



U.S. Department of Energy  
Environmental Management  
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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 Cabbie, 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.



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