



Department of Energy
National Nuclear Security Administration
Nevada Site Office
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February 16, 2011

Walt Wegst, Chair
Nevada Site Specific Advisory Board
232 Energy Way
North Las Vegas, NV 89030

**RESPONSE TO THE NEVADA SITE SPECIFIC ADVISORY BOARD (NSSAB)
01-13-11 RECOMMENDATION LETTER REGARDING CORRECTIVE ACTION
UNIT (CAU) 547, MISCELLANEOUS CONTAMINATED WASTE SITES**

The U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office (NNSA/NSO) appreciates the NSSAB's efforts in reviewing the closure options for CAU 547, Miscellaneous Contaminated Waste Sites. Based on the evaluation of the closure options for these sites, discussions with the NSSAB, and discussions with the Nevada Division of Environmental Protection (NDEP), NNSA/NSO is proceeding with a recommendation of Closure in Place with use restrictions, as recommended by the NSSAB. The Federal Facility Agreement and Consent Order process requires a formal recommendation to the NDEP, response to comments, and receipt of formal acceptance of the approach prior to implementation.

The closure recommendation will be finalized and documented in a Streamlined Approach for Environmental Restoration (SAFER) Plan. The SAFER Plan will include specific information on the decision factors used to evaluate the closure options and determine the recommended path forward. As discussed with the NSSAB Industrial Sites sub-committee, these factors include risk to workers and future land use. The SAFER Plan will also include information on the engineering controls (e.g., soil, synthetic cover, and fencing) and administrative controls (e.g., postings and land use restrictions) that will be put in place to control worker exposure and inadvertent intrusion. The current milestone for submittal of the SAFER Plan to NDEP is May 31, 2011.

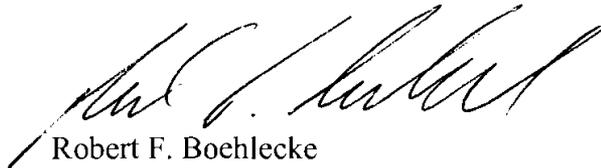
In addition to a closure recommendation the NSSAB provided two specific recommendations regarding actions to be considered as part of the path forward for closure in place. The first recommendation is to have an independent review of the stability of the soil cover design for the pipe on the slope at Corrective Action Site 09-99-06 (Gas Sampling Assembly), the PLAYER site. The NNSA/NSO has considered this recommendation and plans to have an independent review of the closure design for this feature.

The second specific recommendation provided by the NSSAB was to consider immobilizing the plutonium contamination that is in the piping if it could be done safely. The NNSA/NSO evaluated several methods for immobilizing the contamination through the application of fixative

to the interior pipe walls and introducing a material such as wax or grout to fill the void space inside the pipe. The benefits of both options are that contamination would be "fixed" in place providing an additional safety margin when the pipe eventually corrodes or in the event of an inadvertent intrusion. The drawbacks for both methods include the need to penetrate the pipe to install the fixative thereby increasing the potential for worker exposure. Both methods would also likely result in pressure differences inside the pipe which could cause the uncontrolled release of contamination through potential unknown outlets. Additionally, although grout and/or wax fillers would likely still prevent the spread of contamination when the pipe eventually corrodes, the fixatives that were evaluated are estimated to have a working lifetime of up to 50 years. Thus, they would likely not provide additional protection after this time period or would require additional applications. A soil cover over the pipes will provide an effective barrier to prevent migration of contaminants and can be readily repaired if needed. NNSA/NSO believes that the application of a fixative or filler is not warranted given the potential for significant negative consequences (e.g., inadvertent damage to the pipe, release of contaminants to the environment, and worker exposure) while offering limited benefit.

The NNSA/NSO Environmental Restoration Project appreciates the interest of the NSSAB in this activity and the efforts made by the NSSAB to discuss and review the closure options. NNSA/NSO will continue to keep the NSSAB informed on this activity.

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



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