



Nevada Site Specific Advisory Board (NSSAB)

Full Board Meeting - Wednesday, July 17, 2019

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NSSAB FULL BOARD MEETING ATTENDANCE

October 2018 through September 2019 (FY 2019)

Name	11/7/18	1/16/19	3/20/19	4/24/19	7/17/19	9/18/19	Max Terms
MEMBERS							
Amina Anderson	√	√	√	√			2020
Francis Bonesteel	√	√	√	√			2022
William DeWitt	√	√	√	√			2024
Pennie Edmond	√	√	√	√			2020
Karen Eastman	√	√	√	√			2022
Raymond Elgin	E						2022
Charles Fullen	√	√	√	√			2022
Richard Gardner	√	√	√	√			2022
Anthony Graham	√	√	√	√			2024
Tanya Henderson	√	√	√	√		E	2024
Hepburn Klemm	√	√	√	√			2024
Donald Neill	√	√	√	√			2020
Steve Rosenbaum	√	√	√	√			2020
Janice Six	√	√	√	E			2024
Richard Stephans	√	√	√	√			2022
Richard Twiddy	√	√	√	E			2022
Dina Williamson-Erdag	√	√	√	√			2022
C.J. Wissmiller	√	√	√	√			2024
LIAISONS							
Clark County	√	E	√	√			
Consolidated Group of Tribes & Organizations	E	√	E	E			
Esmeralda County Commission	√	√	U	E			
Lincoln County Commission	E	√	E	√			
Nye County Commission	U	E	√	√			
Nye County Emergency Management	√	√	√	√			
Nye Co. Nuclear Waste Repository Project Office	√	√	√	√			
State of NV Division of Env Protection	√	√	√	√			
U.S. Natl Park Service	√	E	E	√			
White Pine County Commission		E	E	E			

KEY: √ - Present E - Excused V - Vacant U - Unexcused

Pahute Mesa Groundwater Sampling Well Prioritization – Work Plan #1



Ken Rehfeldt
UGTA Project Manager
Navarro
July 17, 2019

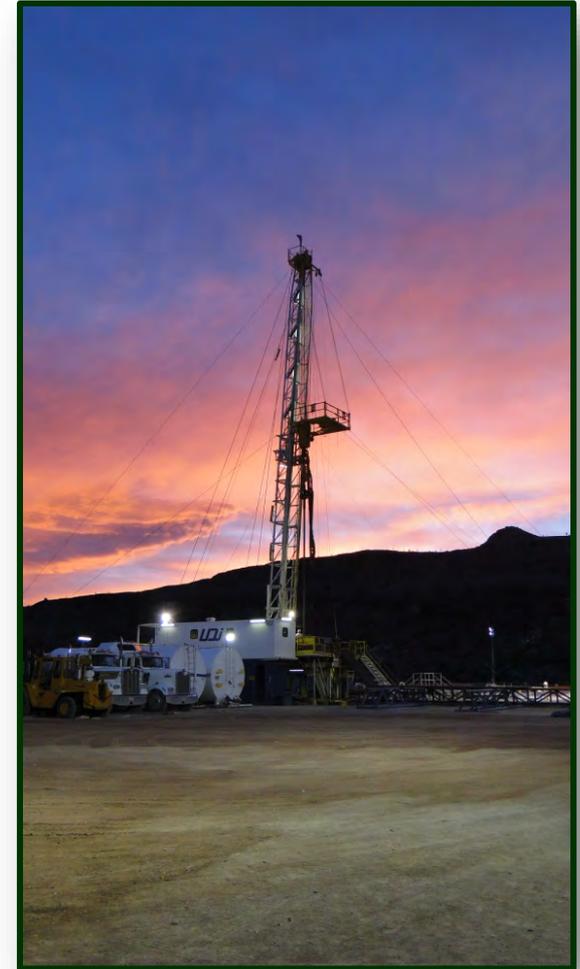


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Key Messages

- Current research shows the public water supply in Oasis Valley is safe from the impacts of historic underground nuclear testing
- Groundwater contamination affected by historic Nevada National Security Site (NNSS) activities has not gone beyond restricted Federal land
- Groundwater models will use current monitoring data to provide output that is key to enhancing current and developing future monitoring strategies



Outline

1. Pahute Mesa Pragmatic Approach Recap
2. Nevada Site Specific Advisory Board (NSSAB) Work Plan Item #1 – Prioritization of Factors for Selection of Pahute Mesa Groundwater Sampling Well Locations
3. Pahute Mesa Background
4. Reasons for Drilling Wells and Timeframe
5. Prioritize Factors





Pahute Mesa Pragmatic Approach Recap

- Use the additional measured contaminant data to the fullest extent possible
 - Evaluate models against measured data (water levels, tritium concentrations, aquifer parameters) to eliminate inaccurate predictions to reduce uncertainty
 - Model must be consistent with the data with acceptable tolerance
 - Models **can** show contamination where data shows there is none
 - Use the data fully to eliminate bad model forecasts



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Pahute Mesa Pragmatic Approach Recap (continued)

- Focus on the monitoring of contaminants that are moving offsite toward Oasis Valley
- Use the model to help figure out if new monitoring wells should be drilled, and if so, where to drill
 - Modeling will identify and fill in gaps in the current well/monitoring network
- Develop a robust monitoring well network that is protective of human health and the environment



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Moving Forward in Pahute Mesa

- The data from monitoring wells is a key element of the pragmatic approach
- Expect that drilling of new wells in support of the pragmatic approach will be needed in the future
- What factors should the Environmental Management (EM) Nevada Program use to select new well locations in support of the pragmatic approach?



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NSSAB Work Plan Item #1

- From a community perspective, provide a recommendation on prioritizing the factors used by the EM Nevada Program to prioritize proposed well locations for Pahute Mesa



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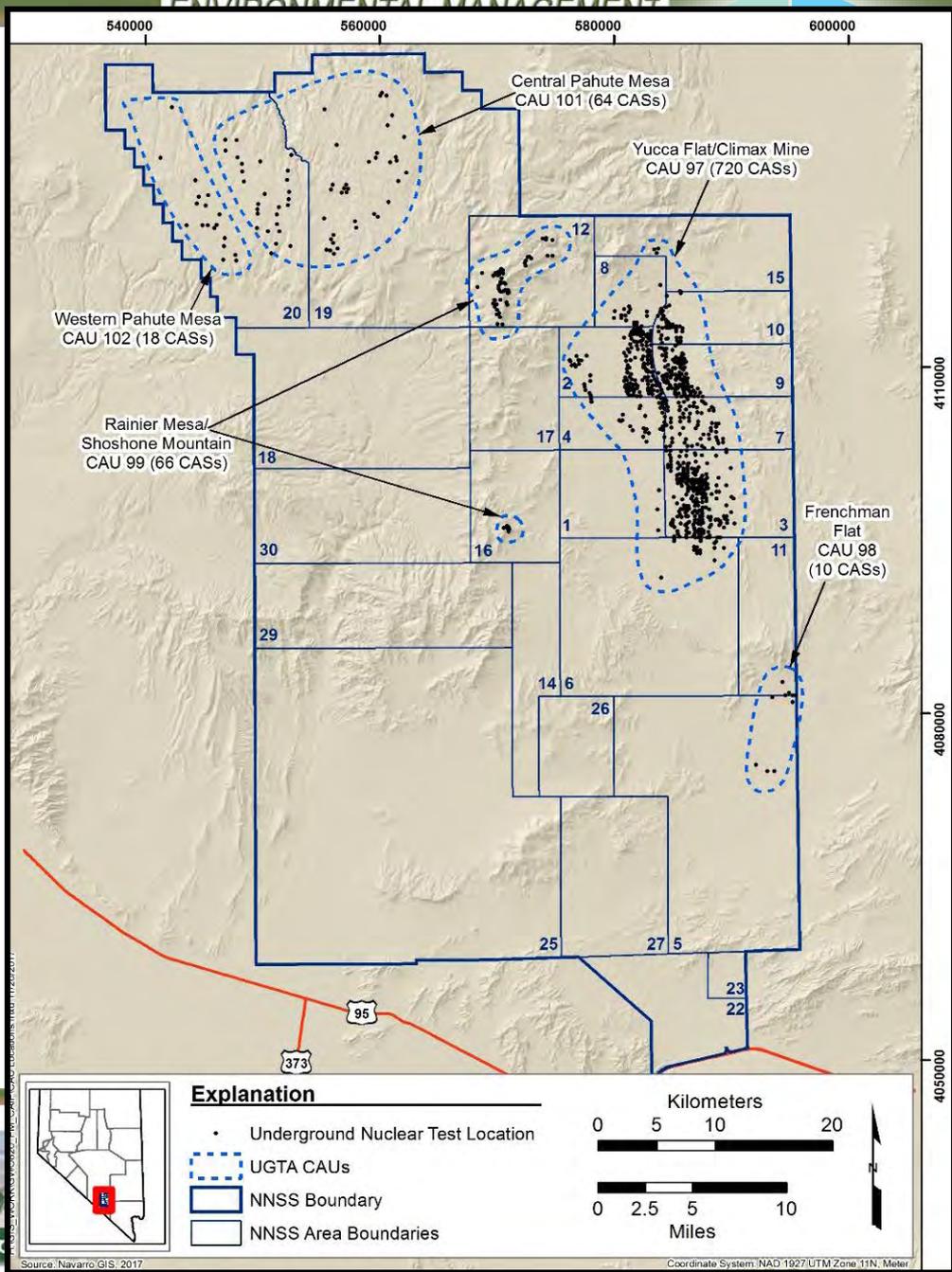
ID 2160 – 7/17/2019 – Page 7
2019-100-EMRP

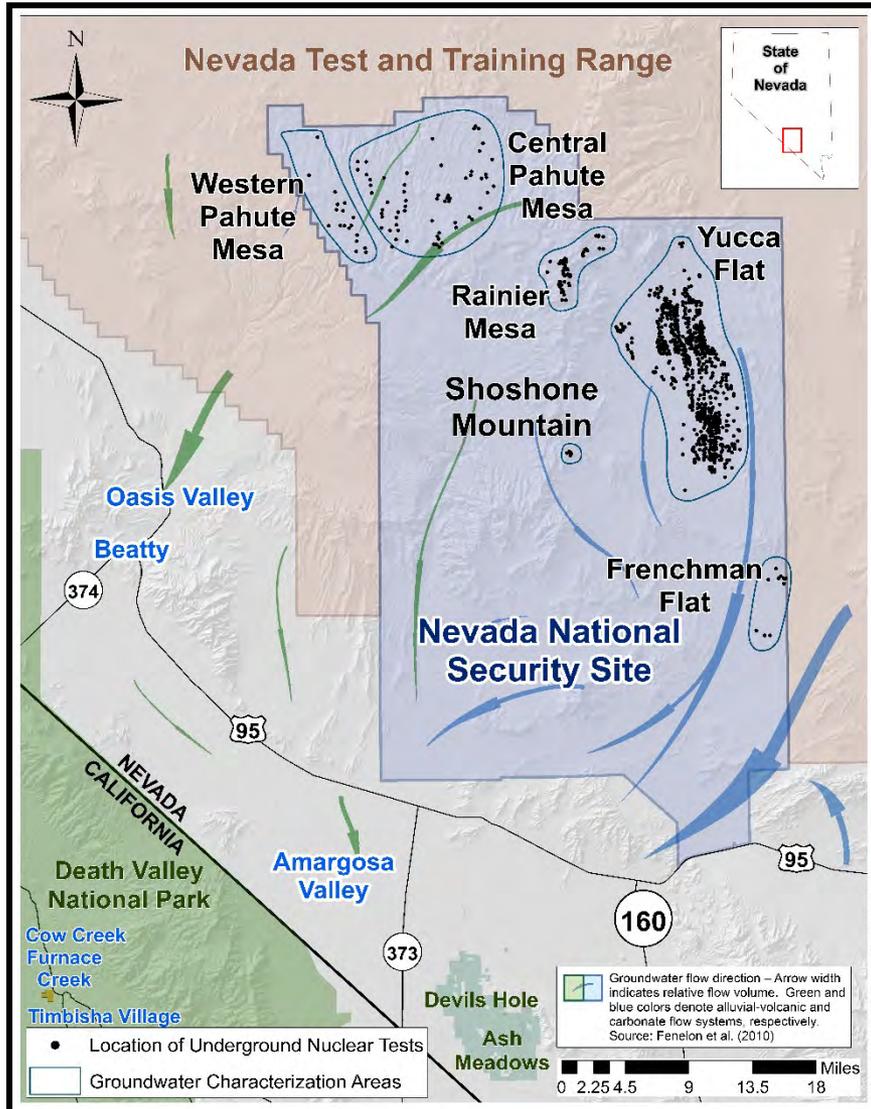
Pahute Mesa Background

- 36 underground nuclear tests were conducted in Area 19, accounting for 14.9% of the radionuclide inventory*
- 46 underground nuclear tests were conducted in Area 20, accounting for 45.3% of the radionuclide inventory*
- At the present time, ~89% of the radionuclide inventory is from tritium

Based on Finnegan et al 2016
Corrected to 9/30/2012

*Curies





Groundwater Flow on the NNSS

- 60 years of data collected indicate that groundwater:
 - In the eastern portion, eventually discharges to the Ash Meadows/Devils Hole or Death Valley areas
 - In the northwestern portion, locally discharges to springs in Oasis Valley



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2019-100-EMRP



When is New Drilling Planned?

- Likely that one or more new wells will be drilled during the corrective action decision document (CADD)/corrective action plan (CAP) stage
- Current planning to drill new wells is ~fiscal year 2023 or later
 - Steps yet to complete before drilling include: modeling, report preparation, EM Nevada Program and State of Nevada Division of Environmental Protection approval, External Peer Review, CADD/CAP approval, then model evaluation data collection beginning with drilling
- Important to start thinking now about what factors to use to select well locations

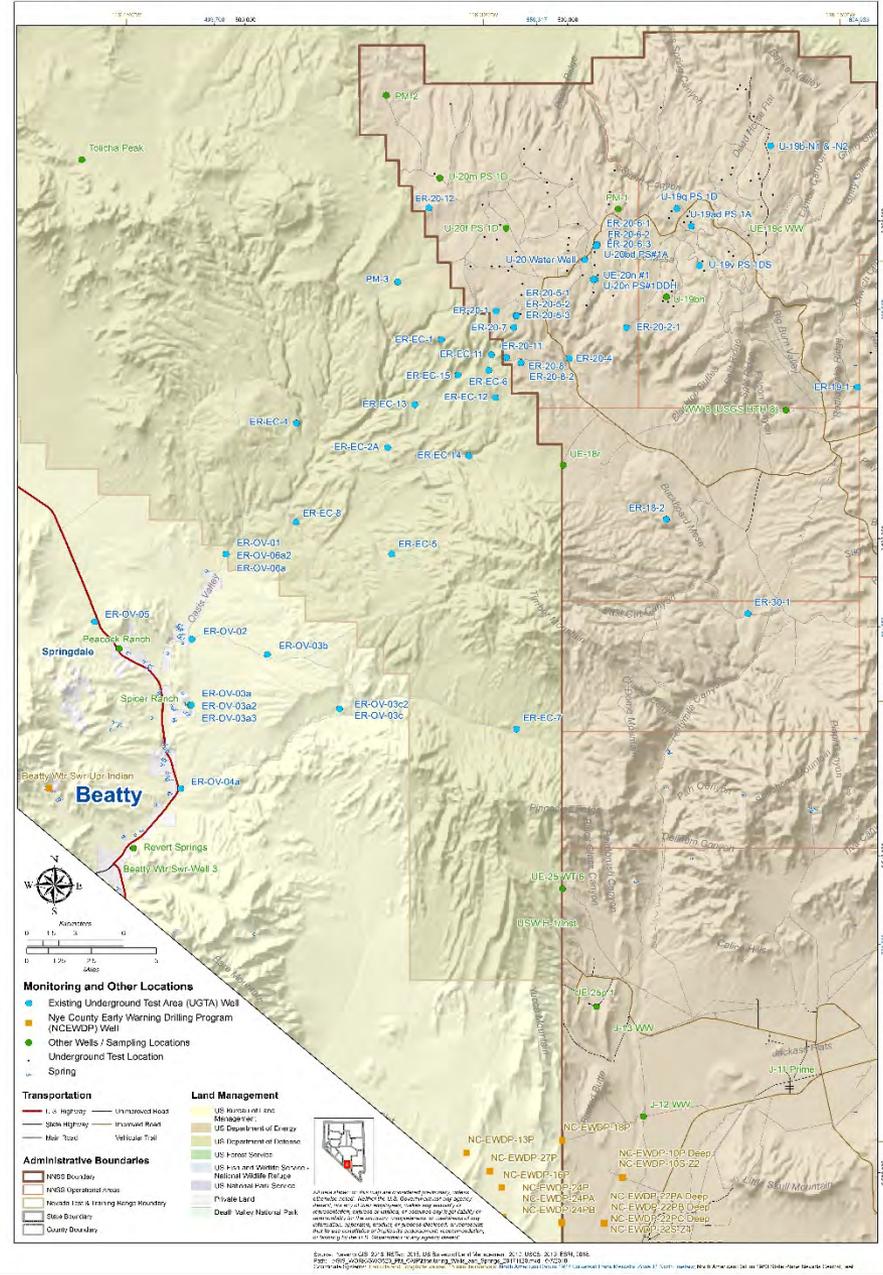


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Existing Well Locations

Monitoring & Hydrogeologic Investigation Wells and Springs of the Nevada National Security Site (NNSS)



EM Environment safety performance



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Why Does EM Nevada Program Drill Wells?



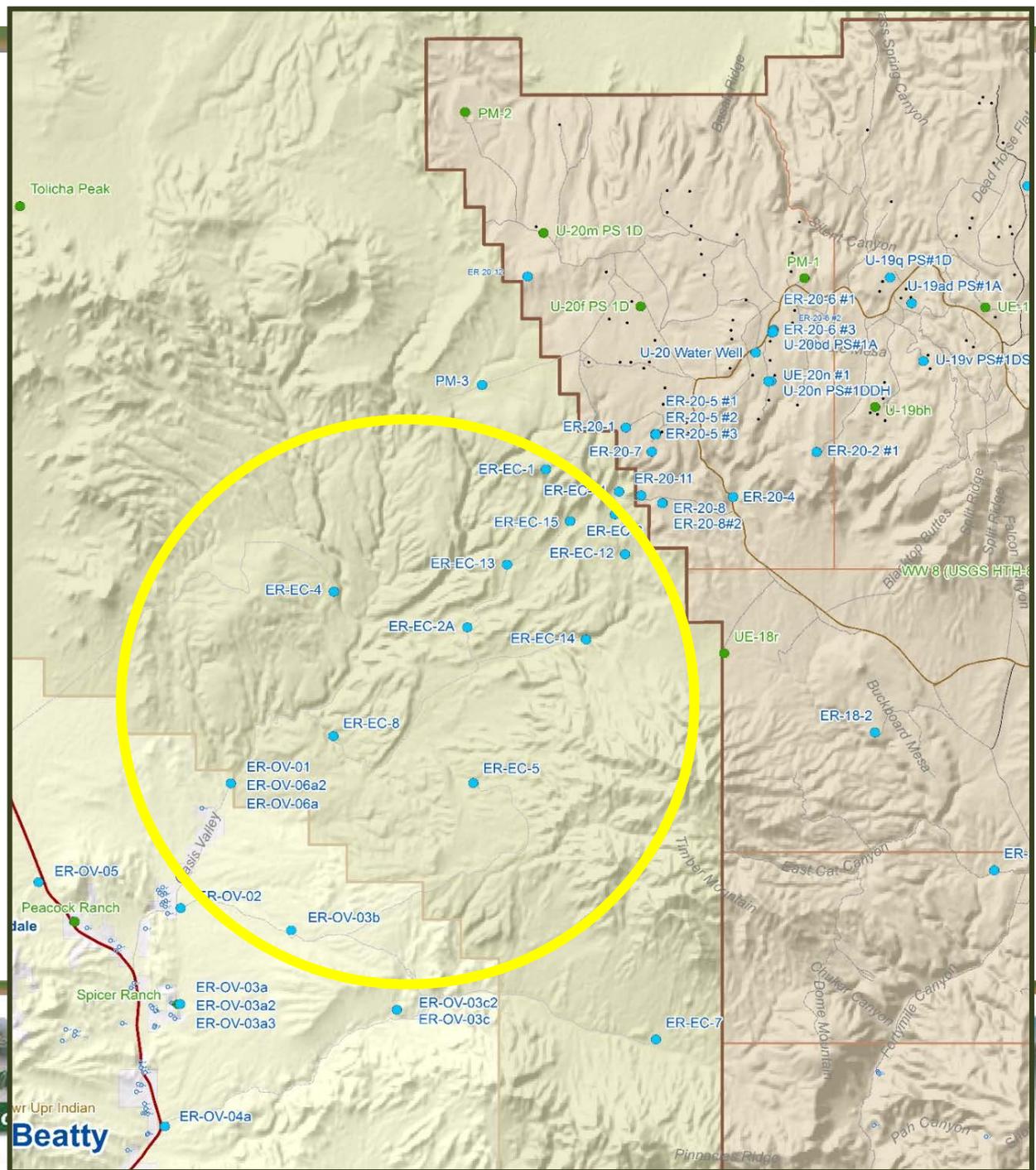
These are the factors the NSSAB is being asked to prioritize:

- Support modeling
 - Forecast contaminant boundary
- Expand knowledge of the flow system
 - Research areas where there is limited data
- Refine monitoring network
 - Show where there is no contamination
 - Find the leading edge of plumes
- Any additional factors?



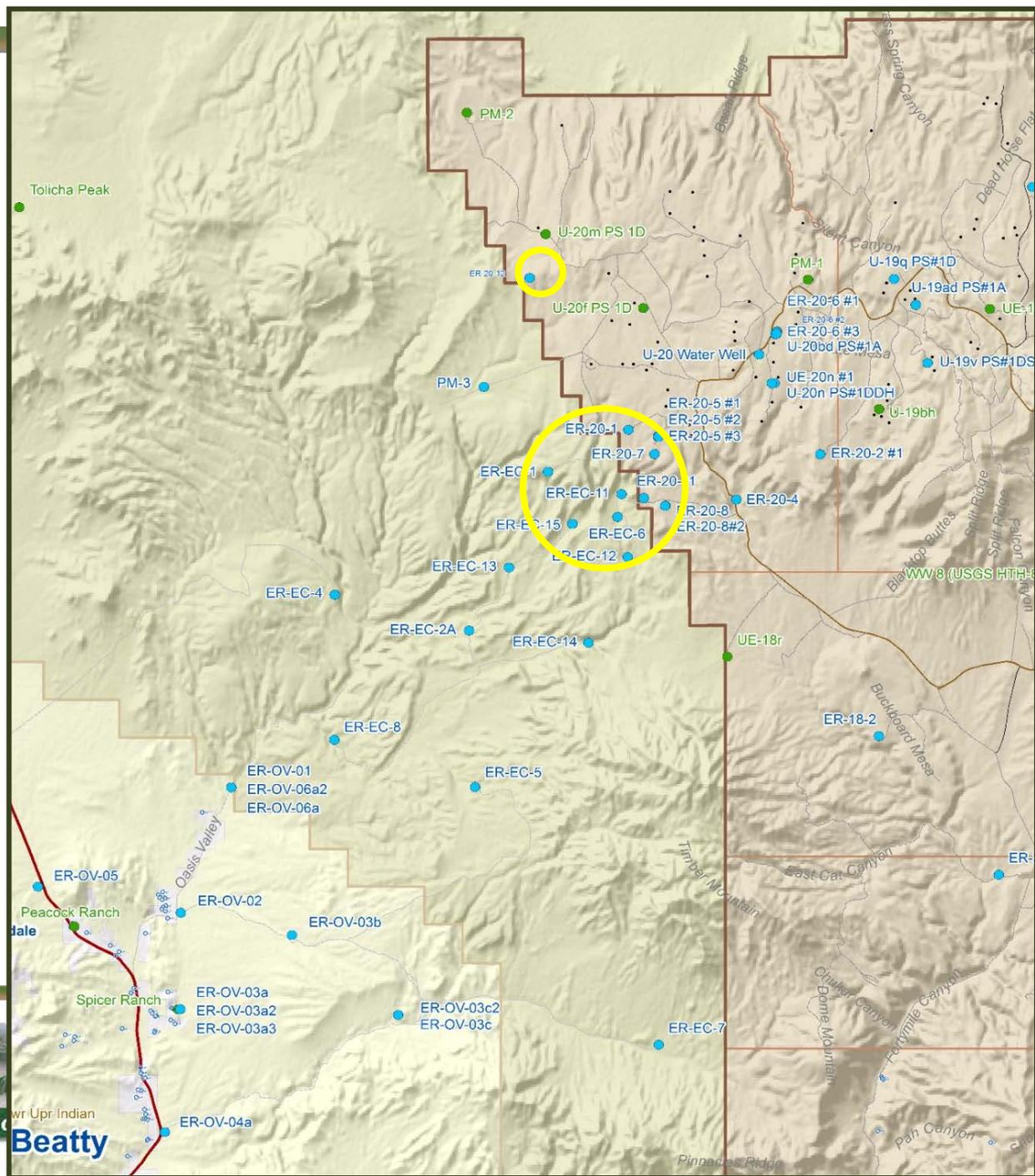
Drilling to Expand Knowledge of the Flow System

- Expand knowledge of the flow system for:
 - Areas with few or no other wells
 - Geology, water levels, structures, water chemistry, etc.
 - Wells on the Nevada Test and Training Range



Drilling to Refine Monitoring Network

- Refine understanding of the nature and extent of radionuclide contamination (monitoring)

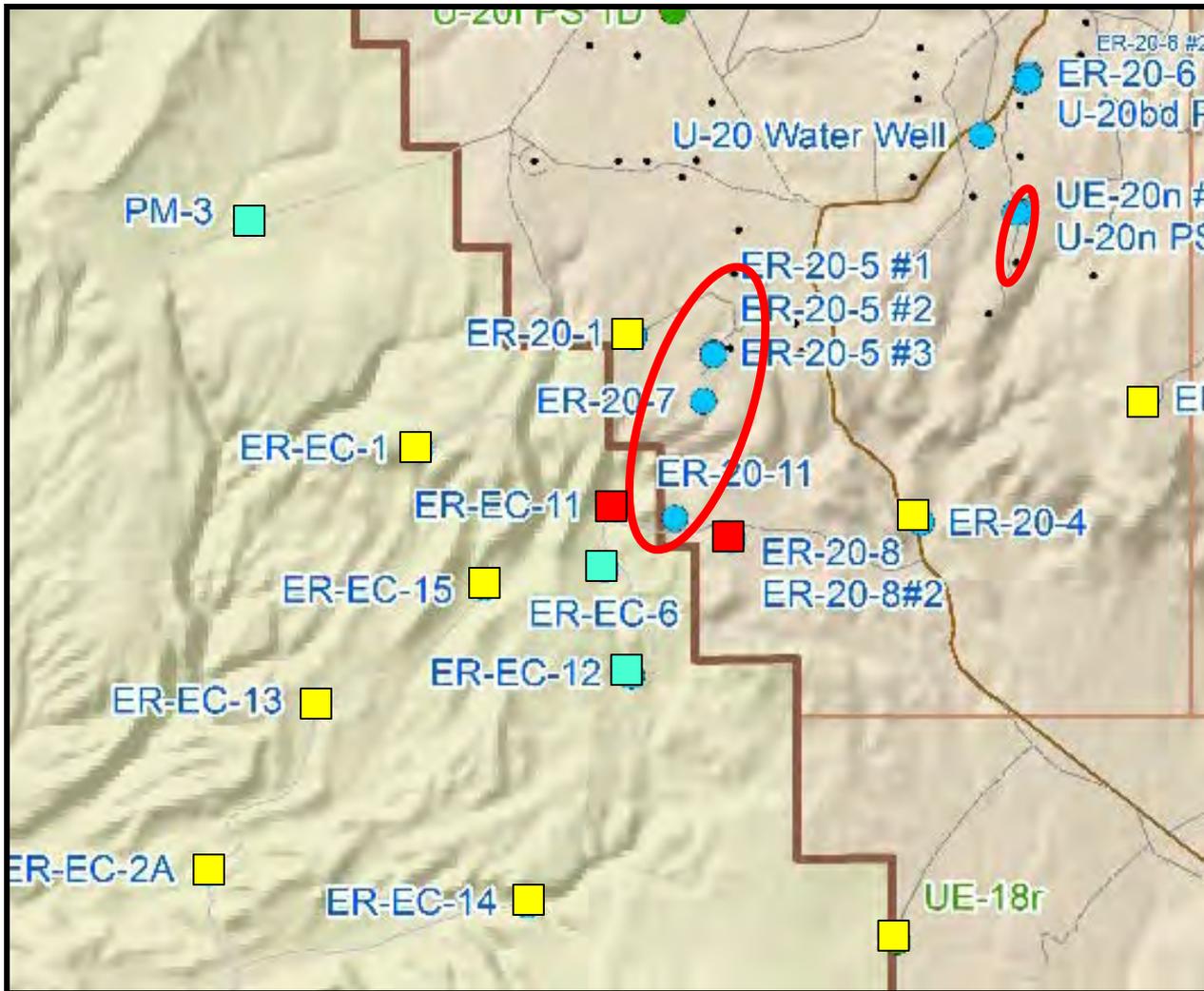


EM Environmental
safety ♦ performance

Beatty



Plume Monitoring Well Network



- Underground Test Location
- Detected migration above the SDWA* Standard
- Tritium Detections below the SDWA Standard
- No Detections of Tritium
- >10% SDWA Standard

*Safe Drinking Water Act (SDWA) Maximum Contaminant Level (MCL)



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Well Selection Subcommittee

- A subcommittee was recently convened to develop technical criteria to consider for selecting future well locations
- Members include:
 - EM Nevada Program
 - State of Nevada Division of Environmental Protection
 - Navarro
 - Nye County
 - Desert Research Institute
 - Lawrence Livermore National Laboratory
 - Los Alamos National Laboratory
 - Mission Support and Test Services, LLC
 - U.S. Geological Survey
- The NSSAB's recommendation on prioritization of the factors will be used by the Well Selection Subcommittee and the EM Nevada Program in making decisions on future well locations



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Prioritize Factors

- From a community perspective, provide a recommendation on prioritizing the factors used by the EM Nevada Program to prioritize proposed well locations for Pahute Mesa
 - Support modeling
 - Forecast contaminant boundary
 - Expand knowledge of the flow system
 - Research areas where there is limited data
 - Refine monitoring network
 - Show where there is no contamination
 - Find the leading edge of plumes
 - Any additional factors?
- The NSSAB recommendation is due tonight

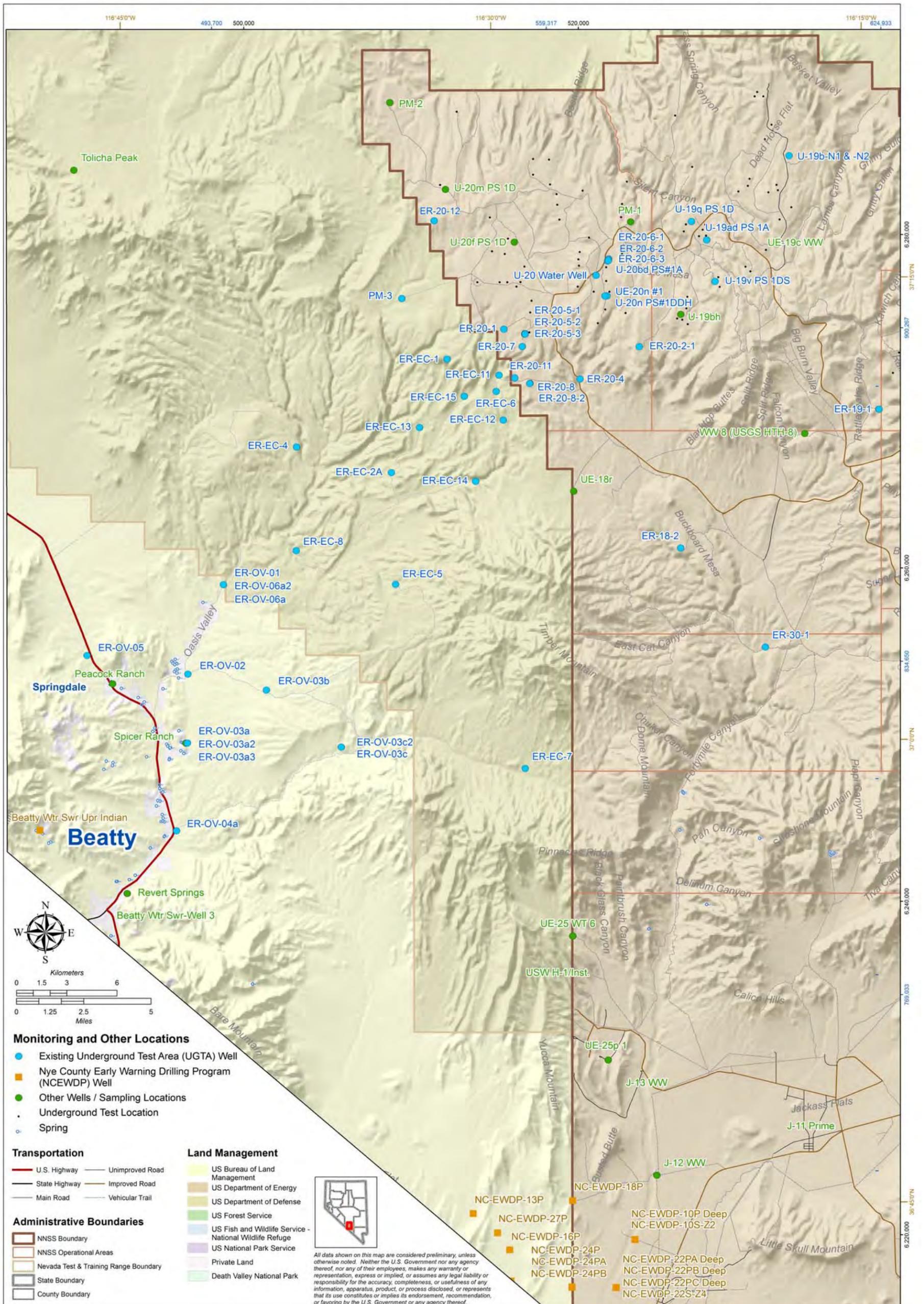




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Monitoring & Hydrogeologic Investigation Wells and Springs of the Nevada National Security Site (NNSS)



Source: Navajo GIS, 2018; NS Tec, 2015; US Bureau of Land Management, 2012; USGS, 2010; ESRI, 2018.
 Path: H:\GIS_WORKING\020_PM_CAI\Monitoring_Wells_and_Springs_20171120.mxd - 6/7/2018
 Coordinate Systems: Latitude and Longitude values, 15 minute intervals, North American Datum 1927 Universal Trans Mercator Zone 11 North, meters; North American Datum 1983 State Plane Nevada Central, feet

Effects of Tritium Exposure



Tom Bastian

Environmental, Safety, Health, and Quality Manager

Navarro

July 17, 2019



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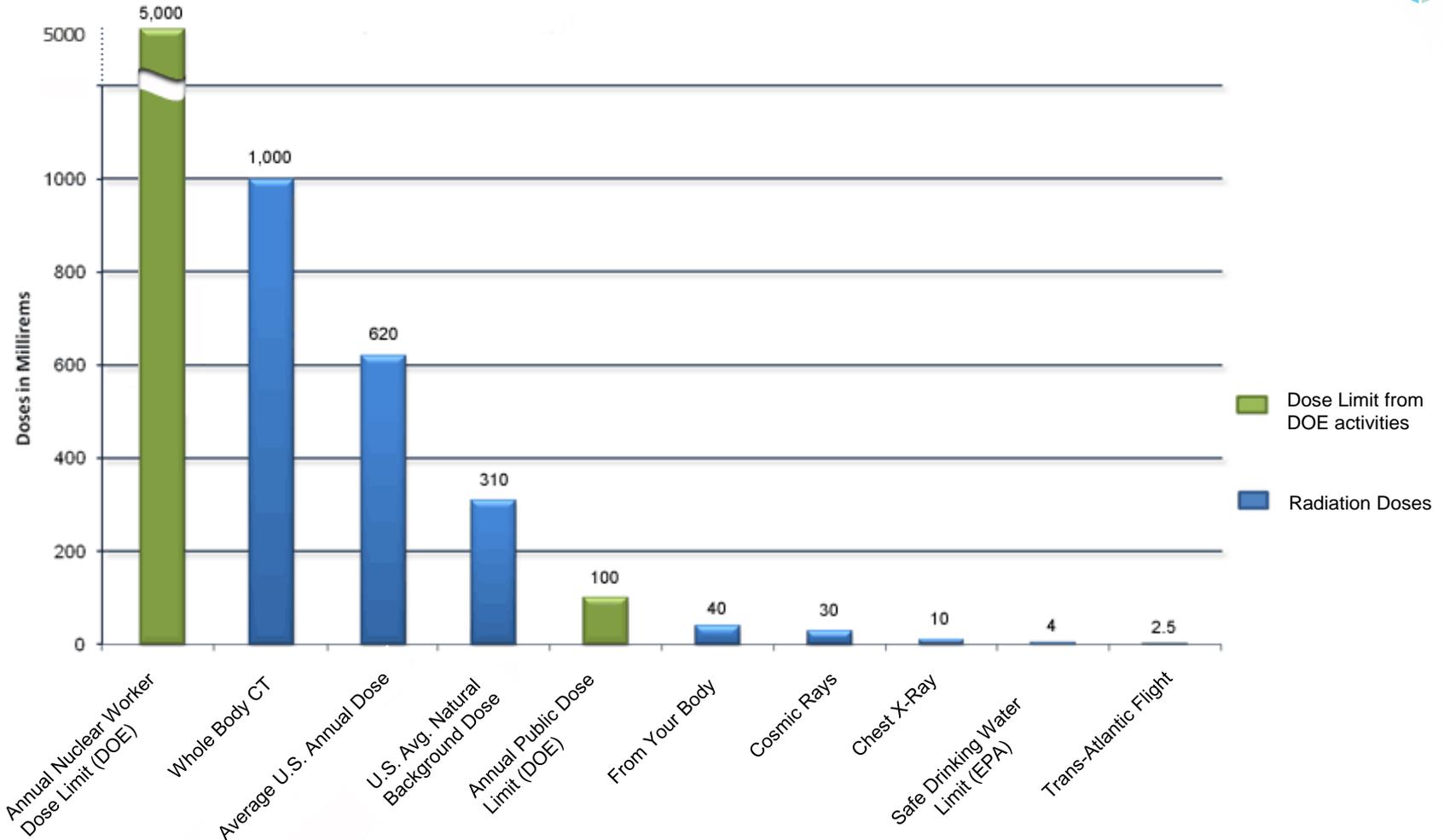
Regulatory Standard for Tritium

- A rem is a unit of effective absorbed dose of ionizing radiation in human tissue
- The average concentration of tritium assumed to yield four mrem per year is 20,000 picocuries per liter (two liters per day, every day)
- On average, a general member of the public receives 620 mrem/yr (a mrem is 1/1,000 of a rem)
- U.S. Environmental Protection Agency has estimated that consumption of 4 mrem of beta/photon emitters in drinking water over a lifetime may result in an individual cancer risk of .000056 (5.6×10^{-5} or 1 out of 17,857)





Radiation Doses and Regulatory Limits (in Millirems)



Source: <https://www.nrc.gov/images/about-nrc/radiation/factoid2-lrg.gif>

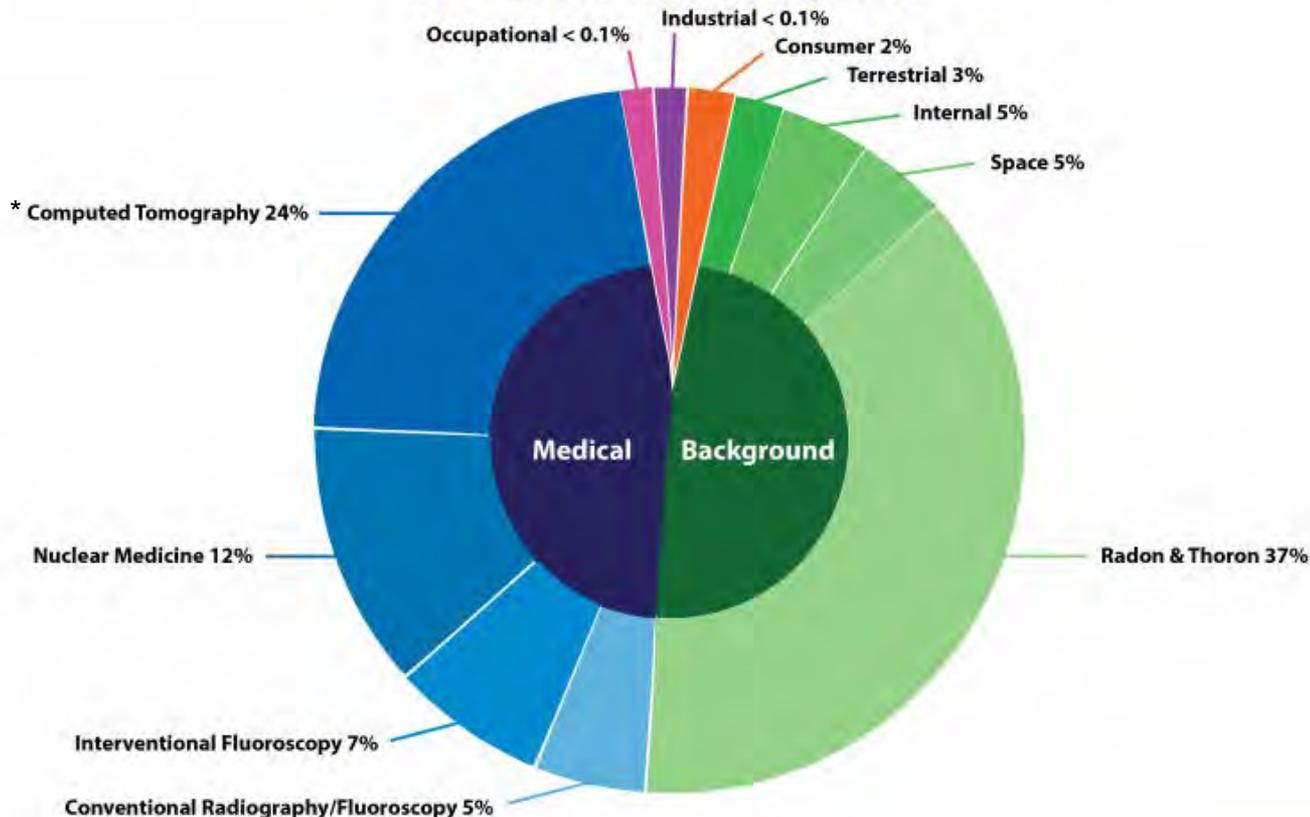


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Sources of Radiation Exposure



*CAT Scan

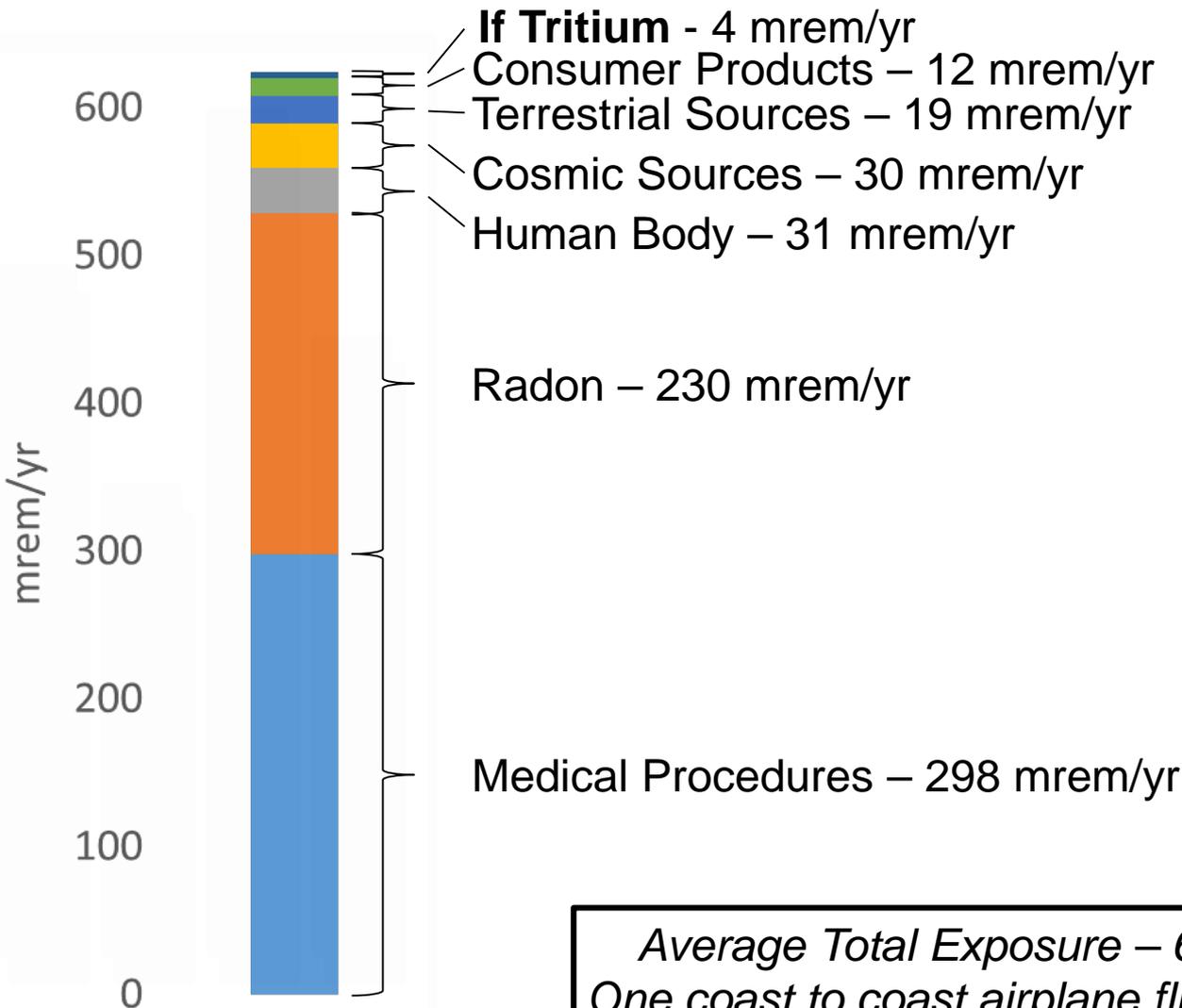
Average Annual Radiation Dose											
Sources	Radon & Thoron	Computed Tomography	Nuclear Medicine	Interventional Fluoroscopy	Space	Conventional Radiography/Fluoroscopy	Internal	Terrestrial	Consumer	Occupational	Industrial
Units											
mrem (United States)	228 mrem	147 mrem	77 mrem	43 mrem	33 mrem	33 mrem	29 mrem	21 mrem	13 mrem	0.5 mrem	0.3 mrem
mSv (International)	2.28 mSv	1.47 mSv	0.77 mSv	0.43 mSv	0.33 mSv	0.33 mSv	0.29 mSv	0.21 mSv	0.13 mSv	0.005 mSv	0.003 mSv

(Source: National Council on Radiation Protection & Measurements, Report No. 160)

Source: <https://www.epa.gov/sites/production/files/styles/large/public/2017-04/donut-pie-chart.png>



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Putting It into Perspective

*Average Total Exposure – 620 mrem/yr;
One coast to coast airplane flight – 3.5 mrem*





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Introduction to the EM SSAB

July 2019 – NSSAB

David Borak, Designated Federal Officer, EM SSAB



- The Formation of the EM SSAB
- FACA and the Guiding Principles for the EM SSAB
- Your Roles & Responsibilities under FACA
- Legal Considerations Under FACA
- Questions



What is the EM SSAB?

- Chartered in **1994** under FACA to involve local citizens more directly in DOE EM cleanup decisions
- There is **one charter** for the EM SSAB – currently eight local boards organized under the EM SSAB umbrella charter
- These eight local boards are brought together routinely at the EM SSAB **Chairs meetings**, where the EM SSAB is able to speak in one voice



- Made up of **representative** members, not necessarily experts
- Focus on **stakeholder values**
- DOE receives **independent input** and focus on **transparency to build trust**

Purpose of FACA

- Ensure that advice by advisory boards/committees is **objective** and **accessible** to the public
- **Formalize** process for establishing, operating, overseeing and terminating advisory boards
- Create the **Committee Management Secretariat**
- Require that boards **advise and recommend**, not decide and implement

Benefits of FACA

- Transparency and participation improves **citizens' trust** in government
- FACA requirements lend **credibility** to the boards' advice



FACA by the Numbers

- ~1,000 federal advisory committees in existence at any time.
- ~65,000 committee and subcommittee members at any time.
- ~60 executive departments and agencies that sponsor committees each year.
- ~1,000 reports issued each year.
- ~7,000 meetings held each year.



- Requires a **charter** outlining the committee's mission and specific duties
- Allow for **open access** to committee meetings and operations
 - Meetings must be **accessible** to the public and **announced** in the Federal Register
 - Committee **documents must be maintained** and made available for public inspection
- Maintain a “**fairly balanced**” membership
- Provide an opportunity for **Public Comment**
- Violations?



Guiding Documents

FACA

DOE Committee
Management
Manual

EM SSAB Charter

EM SSAB Guidance

Operating Procedures

Member Responsibilities

- **Attend regular meetings** and learn about the site's EM cleanup mission
- **Provide recommendations** at the request of EM management
- Work **collaboratively and respectfully** with other Board members
- Avoid techniques such as “**bargaining**” and **acquiescence** simply to avoid conflict and reach agreement
- **Avoid responding directly to public comments**
- Don't use your **title or represent** the board outside of a meeting
- Report if an **outside entity** is attempting to influence your decisions
- Focus on the Board's mission – collaboratively establishing a **work plan**
- Notify the DDFO of any potential or perceived **conflict of interest**

EM SSAB members are **not** subject to the same federal ethics regulations as federal employees and Special Government Employees (SGEs).

- **As a matter of policy**, however, DOE asks that you:
 - Refrain from any use of your membership, which is, or gives the appearance of being, motivated by the desire for private, professional, or financial gain;
 - Recuse yourself from decisions and discussions related to real or perceived conflicts of interest, act impartially, and avoid the appearance of impropriety; and
 - Seek immediate guidance, beginning with the DDFO, if you are offered anything of value such as a gift, gratuity, loan, or favor in connection with advisory board service.

Questions?

David Borak

Designated Federal Officer, EM SSAB

(202) 586-9928

David.Borak@em.doe.gov



ENVIRONMENTAL MANAGEMENT SITE-SPECIFIC ADVISORY BOARD

CHAIRS MEETING RECOMMENDATION

May 9, 2019 - Augusta, Georgia

Recommendation #1 – EM’s Review of Cleanup Milestones

Background:

On February 14, 2019, the U.S. Government Accountability Office (GAO) published “DOE Should Take Actions to Improve Oversight of Cleanup Milestones” (GAO-19-207). The report found that DOE did not accurately track or report whether milestones were met, missed, or postponed. It also found that sites continually renegotiate milestones they are at risk of missing.

GAO recommended the Office of Environmental Management (EM) should update its policies and procedures to establish a standard definition of milestones, track original milestone dates as well as changes to its cleanup milestones, report annually to Congress on the status of its cleanup milestones, and conduct root cause analyses of missed or postponed milestones.

One of the ways that the local boards that make up the Environmental Management Site-Specific Advisory Board (EM SSAB) become informed about cleanup actions at their sites is tracking cleanup milestones. Milestone achievement, delays and change information should be shared with the local boards on a regular basis.

Recommendations:

1. The EM SSAB Chairs recommend EM create a complex-wide, consistently applied data dictionary for milestones terminology. The inconsistency in not applying the same criteria in DOE tracking of milestones results in confusion for the local boards and the EM SSAB Chairs as they meet to discuss cleanup issues and contemplate recommendations.
2. Local boards and the public should be able to access site-specific milestone information in a timely manner. Milestone information should contain the

rationale for identifying the type based on the data dictionary of milestones and detailed information about why a milestone will be advanced/delayed/postponed.

Who We Are

The EM SSAB is the DOE-EM's most effective vehicle for fostering two-way communication between DOE-EM and the communities it serves. The EM program is the world's largest environmental cleanup program, and the EM SSAB its only citizen advisory board. For more than 20 years, the volunteer citizens of the EM SSAB have partnered with EM officials at both the local and national levels to ensure that the public has a meaningful voice in cleanup decisions.

Public participation is required/recommended as part of a number of environmental regulations. It is also good business practice, resulting in better decisions that often result in improved cleanup. Over the past two decades, EM SSAB members have volunteered over 48,000 hours of their time and submitted to EM officials over 1500 recommendations, 88% of which have been fully or partially implemented, resulting in improved cleanup decisions.

The EM SSAB comprises approximately 200 people from communities in Georgia, Idaho, Kentucky, Nevada, New Mexico, Ohio, Oregon, South Carolina, Tennessee and Washington. The Board is cumulatively representative of a stakeholder population totaling millions of people who are affected by generator sites, transportation routes and disposal sites. As we move forward, the EM SSAB welcomes the opportunity to highlight the value of this unique volunteer board and discuss its priorities during the months and years ahead.

ENVIRONMENTAL MANAGEMENT SITE-SPECIFIC ADVISORY BOARD

CHAIRS MEETING RECOMMENDATION

May 9, 2019 - Augusta, Georgia

Recommendation #2 – Improving EM’s Science and Technology Program

Background:

The Environmental Management Site-Specific Advisory Board (EM SSAB) Chairs wish to respond to the National Academies of Sciences’ (NAS) report, “Independent Assessment of Science and Technology for the Department of Energy’s Defense Environmental Cleanup Program” (2019) which assesses the success of the EM Science and Technology (S&T) program; a program that defines needs for near-term and out-year cleanup of radioactive material. As Advisory Boards to DOE-EM, the EM SSAB Chairs collectively seek a continued EM focus on permanent reduction of risk to future human generations and the environment.

The EM SSAB Chairs agree to the need for a formal, open, transparent, quantifiable and integrated S&T program that is accessible, by everyone – scientists, regulators and the public. We also agree on the need for an aggressive, cohesive S&T program that can verify the success of selected remediation pathways by utilizing hard data in defense of chosen risk-informed cleanup decisions. We also see the need for a data-rich, user friendly and publicly accessible digital platform that is easily accessed and navigated by everyone.

Recommendations:

- 1. The EM SSAB Chairs support the development of a programmatically integrated, (under one identified EM government program) robust S&T effort that is fully funded in order to: a) identify and pursue development of the technologies necessary to successfully achieve risk based reduction of radiological and other hazardous waste material; b) to integrate decisions that are common between sites with similar remediation needs; c) to identify scientific challenges common to sites.**

Deferring cleanup to the future (by relying on the myth that there will be more money or other, cheaper remediation solutions) has never driven down cost of remediation, to date.

- 2. A portion of the technology development effort for the DOE-EM cleanup program should focus on breakthrough solutions and technologies that can substantially reduce cleanup costs, schedules and uncertainties as stated in the NAS report.**

- 3. The EM SSAB Chairs recommend exploring already developed, usable computer platforms to see if they are flexible enough to systematize verification of Best Practices decisions.**

At Hanford Nuclear Reservation, the PHOENIX Computer Platform has been in development both for the Richland side of the site (soil and groundwater remediation) and for the DOE Office of River Protection (in support of the safe configuration of the Tank Farms and building of the Waste Treatment Plant).

In development for eight years now, the Phoenix Platform is a data-rich base of maps, waste-site definition, characterization data and more. We wonder if a platform, such as this one, might not be adapted as a solution, programmatically, to address the need to define S&T needs and validate decisions.

It is clear that piecemeal, undocumented and scattered S&T efforts to date, have not served EM well, leaving the DOE-EM department potentially destined to not be able to identify common remediation needs from site to site, or worse, repeat testing of already pursued technologies that could not reach maturity.

- 4. The EM SSAB Chairs recommend EM explore the path of working with the Advanced Research Projects Agency-Energy (ARPA-E) office, coupled with public outreach and transparency to implement a directional shift towards better control.**

The culture and process of contracting must be changed. The reins of scientific need and technology development should reside in a government-identified and controlled structure of discipline that manages budgetary resources, delivery time expectations and mission scope. ARPA-E might be the solution to manage a breakthrough S&T development program for EM. ARPA-E focuses on technologies too early for private-sector investment. ARPA-E awardees are unique because they are developing entirely new ways to generate, store, and use energy.

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FY 2020 Election Time



Elections of the FY 2020 NSSAB Chair and Vice-Chair will take place at the September Full Board meeting. A response is needed from all. Please contact the NSSAB office by August 31 and advise if you would like to be considered for either position.

You may also nominate someone who you feel would be a valuable chair/vice-chair. Anyone nominated will be contacted to ensure they would accept the nomination. A list of interested members will be provided to the Full Board and the officers will be elected by ballot at the September Full Board meeting.

What are the Chair responsibilities?

- Serves as the Chair for 12 months (October 1 - September 30)
- Participates in EM SSAB Chairs conference calls
- Assists in the development of draft meeting agendas
- Leads full board meetings and ensures all members have the opportunity to participate
- Certifies to the accuracy of all minutes within 45 days
- Signs recommendations that the Board has passed
- Serves as spokesperson for the NSSAB between regular meetings of the Board
- Attends national EM SSAB meetings and/or workshops semi-annually
- Adheres to all standard NSSAB member responsibilities (i.e. attendance requirements, etc.)

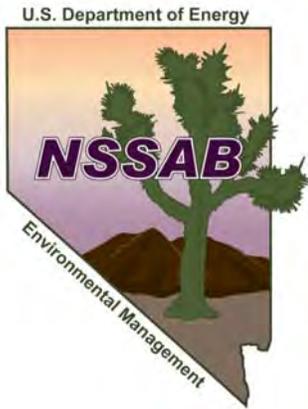


What are the Vice-Chair responsibilities?



- Serves as the Vice-Chair for 12 months (October 1 - September 30)
- Participates in EM SSAB Chairs conference calls
- Assists in the development of draft meeting agendas
- Acts as the NSSAB chair in the absence of the elected chair
- Attends national EM SSAB meetings and/or workshops semi-annually
- Adheres to all standard NSSAB member responsibilities (i.e. attendance requirements, etc.)

Please contact the NSSAB office by August 31 and advise if you are willing to be considered for the FY 2020 Chair and/or Vice-Chair positions.



Nevada Site Specific Advisory Board

April 24, 2019

Mr. Robert Boehlecke
Program Manager
U.S. Department of Energy, EM Nevada Program
P. O. Box 98518
Las Vegas, NV 89193-8518

SUBJECT: Nevada Site Specific Advisory Board (NSSAB)
Recommendation for Fiscal Year (FY) 2021 Baseline
Prioritization—Work Plan Item #7

Dear Mr. Boehlecke:

The NSSAB has completed its annual review and prioritization of the U.S. Department of Energy (DOE), Environmental Management (EM) Nevada Program activities for the FY 2021 budget submittal.

At the April 24th Full Board meeting, the NSSAB was provided a list of EM Nevada Program activities and was asked by DOE to prioritize them by related groupings. The items listed below were ranked by the Board from the highest to the lowest priority, as follows:

1. Central and Western Pahute Mesa
2. Radioactive Waste Management Disposal Operations (tie)
2. Post-Closure Monitoring (tie)
3. Rainier Mesa and Yucca Flat
4. Test Cell C

Thank you for the opportunity to participate in the annual budget prioritization process. The NSSAB would also like to thank the EM staff for their time to meet with the NSSAB to provide detailed information and answer questions.

We sincerely appreciate this support and look forward to your response regarding this year's budget submittal.

Sincerely,

Frank Bonesteel, Chair

Members

Amina Anderson
Frank Bonesteel (Chair)
William DeWitt
Karen Eastman
Pennie Edmond
Charles Fullen
Richard Gardner
Anthony Graham
Tanya Henderson
Hepburn Klemm
Donald Neill
Steve Rosenbaum (Vice-Chair)
Janice Six
Richard Stephans
Richard Twiddy
Dina Williamson-Erdag
Connie Wissmiller

Liaisons

Clark County
Consolidated Group of Tribes
and Organizations
Esmeralda County Commission
Lincoln County Commission
Nye County Commission
Nye County Emergency
Management
Nye County Nuclear Waste
Repository Project Office
State of Nevada Division of
Environmental Protection
U.S. National Park Service
White Pine County Commission

Administration

Kelly Snyder, Deputy Designated
Federal Officer (DDFO)
U.S. Department of Energy,
EM Nevada Program
Barbara Ulmer, Administrator
Navarro, Contractor for the U.S.
Department of Energy,
EM Nevada Program



U.S. Department of Energy
Environmental Management
Nevada Program
P.O. Box 98518
Las Vegas, NV 89193-8518

MAY 07 2019

Frank Bonesteel, Chair
Nevada Site Specific Advisory Board
232 Energy Way
North Las Vegas, NV 89030

RESPONSE TO THE NEVADA SITE SPECIFIC ADVISORY BOARD (NSSAB) FISCAL YEAR (FY) 2021 BASELINE PRIORITIZATION RECOMMENDATION – WORK PLAN ITEM #7

I would like to extend my appreciation to the NSSAB for taking the time to evaluate and prioritize the tasks included in the FY 2021 baseline for the U.S. Department of Energy, Environmental Management (EM) Nevada Program. The NSSAB's baseline prioritization recommendation is important to the EM Nevada Program and will not only be considered in the development of our prioritized budget submission to Headquarters, but will also be sent directly to Headquarters in support of our FY 2021 budget request.

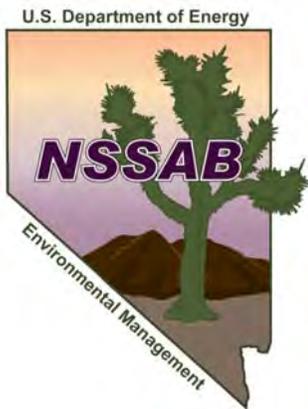
I would also like to thank the NSSAB for the dialogue during the April 24, 2019 Full Board meeting on this work plan item. This discussion allows my staff to understand the board's perspectives and insights for future baseline prioritization planning.

If you have questions or comments regarding this recommendation, please contact Kelly Snyder at (702) 295-2836.

A handwritten signature in black ink, appearing to read 'Robert Boehlecke', written in a cursive style.

Robert Boehlecke
Program Manager
EM Nevada Program

EMOS:13195.KKS



Nevada Site Specific Advisory Board

March 20, 2019

Mr. Kevin Cabble, DOE RWAP Manager
U.S. Department of Energy, Environmental
Management (EM) Nevada Program
P.O. Box 98518
Las Vegas, NV 89193-8518

SUBJECT: Recommendation for Evaluation of the Audit Determination
Process (Work Plan Item #4)

Dear Mr. Cabble,

The Nevada Site Specific Advisory Board (NSSAB) was asked to provide a recommendation, from a community perspective, to the U.S. Department of Energy (DOE) regarding if the existing Radioactive Waste Acceptance Program (RWAP) risk-informed process for scheduling facility evaluations is supported and how it could be enhanced.

In support of this work plan item, Marilew Bartling, Navarro RWAP Manager, provided a briefing at the January 16, 2019 NSSAB Meeting on the Evaluation of the Audit Determination Process work plan item. At this meeting, the NSSAB requested additional information for more detail on the risk score calculations contained in the RWAP risk-informed spreadsheet. In response to this request, a white paper providing this detail, an updated Risk-Informed Spreadsheet, and a fiscal year 2019 facility evaluation schedule was provided to the NSSAB for its review.

After deliberation, the NSSAB makes the following recommendations for ways DOE should consider to enhance its risk-informed process for scheduling facility evaluations:

- Use a per unit score for risk attributes in place of assigning point values to the top generators.
- Conduct facility evaluations with no prior notice to the generators.
- Add the generator's overall ranking to the RWAP facility evaluation schedule.
- Include historical information from DOE's Occurrence Reporting and Processing System regarding near-miss incidents, primarily in transportation, although more study could be done to determine if other areas would also apply.

The NSSAB supports the risk-informed process for scheduling facility evaluations with consideration of the enhancements listed above.

Members

Amina Anderson
Frank Bonesteel (Chair)
William DeWitt
Karen Eastman
Pennie Edmond
Charles Fullen
Richard Gardner
Anthony Graham
Tanya Henderson
Hepburn Klemm
Donald Neill
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Janice Six
Richard Stephans
Richard Twiddy
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Connie Wissmiller

Liaisons

Clark County
Consolidated Group of Tribes
and Organizations
Esmeralda County Commission
Lincoln County Commission
Nye County Commission
Nye County Emergency
Management
Nye County Nuclear Waste
Repository Project Office
State of Nevada Division of
Environmental Protection
U.S. National Park Service
White Pine County Commission

Administration

Kelly Snyder, Deputy Designated
Federal Officer (DDFO)
*U.S. Department of Energy,
EM Nevada Program*
Barbara Ulmer, Administrator
*Navarro, Contractor for the U.S.
Department of Energy,
EM Nevada Program*

The NSSAB thanks Ms. Bartling for her time in briefing this work plan item and providing the additional requested information in order to provide this recommendation.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank Bonesteel". The signature is fluid and cursive, with a large initial "F" and "B".

Frank Bonesteel, Chair

cc: David Borak, DOE/HQ (EM-4.32)
Michelle Hudson, DOE/HQ (EM-4.32)
Marilew Bartling, Navarro
Barbara Ulmer, Navarro
NSSAB Members and Liaisons
Robert Boehlecke, EM
Jhon Carilli, EM
Catherine Hampton, EM
Kelly Snyder, EM
Bill Wilborn, EM



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JUN 03 2019

Frank Bonesteel, Chair
Nevada Site Specific Advisory Board
232 Energy Way
North Las Vegas, NV 89030

RESPONSE TO THE NEVADA SITE SPECIFIC ADVISORY BOARD (NSSAB)
RECOMMENDATION FOR EVALUATION OF THE AUDIT DETERMINATION PROCESS
(WORK PLAN ITEM #4)

Reference: Ltr Bonesteel to Cable, dtd 3/20/2019

I would like to thank the NSSAB for its recommendation on the Evaluation of the Audit Determination Process work plan item in the above-mentioned letter. The U.S. Department of Energy (DOE), Environmental Management (EM) Nevada Program appreciates the time that the NSSAB spent in review and its subsequent support of the Radioactive Waste Acceptance Program's (RWAP) risk-informed process for scheduling facility evaluations.

Below are responses to NSSAB recommendations for enhancements to RWAP's risk-informed process for scheduling facility evaluations:

NSSAB Recommendation: Use a per unit score for risk attributes in place of assigning point values to the top generators.

DOE Response: The RWAP team will be reviewing the protocols previously used for the FY2019 ranking and will consider the NSSAB recommendation during the development of the FY2020 risk-informed facility evaluation scheduling.

NSSAB Recommendation: Conduct facility evaluations with no prior notice to the generators.

DOE Response: This recommendation remains under consideration at this time. As discussed during NSSAB meetings, pre-scheduling facility evaluations may be necessary due to what is going to be observed and/or reviewed. Access to some areas or material can require time periods that are not conducive to "surprise" visits. This recommendation will be considered if a pre-visit notification is not warranted due to access constraints.

NSSAB Recommendation: Add the generator's overall ranking to the RWAP facility evaluation schedule.

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DOE Response: There are sensitivities with this information and the potential for misinterpretation, so distribution would require control. DOE will work with the NSSAB to share pertinent information regarding rankings for transparency while protecting sensitive information.

NSSAB Recommendation: Include historical information from DOE's Occurrence Reporting and Processing System (ORPS) regarding near-miss incidents, primarily in transportation, although more study could be done to determine if other areas would also apply.

DOE Response: DOE agrees with NSSAB that the ORPS is a key source of information regarding issues across the complex. The RWAP team will look at the feasibility for performing an ORPS search prior to each facility evaluation to determine any issues that require review and to ensure generators are making notifications as required per the Nevada National Security Site Waste Acceptance Criteria.

Again, thank you for learning more about RWAP's risk-informed process for scheduling facility evaluations and providing recommendations for enhancements.

If you have any questions or comments, please contact Kelly K. Snyder at (702) 295-2836.



Kevin J. Cabble
RWAP Manager
EM Nevada Program

EMO:13219.KC

cc via email:

David Borak, DOE/HQ (EM-4.32)
Michelle Hudson, DOE/HQ (EM-4.32)
Marilew Bartling, Navarro
Barbara Ulmer, Navarro
NSSAB Members and Liaisons
Navarro Central Files
Robert Boehlecke, EM
Jhon Carilli, EM
Catherine Hampton, EM
Kelly Snyder, EM
Bill Wilborn, EM