow and Transport document on July 17, 18, 22 and August 5, 12, 19 and 21, 2013. Between October and December 2013, the committee member attended a meeting for a USGS presentation on the development of conceptual models for Rainier Mesa, reviewed the material presented and prepared and submitted comments and suggestions for additional consideration for the ongoing work.

Current: The preemptive review committee member provided comments on proposed responses-to-comments on the Flow and Transport document and White Papers during this quarter.

Background: On November 19, 2013, UGTA personnel met with NNSA/NFO personnel to discuss the need for a Phase II Pahute Mesa Modeling Strategy/Approach document and QC questions concerning data collected before the most recent QAP went into effect. On December 18, 2013, the NNSA/NFO issued a letter, *Phase II Modeling Strategy/Approach Document for Corrective Action Units (CAUs) 101 and 102: Central and Western Pahute Mesa, Nevada National Security Site (NNSS), Nevada* stating that there was a mutual agreement between NDEP

and NNSA/NFO that there was no need for a separate Phase II modeling document for this CAU. The current strategy being used will be described in the Phase II Flow and Transport document. The letter also stated that the 2004 modeling strategy document is no longer in effect, as it is outdated.

Current: The NDEP issued a letter on January 6, 2014 stating that it was in agreement that a Modeling Strategy/Approach document will not be developed for Phase II of the Pahute Mesa Corrective Action Investigation. Instead, the Phase II modeling approach will be documented in the Pahute Mesa Phase II Flow and Transport document. Until that document is published, the NDEP will be kept apprised of the Phase II modeling approach through preemptive review activities and presentations.

On February 27, 2014, the NNSA/NFO submitted a *Record of Technical Change Number DOE/NV--1312-Rev.2 ROTC-1 for the Final Phase II Corrective Action Investigation Plan (CAIP), Revision 2, July 2009 for Corrective Action Units (CAU) 101 and 102 Central and Western Pahute Mesa, Nevada Test Site, Nye County, Nevada* requesting a needed change to the sampling and analytical requirements for this CAU. The NDEP signed the ROTC and acknowledged it in a March 10, 2014 letter.

BFF UGTA personnel observed and inspected aquifer testing activities at Well ER-EC-15 on January 8, 14, 23 and 28, February 10 and 25, and March 4, 2014 and at ER-EC-14 on March 13 and 18, 2014.

Background: NDEP, NNSA/NFO and their contractor QA staff met on December 17, 2013 for a UGTA QA meeting. The discussion included the following topics: (1) DOE's contractor has developed a comprehensive checklist for the UGTA QAP. The contractor is currently assessing the program and plans on using the checklist on all participants this fiscal year. The assessment will be at the QAP level. The DOE is conducting more focused implementation assessments; (2) The UGTA QA report is on schedule to be delivered to the NDEP by January 15, 2014; (3) The upcoming DOE assessment of LLNL software quality assurance is scheduled for late January. This may be combined with a remaining analytical procedures assessment and corrective action verifications. NDEP and NNSA/NFO staff will coordinate schedules with LLNL and contractor QA staff to do a joint assessment.

Current: The NNSA/NFO submitted the Underground Test Area (UGTA) Fiscal Year (FY) 2013 Annual Quality Assurance Report, January 2014 on January 14, 2014. The NDEP acknowledged its review in a February 19, 2014 letter.

Also on January 14, 2014, NDEP, NNSA/NFO and NI QA staff met for a UGTA-NDEP QA meeting and discussed the following topics: (1) the schedule for the LLNL visit was determined; (2) in regards to DOECAP, the Contractor clarified that DOECAP is an audit program only, they do not certify or accredit like NELAC/P. The program is based on the DOE contractual requirements in the Quality Systems for Analytical Services (QSAS) for commercial laboratories. DOECAP does not audit DOE national laboratories or TSDFs. LLNL has agreed to the UGTA QAP; (3) laboratory approval and (4) LLNL data package were also discussed.

A follow-up meeting was held on January 17, 2014 with NDEP, NNSA/NFO and NI QA staff and determined the following points: (1) Demonstrations of capability for those analytes without PEPs have been completed by commercial labs as a NELAC requirement. For long term monitoring, commercial laboratories can be used to determine/verify <MCL; (2) LLNL analyses use non-standard methods that provide lower detection limits for these constituents to determine

the concentration present versus a non-detect or <MCL. This data could support the commercial laboratories but is generally orders of magnitude lower than the MCL. These could also be used for public perception (below MCL, but look how far below!); (3) In the future, these analyses could be performed by a commercial lab (to determine <MCL) and LLNL (to determine concentration, if present). This would ensure that one set of analyses are analyzed by either BWQ or NELAC certified laboratories; (4) Non-contaminant constituents ($\delta^2\text{H}$, $\delta^{18}\text{O}$, $\delta^{13}\text{C}$, Noble gases, $^{87}\text{Sr}/^{86}\text{Sr}$, and $^{234}\text{U}/^{238}\text{U}$) do not have MCLs or BWQ certifications.

A meeting was also held on January 31, 2014 to state that DOE must use Nevada Certified Laboratories for any analyses that are certifiable. For those which do not have certifiable methods, the procedures listed in their QAP must be followed.

NDEP staff visited LLNL February 5-7, 2014 to observe methods review by NNSA/NFO and Contractor, and to inspect the Center for Accelerator Mass Spectrometry.

Background: The completed, updated BFF's webpage was posted to the NDEP website on September 6, 2013. A few minor, needed corrections/updates were discussed with the current webmaster on October 17, 2013 in Carson City.

Current: The UGTA supervisor participated in a video-conference call with webpage representatives from all the bureaus on January 30, 2014. She submitted the homework assignment to the project lead by the February due date.

A BFF employee participated in a NNS site tour with the NNSAB on January 22, 2014.

The Chief and Supervisors met with the Administrator on February 4, 2014 in Las Vegas. The Administrator held a Bureau staff meeting on February 21, 2014.

The UGTA Supervisor attended a meeting with the Administrator and NSSAB members on February 6, 2014.

The UGTA supervisor participated in a conference call as a member of the NGA's FFTF on February 6, 2014.

The Annual FFACO meeting was held on February 12, 2012. The two BFF supervisors and one staff member participated in the meeting.

The Chief and/or UGTA supervisor attended NSSAB meetings on February 19, 2014 in Beatty, NV and March 19 in Las Vegas, NV.

The BFF supervisors conducted cross-training on March 26, 2014 for two interested staff.

Nevada Off-Sites

The BFF received from the Department of Energy/Office of Legacy Management (DOE-OLM) the *Draft 2013 Groundwater Monitoring Report, Project Shoal Area, Subsurface Corrective Action Unit (CAU) 447, Shoal, Nevada, Site* on January 9, 2014. Comments and a Notice of Completion were sent on January 27, 2014. The *Final 2013 Groundwater Monitoring Report for Corrective Action Unit (CAU) 447: Project Shoal Area – Subsurface* was received in March

2014 and a letter stating all previous comments were adequately addressed was sent on March 10, 2014.

The DOE-OLM submitted the *Draft 2013 Groundwater Monitoring Report for Corrective Action Unit (CAU) 443: Project Central Nevada Test Area (CNTA) – Subsurface* on March 6, 2014. Some comments were discussed during a March 27, 2014 conference call. The BFF will review and send comments and a Notice of Completion for the milestone early next quarter.

A Request for Change of Milestone Title for Corrective Action unit (CAU) 447 was submitted January 15, 2014 by DOE-OLM. This request was granted in a January 24, 2014 letter from the NDEP.

A Submittal of the Record of Technical Change Number DOE/NV-1025-CADD/CAP-ROTC 2 and Resubmittal of Record of Technical Change Number DOE/NV-1052-CADD/CAP 2 for the Final Corrective Action Decision Document/Corrective Action Plan, Revision 3 for Corrective Action Unit (CAU) 447: Project Shoal Area - Subsurface, Nevada was submitted to the NDEP on February 25, 2015 in order to install additional groundwater characterization and monitoring wells at the site. A Notice of Completion for this milestone as well as our acknowledgement of the signed ROTC was sent on March 10, 2014.

On January 9, 2014, NDEP UGTA staff attended a meeting at DRI which included the OLM-DOE project manager, OLM contractors, and DRI contractors to discuss possible site conceptual models based on current data.

A meeting was held on February 11, 2014 between NDEP UGTA staff and the OLM-DOE project manager and OLM contractors to discuss the progress of the offsite projects and possible changes to the Shoal CADD/CAP.

A site visit was conducted by BFF personnel at the Project Shoal Area site on March 11, 2014 to assist in locating future drill holes.

Bureau personnel participated in a conference call with the DOE-OLM project manager and contractors on March 27, 2014 to discuss site statuses of both the CNTA and Project Shoal Area sites.

Training

BFF staff completed their required 8-hour annual OSHA HAZWOPER training. A new employee completed 40-hour HAZWOPER training.

BFF staff completed Parts I and II of their OSHA physicals performed by ARC Health and Wellness, which were all coordinated by a staff member.

The UGTA supervisor completed five on-line and one classroom refresher supervisory training classes.

The Bureau Chief attended the Waste Management Symposia in Phoenix, AZ March 2-6, 2014/

Site Visits

During the quarter, BFF staff made twelve (12) individual trips and visits to locations on the NNSS and/or the Nevada Off-Sites to carry out FFACO-related UGTA oversight activities.

During the quarter, one or more BFF staff made three (3) trips/visits to locations on the Nevada National Security Site to carry out FFACO-related Industrial and Soils Activity Sites oversight duties.

Bureau Chief attended Hill AFB/DOE inspection held February 19-20, 2014; PermaFix North West inspection held February 24-27, 2014.

Agreement in Principle (AIP) Functional Areas Summary

Functional Area Discussion

1. On-Site Discharges

Spill Reports

There were no spills reported this quarter.

Water Pollution Control

Water Pollution Control Permit GNEV 93001

The NFO submitted the October 1 through December 31, 2013 Quarterly Discharge Monitoring Report for the Water Pollution Control Permit GNEV 93001 in a timely manner. The BFF reviewed it this quarter and found it compliant with the permit and stated this in a January 14, 2014 letter.

Water Pollution Control Permit NEV 96021

The NNSA/NFO submitted the E-Tunnel Waste Water Disposal System Quarterly Discharge Monitoring Report for the Water Pollution Control Permit NEV 92601 in a timely manner and BFF personnel reviewed it. There were no non-conformance or deficiencies noted in NDEP's February 3, 2014 letter to the NFO.

Background: Rainstorms took place in July 2013 where a total rainfall at the E-Tunnel rain gauge from two high intensity events on July 23 and 28, 2013 was 3.18 inches; 1.53 inches from the July 28 event fell over a 2-hour period. On August 29, 2013, BFF personnel traveled to Area 12 on the NNSA to inspect possible erosional damage to the E-tunnel collection pond impoundments. There was a severe erosional breakthrough from the road into Pond 1. Because this pond is filled with sediment, this damage diverts the course of the runoff over the top of the sediments directly to the berm. While this event did not cause severe damage to the berm this time, a future storm of this magnitude could cause serious damage to the berms. The repair of such damage falls under the requirements of the NNSA/NFO's Maintenance and Operation's program and was brought to the attention of the NNSA/NFO. The NDEP received NNSA/NFO's December 4, 2013 letter concerning the *Proposed Repairs to Address Erosion at Corrective Action Unit (CAU) 551, Area 12 Muckpiles, and the E-Tunnel Wastewater Disposal System (ETDS)*. NDEP staff reviewed and concurred with the proposed repairs and preventative maintenance. However, there were no time lines listed in the letter for the proposed repairs and preventative maintenance. In a December 13, 2013 letter, the NDEP requested the NNSA/NFO provide the NDEP with a time line for the proposed repairs and preventative maintenance, all of which need to be completed before the next rainy season.

Current: The NNSA/NFO sent a letter to NDEP on January 29, 2014 stating that the proposed repairs will be performed in late March or April, pending weather conditions. NDEP received word in late March that the repairs would take place the week of April 7.

The NDEP, NNSA/NFO and their contractors conducted the quarterly Water Meeting on February 4, 2014.

2. Ground Water Monitoring

No activity this quarter.

3. Air Quality Monitoring

BFF personnel met with BAPC personnel in Carson City on February 6, 2014 to discuss the status of permit applications for both TTR and NNSS.

Air Quality inspections were conducted at the NTTR by bureau chief and staff February 10-12, 2014.

The NJMAC meeting at Nellis Air Force Base was attended on March 5, 2014.

Nevada Test & Training Range

On February 6, a staff member visited with BAPC personnel in Carson City to discuss the air permits for the Nevada Test & Training Range (NTTR). In the previous quarter, the BFF staff person reviewed and commented to BAPC on the NTTR Class I renewal permit, as well as reviewing the request to change the permit from Class I to Class II. During this quarter, attention was specifically given to the Class II permit request.

Communications were held between BAPC and US Air Force contractor personnel regarding the permit application contents. Particular attention was given to the request for a provision in the permit that would include annual reports/revisions notifying NDEP of the actual engine specifications for permit identification "placeholders" since future equipment would be considered 'authorized equipment'; this same approach was proposed for the boiler placeholders. The reason behind this request to essentially permit future equipment is based on the practical fact that, on average, there are engine changes (retirement and new equipment) occurring at NTTR every month and boiler replacements usually only happen during the summer while the boilers are not needed for heating. As such, a regulatory-approved method to replace these units without having to file new requests with the BAPC for these minor changes is being sought.

In addition to these equipment changes, the need for the NTTR to use a new paint booth (located) at the Wheel and Tire Shop starting in April was also discussed. One approach discussed was the NTTR using the new paint booth if the other permitted paint booth was not operated at the same time, e.g., offsetting air emissions. Staff wanted to look into this possibility a bit more to verify the regulatory viability of this approach with these particular units.

Regulations Development

Towards the end of March, discussions began with BAPC on the topic of updating the non-attainment provisions within Nevada's State Implementation Plan to prepare for the potential of having portions of the state of Nevada designated as 'non-attainment'. A research effort to develop draft language of those potential changes to the regulations has been initiated. These changes may impact future permitting requests for federal facilities.

4. Low Level and Mixed Low Level Waste Oversight

BFF staff participated, via teleconference, in weekly Waste Acceptance Review Panel (WARP) meetings, held each Wednesday afternoon throughout the quarter. Review panel members discussed waste-specific compliance issues for submitted low-level radioactive waste profiles as they pertain to NTSWAC, Rev. 10. Where applicable, BFF staff reviewed and provided comments on low-level radioactive waste and mixed waste profiles (for compliance with NTSWAC, Rev. 10) from various approved LLW and MLLW generators.

5. Waste Management

Solid Waste Disposal Site Reports - The active landfill site inspections are in progress and will be completed during the upcoming Annual Compliance Evaluation Inspection (CEI) in April.

During the quarter, NDEP reviewed and accepted the Semiannual SWDS Report for the Area 23 landfill (Permit SW 13 097 04) by letter dated January 22, 2014, and the Annual Reports for the Area 6 landfill (Permit SW 13 097 02) and the Area 9 landfill (Permit 13 097 03) by letter dated January 22, 2014. Review of the new Area 5 Asbestiform Landfill (Permit 532) is in progress. A report was issued in February and is planned for onsite verification during the CEI in April.

RCRA Part B Permit Program Activities – CAUs 90, 91, 92, 110, 111, and 112 require regularly scheduled inspections. NNSA/NFO and BFF visited all of the RCRA Part B Historic sites during the quarter. All sites were in good condition with minor maintenance needs noted below for NNSA/NFO correction:

CAU 91 – Area 3 U-3fi Injection Well – The site was visited on March 11, 2014. The site, including the fencing, signs, and cap appeared to be in good condition. Only, two small animal burrows were observed.

CAU 92 – Area 6 Decontamination Pond – The site was visited on March 11, 2014. The fencing, signs, and cap were in good condition. No problems were noted.

CAU 110 – Area 3 U-3ax/bl Subsidence Crater – The site was visited on March 11, 2014. This site has a vegetative cover and was in generally good condition. Prior areas of subsidence showed no signs of further activity. One large hole was observed and put on a watch list, but no immediate correction was required. One sign needs a new WARNING sticker. NNSA/NFO was made aware of this issue.

CAU 111 – Area 5 WMD Retired Waste Pits – An extended visit was made on March 11, 2014. The sites were visited by BFF with NNSA/NFO and then separately by NNSA/NFO. The sites are devoid of vegetation and have been reseeded. Irrigation is also being used as rainfall to date has been sparse.

CAU 112 – Hazardous Waste Trenches – The site was visited on March 11, 2014 and was found to be in excellent condition.

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.

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

The NDEP, NNSA/NFO and their contractors conducted the quarterly Water Meeting on February 4, 2014.

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. 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

Information is being developed for the quarter.
Comparison of estimate to budgeted expenses

Information is being developed for the quarter.

Miscellaneous

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The Bureau Chief attended meeting with Nye and Clark County on CEUSP.

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BFF staff completed Parts I and II of their OSHA physicals performed by ARC Health and Wellness, which were all coordinated by a staff member.

One supervisor completed five on-line and one classroom refresher supervisory training classes.

Site Visits

A trip record is maintained for each site visit and for informal inspections. Multiple site visits or inspections may occur during discrete visits to the NNSS and the TTR. This quarter a total of fifteen (15) unique visits were made by one or more BFF staff members to carry out AIP-related oversight activities.