



Nevada Site Specific Advisory Board (NSSAB)

Full Board Meeting Valley Electric Association's Valley Conference Center Pahrump, Nevada

4:00 p.m. – January 17, 2024

Members Present: Erik Anderson, Joycelyn Austin-Mabe, Lisa Blandi, John Cole, Gary Elgort, Anthony Graham (Chair), Mark Hilton (Vice-Chair), Janice Six, Kevin Trainor, Favil West, Eddie Williams

Members Absent: William Dolan, Bruce Jabbour, Dan Peterson

Liaisons Present: Andrew Bennett (Clark County), Richard Arnold (Consolidated Group of Tribes and Organizations [CGTO]), Janine Woodworth (Lincoln County Commission), Scott Lewis, Frank Bonesteel and Patrick Lazenby (Nye County Emergency Management [NCEM]) John Klenke (Nye County Natural Resources and Federal Facilities Office [NRFFO]), Christine Andres (State of Nevada Division of Environmental Protection [NDEP])

Liaisons Absent: Frank Carbone (Nye County Commission), Bill Wolf (White Pine County Commission)

U.S. Department of Energy (DOE): **Environmental Management (EM) Nevada Program:** Robert Boehlecke (Deputy Designated Federal Officer [DDFO]), Tiffany Gamero (Alternate DDFO)
National Nuclear Security Administration/Nevada Field Office (NNSA/NFO): Dr. David Bowman, John Daniels, Kathryn Gladden

Government Contractors: **Navarro Research and Engineering, Inc. (Navarro):** Marilew Bartling, Grant Johnson, Kevin Knapp, Glenn Puit, Byron Smith, Barbara Ulmer
U.S. Geological Survey (USGS): Jeff Sanchez

Members of the Public and Media Signed In: Robert Adams, Mark Cochran, Tammi Odegard, and Bill Stremmel (Pahrump, NV), Wayne Barber (Exchange Monitor)

Open Meeting

Chair Anthony Graham welcomed everyone to the meeting and thanked the community of Pahrump for its hospitality. He noted that there will be several opportunities for NSSAB members to volunteer to observe activities conducted by the Radioactive Waste Acceptance Program (RWAP) and report back to the NSSAB in July 2024. Member Kevin Trainor moved to approve the draft agenda. The motion was seconded and passed unanimously.

Public Comment

The following public comment was provided by Bill Stremmel from Pahrump, NV:

In 2019 the State of Nevada did nothing to discourage the "Storm Area 51" protest organized by people in California. Nye and Lincoln County Sheriff's departments had to deploy additional deputies to guard the perimeter and entrances into the Nevada National Security Site which encompasses "Area 51" where according to ufologist lore, alien spacecraft are being reverse-engineered. This protest was universally condemned by all credible researchers in the mainstream ufology community, which helped dampen the turnout, but Nye and Lincoln counties are left having to pay a combined total of **\$573,622.38** for their Sheriff's overtime. Their request to the State Finance Committee for reimbursement was declined at the direction of former Governor Steve Sisolak.

These costs are ultimately the responsibility of the U.S. Department of Energy (DOE), because it is their facilities within the Nevada National Security Site (NNSS) which the county sheriff's are charged with protecting. I am taking this occasion before the Nevada Site Specific Advisory Board (NSSAB) meeting today in Pahrump to ask that DOE, for whom this body serves as liaison, reimburse these extra security costs borne by Nye and Lincoln counties on their behalf. I have a specific figure from the Lincoln County Treasurer, Ms. Shawn Frehner: **\$209,698.31** and Nye County's public records requests yielded **\$363,924.07** combining into a joint request for **\$573,622.38**

Liaison Updates

CGTO (Richard Arnold)

Liaison Richard Arnold introduced himself as a southern Paiute and the Spokesperson for the CGTO, representing 16 culturally affiliated tribes with ties to the NNSS. The CGTO has been involved in meetings of the State and Tribal Governments Working Group (STGWG) and the DOE, focusing on EM activities across the DOE complex. There are currently revisions going forward on DOE Order 144.1, "*American Indian Tribal Government Interactions and Policy*," published in 1992. The DOE Order 144.1 is currently being reviewed by DOE's General Counsel and will affect all offices across the DOE complex, giving the Tribes the opportunity to engage in dialogue with the Department. Liaison Arnold continued that DOE EM Headquarters (HQ) is supporting workshops for sacred sites. These workshops are being led by the Tribes in Hanford, WA, and Los Alamos, NM, organized as a think tank to provide recommendations for DOE Order 144.1. In response to an NSSAB question, Liaison Arnold explained that Executive Order 13007, "*Indian Sacred Sites*", directs federal land managing agencies to accommodate access to, and ceremonial use of, Indian sacred sites and to avoid adversely affecting the physical integrity of such sacred sites. The NNSS does not currently have any sites specifically identified as sacred sites. Liaison Arnold noted that the Tribes have been involved in meetings

with the NNSC Clean Energy Initiative proposed for potential solar projects. Liaison Arnold will be participating in the Waste Management Symposia (WMS) in Phoenix, AZ in March 2024. The CGTO will be hosting its annual Tribal Update meeting with the NNSA/NFO in April 2024, and the EM Nevada Program will also be in attendance and sharing insights. Liaison Arnold concluded that the National Transportation Stakeholders Forum (NTSF) will be held in Denver, CO on June 3-6, 2024, that focuses on the transportation of DOE shipments. As a part of the NTSF, there will be meetings of the Tribal Radioactive Materials Transportation Committee to share the Tribe's unique perspectives and to dialogue with the Department.

NCEM (*Scott Lewis*)

Liaison Scott Lewis introduced himself as the Director of Emergency Management for Nye County. He reported that NCEM will host the Local Emergency Planning Committee meeting on February 1, 2024, and the EM Nevada Program's Low-Level Waste (LLW) Stakeholders Forum meeting on February 7, 2024.

NRFFO (*John Klenke*)

Liaison John Klenke thanked the EM Nevada Program for hosting NNSAB meetings in rural communities that are in close proximity to the NNSC to give citizens the opportunity to attend public meetings and provide public comments.

Lincoln County Commission (*Janine Woodworth*)

Liaison Janine Woodworth introduced herself as representing the Lincoln County Commission.

NDEP (*Christine Andres*)

Liaison Christine Andres introduced herself as the Bureau Chief for the Bureau of Federal Facilities for the NDEP, a division of the State of Nevada Department of Conservation and Natural Resources (DCNR). She reported that she was invited to be a panelist representing Nevada during WMS on the topic of LLW streams and policies and the working relationships that DOE has with its state regulatory partners. Liaison Andres commented that she participated in STGWG meetings to provide comments on behalf of the Tribes and the States to EM HQ on enhancements to the 10-year DOE EM Strategic Vision document. She continued that she issued and signed the approval letter yesterday for the Corrective Action Decision Document/Corrective Action Plan (CADD/CAP) for the Pahute Mesa corrective action units. Liaison Andres concluded that her management both in NDEP and DCNR have recently changed, so NNSA/NFO and the EM Nevada Program will be hosting a tour of the NNSC for them at the end of January 2024.

Clark County (*Andrew Bennett*)

Liaison Andrew Bennett introduced himself as the Director of Traffic Safety for Clark County. He commented that Clark County is tracking several construction projects on LLW and mixed LLW transportation routes to the NNSC that could possibly have impacts on these shipments. Liaison Bennett continued that the county looks forward to conversations with DOE and the State of Nevada Department of Transportation on the expansion of I-15 in Nevada. A new bridge in Laughlin, NV is planned to open soon, and the county is interested in having conversations on the most appropriate use of the new bridge versus the existing bridge. Liaison Bennett had the opportunity to attend the NNSC Clean Energy Information Day yesterday and expressed support on behalf of Clark County for solar projects that are on federal land with the preference that the energy remains in the great State of Nevada. Clark County has concerns with two other projects for the use of microreactors in Washington and

Idaho without an identified long-term waste disposal solution. He concluded that the Super Bowl is about 20 days away and is considered a U.S. Department of Homeland Security Level 1 event, so many logistical details are being coordinated behind the scenes, and the county appreciates DOE's continued support in working and partnering with Clark County on special events.

NNSA/NFO Update (*Dr. David Bowman, NNSS Manager*)

Dr. David Bowman provided additional information on the NNSS Clean Energy Initiative that has been mentioned in previous NSSAB meetings. This is a DOE initiative to allocate some of its federal lands for the development of clean energy. There were five DOE sites identified including the NNSS. A community roundtable was hosted yesterday for stakeholders to express any thoughts or concerns about this initiative for potential solar power generation at the NNSS. Dr. Bowman briefly shared some of the concerns of stakeholders. Tribal representatives provided comments about ensuring that communications continue as the project moves forward and about the protection of environmental and cultural resources. The Tribes indicated they would like to be part of any site surveys performed by commercial developers. U.S. Air Force representatives expressed concerns about potential introduction of sensing equipment resulting from commercial development. The Bureau of Land Management (BLM) representatives participated and reinforced some of the concerns expressed by the Tribes, especially with respect to water conservation and protected species, specifically desert tortoises. BLM also cited the land withdrawal agreement with DOE, specifically that NNSS land was withdrawn for national security purposes. This particular issue is being worked on by DOE's and the U.S. Department of Interior's General Counsels in Washington, DC. Clark County provided comments about power generation and small modular reactors, which is not an option at the NNSS. The NNSA/NFO is hosting an information day on February 13, 2024, at the Atomic Museum for developers interested in leasing land for commercial development. Interested parties can contact John Daniels, NNSA/NFO Federal Public Affairs Officer, for additional information.

U.S. DOE Update (*Robert Boehlecke, DOE*)

DDFO Robert Boehlecke reported on the following DOE EM Nevada Program updates:

- **Engine Maintenance, Assembly and Disassembly (EMAD) Facility:** The EM Nevada Program continues to work on asbestos abatement at EMAD. Navarro has successfully brought down multi-story water towers at both EMAD and Test Cell C (TCC) in January 2024.
- **Underground Test Area (UGTA) Activity:** The EM Nevada Program recently received approval from NDEP on its CADD/CAP for the Pahute Mesa corrective action units. This approval moves the Program into the model evaluation phase. At the last NSSAB meeting, Ken Rehfeldt, Navarro's UGTA Manager, reported on plans for the drilling of two new wells on Pahute Mesa and also the work being done to assess tritium levels in samples drawn from Well ER-EC-11. The Program is awaiting results from this sampling from an independent laboratory.
- **NSSAB Membership Recruitment Drive:** Navarro's strategic communications team has implemented a rigorous membership recruitment advertisement campaign for the month of January 2024. Representatives from the EM Nevada Program have spoken to

the Nye County Board of Commissioners, the Amargosa Valley Town Board, the Beatty Town Board, and have interviewed for a segment on KPVM TV in Pahrump, NV.

- **Federal Site Liaison:** The EM Nevada Program welcomed its federal site liaison, Beth Lisann, to the EM offices and the NNSS last week. This successful visit offered the Program an excellent opportunity to further communication with supervisors from EM HQ. Ms. Lisann witnessed the downing of the TCC water tower.
- **LLW Stakeholders Forum:** The next meeting is on February 7, 2024, in Pahrump, NV with Clark County liaison, Andrew Bennett, making a presentation on Clark County Office of Traffic Safety Overview.
- **LLW Waste Shipments:** Clark County had requested that no shipments be transported to the NNSS over the southern routes during the Formula 1 race and the Christmas and New Year holidays. The EM Nevada Program met this request and is now working on facilitating a similar request during the Super Bowl next month in Las Vegas.
- **STEM Grant Awards:** Navarro recently awarded five STEM grants in Nevada schools through its Community Commitment Grant Program. These grants are aimed at furthering education in science, technology, engineering, and math (STEM). A total of nearly \$16,000 was awarded this year in the advancement of STEM learning, representing a total investment of just over \$37,000 over the last three years. This year's awardees are the Tonopah Middle School, New Horizons Academy, Walter Bracken STEAM Academy, Montessori Visions Academy, and Lake Mead Christian Academy.
- **Waste Management Symposia in March 2024:** The EM Nevada Program will be represented by Glenn Puit, Navarro's Strategic Communications Manager, who is presenting a white paper on communications in rural Nevada with the focus being on the Groundwater Open House. DDFO Boehlecke will be participating on a panel with other program managers from smaller EM sites to discuss progress in baseline cleanup and current cleanup activities.
- **NDEP/DCNR Tour of the NNSS:** The EM Nevada Program is looking forward to the opportunity to show new and current NDEP/DCNR senior management the current EM work taking place at the NNSS.

Other NSSAB Business (*Anthony Graham, Chair*)

EM Strategic Vision Document

Chair Graham led discussion on feedback and input for enhancements or improvements to the *EM Strategic Vision: 2023-2033*. There was minimal discussion and no major input or suggested changes. NSSAB members and liaisons were encouraged to provide individual comments using the following email address: StrategicVisionFeedback@em.doe.gov by Friday, January 19, 2024.

NSSAB Membership Recruitment Drive

Chair Graham updated on the NSSAB membership recruitment drive that he and Vice-Chair Mark Hilton have been interviewing potential candidates the past couple of weeks. He encouraged current members to visit with people in their communities who could become productive NSSAB members. The best recruitment tool is word of mouth and current members are the best recruiters. Chair Graham noted that applications are available on the welcome table and posters in both English and Spanish to support individual member's recruitment

efforts. He encouraged current members eligible for another two-year term to turn in their reappointment applications by Friday.

Low-Level Waste (LLW) Facility Evaluations – Work Plan Item #3 (Marilew Bartling, RWAP Manager)

- **NNSS Waste Acceptance Program**
 - Wastes eligible for disposal in Nevada must be certified under an approved Waste Certification Program and independently reviewed to confirm compliance with the NNSS Waste Acceptance Criteria (NNSSWAC)
 - Three key focuses of the Radioactive Waste Acceptance Program (RWAP)
 - **Program Verification**
 - Profile Verification
 - **Container Verification**
- **Verification Overview – Waste Certification Program**
 - Review of waste generator’s written Work Control Documentation
 - Perform facility evaluation to confirm waste generator’s implementation of written Work Control Documentation
 - Review Independent Assessment Reports
 - Review reportable incidents at the waste generator’s sites
- **Verification Overview – Profile Verification**
 - All waste is profiled, and each profile is reviewed by subject matter experts chartered as the Waste Acceptance Review Panel (WARP)
 - Key information reported and reviewed includes radionuclide content, chemical and physical characteristics, package types
 - Each container shipped is compared to key profile information prior to acceptance
- **Verification Overview – Container Verification**
 - Generator certifies each container
 - Independent verification of containers by RWAP
 - **Visual verification**
 - **Real time radiography**
 - Split sampling
 - Other
- **NSSAB – Work Plan Item #3**
 - From a community perspective, the NSSAB will provide recommendations for how the RWAP facility evaluations could be enhanced
 - Background: RWAP conducts facility evaluations at generator sites throughout the country. These facility evaluations evaluate the generator’s waste certification program to verify continued implementation of the NNSSWAC.
 - Up to two NSSAB members are invited to observe RWAP conducting a facility evaluation and present their observations to the Full Board during the NSSAB Meeting on July 17, 2024.
 - NSSAB recommendation is due in July 2024.
- **Facility Evaluations Defined**
 - What is a facility evaluation?
 - A documented, in-depth review of written controls and evidence of implementation to assess a waste generator’s program adherence to the requirements of the NNSSWAC
 - A facility evaluation is categorized as either an audit or surveillance

- An audit assesses all five key program areas: radiological characterization; chemical characterization; waste traceability; quality assurance; packaging and transportation
 - A surveillance generally assesses two of the key program areas or is targeted to review a specific waste or assess implementation of corrective actions
- **Facility Evaluations Purpose**
 - Why does the NNSC conduct facility evaluations?
 - To ensure a periodic review of waste generator's written controls (e.g., work plans and procedures) is conducted to ensure alignment with the requirements of the NNSCWAC
 - To periodically assess evidence that written work controls are being implemented through the observation of the work, interviews with waste generator staff including technical specialists, work floor personnel and support staff
 - To perform periodic on-site review of records, documenting work is completed in accordance with written controls (e.g., laboratory analysis reports, fill sheets documenting waste container contents, procurement, and inspection sheets for purchased containers, calibration records, shipping papers)
- **Facility Evaluations Frequency**
 - What is the frequency of facility evaluations?
 - Generally, a facility evaluation is performed at each active generator annually
 - RWAP seeks to perform an audit at each facility every three years although audits are assigned primarily based on the risk rankings
 - Risk rankings consider any issues the facility has had, the volume of waste shipped, the activities performed at the generator site and the radiological hazards associated with the site
 - On average seven audits are conducted per year
 - Remaining facility evaluations are conducted as surveillances and an average of 20 surveillances are conducted per year
- **Facility Evaluations Personnel**
 - Who performs facility evaluations?
 - Assessors are subject matter experts in the five key areas and are members of RWAP
 - Assessors must be free from organizational conflicts of interest
 - Invited specialists for areas of interest based on specific wastes or operations
 - Observers routinely include DOE federal and contractor (MSTS) staff and NDEP personnel
 - Other observers if approved by DOE EM Nevada Program manager
- **Facility Evaluations Documentation**
 - How is a facility evaluation documented?
 - Each subject matter expert completes a standard checklist that verifies each applicable NNSCWAC requirement is implemented through written work controls and there is evidence of implementation
 - Documentation reviewed is catalogued
 - Personnel interviewed are identified
 - RWAP produces a final report that captures all critical information and supports with narrative documentation
 - Reports and supporting documentation are retained as records

- **Key Messages – Facility Evaluations**
 - Assesses both the adequacy of the waste generator’s written work controls and evidence of their implementation in the field
 - Allows for the potential to identify issues, including systematic issues not evident on individual profiles or verifications
 - Structured to assign audits based on risk and use surveillances for low-risk facilities
 - Documentation is standardized and comprehensive
- **Proposed RWAP Facility Evaluations for NSSAB Observations**
 - UT-ORNL (surveillance) in Oak Ridge, TN from April 23-24, 2024
 - Portsmouth Gaseous Diffusion Plant (surveillance) in Piketon, OH from June 11-12, 2024
 - Idaho Cleanup Project (surveillance) in Idaho Falls, ID from June 25-26, 2024

In response to Board questions, the following clarifications were provided regarding facility evaluations:

- In the NNSWAC, it is a requirement that waste generators notify the EM Nevada Program of changes in contractors or key personnel who are associated with the waste certification program or its technical leads. If this notification is not made, the generator may be issued a Finding by RWAP.
- When waste is amenable to sampling, such as soils, resins, etc., one method used by RWAP to verify chemical constituents is called split sampling. During this process, RWAP staff observes the collection of the sample and then sends it to a certified laboratory and receives the results directly. Another method used is RTR that allows RWAP to view items of potential concern.
- The NNSWAC documents the notification requirements for waste generators for any incidents relating to waste destined for disposal at the NNS.

Member Lisa Blandi volunteered to observe the surveillance of the Portsmouth Gaseous Diffusion Plant in Piketon, OH from June 11-12, 2024 (travel days include one day before and one day after). Member John Cole volunteered to observe the surveillance of the Idaho Cleanup Project in Idaho Falls, ID from June 25-26, 2024 (travel days include one day before and one day after). Member Gary Elgort will serve as an alternate if either Member Cole or Member Blandi is not available to attend. The NSSAB Office will support the members with travel arrangements. Chair Graham thanked Members Blandi and Cole for volunteering for these surveillances and looks forward to their reports in July 2024.

LLW Visual Verification – Work Plan Item #2 *(Marilew Bartling, RWAP Manager)*

- **NSSAB – Work Plan Item #2**
 - From a community perspective, the NSSAB will provide recommendations for how the RWAP visual verifications could be enhanced
 - Background: RWAP conducts different types of verifications at generator sites throughout the country. This includes visual verifications which focus on the packaging of waste into the shipping containers to ensure the waste is consistent with the waste profile and does not have any NNSWAC prohibited items.

- Up to two NSSAB members are invited to observe RWAP conducting a visual verification and present their observations to the Full Board during the NSSAB Meeting on July 17, 2024.
- NSSAB recommendation is due in July 2024.
- **NSS Waste Acceptance Program**
 - Wastes eligible for disposal in Nevada must be certified under an approved Waste Certification Program and independently reviewed to confirm compliance with the NNSWAC
 - Three key focuses of the Radioactive Waste Acceptance Program (RWAP)
 - Program Verification
 - Profile Verification
 - **Container Verification**
- **On-Site Visual Verification Defined**
 - What is a visual verification?
 - Usually an in-person observation of the packaging, closure, securement, and labeling of a package to be shipped to the NNS that is scheduled based on the planned date of generation of the waste
 - Occasionally through review of videos/photos of packaging and closure due to hazards (e.g., asbestos, elevated dose)
- **On-Site Visual Verification Purpose**
 - Why does NNS verify containers?
 - Satisfies NDEP-issued permits
 - Provides assurance that generators are implementing written work controls when filling and securing containers
 - Provides a unique opportunity to talk with generators to understand any waste challenges or potential issues prior to shipment
- **On-Site Visual Verification Frequency and Personnel**
 - What is the frequency of verification?
 - Minimum of ten percent (10%) for waste disposed in the Hazardous Waste Permitted cell based on the profile population unless otherwise approved by WARP
 - Who performs visual verifications?
 - RWAP members
 - Trained federal local on-site staff
- **On-Site Visual Verification Documentation**
 - How is a visual verification documented?
 - Standard checklist is completed for all containers verified
 - Relevant evidence is attached to the checklist
 - Documented information
 - General information to ensure traceability to the containers reviewed is captured including site and generator identification; verifier and organization; associated waste profile; container number; container type
 - Specific information regarding the waste is recorded, including regulatory classification (e.g., Low-Level Radioactive Waste, Hazardous waste (radioactive or non-radioactive), security classification; type of waste (e.g., debris, soil, sludge, concrete, or equipment) and confirmation content aligns with waste profile; confirmation container is free from prohibited items (e.g., free liquids, unpunctured aerosol cans, certain batteries, circuit boards)

- Container loading information, such as evidence of a pre-use inspection of the container; estimation of void space; addition of absorbents if required; closure in accordance with manufacturer’s instructions; application of tamper indication devices
- Description of treatment if conducted (e.g., microencapsulation, stabilization with concrete)
- Approval signatures
 - Each visual verification checklist is signed by the verifier with their recommendation for acceptance or rejection
 - RWAP manager or designee conducts final reviews of the checklist and approves
- **Key Messages – Visual Verifications**
 - The execution of visual verifications is a useful tool for assessing a subsample of the waste received at the NNSS and interacting with the generators
 - Allows for the potential to identify issues prior to shipment
 - Completion of visual revocations supports compliance with the NDEP-issued permits
 - Documentation is standardized, comprehensive and traceable to the specific container verified

In response to Board questions, the following clarifications were provided regarding visual verifications:

- In most cases, visual verifications by RWAP include the inspection of the empty container, loading of the waste into the container, and closure of the container. RWAP may not be present when a generator is loading the waste onto the truck. For high visibility shipments, RWAP may conduct a surveillance to specifically observe the loading of the waste container onto the truck and the transport of the waste shipment.
- Aerosol cans are an acceptable waste under the NNSSWAC if punctured and drained.

Member Gary Elgort and Member Kevin Trainor volunteered to observe visual verifications in support of this work plan item. Vice-Chair Hilton will serve as an alternate if either Member Elgort or Member Trainor is not available to attend. The NSSAB Office will support the members with travel arrangements. Chair Graham thanked Members Elgort and Trainor for volunteering for these visual verifications and looks forward to their reports in July 2024.

Real Time Radiography Operations at the Area 5 Radioactive Waste Management Complex (RWMC) – Work Plan Item #4 *(Byron Smith, RWAP Manager)*

- **NSSAB – Work Plan Item #4**
 - From a community perspective, the NSSAB will provide recommendations for how the RWAP real time radiography (RTR) operations could be enhanced
 - Background: RWAP conducts RTR (essentially x-ray technology) on waste containers received by generators across the DOE complex at the Area 5 RWMC. RTR examinations are used to verify that waste matches the profile description, and no indeterminate items are identified prior to disposal at the NNSS.
 - Up to two NSSAB members (due to the size of the facility only one member at a time can observe) are invited to observe RWAP conducting an RTR evaluation and

- present their observations to the Full Board during the NSSAB Meeting on July 17, 2024.
- NSSAB recommendation is due in July 2024.
- **NNSS Waste Acceptance Program**
 - Wastes eligible for disposal in Nevada must be certified under an approved Waste Certification Program and independently reviewed to confirm compliance with the NNSSWAC
 - Three key focuses of the Radioactive Waste Acceptance Program (RWAP)
 - **Program Verification**
 - Profile Verification
 - **Container Verification**
- **RTR Defined**
 - What is RTR?
 - Nondestructive test method where an image is produced electronically rather than on film
 - X-rays penetrate a target area to give a positive image of objects being inspected
- **RTR Purpose**
 - Why does NNSW verify containers?
 - To provide monitoring data for a select number of containers to ensure the packaged waste aligns with the profile
 - To examine containers for the presence of indeterminate items
 - To assess the amount of void space in a container to monitor compliance with NDEP-issued permit requirements
- **RTR Highlights**
 - What is the frequency of verification using RTR?
 - No prescribed frequency requirement
 - Over the past two years, 24 RTR events per year were required to satisfy the Settlement Agreement signed with NDEP resulting from the Y-12 incident
 - An RTR event is defined as a random visual inspection of packaged waste shipped associated with a given generator profile prior to burial in the cell
 - In fiscal year 2023, 47 total containers were subjected to RTR, representing 8 generators and 19 profiles
 - RTR is primarily used to ensure that 10 percent of all waste containers destined for the solid waste cell are verified
- **RTR Personnel**
 - Who verifies RTR?
 - Operator trained for operating the RTR unit
 - Trained independent verifier
 - Note: Some generators have RTR capability and provide videos for review, which is helpful for shielded high dose containers
- **RTR Documentation**
 - How is RTR documented?
 - A Container RTR Verification checklist is completed for each container with a recommendation for further review or disposal
 - A RTR Verification Review is completed by RWAP and the waste generator upon receipt of an indeterminate item(s)
 - Recordings of each RTR event are maintained by MSTS (NNSW Management and Operating contractor)
 - The RWAP manager reviews and approves all RTR forms

- **RTR – Indeterminate Items**
 - What if an item is suspected to be indeterminate?
 - RWAP
 - Contacts the generator
 - Reviews any information provided by the generator
 - Makes a recommendation to the EM Nevada Program whether to dispose or return to the generator
- **RTR Equipment**
 - What equipment is used?
 - Existing equipment
 - Built-in shielded vault with trolley system that views both drums and boxes
 - Planned equipment
 - Drive-through truck portal system that views various sized waste containers
- **Key Messages - RTR**
 - Provides a mechanism for verifying profile compliance for individual containers
 - A highly controlled operation with auditable records produced
 - Used to satisfy NDEP permit requirements
 - Capabilities are to be expanded with the new truck portal system
- **Proposed RWAP Visual Verifications for NSSAB Observations**
 - To foster NSSAB understanding of waste generator missions and the depth of RWAP visual verifications, EM Nevada is offering an opportunity for up to two NSSAB members to observe RWAP conducting a visual verification
 - Two-day surveillances with two auditors plus two days travel for out-of-state generators
 - RWAP receives about two weeks' notice before a generator plans to package waste
- **Proposed RTR Evaluations for NSSAB Observations**
 - To foster NSSAB understanding of waste generator missions and the depth of RWAP RTR evaluations, EM Nevada is offering an opportunity for up to two NSSAB members to observe RWAP conducting an RTR evaluation
 - Location will be at the Area 5 RWMC on the NNSS
 - Scheduled in April – May 2024 to ensure that weather is favorable based on availability of the NSSAB members who observe

In response to Board questions, the following clarifications were provided regarding RTR:

- When RWAP rejects waste due to an indeterminate item, such as an aerosol containing liquid, the generator pays the cost for the return of the waste to the generator's site. The generator is required to develop corrective actions to prevent the incident from recurring. RWAP keeps NDEP apprised of any corrective actions imposed on NNSS generators. The generators are required to share any lessons learned from an incident with other NNSS generators.
- With the new drive-through truck portal system, RWAP will initially undergo a learning curve to understand the system's capabilities while developing processes and procedures. This includes determining the percentages of waste containers to undergo RTR using the new system versus existing equipment. If there is a question regarding an indeterminate item in a particular waste container using the truck portal system, the waste container can also be verified using the existing RTR equipment.

- Under the Resource Conservation and Recovery Act (RCRA), the solid waste permit requires a specific percentage of the waste to be verified.
- The EM Nevada Program received a special appropriation to procure the new drive-through truck portal system that includes funding for startup costs, training, developing procedures, and carryover funds. Ongoing long-term costs with the new system may be minimal due to the qualified and cross-trained staff with RTR expertise already onboard.

Member Gary Elgort and Member Lisa Blandi volunteered to observe RTR operations at the NNSS in support of this work plan item. Vice-Chair Hilton and Chair Graham will serve as alternates if either Member Elgort or Member Blandi is not available to attend. The NSSAB Office will support the members with travel arrangements. Chair Graham thanked Members Elgort and Blandi for volunteering for these RTR operations and looks forward to their reports in July 2024.

Meeting Wrap-Up and Adjournment

Upcoming calendar of events:

- LLW Stakeholders Forum – Nye County Office of Emergency Management, Pahrump, NV from 1-3 p.m. (invite only) – February 7, 2024
- NSSAB Liaison Intergovernmental meeting – Molasky Corporate Center, Las Vegas, NV at 3 p.m. – February 21, 2024
- NSSAB Full Board meeting – Molasky Corporate Center, Las Vegas, NV at 4 p.m. – February 21, 2024

Member Trainor made a motion to adjourn the meeting. The motion was seconded and passed unanimously. The meeting was adjourned at 7:08 p.m.