

NSSAB MEETING ATTENDANCE

Full Board Meetings

FY 2011

October 2010 through September 2011

									Maximum
Name	11/10/10	1/12/11	2/16/11	3/16/11	5/11/11	6/8/11	9/14/11		Terms Limit
Kathleen Bienenstein	✓	E	✓	✓	✓	✓	✓		2014
Donna Hruska	✓	✓	✓	✓	✓	✓	✓		2016
Robert Johnson	✓	✓	✓	✓	E	✓	✓		2012
John McGrail	✓	✓	✓	✓	U	✓	✓		2014
Gregory Minden	✓	✓	✓	✓	✓	✓	✓		2016
Michael Moore	✓	E	✓	✓	E	✓	✓		2016
Harry Mortenson	U	U	RS						2016
Hal Sullivan	✓	✓	✓	U	RS				2012
Michael Voegele	✓	✓	✓	✓	✓	E	✓		2016
Jim Weeks	✓	✓	✓	✓	✓	✓	✓		2012
Walt Wegst	✓	✓	✓	✓	✓	✓	✓		2012
Key:									
	✓ = Present								
	E = Excused U = Unexcused								
	RM = Removed RS = Resigned								
	Term Limit								

Bureau of Federal Facilities

Tim Murphy – Bureau Chief

Chris Andres – Supervisor / Environmental Scientist IV

Biology and Natural Resources

“Project Manager” for Nevada Off-Sites, UGTA, Water Pollution Control and Safe Drinking water / Public Water Systems at the NNSS

Greg Raab – Environmental Scientist III

Geology and QA/QC

Environment, Safety & Health Program

Water Pollution Control

Safe Drinking Water

Britt Jacobson – Environmental Scientist III

Groundwater Hydrology & Modeling

UGTA Sub-Project

Nevada Off-Sites

Mark McLane – Environmental Scientist III

Geology

UGTA Sub-Project

Nevada Off-Sites

Bureau of Federal Facilities

Jeff MacDougall – Supervisor / Environmental Scientist IV
Inorganic Chemistry

“Project Manager” for Industrial Sites, Soil Sites and Low Level Waste
Disposal

Ted Zaferatos – Staff Engineer II
Engineering

Industrial Sites, Hazardous Waste

John Wong – Environmental Scientist III
Chemistry

Industrial Sites, Soil Sites and Low Level Waste Disposal

Kevin Campbell – Environmental Scientist III
Chemistry

Industrial Sites, Soil Sites and Low Level Waste Disposal

Scott Page – Environmental Scientist III
Environmental Project Management

Industrial Sites, Soil Sites and Low Level Waste Disposal

Nevada Department of Conservation and Natural Resources

Divisions of: Conservation Districts
Environmental Protection
Forestry
State Lands
State Parks
Water Resources
Natural Heritage Program

Division of Environmental Protection

Bureaus of: Air Pollution Control

Air Quality Planning

Corrective Actions

Federal Facilities

Mining Regulation and Reclamation

Safe Drinking Water

Waste Management

Water Pollution Control

Water Quality Planning

Division of Environmental Protection's Mission

“To preserve and enhance the environment of the state in order to protect public health, sustain healthy ecosystems and contribute to a vibrant economy.”

Bureau of Federal Facilities

The NDEP's Bureau of Federal Facilities provides programmatic and regulatory oversight of the U.S. Department of Energy's (DOE) Environmental Restoration and Waste Management programs at the Nevada National Security Site, Nevada Test and Training Range and Tonopah Test Range, Central Nevada Test Area and Project Shoal Area

The Nevada National Security Site, Tonopah
Test Range, Central Nevada Test Area and
Project Shoal Area

ARE

Nuclear Weapons Testing Sites

Yucca Mountain

=

The proposed deep geological repository
storage facility for spent nuclear reactor
fuel

Bureau of Federal Facilities'

Applicable Agreements, Laws and Regulations

- The Federal Facility Agreement and Consent Order (FFACO) – 1996
- Resource Conservation and Recovery Act
- Federal Facility Compliance Act of 1992
- Agreement in Principle
- Nevada Administrative Code, Chapter 445A
– Water Controls

The FFACO

- A three-party compliance agreement for U.S. DOE and U.S. Department of Defense sites within Nevada – 24 months of negotiations – effective May 1996
- The NDEP has regulatory oversight of cleanup operations at federal facilities in Nevada
- Specifically covers the following sites:
 - The Nevada National Security Site
 - The Tonopah Test Range
 - The Nevada Test & Training Range
 - The Central Nevada Test Area
 - The Project Shoal Area

- Ensures the government entities work together in a cost-effective manner
- The DOE Offices of Environmental Management and Legacy Management are responsible for remediating the sites and maintaining the sites
- FFACO establishes a framework for identifying, prioritizing, investigating, remediating, and monitoring historically contaminated sites
- Defines the regulations the State of Nevada will use to direct and enforce corrective action activities

- Provides public involvement opportunities
- Establishes a corrective action strategy for cleanup activities
- Has six appendices:
 - I. Facility descriptions
 - II. Corrective Action Sites / Units
 - III. Corrective Action Investigations
 - IV. Closed Corrective Action Units
 - V. Public Involvement Plan
 - VI. Corrective Action Strategy

Corrective Action Strategy

- Corrective action ranges from no action to clean closure
- Corrective action sites grouped into units having common contaminants, geology, location or other factors
- These groups, called Corrective Action Units (CAUs), are prioritized based on:
 - Potential risk to workers and public
 - Available technology
 - Future land use
 - Agency and stakeholder concerns
 - Other criteria

- Under the FFACO, NNSA/NSO and DOD propose and discuss priorities with the State
- State makes recommendations
- Recommendations presented for review by the public and NSSAB for NNS programs
- Following public's input, the State, NNSA/NSO and DOD develop a final prioritization of units for investigation and corrective action

Three types of activities under DOE's Environmental Restoration Project that their Environmental Management Program handles and NDEP oversees and regulates:

- Industrial Sites
- Soils Sites
- Underground Test Area Sites

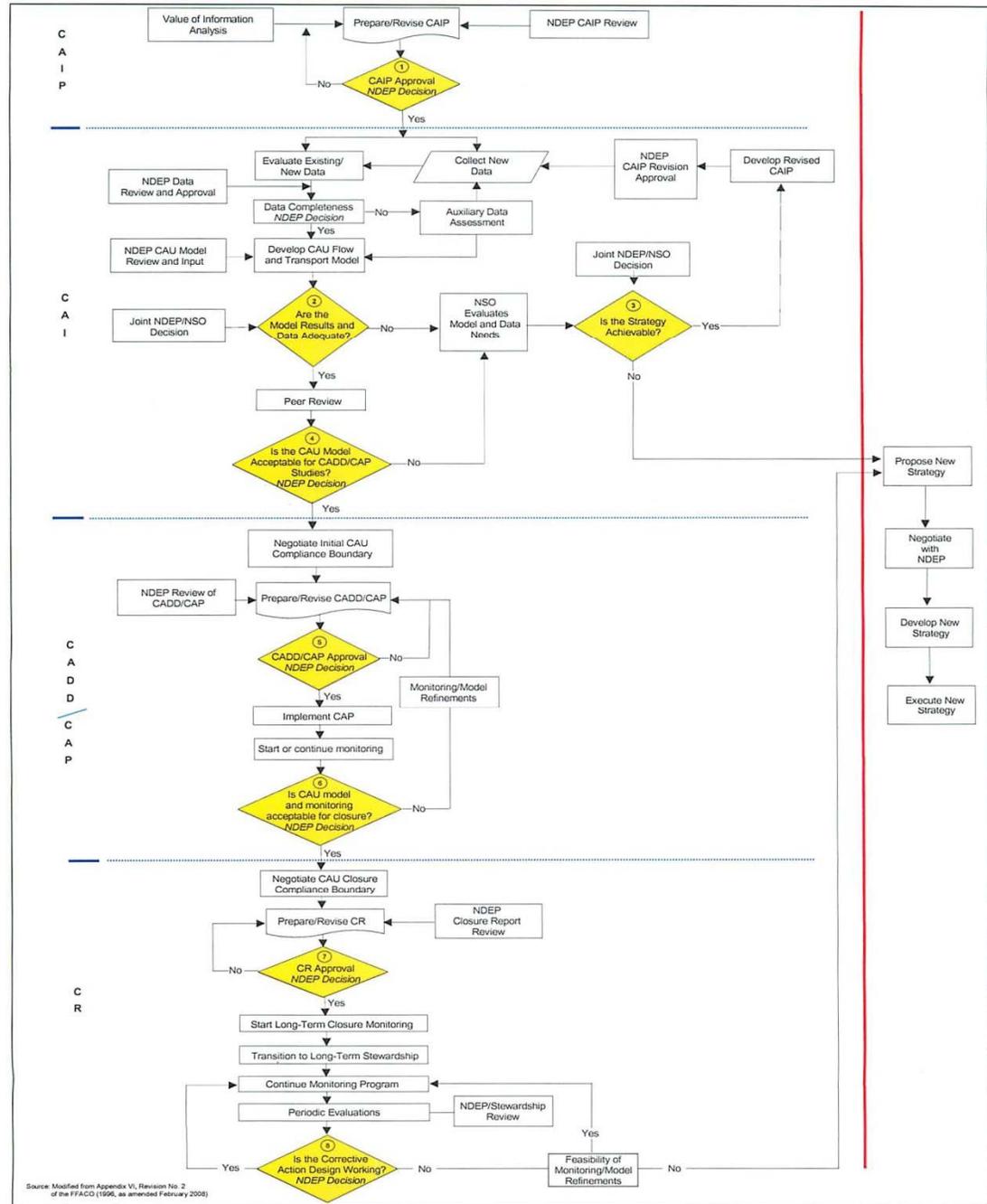
- To ensure compliance with the FFACO, a specific closure approach is chosen to investigate and remediate an Industrial, Soils or UGTA Site

- The three methods for achieving closure are:
 1. Housekeeping

 2. Complex Closure
 - Corrective Action Investigation Plan (CAIP)
 - Corrective Action Decision Document (CADD)
 - Corrective Action Plan (CAP)
 - Closure Report (CR)
 - Notice of Completion

 3. SAFER Plan - Streamlined Approach for Environmental Restoration (SAFER) process

Section 3,
 Appendix VI
 of the
*Federal Facility
 Agreement and
 Consent Order*
 Process Flow
 Diagram
 for UGTA
 CAUs



UGTA Interim Documents

- Hydrostratigraphic Model (Geology)
- Source Term
- Hydrologic Data Documentation Package
- Transport Data Documentation Package
- Modeling Approach Strategy
- Groundwater Model
- Transport Model
 - NDEP's oversight & input at every step along the way
 - Iterative process

Nevada Off-Sites

- Underground nuclear testing activities conducted in 5 states for various purposes
- DOE Office of Legacy Management assumed responsibility for all activities associated with subsurface completion and long-term surveillance and maintenance at the Offsites on 10/1/06
- The two Nevada Offsites are under the regulatory authority of the Federal Facility Agreement and Consent Order administered by the NDEP

Agreement in Principle - 1999

- Parties to the Agreement:
 - Office of the Governor – Agency Integrator
 - DCNR through NDEP, BFF
 - Dept. of Motor Vehicles and Public Safety through Division of Emergency Management
 - NNSA/NSO

Regulatory Considerations

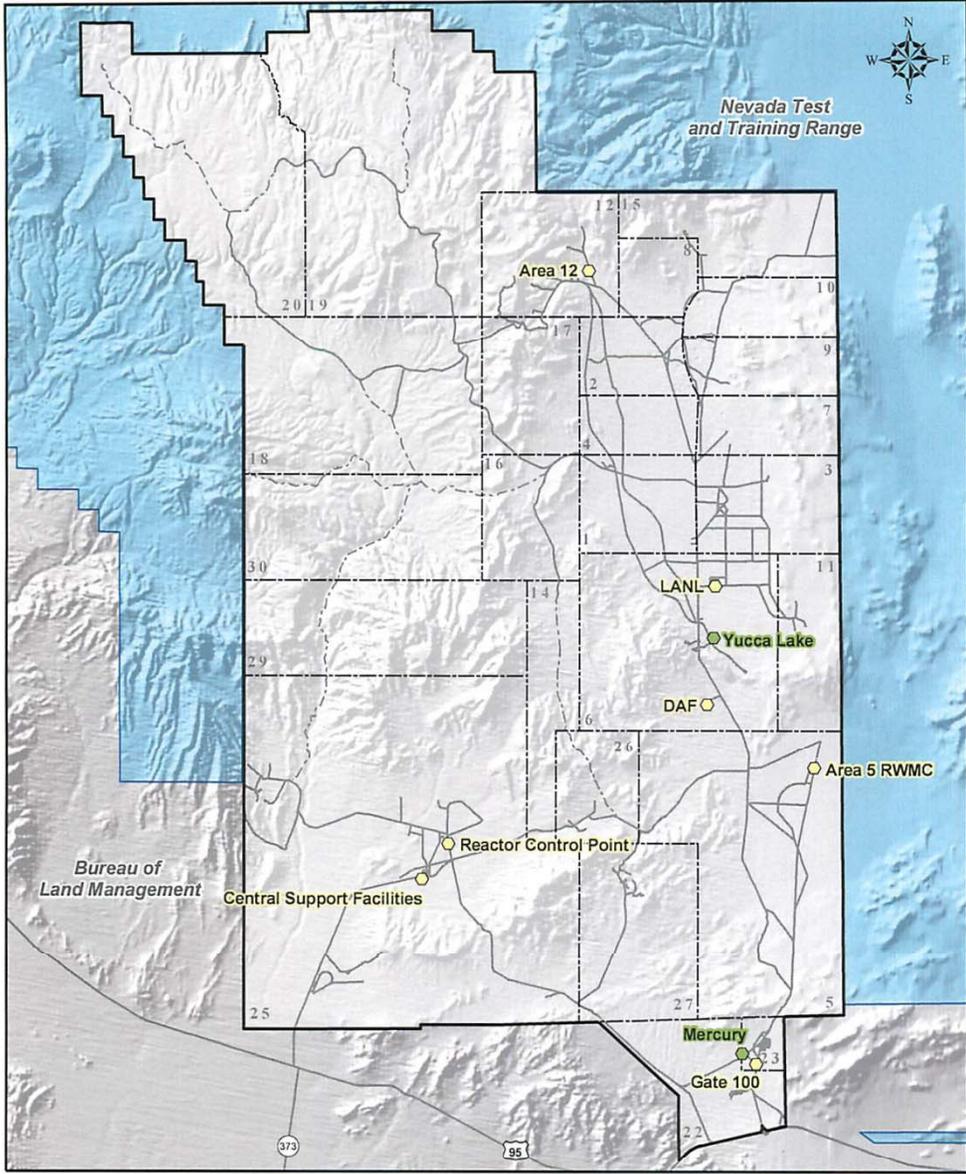
- At DOE facilities, the BFF implements existing State regulations for:
 - Water pollution control
 - Safe Drinking Water
 - Storage, treatment and disposal of waste
 - Underground storage tanks
 - Corrective actions
- BFF implements authorities of other bureaus in NDEP. Consistency of regulatory decisions is critical to maintain credibility.

- The original intent was to support “non-regulatory” oversight and environmental monitoring. DOE’s intent was to gain public confidence through enhanced State oversight.
- Intent is to work cooperatively to assure citizens of NV that the public’s health and safety, as well as the environment, are protected
- Nevada’s oversight will encompass only environmental cleanup activities that fall outside those encompassed by the scope of the FFACO
- Five Attachments describe, in part, each of NV’s Agencies’ commitments and activities in carrying out the AIP

Water Pollution Control

NEVADA ADMINISTRATIVE CODE CHAPTER 445A - WATER CONTROLS

- General Provisions 445A.070 - 445A.117
- Action Levels for Contaminated Sites 445A.226 - 445A.22755
- Discharge Permits 445A.228 - 445A.263
- General Permits 445A.266 - 445A.272
- Corrective Action 445A.273 - 445A.2739
- Use of Treated Effluent 445A.274 - 445A.280
- Treatment Works 445A.283 - 445A.292
- Notification of Release of Hazardous Substance 445A.345 - 445A.348
- Permits for Facilities 445A.390 - 445A.420
- Operation and Design of Facilities 445A.424 - 445A.447



- Commercial Septic System
- Sewage Lagoon
- Primary Road
- - - Secondary Road
- - - NTS Operational Areas
- NTS Boundary



Safe Drinking Water Public Water Systems

NAC 445A - WATER CONTROLS

- Water Quality 445A.450 - 445A.492
- Treatment of Water: Generally 445A.495 - 445A.540
- Treatment of Water: Groundwater 445A.54022 - 445A.5405
- Certification of Laboratories to Analyze Drinking Water 445A.542 - 445A.54296
- Operation of Community Water System or Non-transient Water System 445A.591 - 445A.5926
- Permits to Operate Privately Owned Systems 445A.595 - 445A.614
- Certification of Operators 445A.617 - 445A.652
- Design, Construction, Operation and Maintenance 445A.65505 - 445A.6731
- Environmental Review of Proposed Water Projects 445A.6758 - 445A.67611
- Requirements for Water Projects 445A.67624 - 445A.67644

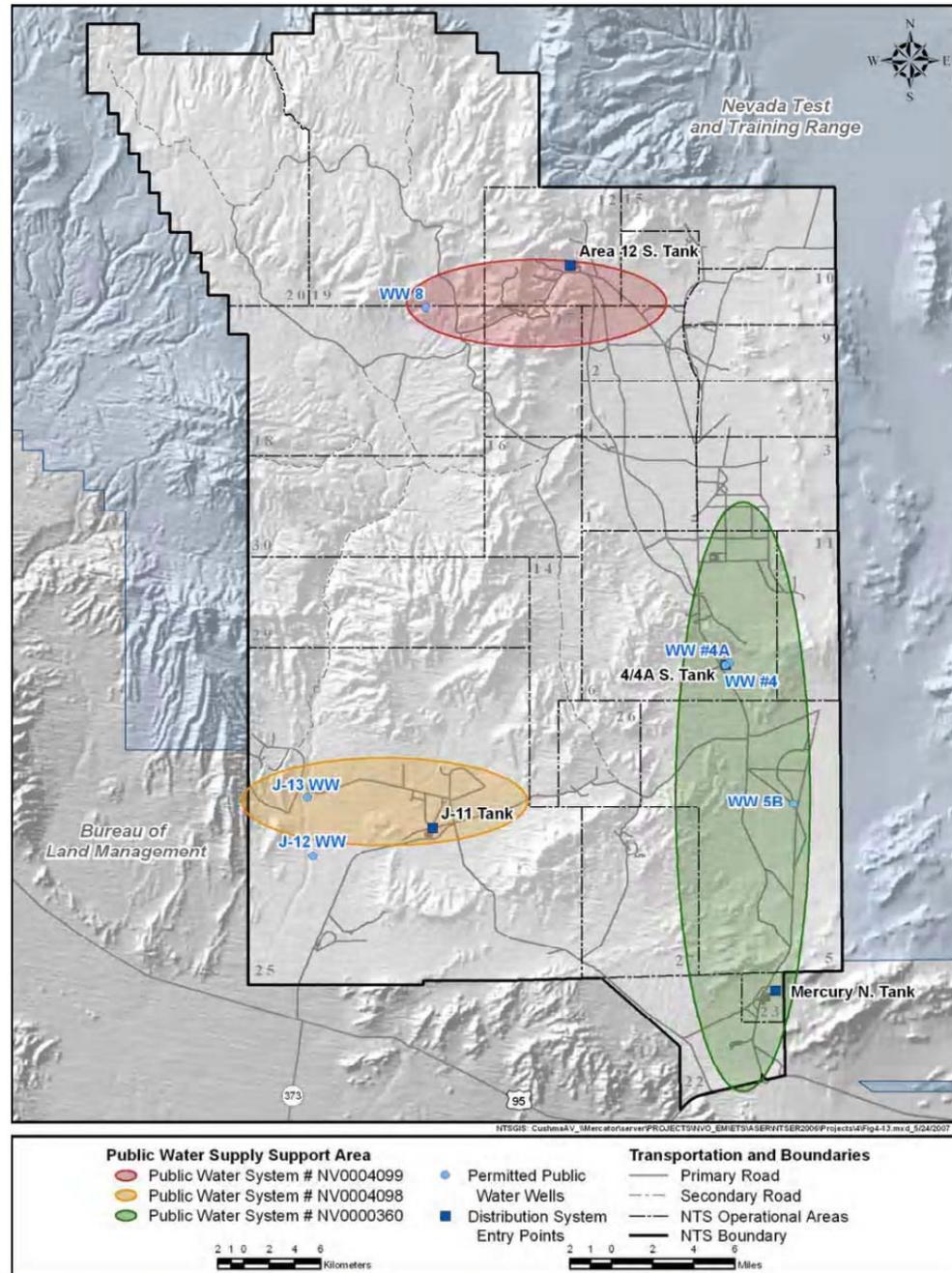


Figure 4-19. Water supply wells and drinking water systems on the NTS

Solid Waste Disposal / Resource Conservation and Recovery and Major Amendments

- The Solid Waste Disposal Act – passed in 1965 as Title II of the Clean Air Act of 1965
- The Resource Recovery Act of 1970
- Resource Conservation and Recovery Act (RCRA) – 1976
 - Subtitle C
 - Hazardous and Solid Waste Amendments of 1984
 - Federal Facility Compliance Act of 1992

Mixed Low-Level Waste Disposal

- Supports DOE Complex-wide cleanup
- LLRW and hazardous waste
- Managed separately from LLRW
- Governed by RCRA, which NV authorized to regulate
- Disposal Facility
 - “Old” mixed waste disposal cell (Cell 3)
 - Permitted by NDEP
 - Closed December 2010
 - New cell
 - Fully RCRA compliant
 - Opened Cell 18 January 2011

Low-Level Radioactive Waste Disposal

- Supports DOE Complex-wide cleanup
- Compliance with Orders and Directives
 - DOE 435.1
 - AIP
 - Stakeholder commitments (NSSAB requests)
- Disposal in several cells in Area 5

Mixed Low-Level and Low-Level Radioactive Waste Acceptance Program

- Radioactive Waste Acceptance Program & Approval Process by the WARP
 - Reviews generator programs and procedures
 - Reviews all specific waste stream profiles
 - Conducts site audits/waste generator evaluations
 - Waste verification
- At NNSS
 - Waste Acceptance Criteria
 - Inspections
 - Paperwork verification
 - Monitoring
- NDEP “cradle-to-grave” oversight of evaluation & auditing & active participation & involvement (review & approval) in ALL program aspects and the process

Low-Level and Mixed Low-Level Radioactive Waste

- Performance Assessment on Area 5
 - Extensive complex modeling
 - Gauges potential risks
 - Conservative
 - Short- and long-term
- Environmental Monitoring
 - Air, groundwater and soil
 - Long term groundwater monitoring (UGTA)
 - No indication of any offsite migration
- Closure Program
 - Earthen ET cap research and development
 - Focus on erosion control

RCRA Part B Permits for Four Units at the NNSS

- A Hazardous Waste Storage Unit
- An Explosive Ordnance Disposal Unit
- A Mixed Low-Level Waste Cell
- A Mixed Low-Level Storage Facility

RCRA Part D Permits for Solid Waste at the NNSS:

- One near Mercury
- One near CP Basin
- One at the Area 3 Craters
 - These 3 are permitted for waste generated on-site only
- One Asbestos in Area 5
 - This one is permitted for waste generated on-site and LLW from off-site

Transportation

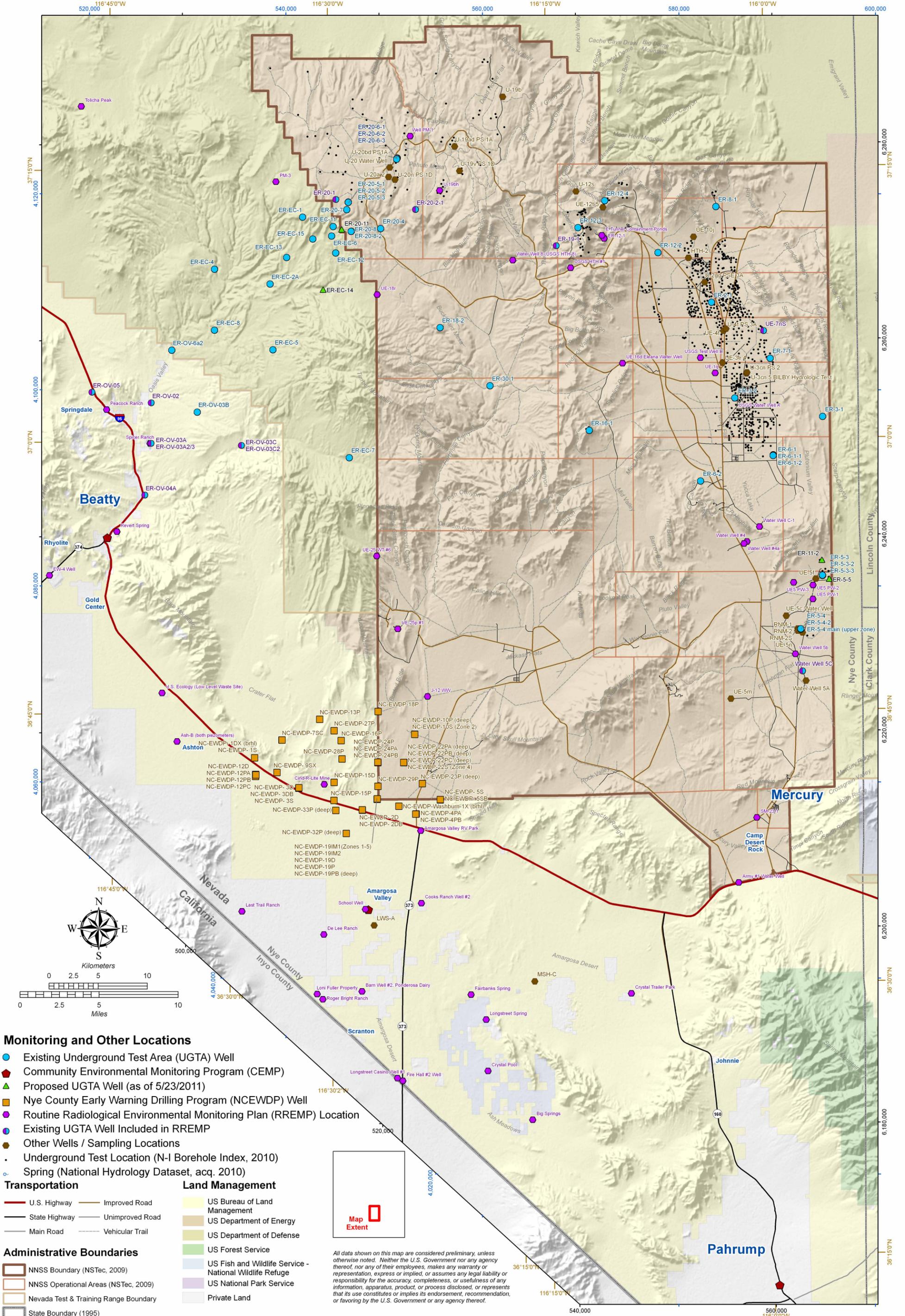
The NDEP does not regulate transportation to and from the NNSS.



The Nevada Department of Transportation Statutes and Regulations would apply.



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



Monitoring and Other Locations

- Existing Underground Test Area (UGTA) Well
- ◆ Community Environmental Monitoring Program (CEMP)
- ▲ Proposed UGTA Well (as of 5/23/2011)
- Nye County Early Warning Drilling Program (NCEWDP) Well
- Routine Radiological Environmental Monitoring Plan (RREMP) Location
- Existing UGTA Well Included in RREMP
- Other Wells / Sampling Locations
- Underground Test Location (N-I Borehole Index, 2010)
- Spring (National Hydrology Dataset, acq. 2010)

Transportation

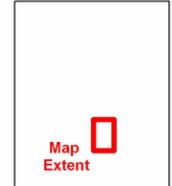
- U.S. Highway
- State Highway
- Main Road
- Improved Road
- Unimproved Road
- Vehicular Trail

Land Management

- US Bureau of Land Management
- US Department of Energy
- US Department of Defense
- US Forest Service
- US Fish and Wildlife Service - National Wildlife Refuge
- US National Park Service
- Private Land

Administrative Boundaries

- NNSS Boundary (NSTec, 2009)
- NNSS Operational Areas (NSTec, 2009)
- Nevada Test & Training Range Boundary
- State Boundary (1995)
- County Boundary (ESRI, 2009)



All data shown on this map are considered preliminary, unless otherwise noted. Neither the U.S. Government nor any agency thereof, nor any of their employees, makes any warranty or representation, express or implied, or assumes any legal liability or responsibility for the accuracy, completeness, or usefulness of any information, apparatus, product, or process disclosed, or represents that its use constitutes or implies its endorsement, recommendation, or favoring by the U.S. Government or any agency thereof.

Particle tracking studies were conducted for the Pahute Mesa groundwater flow model (Stoller Navarro 2006) both as part of flow calibration and for sensitivity and uncertainty analysis. Particles were released from wells used in the model calibrations and tracked through the model domain. A wide range of particle tracking studies were conducted for alternative models of the hydrostratigraphic framework, recharge and different assumptions for depth decay and anisotropy. Only a small number of tests were conducted west of the Purse fault, an important hydrologic barrier in western Pahute Mesa, and PM-3 is the only well down gradient of these tests. There is limited hydrologic and geologic data to constraint the particle track responses for underground tests located west of the Purse fault. Flow from the Handley test under a wide range of alternative model configurations and assumptions is almost always south to southwest toward PM-3 parallel to but not crossing the Purse fault.

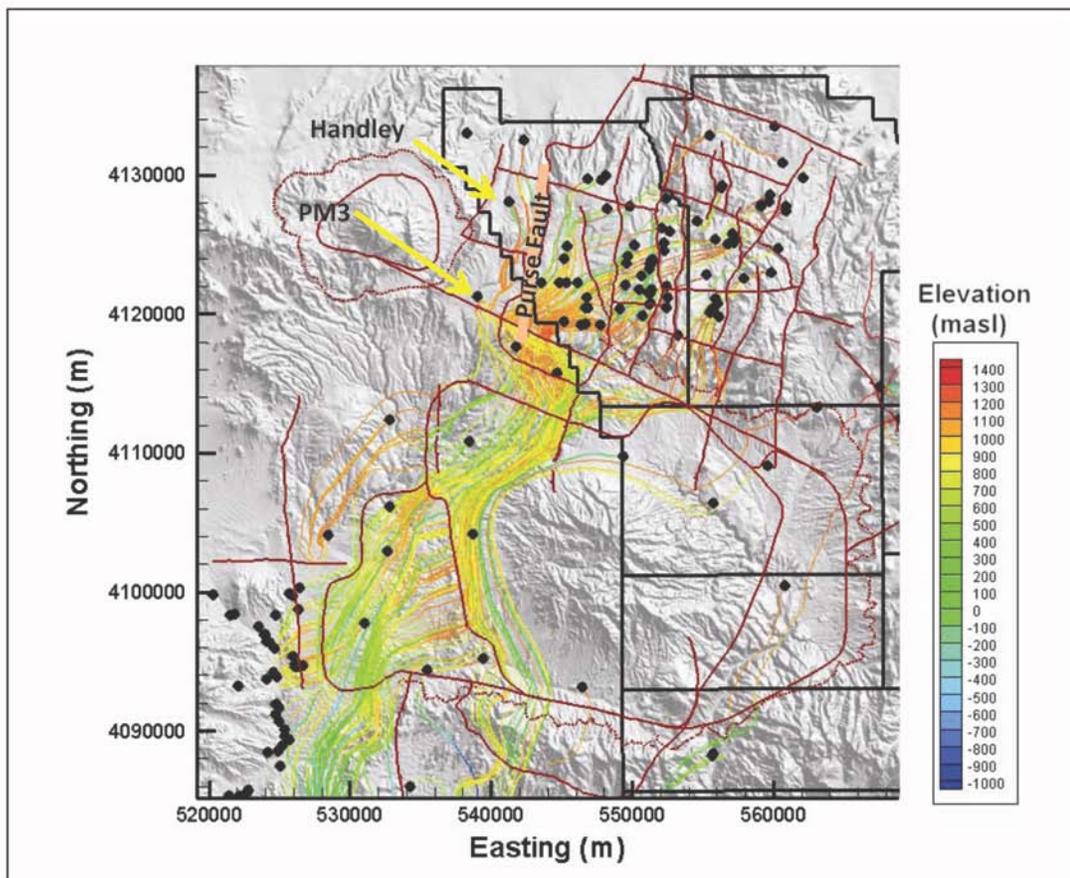


Figure 5-26
Particle Tracks for BN-MME-SDA

Base Hydrostratigraphic Framework Model with the Modified Maxey Egan recharge model and boundary flows

Draft letter to DOE/NV EM the Draft Site Wide Nevada National Security Site Environmental Impact Statement

TO: Scott Wade, Assistant Manager for Environmental Management
CC: Linda Cohn, SWEIS Document Manager

October 12, 2011

Dear Mr. Wade,

The Nevada Site Specific Advisory Board formed a subcommittee to review the Nevada National Security Site (NNSS) Draft Site Wide Environmental Impact Statement (SWEIS). The subcommittee developed a number of comments on the Draft SWEIS and, those transmitted with this letter were adopted by the Full Board. The Nevada Site Specific Advisory Board offers the following recommendations and comments for consideration by the Department of Energy (DOE).

1. The NNSS Draft SWEIS describes approximately forty Mission Based Program Activities for the three alternatives (No Action, Expanded Action, and Reduced Operations). For roughly half of these forty Mission Based Program Activities, there is either no difference or no significant difference between the three alternatives, or, no difference between the No Action and Reduced Operations alternatives. Differences between the alternatives exist and are evaluated for the numbers of specific types of tests for each alternative, additions of new facilities to support new missions, and the types and amounts of waste and facilities needed. While these activities have impacts, they are not, with the possible exception of the significant increase in Low Level Waste (LLW) volumes, of such major impact that they could not have been handled in a supplement to the Environmental Impact Statement.

What is more significant, however, is the fact that there are numerous new activities, likely with potentially meaningful environmental impacts, considered in all three alternatives, for which impacts are not assessed. These new missions, which have the potential to be major federal actions, include renewable energy projects, a commercial-scale solar power generation facility, new and expanded training facilities, new nonproliferation and counterterrorism facilities, a high-speed road, a short section of full-scale railroad line, a simulated seaport facility, and a mock urban area, nuclear rocket motor development, including sequestering radionuclides released as part of emissions from tests, test beds to support research and development for sensors, high-power microwaves, and high-power lasers, a geothermal demonstration project, a geothermal research center, and the reconfiguration of Mercury.

For each of these activities, the NNSS Draft SWEIS states that additional National Environmental Policy Act (NEPA) analysis would be required before the work could be conducted. It is difficult to understand how the Draft SWEIS meets the requirements of the NEPA when so many new Mission Based Program Activities that have the

characteristics of major federal actions can be included as future activities for the NNSS and not be fully evaluated, at least at a programmatic level in the Draft SWEIS.

2. The air space above Area 25 is restricted. This is an impediment to developing commercial solar facilities. That and the current U.S. Air Force use restrictions on adjacent land seem to preclude development of a tower facility, which is the most meaningful type of facility in an area where private water supplies are oversubscribed, and the NNSS water permits are restricted to weapons related activities.
3. The NNSS Draft SWEIS does not recognize that certain elements of the Reduced Operations Alternative would have an impact on Environmental Management activities. For example, under the Reduced Operations Alternative, road maintenance on Pahute Mesa would be curtailed, effectively limiting access to the Underground Test Area monitoring wells.
4. The NNSS Draft SWEIS does not provide sufficient detail to allow meaningful evaluation of transportation shipping routes, such as the source of and the number of shipments proposed for each alternative transportation route under the constrained and unconstrained options, for each of the three alternative scenarios.

The unconstrained case is not evaluated in sufficient detail to allow independent evaluation of the associated impacts. The NNSS Waste Acceptance Criteria prohibit transportation through Las Vegas, over Hoover Dam, or over the O'Callahan-Tillman Bridge. If those criteria are meaningful requirements, they should not be changed unilaterally. Further, ongoing construction defeats any advantage that could be gained by routing wastes through the Las Vegas valley. Examples include: future modification of the I-15 / U.S. 95 interchange; continuing construction of overpasses; poorly designed interchanges at the I-215 bypasses; and a new bridge planned for the Charleston underpass. Public reaction to shipping wastes to the NNSS via the I-15 / U.S. 95 interchange, essentially through downtown Las Vegas is likely to be very negative.

The Draft SWEIS includes an analysis of LLW/Mixed Low-Level Waste (MLLW) shipping routes, but notes that decisions on routing would not be made as part of this NEPA process (see comment 1). This analysis apparently was undertaken to develop a greater understanding of the potential environmental consequences of shipping such waste through and around metropolitan Las Vegas and to inform any highway routing revisions to NNSA's waste acceptance criteria.

Because the NNSS Draft SWEIS is not forthcoming about whether or not this route is seriously under consideration, meaningful comments that allow a complete assessment of impacts are not likely to be generated.

5. The current Administration's position, which is reflected in the NNSS Draft SWEIS, is that the Yucca Mountain project has been canceled. If the Yucca Mountain program has been canceled, the existing Memorandum of Understanding between the Nevada Site

Office and the Office of Civilian Radioactive Waste Management, which states that the Environmental Management Program is responsible for the necessary remediation activities, must be considered. NNSS Draft SWEIS does not evaluate the impacts of remediating the Yucca Mountain site. While the document notes that “Until DOE receives appropriations for remediation of the infrastructure and buildings of the former Yucca Mountain Project, NNSA will maintain the infrastructure and buildings and provide security and support to DOE to remain compliant with Federal and state regulations pursuant to existing site permits. Upon receipt of appropriations, DOE will remediate and close the infrastructure and buildings as required by law, regulations, and applicable agreements. At the completion of site closure, DOE will initiate a long-term surveillance program;” this is more than a funding issue.

Remediation of the Yucca Mountain site will be a major federal action. It is appropriate to evaluate the impacts of this action in this SWEIS so that not only can the true costs of closing the Yucca Mountain project be understood by decision makers, but that reviewers of this SWEIS can evaluate the impacts of remediating the site.

6. We understand DOE is considering the use of the NNSS for disposal of Greater than Class C waste (in fact, NNSS is a leading candidate for this disposal) and the treatment of MLLW. The impacts off these Mission Based Program Activities are not addressed in the SWEIS.
7. Our understanding of the current NNSS land withdrawal restrictions for the NNSS suggests they are not consistent with some land uses envisioned for several potential actions described in the SWEIS, e.g. commercial solar power generation. We request DOE explain how they intend to modify the land use restrictions that need to be changed for every expanded use, and the process for making needed changes to the NNSS land withdrawal.
8. There are a number of miscellaneous comments identifying inaccuracies and needed clarifications provided in the attached notes.

The Nevada Site Specific Advisory Board thanks you for the opportunity to comment on the Nevada National Security Site Draft Site Wide Environmental Impact Statement. We hope that these comments will be beneficial as DOE moves forward in planning for the future of the Nevada National Security Site. A representative of the Nevada Site Specific Advisory Board is available to discuss any of these issues with DOE staff, if you so desire.

Sincerely,

Kathleen Bienenstein
Chair

SWEIS Committee Comments

Number	Page	Section	Comment
1. Purpose / No Preferred Alternative			
1-1	1-3	1.2	My biggest issue is that there does not seem to be any significant purpose and need for this EIS other than statement on page 1-3 as follows: "The purpose and need for agency action is to support NNSA's core missions established by Congress and the President." There should be a major federal action proposed that requires this EIS to support a "decision" but there does not appear to be any true decision to be made. So to justify the need for this EIS a "Goldilocks" question has been fabricated. Is the use of the Site too much (we should reduce activities); too little (we should increase activities); or is it "just right" (we should continue existing activities). If there are true alternatives to reduce or increase activities, then specific activities to be reduced or increased should be named. Since the most significant federal action regarding nuclear weapons testing since the Manhattan Project, was to cease nuclear testing in 1992; and that major federal action did not require an EIS, why should relatively minor questions regarding "should on-going activities at the NNSS be somewhat more or less" require an EIS? This document appears to be nothing but a baseline statement of the known conditions and programs at the various on and off site locations that is being prepared to satisfy political reasons, not to support an actual decision.
1-2	1-12 and 13	1.4	Since no preferred alternative is chosen in this document, it makes it a little hard to comment on the overall SWEIS. Since NNSA can choose to implement any alternative, that leaves the EIS very "open-ended".
1-3	1-12	1.4 (paragraph 7)	That information must include an assessment of impacts
1-4	3-78	3.6	And this precludes reviewers from commenting intelligently on the proposed missions
2. If Preferred Alternative, additional comment period needed			
2-1	1-21	Table 1-2, Alternatives, 2nd comment	Difficult to comment intelligently when there is no basis for weighting concern about alternative. Yes, it is legal, but what is the literal intent of allowing it? Will DOE allow comments on the FSWEIS before the ROD is issued?
3. Solar and Geothermal			
3-1	1-1 and 1-3	1.1	None of the land withdrawal actions or the Administrative Orders or Public laws allows for the Nevada National Security Site to be used for commercial activities such as electrical power generation

SWEIS Committee Comments

Number	Page	Section	Comment
3-2	1-3 and 1-4	1.2	NNSS was not established to serve as a waste disposal site for off-site generated defense wastes, or commercial generation of electrical power. See p1-20 for land withdrawal scoping comments. 1996 EIS comments: concurrence to use the NNSS for any other activity outside of research, development, and testing of nuclear weapons was never formally considered, as required by law. <i>Nevada officials do not concur that DOE has the authority under the existing withdrawal, nor has completed the required analysis under NEPA, to support a major waste disposal program at NTS.</i> Department of Energy/EIS-0200-F PEIS WM should have taken care of the disposal part of this Executive Orders 13212 and 13514, and the 2005 EnPAct only direct conservation, do not change NNSS mission. So, there is no justification for commercial use of NNSS for electricity generation, but power generation for use on NNSS is probably justified.
3-3	1-4	1.3	No justification for commercial use of NNSS for electricity generation, but power generation for use on NNSS is probably justified
3-4	1-27	Table 1-2, Renewable Energy, last comment response	There are two issues here. One is commercial power production masquerading as demonstration of the viability of cutting-edge technologies. The other is preparing an Environmental Impact Statement for future missions of the Nevada National Security Site and not adequately addressing impacts. It is not possible to comment on the SWEIS when assessing the impacts of the missions that lead to impacts are postponed
3-5	3-40 and 3-41	3.2.3.2	Not consistent with Nevada National Security Site land withdrawals. There is no Section 3.1.4.2. How then can you include a new transmission line without assessing the impacts of developing it. It took years to get the new existing line in.
3-6	3-77	3.5.4	It is unclear if this section is intended to address the same issue as 3.2.3.2., specifically the proposed solar project. If so, the SWEIS seems inconsistent in its discussion of this issue. I do agree that the issue should be addressed as stated in 3.2.3.2, i.e., a separate more detailed analysis.
3-7	4-3	4.1.1.1 (4th paragraph on page)	Without such a PEIS, how can commercial solar be included in this SWEIS – that is assuming that somehow the Land Withdrawals can legally be amended
3-8	4-7 and 4-9	4.1.1.3 (1-8 paragraphs)	Not clear that commercial development got solar or geothermal for that matter should be legally any different from the public access and mining restrictions
3-9	4-12	4.1.1.5 (3rd paragraph)	The airspace is restricted – how then can the Department of Energy allow commercial use
3-10	4-56	4.1.5.2.6	I think there should have been cross references between this section and 3.2.3.2

SWEIS Committee Comments

Number	Page	Section	Comment
3-11	D-63	D.2.2.1	Mention is made that the construction emissions for the proposed power generation facility were scaled based on generating capacity from the Amargosa Farm Road Energy Project. However, the numbers for these emissions from the various proposed NNSS solar facilities are not shown in this entire discussion about emissions under the Expanded Operations Alternative.
3-12	D-68	D.2.2.2.1	Similarly to above comment, the emissions from construction of the proposed solar power generation facility under the Reduced Operations Alternative do not appear to be listed anywhere.
4. Reduced Operations			
4-1	3-24, 3-49, A-49, and A-52	3.1.2.2, Table 3.3, A.3, and A.3.2	No Action Alternative – UGTA paragraph states that up to 50 new groundwater characterization and monitoring wells would be developed over the next 10 years. Paragraph A.3.2, pg. A-52, states that EM activities under the Reduced Operations Alternative would be the same as under the No Action Alternative. Table 3-3, on page 3-49, reiterates that under the Reduced Operations Alternative the Environmental Management Program would be the same as under the No Action Alternative. However, in ¶ A.3, pg. A-49 the statement is made that under the Reduced Operations Alternative maintenance of roads on Pahute Mesa, Stockade Wash, and Buckboard Mesa would be terminated. These two statements re continuing UGTA activities vs termination of maintenance on the roads necessary to get to the current and new well sites appear to be incompatible.
4-2	8-6	8.1.3.1.2	Hard to believe that a significant reduction in mission would not adversely impact EM mission. If all else at site is reduced, overhead cost to EM will sky rocket and ability to accomplish mission may be in jeopardy.
5. Transportation			
5-1	1-12	1.4 (paragraphs 5 and 6)	“informing any highway routing revisions” without analyzing the potential impacts seems inconsistent with NEPA requirements
5-2	1-12 and 1-13	1.4	Why will no decision be made as to recommended transportation routes for waste shipped to the NNSS?
5-3	1-23	Table 1-2, Waste Disposal, 2nd comment	Non-responsive. The purpose of this Environmental Impact Statement ought to be to understand the impacts based on known history of shipments

SWEIS Committee Comments

Number	Page	Section	Comment
5-4	3-38	3.2.2.1	The statement about rail-to-truck transloading facilities seems to assume that commercial vendors would establish such a facility if the 'Expanded Action' alternative is chosen. Do the various analyses of increased transportation requirements, discussed later in the EIS, include the increased truck traffic if such a facility is not established?
5-5	3-51	Table 3-3	The transportation fatalities don't seem to scale with the increase in the number of shipments
5-6	4-25 and 4-26	4.1.3.2.1 (2nd sentence)	This is incorrect. Also, the following Map shows 160 as the most commonly used truck route
5-7	4-32 and 5-67	Tables 4-11 and 5-19	7.7 miles east of 372 with 8,900 cars passing, is roughly 3 miles from the point that is 0.6 miles east of the Clark – Nye county line with 1,600 cars passing. It is inconceivable that 8,900 – 1,600 = 7,300 cars find something to do in this relatively uninhabited region of the County
5-8	A-41	A.2.2.1	Table A-6. The Expanded Operations Alternative calls for an additional waste generation of 11,000,000 cubic feet of waste from TTR. This waste would come from cleanup of sites Clean Slates 1, 2, & 3, Project 57 and Small Boy. How will this waste be transported to the NNSS for disposal at Area 5 (or 3)? This information is not readily apparent in the EIS.
6. Yucca Mountain			
6-1	2-13	2.5.2 (3rd paragraph)	Inconsistent action. If the site project is closed, then Department of Energy must remediate the site. There are in excess of 600,000 yd ³ of excavated rock in piles that need to be reclaimed, in addition to roads and pads. The impacts of these activities can be assessed regardless of whether or not the DOE has funds appropriated for it. Also, the operation of the Yucca Mountain project as a part of the Nevada National Security Site mission was raised in scoping as an ongoing program. The Department of Energy dropping it allowed no opportunity for the public to comment on the impacts of remediation of the disturbed land, let alone the issue of no location to dispose of wastes.
6-2	4-9	4.1.1.3 (Yucca Mountain paragraph)	Then the Department of Energy is responsible for returning the land to original conditions - this is a condition of existing MOUs and the impacts ought to be included in the SWEIS
6-3	6-32	6.3.3 (1st paragraph)	Development of the Yucca Mountain Project Gateway Area assumed and Yucca Mountain is assumed to be canceled
7. Inaccuracies and Clarifications			
7-1	viii	Table of Contents	Chapter 3 pages 3-1 to 3-10 are omitted from TOC

SWEIS Committee Comments

Number	Page	Section	Comment
7-2	1-3	sidebar	The last paragraph of the sidebar text box about American Indian prospective, should be the first paragraph, and would probably be better if it was a separate sidebar. As I read this sidebar it was not until I got to the last paragraph that I actually understood that I was reading text prepared by others and not a government position.
7-3	1-6	1.3.2	There should be some mention of the possibility of siting a GTCC disposal facility at the NNSS. This subject is discussed further in the SWEIS, but an initial reference should be made here.
7-4	1-17 and 1-23	1.5 and Table 1-2, Waste Disposal, 1st comment	Then why doesn't the SWEIS fully consider the impacts of disposal of Greater Than Class C wastes? It is not identified as a future mission of the Nevada National Security Site. NNSS is, however, a leading candidate for the disposal site in the GTCC EIS
7-5	1-22	Table 1-2, Nye County Impacts	Am not able to figure out if this is addressed
7-6	1-23	Table 1-2, Waste Disposal, Final comment	This is Greater than Class C and should be treated explicitly
7-7	1-28	Table 1-2, Potential Impacts, 1st comment	Disagree. It is not possible to comment on the SWEIS when assessing the impacts of the missions that lead to impacts are postponed Preparing an Environmental Impact Statement for future missions of the Nevada National Security Site and not adequately addressing impacts does not result in an acceptable SWEIS
7-8	2-1	2.0 and Table 1-1	return to nuclear testing - Table 1-1 shows this is not analyzed in the SWEIS
7-9	2-14	Chapter 2, 2.5.3, bullet 2	This bullet implies that BEEF was planned and analyzed in 1996 SWEIS and then constructed. Actually BEEF went on line in 1994, and as such is not a change since 1996. Furthermore, for all of these bullets of "changes since 1996 EIS" I recommend that the date of first operation be added.
7-10	3-20 and 4-153	3.1.2.1 and 4.1.11.1.2	"Under the no action alternative, offsite generated MLLW would not be treated at the NNSS." DOE/NV has already applied for a permit from NDEP to treat MLLW at the NNSS. This is discussed further in the EIS and this statement should be corrected. See also pg. 4-153, ¶4.1.11.1.2 The DOE has already submitted an application to NDEP for the MLLW treatment permit.
7-11	3-20, 3-38, and 3-39	3.1.2.1 (LLW and MLLW management), 3.2.2.1 (1st paragraph), 3.2.2.2 (last sentence)	This is 11,000,000 ft ³ of additional wastes. Unable to determine if it was included.

SWEIS Committee Comments

Number	Page	Section	Comment
7-12	3-47	3.3.2	Waste management program is not addressed under the reduced operations alternative.
7-13	3-77	3.5.5	I thought a table that presented the differences in assumptions between the 1996 and the current document would have been useful.
7-14	4-1	4.1 and 4.1.1	both state site is 57 miles from Las Vegas in different terms. 4.1.1 is better, use of term overland miles in 4.1 may be confused with road miles, and the 57 miles is direct line of site. Recommend either deleting the redundant distance sentence from one of the paragraphs, or make the use of terms, and “downtown starting point” the same.
7-15	4-14	4.1.2.1.1	Facilities: avoid exact count of buildings and trailers, I am confident that the number changes frequently, and will not be same from time of draft input to final issue date. Further down in paragraph, data is clarified with “as of November 2009” that should perhaps lead the paragraph.
7-16	4-35	Table 4-12	I find the table of Clark County Largest Employers to be misleading. The source is NV Energy who has split up employers by billable locations or power accounts. Find a better source of data. The decision on how to group employers does not seem to be consistent. For example: All of County Government workers are grouped together with the exception of UMC where all workers are also County employees. It seems arbitrary to split up the employees that work for major hotel/casino companies by property. All MGM properties should be grouped (MGM Grand, Bellagio, numerous City Center hotels, Mirage, Luxor, etc. Likewise all Caesars Entertainment properties, Bally's Caesars Palace, Harrah's, Flamingo, All Station Casino properties as a group should be included (I am sure once grouped together they will make the list). The US government including military, civilian, VA hospitals, Postal Service, FAA BLM etc should be totaled and put on the list- you get the picture-
7-17	4-36	Table 4-13	Disingenuous to refer to NSTEC and Wackenhut as Nye County employers
7-18	4-63 and 4-94	4.1.6.1	The first sentence of Surface Water Characteristics appears to contradict the American Indian Perspective of Water Resources on page 4-94. The present nature of the analysis should be highlighted. Apart from that, I though the hydrology section was particularly well written.
7-19	4-84	4.1.6.2	There is no mention of the small amount of PU found in one of the wells on Pahute Mesa.
7-20	4-85	Footnote	Pretty sloppy referencing
7-21	4-91 and 4-92	UGTA and RREM Plan	Disingenuous, and indicates that the Department of Energy has a bad monitoring program if it has 10.7 max on site and 62.5% off site (conveniently not expressed as a percentage)

SWEIS Committee Comments

Number	Page	Section	Comment
7-22	4-163 and 4-164	4.1.12.5	Accident History. Not all significant accidents seem to be included off the top of my head I can think of two: About 1990 two workers died in a vehicle roll over coming off Pahute Mesa in the snow late at night having worked late, and; August 1998 in U16b a tunnel worker was almost killed (heart stopped and then revived) in industrial accident. If I can think of 2 then there are likely more, this section should be given some thought and attention to completeness. If I was a relative of one of these workers and found the case omitted there is an implication my “loved one” was not “noteworthy” which could be interpreted as non-caring or insulting to their memory.
7-23	5-23, 5-24 and 5-25	5.1.2.1.2 and Table 5-4	Expanded Operations land use discussion should contain some comment re use of land for potential GTCC disposal. This use should also be included in Table 5-4, “Proposed New Infrastructure ---”.
7-24	5-258	5.4.6.1.2.2	The statement that impacts would be similar to those described under the No Action Alternative is a bit of an understatement, or perhaps just misleading.
7-25	7-11	Mitigation Measure 6	The discussion of actions in the event of discovery of human remains is too presumptive that any remains found are American Indian. If remains are discovered one should first determine not a recent death (say in the last 75 years) and not a crime scene, body dump, previously unknown missing worker or trespasser, etc. After law enforcement and Nye County Coroner have complete their investigations, then anthropologist can determine if its remains of native American or perhaps an 18th Century European explorer or 19th Century rancher/pro prospector.
7-26	8-2	8.1.1.1.2	after reams and reams of pages leading up to this section there is not very much here, this re-emphasizes original comment of “what’s the point?”
7-27	9-3	Table	Heading Human Health should be renamed or a different Heading of Safety needed. Many of the right column citations have nothing to do with “health” and are in fact safety documents. I don’t have time to describe difference between safety and human health but writers should understand. Examples of safety and not health documents are 10CFR820, 10CFR830, DOE Order 5480.20A, and DOE Orders 420.1B, 4251.D, 433.1D, 440, (458 is protection of public health and protection of environment)
7-28	A-43	A.2.2.2	Environmental Restoration Program – Soils Project, does not mention the Double Track site. Does this mean that this site is considered remediated to acceptable standards?
7-29	D-86	D.2.5.2.1	This section does not appear to account for ground disturbance nor increased truck traffic caused by cleanup of Clean Slates 1, 2, 3, etc. (See also Table 3-6, page 3-72.)

SWEIS Committee Comments

Number	Page	Section	Comment
7-30	G-2 and G-3	G.1.1.1	Why are the “traditional units” of radiation and radioactivity, i.e. curie, rad, and rem, used instead of the currently accepted International System Units of becquerels, grays, and sieverts?
7-31	G-3 and G-4	G.1.1.2 and Table G-1	The discussions in this paragraph and table are somewhat misleading. There should be some statement that “averages” vary greatly over the US. For example, radon is not a problem in the Western US, but is a big problem in the East. Air travel average is truly meaningless, since only those people who actually fly get any dose and that dose is considerably more than 1 millirem per year. The air travel dose could be expressed as the dose for a coast-to-coast flight, which would be more meaningful than the average dose. There should be some discussion that these average doses vary greatly across the US and from person-to-person.
7-32	G-42	G.3.7.1	Table G-16. Table G-16 (NNSR Radiological and Chemical Facility Accidents) lists plutonium source terms for accidents in the Area 5 Waste Management facility. What is the source of this plutonium? The NNSAB has been informed that all of the TRU waste at NNSR has been shipped to WIPP.
			Examples of citations from the Draft Site Wide Site Environmental Impact Statement that illustrate major federal actions planned or considered for the Nevada National Security Site that require additional NEPA analyses.
			Although an analysis of LLW/MLLW shipping routes is included in this SWEIS, decisions on routing would not be made as part of this NEPA process. This analysis was undertaken to develop a greater understanding of the potential environmental consequences of shipping such waste through and around metropolitan Las Vegas and to inform any highway routing revisions to NNSA’s waste acceptance criteria. P1-12

SWEIS Committee Comments

Number	Page	Section	Comment
			<p><i>Final Environmental Impact Statement for Construction and Operation of a Depleted Uranium Hexafluoride Conversion Facility at the Paducah, Kentucky, Site (DOE/EIS-0359) (DOE 2004d) – This environmental impact statement (EIS), tiered from the Final Programmatic Environmental Impact Statement for Alternative Strategies for the Long-Term Management and Use of Depleted Uranium Hexafluoride (DOE/EIS-0269) (DOE 1999c), considered the potential environmental impacts of construction, operation, maintenance, and decontamination and decommissioning of a proposed facility for converting depleted uranium hexafluoride to a more-stable chemical form at alternative locations within the Paducah Site. DOE evaluated transportation of the depleted uranium conversion product to a commercial facility or the NNS for disposal as LLW. The July 27, 2004, ROD (69 FR 44654) stated that DOE planned to decide the specific disposal location(s) after further NEPA review. 1-14</i></p>
			<p><i>This NNS SWEIS would not provide the basis for a DOE programmatic decision, but would provide the basis for site specific implementation of programmatic decisions that have already been made in existing programmatic EISs and other NEPA documents. DOE NEPA regulations (10 CFR 1021.330(c)) require that large, multiple-facility DOE sites, such as the NNS, prepare SWEISs. This Nevada National Security Site SWEIS addresses the full range of missions, programs, capabilities, projects, and activities under the purview of NNSA in Nevada. Table 1-2</i></p>
			<p>Response: <i>Each of the three alternatives includes renewable energy projects. Each alternative includes a commercial solar power generation facility that varies among the alternatives in terms of electricity-generating capacity, as described in Chapter 3. All the commercial solar projects would be located in Area 25 of the NNS. In addition, the Expanded Use Alternative includes a project to install a photovoltaic system in Area 6 and a project to demonstrate the feasibility of enhanced geothermal electricity-generating systems in other locations on the NNS. In the cumulative impacts chapter (Chapter 6), a Concentrating Solar Power Validation Project for solar research and development is also evaluated. This project is intended to demonstrate the viability of cutting-edge technologies for commercial power production. Because there are no proposals for the commercial scale solar power generation facilities or geothermal electricity generation, additional NEPA review would be required if a specific proposal is considered by NNSA. table 1-2</i></p>

SWEIS Committee Comments

Number	Page	Section	Comment
			<p>Response: NNSA concurs with the U.S. Environmental Protection Agency comments addressing renewable energy. However, the renewable energy projects in this SWEIS are not sufficiently defined to include this level of detail and would require additional NEPA analysis before being implemented.</p>
			<p>Ch 3</p>
			<p>If a commercial solar power project were proposed at the NNS in the future, additional project-specific NEPA analysis would be required</p>
			<p>Therefore, additional NEPA analysis would be required to identify, analyze, and document project-specific impacts if such a commercial-scale solar power generation facility were proposed.3-28</p>
			<p>Training facilities. These new and expanded facilities projects are conceptual at this time and would require an appropriate level of NEPA analysis before they could be implemented p 3-34</p>
			<p>Nonproliferation- and counterterrorism-related activities – NNSA nonproliferation- and counterterrorism-related activities would include four related areas: arms control, nonproliferation, nuclear forensics, and counterterrorism. Although the purpose of nonproliferation- and counterterrorism related activities would be the same as that under the No Action Alternative, new nonproliferation and counterterrorism facilities, described below, would be constructed at various locations on the NNS to undertake enhanced activities. Because the new nonproliferation and counterterrorism facilities (Arms Control Treaty Verification Test Bed, nonproliferation test bed, and Urban Warfare Complex) are still conceptual in nature and their locations are unknown, they are not fully analyzed in this SWEIS, and an appropriate level of NEPA analysis would be required before they could be implemented. O3-34</p>

SWEIS Committee Comments

Number	Page	Section	Comment
			<p>DHS counterterrorism operations support would include construction of new training facilities (about 10,000 square feet of floor space). In addition, RNCTEC would be operated up to the level of a Hazard Category 2 nonreactor nuclear facility, which would allow larger amounts of radioactive material in alternative configurations to be used in tests and experiments. A high-speed road, a short section of full-scale railroad line, a simulated seaport facility, and a mock urban area would also be added to RNCTEC (DOE 2004f), requiring about 125 acres of additional land in Area 6. These new facilities are still conceptual in nature and their potential locations have not been identified. An appropriate level of additional NEPA analysis (beyond this SWEIS) would be required before NNSA makes any decision regarding these facilities. P 3-35</p>
			<p>Support for NASA – NNSA would support NASA nuclear rocket motor development, including using existing boreholes to examine for proof of concept the use of deep alluvial basins for sequestering radionuclides released as part of emissions from tests of a yet-to-be-developed prototype nuclear rocket motor. Over about a 10-year period, NASA would not likely test a nuclear rocket motor, but may conduct proof-of-concept tests using a surrogate, such as spiked xenon, in a borehole to evaluate the effectiveness of the alluvium for this purpose. NNSA would identify and comply with all applicable regulatory requirements for both proof-of-concept experiments and any actual test of a nuclear rocket motor. If NASA proposes to test an actual nuclear rocket motor, additional NEPA analysis would be prepared. 3-35</p>
			<p>New test beds – Additional test beds would be developed to support research and development for sensors, high-power microwaves, and high-power lasers. New test beds (including approximately 50,000 square feet of new building spaces) would be constructed at various locations on the NNS and would disturb approximately 200 acres of previously undisturbed land. Because there are no specific plans for construction of these new test beds at this time, additional NEPA analysis would be necessary before they could be implemented. 3-37</p>

SWEIS Committee Comments

Number	Page	Section	Comment
			<p>Under the Expanded Operations Alternative, Mercury would be reconfigured to provide the modern facilities and infrastructure necessary to support advanced experimentation and production at the NNSS. Because the reconfiguration of Mercury is conceptual in nature, an appropriate level of NEPA analysis and documentation would be required before it could be implemented. 3-40</p>
			<p>The analysis in this SWEIS is based on assumptions for a representative commercial solar project (West 2010). Because there is no specific proposal for a commercial solar power-generating project, additional NEPA analysis would be required to evaluate any such proposals in the future. 3-41</p>
			<p>Because there are no specific proposals for geothermal exploration or development on the NNSS at this time, additional NEPA analysis would be required before such work could be conducted. 3-41</p>

NSSAB FY 2012 Work Plan

Item 1 EM (DOE Item 10)	Description of Work Plan Item:	Review and provide public comment on EM sections of the Site-Wide Environmental Impact Statement.
	Deadline for Submittal to DOE:	October 27, 2011
	Expectations:	Review Site-Wide Environmental Impact Statement and provide public comment on EM sections.

Item 2 Waste Management (DOE Item 8)	Description of Work Plan Item:	FY 2012 membership drive
	Deadline for Submittal to DOE:	March 2012
	Expectations:	NSSAB members will review applications, interview applicants, and provide a recommendation regarding a slate of candidates for DOE consideration.

Item 3 Waste Management (DOE Item 1)	Description of Work Plan Item:	From a community perspective, provide a recommendation regarding if the Nevada Site Office should safely dispose U233 waste from Oak Ridge.
	Deadline for Submittal to DOE:	March 2012
	Expectations:	DOE will provide background documentation, work plan, and waste profile for NSSAB review. If necessary, DOE may send 1-2 NSSAB members to Oak Ridge to view the waste. NSSAB will then provide a recommendation to DOE.

Item 4 Soils (DOE Item 7)	Description of Work Plan Item:	Review and provide a recommendation on the draft “Risk-Based Corrective Action Decision Process” document.
	Deadline for Submittal to DOE:	March 2012
	Expectations:	DOE will provide a briefing and draft document in January 2012. NSSAB will review and comment.

NSSAB FY 2012 Work Plan

Item 5 EM (DOE Item 9)	Description of Work Plan Item:	Review FY 2014 Baseline funding and determine budget prioritization by activity
	Deadline for Submittal to DOE:	April 2012
	Expectations:	DOE will provide briefings on planned FY 2014 activities. The NSSAB will provide a recommendation ranking the activities.

Item 6 Industrial Sites (DOE Item 6)	Description of Work Plan Item:	Provide a recommendation regarding long-term monitoring activities at closed Industrial Sites.
	Deadline for Submittal to DOE:	May 2012
	Expectations:	DOE will provide a briefing on current long-term monitoring activities at closed sites and what the plan is for future monitoring (March 2012). NSSAB will review and provide a recommendation on what should be done in the future.

Item 7 UGTA (DOE Item 2)	Description of Work Plan Item:	<p>A) Provide a recommendation regarding if there is a need for a formal response plan if contamination goes beyond the regulatory boundary related to Frenchman Flat</p> <p>B) If the NSSAB determines there is a need, what should the response plan include from a community perspective?</p>
	Deadline for Submittal to DOE:	<p>A) September 2012</p> <p>B) FY 2013 - Begin studying background in FY 2012</p>
	Expectations:	<p>A) Analyze if there is a need for a formal response plan. DOE can provide briefings and answer questions regarding formal response plans.</p> <p>B) DOE will provide examples of other sites' response plans. NSSAB to provide recommendation on the specific topics that should be addressed in the Frenchman Flat response plan.</p>

NSSAB FY 2012 Work Plan

<i>Item 8</i> <i>UGTA</i> <i>(DOE Item 4)</i>	Description of Work Plan Item:	Provide a recommendation regarding if DOE needs to re-evaluate the options for groundwater contamination contaminant/removal.
	Deadline for Submittal to DOE:	September 2012
	Expectations:	DOE will provide a presentation to the NSSAB explaining why containment was not an option in the 1990s and explain what is being done at other sites. The NSSAB will study the information and make a recommendation.



Department of Energy
National Nuclear Security Administration
Nevada Site Office
P.O. Box 98518
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October 12, 2011

Kathy Bienenstein, Chair
Nevada Site Specific Advisory Board
232 Energy Way
North Las Vegas, NV 89030

**RESPONSE TO FISCAL YEAR 2012 NEVADA SITE SPECIFIC ADVISORY BOARD
WORK PLAN REQUEST**

I would like to thank the Nevada Site Specific Advisory Board members for your dedication and thoroughness in creating your proposed FY 2012 work plan.

After observing your work plan development session and reviewing the formal request dated September 14, 2011, the Nevada Site Office (NSO) has approved all work plan items requested by the Board. The NSO looks forward to working closely with the NSSAB and receiving your recommendations.


Kelly K. Snyder
Deputy Designated Federal Officer

PSG:8015.KS

cc via e-mail:
Melissa Nielson, DOE/HQ (EM-13)
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NNSA/NSO Read File

Environmental Management's (EM) Monthly Report to the Nevada Site Specific Advisory Board October 2011

Low-Level Waste

Activities (September)

- During FY 2011, the cumulative Low-Level Waste (LLW) volume received was 1,710,000 ft³ in 2,449 shipments, and the cumulative Mixed LLW volume received for FY 2011 was 56,254 ft³ in 968 shipments.
- LLW Operations has worked 158,813 hours since its last lost-time accident (September 23, 2009).
- A shipment from Batelle Energy Alliance (Idaho) was received at the Nevada National Security that contained several wooden boxes, with more than one box leaking absorbent material. No leakage of radioactive material was detected. The generator has suspended all further waste shipments until a Corrective Action Plan (CAP) has been submitted, approved and implemented.
- During offloading of 17 waste shipments from Los Alamos National Laboratory (New Mexico), it was discovered that the first two trailers off-loaded had trailer beds contaminated in excess of Department of Energy release limits. No radioactive contamination was found on any packages and no containers were found to be leaking. As a result, the remaining 15 shipments were not off-loaded and are being addressed. The generator has suspended all further waste shipments until a CAP has been submitted, approved and implemented.

Planned Activities (October)

- The site expects to receive approximately 12,000 ft³ of LLW and MLLW for disposal during the month.
- The Nevada National Security Site is forecasted to receive 1,126,000 ft³ of LLW and 89,000 ft³ of MLLW in FY 2012.
- The Radioactive Waste Acceptance Program will conduct one impromptu facility evaluation and one audit.

Underground Test Area

Activities (September)

- **Frenchman Flat**
 - Completed draft drilling criteria document for the two proposed model evaluation wells
 - Completed construction of the ER-11-2 access road, drill pad and sumps State of Nevada Division of Environmental Protection (NDEP) (funded by American Recovery and Reinvestment Act [ARRA])
- **Pahute Mesa**
 - Completed well development and testing of Well ER-20-4
 - Completed analysis of well development and testing of Wells ER-20-7, ER-20-8#2 and ER-EC-11
 - Mobilization in preparation of the well development and testing of the well ER-EC-12 is underway
- **Yucca Flat**
 - Continued supplemental analyses of flow and transport modeling
 - Preemptive review of the preliminary flow and transport model document was completed and the recommendations are being evaluated

- **Rainier Mesa/Shoshone Mountain**
 - Continued flow and transport model analysis and evaluation
 - Briefed NDEP on flow and transport status
 - Began “hot well sampling” of U-12n Vent Hole #2

Planned Activities (October)

- **Frenchman Flat**
 - Complete review and finalize drilling criteria document for the two proposed model evaluation wells
- **Pahute Mesa**
 - Conduct well development and testing of Well ER-EC-12
 - Continue development of hydrostratigraphic framework model and analysis of field data
 - Begin access road and drill pad construction at the ER-20-11 site (ARRA funded)
- **Yucca Flat**
 - Continue supplemental analyses of flow and transport modeling
- **Rainier Mesa/Shoshone Mountain**
 - Continue flow and transport modeling analysis and evaluation
 - Complete “hot well” sampling at the U-12n Vent Hole #2 site

Industrial Sites

Activities (September)

- Corrective Action Unit (CAU) 91, Area 3 U-3fi Injection Well
 - Performed post-closure inspection
- CAU 92, Area 6 Decon Pond Facility
 - Performed post-closure inspection
- CAU 110, Area 3 Waste Management Division (WMD) U-3ax/bl Crater
 - Performed post-closure inspection
- CAU 112, Area 23 Hazardous Waste Trenches
 - Performed post-closure inspection
- CAU 116, Area 25 Test Cell C Facility
 - Submitted Final Closure Report (CR) to State of Nevada Division of Environmental Protection (NDEP)
 - Completed closure activities and waste disposal
- CAU 561, Waste Disposal Areas
 - Completed field closure activities
 - Submitted Final Corrective Action Decision Document/Closure Report (CADD/CR) to NDEP
- CAU 547, Miscellaneous Contaminated Waste Sites
 - Submitted Final CADD/Corrective Action Plan (CAP) to NDEP
 - Continued closure activities

Planned Activities (October)

- CAU 116, Area 25 Test Cell C Facility
 - Anticipate NDEP approval of the Final CR

- CAU 547, Miscellaneous Contaminated Waste Sites
 - Anticipate NDEP approval of the Final CADD/CAP
 - Continue closure activities
- CAU 548, Areas 9, 10, 18, 19, and 20 Housekeeping Sites
 - Perform Phase II closure activities
- CAU 561, Waste Disposal Areas
 - Anticipate NDEP approval of the Final CADD/CR
- CAU 562, Waste Systems
 - Begin closure activities
- CAU 566, EMAD Compound
 - Perform wall repair

Soils:

Activities (September)

- Corrective Action Unit (CAU) 104, Area 7 Yucca Flat Atmospheric Test Sites
 - Received NDEP approval of the Final Corrective Action Investigation Plan (CAIP)
- CAU 106, Areas 5, 11 Frenchman Flat Atmospheric Sites
 - Submitted the Final Corrective Action Decision Document/Closure Report (CADD/CR) to State of Nevada Division of Environmental Protection (NDEP)
- CAU 365, Baneberry Contamination Area
 - Completed field closure activities
 - Submitted the Final CADD/CR to NDEP (funded by American Recovery and Reinvestment Act [ARRA])
- CAU 366, Area 11 Plutonium Valley Dispersion Sites
 - Submitted the Final CAIP to NDEP (funded by ARRA)
- CAU 375, Area 30 Buggy Unit Craters
 - Received NDEP approval of the Final CADD/CR (funded by ARRA)
- CAU 574, Neptune
 - Received NDEP approval of the Final Streamlined Approach for Environmental Restoration (SAFER) Plan (funded by ARRA)

Planned Activities (October)

- CAU 104, Area 7 Yucca Flat Atmospheric Test Sites
 - Initiate field investigation activities
- CAU 106, Areas 5, 11 Frenchman Flat Atmospheric Sites
 - Anticipate NDEP approval of the Final CADD/CR (funded by ARRA)
- CAU 365, Baneberry Contamination Area
 - Anticipate NDEP approval of the Final CADD/CR (funded by ARRA)
- CAU 366, Area 11 Plutonium Valley Dispersion Sites
 - Anticipate NDEP approval of the Final CAIP (funded by ARRA)
 - Initiate field investigation activities
- CAU 465, Hydronuclear
 - Submit Final Streamlined Approach for Environmental Restoration (SAFER) Plan to NDEP (funded by ARRA)
- CAU 574, Neptune
 - Pick up thermoluminescent dosimeters (TLDs)

Public Involvement:

Activities (September)

- Continued exhibit of the *Operation Clean Desert* display in the Las Vegas, Nevada Public Reading Room
- Continued exhibit of *Groundwater at the Nevada National Security Site* poster at the Amargosa Valley Library, Goldfield Library, and Central Nevada Museum
- Published three Environmental Management (EM) News Flash articles: *NNSS Groundwater Scientists Gear Up to Test Frenchman Flat Model*, *Nevada Site Office Welcomes Public to Participate in EIS Hearings*, and *NNSS Wraps Up RA Work with a List of Major Achievements*
- Conducted Draft Site Wide Environmental Impact Statement (SWEIS) Open House/Public Hearings in Las Vegas (NV), St. George (UT), Pahrump (NV), Tonopah (NV) and Carson City (NV) and a Consolidated Group of Tribal Organizations specific session in Las Vegas.
- Supported Nevada Site-Specific Advisory Board meeting

Planned Activities (October)

- Continue exhibit of *Operation Clean Desert* display in the Las Vegas, Nevada Public Reading Room
- Continue exhibit of *Groundwater at the Nevada National Security Site* poster at the Amargosa Valley Library, Goldfield Library, and Central Nevada Museum
- Publish two EM News Flash articles
- Submit one article for Headquarters EM Update
- Support Nevada Site-Specific Advisory Board meeting