At the end of December 2017, 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. National Nuclear Security Administration/Nevada Field Office (NNSA/NFO) and/or the Department of Energy’s (DOE) Environmental Management (EM) Nevada Program (NP) federal funding will dictate when these twelve (12) remaining Industrial Sites CASs are closed under the FFACO. Meanwhile, post-closure monitoring activities (report reviews, meetings and site visits) continued for a number of closed Industrial Sites on the Nevada National Security Site (NNSS).

Soils Activity Sites

At the end of December 2017, there were 141 CASs (out of a total of 150) that have been closed, with nine (9) in various stages of active investigation.

During the past quarter, the Nevada Division of Environmental Protection’s Bureau of Federal Facilities (NDEP and/or BFF) staff reviewed FFACO documents and related correspondence, participated in project evaluations, and attended comment and technical issue resolution meetings with the EM NP personnel with the aim of closing the remaining 9 CASs, which comprise four (4) Soils CAUs.

Document Reviews:

CAU 412 – Clean Slate I – BFF received notification of the “United States Air Force (USAF) Acknowledgement of Final Federal Facility Agreement and Consent Order (FFACO) Closure of Corrective Action Unit (CAU) 412 (Clean Slate I).”

CAU 414 – Clean Slate III – The Final Corrective Action Decision Document/Corrective Action Plan (CADD/CAP) was received and reviewed this quarter. Approval of this document will be issued early in the following quarter.
CAU 415 – Project 57 No. 1 Plutonium Dispersion (NTTR) – BFF received the Final Closure Report in mid-December. After review of the Final, several issues need to be addressed in the new quarter.

CAU 576 – Miscellaneous Radiological Sites and Debris – A request was received and approved to delete an established milestone because the document need will be different.

Soils Quality Assurance Plan, Rev. 1 (Soils QAP) – As an ongoing part of Quality Assurance/Quality Control (QA/QC) oversight, NDEP is conducting an internal review of selected FFACO documents completed in the Soils Activity to ensure compliance with applicable QA/QC requirements. The EM NP will be notified of the results of this review in the upcoming quarter.

Meetings and Site Visits:

CAU 413 – Clean Slate II – Field work began at the Clean Slate II site this quarter and site visits occurred both on the Tonopah Test Range (TTR) and the NNSS. Staff traveled to the TTR to observe and monitor the radiological soil removal and packaging operations being conducted as part of the clean-closure alternative selected for this site. After the visit and review of on-site permits, staff coordinated with the Air Quality Bureau in Carson City to clarify issues related to operational requirements for the Class II air permit issued by the Bureau to Sandia National Laboratory on the TTR. Staff also visited the Area 5 Radioactive Waste Management Complex on the NNSS to view receipt of shipments of soil from the TTR. Staff met internally to discuss a radon measurement interference issue with plutonium swipe samples taken externally from waste packages prepared for shipment off-site. Staff also traveled to Tonopah, NV to participate in two public meetings regarding the clean-up and transportation of radiologically contaminated soils.

CAU 414 – Clean Slate III – Staff reviewed responses to NDEP comments on the draft document, then participated in the Draft CADD/CAP comment resolution meeting.

Underground Test Area (UGTA) Activity

There are five (5) UGTA CAUs, all of which are in various stages of active investigation, CADD/CAP (model evaluation) or long-term monitoring during the Closure Stage.

During this quarter, BFF staff participated in the process of document review, project evaluation, meetings and/or site visits for three (3) of the CAUs in the following ways:

Document Reviews and Letters:

CAU 97 – Yucca Flat – BFF staff reviewed, and issued approval letters for, Fluid Management Strategy letters for Wells U-3cn-5, Area 3; UE-1h, Area 1; and UE-10j, Area 8. Staff also reviewed and issued an approval letter for milestone changes. A Notice of Completion (NOC) was issued for a Presentation milestone.

CAU 98 – Frenchman Flat – Staff received and reviewed the Final Post-Closure Monitoring Report, Revision 1, for Calendar Year 2016. This submission was not a FFACO milestone but receipt will be acknowledged in the next quarter.
CAU 99 – Rainier Mesa/Shoshone Mountain (RM/SM) – BFF staff was previously provided a GoldSim CD by the EM NP contactor, which included an example of a Rainier Mesa model application. BFF staff, as time allowed, continued to investigate and experiment with the application to aid in the technical review of modeling the CAU. BFF staff reviewed the Rainier Mesa/Shoshone Mountain Flow and Transport Model Report, Rev. No. 0 and provided comments to DOE and their contractors. The BFF preemptive review (PER) member reviewed the comments on the Draft Flow and Transport report from the other PER members. The bureau issued NOCs to EM NP for the milestones, “Complete Peer Review Selection” and “Phase 1 Data Completion Presentation #2.”

Meetings and Presentations:

CAU 97 – Yucca Flat – Staff attended both a technical and overview presentation on the Yucca Flat/Climax Mine New Model Evaluation Data.

CAU 99 – Rainier Mesa/Shoshone Mountain (RM/SM) – Staff attended both a technical and overview presentation on the Phase I Data Completion Presentation #2. BFF staff attended a kickoff meeting for the RM/SM External Peer Review and participated in a meeting to discuss and provide input on the questions for the RM/SM External Peer Review. Staff also attended a mock peer review in preparation for the actual RM/SM external peer review.

Nevada Off-Sites

There are four (4) Nevada Off-Sites CAUs, two (2) Surface CAUs (CAU 416 and 417) and two (2) Subsurface CAUs (CAU 443 and 447). CAU 416 has been clean-closed. CAU 417 is in Post-Closure Monitoring. CAU 443 is in the Closure Stage. CAU 447 is in the Corrective Action Decision Document/Corrective Action Plan Stage and is undergoing further site evaluation.

During this quarter, BFF staff participated in the process of document review, project evaluation, conference calls and/or meetings for one (1) of the active CAUs:

Document Reviews and Letters:

CAU 447 – Project Shoal Subsurface – Staff reviewed and approved a request for an established milestone change.

Miscellaneous:

The chief attended the Division Staff Meeting in Carson City on October 9, 2017. While in Carson City for the meeting, various other bureau business was conducted. The staff meetings on October 23, November 6, November 20 and December 4 and December 18 were participated in via conference call by either the Bureau Chief or Bureau Supervisor.
The bureau chief attended: (1) the Nevada Site-Specific Advisory Board’s (NSSAB) annual tour of the NNSS to visit places pertaining to their yearly work plan items; (2) a NSSAB leadership meeting with EM NP staff and upper management from NDEP; (3) the annual Intergovernmental Meeting in San Antonio, TX; (4) a Low-Level Waste Stakeholder’s meeting in Las Vegas; (5) and participated in NDEP’s Safety Awareness Day in Carson City and (8) numerous planning calls for the Intergovernmental Meeting in San Antonio, TX.

The Bureau is participating in a pilot program for establishing an e-Records system for the Agency. Staff completed verification of Documentum Files, preparing them for export to the Document Viewer website. Several Industrial and Soil Sites’ CAU files (CAU 91 and 106) were verified and prepared for export over these three months.

Staff completed their Part I and Part II OSHA physicals.

**Training:**

Staff completed OSHA 8-hour training.
Agreement in Principle (AIP) Functional Areas Summary

1. On-Site Discharges

Water Pollution Control

Document Reviews:

Water Pollution Control Permit GNEV 93001 – The Nevada Division of Environmental Protection’s Bureau of Federal Facilities (NDEP and/or BFF) staff reviewed the July 1 through September 30, 2017, Quarterly Discharge Monitoring Report (QMR). With the temporary waiver from the use of the calculated flow limit for the DAF sewage lagoon system as a permit limit, granted by the BFF in the first quarter of SFY 16, the facilities at the Nevada National Security Site (NNSS) are in compliance with the current permit.

Water Pollution Control Permit GNEV 96021 – BFF staff reviewed the QMR for July 1 through September 30, 2017 and sent a letter stating it was compliant.

Meetings:

BFF staff attended the quarterly Water Meeting held on October 5, 2017.

Spills

There were no spills reported during these three months.

2. Ground Water Monitoring

There was no activity in this category during this quarter.

3. Air Quality Monitoring

There was no activity in this category during this quarter.

4. Low Level and Mixed Low Level Waste Oversight

Conference Calls:

Staff participated in weekly Waste Acceptance Review Panel (WARP) meetings in person and/or via teleconference. Review panel meetings were held on October 4, 11, 18, 25; November 1, 15, 22, 29; and December 6, 13, 20, 2017. 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 Nevada National Security Site Waste Acceptance Criteria (NSSWAC), Rev. 16-00, which became effective in February 2017. As applicable, BFF staff reviewed and provided comments on low-level radioactive waste and mixed waste profiles (for compliance with NNSSWAC, Rev. 16-00) and reviewed all comment responses submitted by the currently-approved Low-Level Waste and Mixed Low-Level Waste generators.
Situated in Piketon, OH, Duratek participated in the preparatory meeting for the radioactive waste generator facility.

Meetings/Conferences:

NDEP staff held a show cause meeting on November 8, 2017 with NFS, NNSA/NFO and EM NP personnel for violations regarding past shipments made to the NNSS, as stated in a Finding of Alleged Violation issued on October 26, 2017. The NNSA/NFO is required to submit a written report of the explanation for how the incident occurred by no later than January 11, 2018. Additionally, the NNSA/NFO must submit a DRAFT Corrective Action Plan (CAP) that includes steps taken to prevent a recurrence of the alleged violation, including any appropriate revisions needed to the Waste Analysis Plan for Permit NEV HW0101, by no later than March 30, 2018. Discussions also occurred on November 8, 2017 in regards to NFS petitioning NDEP for a trivalent chromium exclusion in the near future.

BFF staff attended a meeting with EM NP and contractor personnel to discuss the FY 2018 facility evaluation schedule for RWAP.

5. Waste Management

Document Review:

Staff reviewed: (1) NNSS Quarterly Hazardous Waste Volume Report and Fee: Third Quarter Calendar Year 2017; (2) NNSS Area 5 Asbestos Waste Disposal Report: Third Quarter Calendar Year 2017; (3) Bimonthly Progress Reports for Revegetation at CAU 111: Area 5 WMD Retired Mixed Waste Pits; (4) and approved an application for Approval to Establish a Solid Waste Incinerator at the NNSS; (6) Uniform Hazardous Waste Manifest; (6) Asbestos Shipping Documents – State Reporting.

Meetings and Conference Calls:

CAU 111 Revegetation – NDEP Staff participated in a weekly planning meeting for the CAU 111 Revegetation effort and received a copy of the finalized tribal revegetation project fieldwork plan submitted to the NNSA/NFO.

Permit NEV HW0101 PCM Report – NDEP staff participated in meetings with the NNSA/NFO to discuss options that are being considered for the closure and post-closure of the landfill cells containing the improperly disposed mixed waste from NFS (see above). The NNSA/NFO agreed to use the FFACO process, which also follows the RCRA processes and was used previously to close CAU 111.

NEV HW0101 Cell 25 Weekly Meeting – NDEP staff participated in the weekly construction meeting.
Solid Waste Disposal Site (SWDS) Permit Updates – Staff met with EM NP personnel to discuss needed updates to the current Solid Waste permits.

RCRA Information Network Meeting (RIN) – BFF participated in the monthly RIN meeting hosted by the U.S. Environmental Protection Agency (EPA). The RIN group consists of the various EPA regional offices and state environmental agencies.

Site Inspections:

Permit NEV HW0101 Cell 25 Inspections – NDEP staff visited Cell 25, undergoing construction, seven times from October through December 2017. NDEP personnel inspected materials and reviewed documentation during site visits.

RCRA Annual Post-Closure Monitoring (PCM) Inspections – BFF staff prepared for, and conducted, annual post-closure monitoring inspections for closed RCRA permitted sites on the NNSS.

SWDS Informal Inspections – BFF conducted informal SWDS inspections for permitted landfills.

6. Major Program Proposals
There was no activity in this category during this 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 this quarter.

9. Sampling
No sampling activities were conducted by the Bureau during this quarter

10. Safe Drinking Water

Meetings:
BFF staff attended the quarterly Water Meetings held on October 5, 2017.

Fiscal Analysis:

Estimate of personnel resources used (FTE or hours)

The bureau of Federal Facilities is made up of a Bureau Chief, one supervisor, five technical staff and an administrative assistant. The AIP grant funds activities
for each of these individuals. For the quarter, that represents approximately 3.5 FTEs based on a review of grant related activities.

**Total expenditures for each task area**

A total of approximately $151,150.00 was spent during this quarter for AIP work. This is the most current figure available at this time and includes personnel, operating, information services, DOE and DOE oversight and purchasing costs.

**Comparison of estimate to budgeted expenses:**

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

**Miscellaneous:**

The chief attended the Division Staff Meeting in Carson City on October 9, 2017. While in Carson City for the meeting, various other bureau business was conducted. The staff meetings on October 23, November 6, November 20 and December 4 and December 18 were participated in via conference call by either the Bureau Chief or Bureau Supervisor.

The bureau chief attended: (1) the Nevada Site-Specific Advisory Board’s (NSSAB) annual tour of the NNSS to visit places pertaining to their yearly work plan items; (2) a NSSAB leadership meeting with EM NP staff and upper management from NDEP; (3) the annual Intergovernmental Meeting in San Antonio, TX.; (4) a Low-Level Waste Stakeholder’s meeting in Las Vegas; (5) and participated in NDEP’s Safety Awareness Day in Carson City and (8) numerous planning calls for the Intergovernmental Meeting in San Antonio, TX.

BFF’s supervisor attended a NSSAB meeting in Las Vegas, a Low-Level Waste Stakeholder’s meeting and McCoy’s RCRA training.

The Bureau is participating in a pilot program for establishing an e-Records system for the Agency. Staff completed verification of Documentum Files, preparing them for export to the Document Viewer website.

Staff completed their Part I and Part II OSHA physicals.

**Training:**

Staff completed OSHA 8-hour training.