



NEVADA DIVISION OF
**ENVIRONMENTAL
PROTECTION**

STATE OF NEVADA
Department of Conservation & Natural Resources

Steve Sisolak, *Governor*
Bradley Crowell, *Director*
Greg Lovato, *Administrator*

DATE: July 16, 2021
TO: Greg Lovato, Administrator
FROM: Christine Andres, Chief, Bureau of Federal Facilities *COA*
SUBJECT: Quarterly Report: April 1, 2021 to June 30, 2021

FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

(FFACO) QUARTERLY REPORT

This quarter saw a combination of teleworking by Nevada Division of Environmental Protection Bureau of Federal Facilities (NDEP or BFF) staff and more in-office work, following all State of Nevada COVID-19 pandemic protocols. The Department of Energy's Nevada Offices continued mostly teleworking this reporting period. Teleworking did continue to impact in-person meetings and field visits/in-person inspections this quarter. However, it did not impact submittal and review of documents, reports, letter, virtual meetings or teleconferences, as noted below.

Industrial Sites Activity

At the end of June 2021, there were 1962 historical Corrective Action Sites (CASs) (out of 1970 total) that have been closed, with two (2) CASs in Corrective Action Unit (CAU) 114 and six (6) CASs in CAU 572 held for future work. National Nuclear Security Administration/Nevada Field Office (NNSA/NFO) and/or the Department of Energy's (DOE) Environmental Management (EM) Nevada Program (NP) federal funding will dictate when these eight (8) Industrial Sites CASs are closed under the FFACO. However, during this quarter, planning by the EM NP continued for the needed remediation work on both of these CAUs, including NDEP's approval of the Final Streamlined Approach for Environmental Restoration (SAFER) Plan for CAU 572 (see below).

The NDEP's BFF staff continued post-closure monitoring activities through report reviews, Use-Restrictions reviews, and post-closure inspections for a number of closed Industrial Sites on the Nevada National Security Site (NNSS), as well as the following activities:

Document Reviews and Letters:

CAU 111 and Tribal Interaction – BFF staff reviewed the quarterly revegetation effort status letter report. Also, at the very end of last quarter, the BFF received the Tribal Revegetation Committee's final report *Tribal Revegetation Project Final Project Report, 92-Acre Area, Area 5 Radioactive Waste Management Complex, Nevada National Security Site, Nevada*. The Report was reviewed and discussed with the NNSA/NFO and EM NP this quarter in regard to Recommendations made in the Report and any implementation of those Recommendations as revegetation efforts continue for the 92 acres, of which CAU 111 is a portion of that total acreage.

CAU 114 – BFF received and reviewed the *Draft Streamlined Approach for Environmental Restoration (SAFER) Plan for Corrective Action Unit (CAU) 114: Area 25 EMAD Facility, Nevada National Security Site (NNSS), Nevada, Revision 0, April 2021*. Comments were sent to the EM NP and following resolution of those comments, a Final SAFER was issued by EM NP and approved by NDEP.

CAU 572 – At the end of the previous quarter, BFF staff received the *Final Streamlined Approach for Environmental Restoration (SAFER) Plan for Corrective Action Unit (CAU) 572: Test Cell C Ancillary Building and Structures, Nevada National Security Site (NNSS), Nevada, Revision 0, December 2020*. As all of NDEP's comments on the Draft SAFER had been satisfactorily addressed, an approval letter for this document was issued by BFF this quarter.

Closed Non-Resource Conservation and Recovery (RCRA) Sites - BFF staff reviewed the *Draft Post-Closure Letter Report for Closed Non-Resource Conservation and Recovery Act (RCRA) Corrective Action Units (CAUs) on the Nevada National Security Site (NNSS) for CY 2020* and provided comments in a letter dated June 4, 2021. An approval letter for the letter report was sent June 18, 2021, as all comments were satisfactorily addressed.

Closed RCRA Sites – BFF staff reviewed the *Final Post-Closure Report for Closed RCRA CAUs on the NNSS for CY 2020, Rev. 0, May 2021* and provided comments to the EM NP in a letter dated June 23, 2021.

Inspections:

Staff accompanied EM NP and Navarro personnel on post-closure inspections of several closed RCRA CAUs during this quarter.

Meetings and Presentations:

A comment resolution meeting was held to discuss the DRAFT SAFER Plan for CAU 114.

Soils Activity Sites

At the end of December 2019, all Soil CASs, a total of 144, had been closed. All identified Soils Sites have been addressed under the FFACO.

Underground Test Area (UGTA) Activity

There are five (5) UGTA CAUs, all of which are either in the Corrective Action Investigation Stage or in long-term monitoring during the Closure Stage.

During this quarter, BFF staff participated in the process of document review, project evaluation, meetings and/or teleconferences for all five (5) of the CAUs in the following ways:

Document Reviews and Letters:

CAU 97 – Yucca Flat / Climax Mine – BFF staff reviewed the *Draft Annual Post-Closure Monitoring Letter Report for Calendar Year 2020 for CAU 97: Yucca Flat/Climax Mine; CAU 98: Frenchman Flat; and CAU 99: Rainier Mesa/Shoshone Mountain, Underground Test Area, Nevada National Security Site, Nevada* submitted at the end of last quarter and submitted comments in April of this quarter. The Final Revision 1 of the Letter Report was submitted by the EM NP in early June and BFF issued an approval letter on June 9, 2021, approving the Letter Report.

CAU 98 – Frenchman Flat – BFF staff reviewed the *Draft Annual Post-Closure Monitoring Letter Report for Calendar Year 2020 for CAU 97: Yucca Flat/Climax Mine; CAU 98: Frenchman Flat; and CAU 99: Rainier Mesa/Shoshone Mountain, Underground Test Area, Nevada National Security Site, Nevada* submitted at the end of last quarter and submitted comments in April of this quarter. The Final Revision 1 of the Letter Report was submitted by the EM NP in early June and BFF issued an approval letter on June 9, 2021, approving the Letter Report.

BFF staff received the *Calendar Year (CY) 2020 Closure Monitoring Report for Corrective Action Unit (CAU) 98: Frenchman Flat, Underground Test Area (UGTA), Nevada National Security Site (NNSS), Nevada (January 2020-December 2020)* in mid-June 2021. Comments were submitted to the EM NP in a letter dated July 6, 2021.

CAU 99 – Rainier Mesa / Shoshone Mountain – BFF staff received the *Calendar Year (CY) 2020 Post-Closure Monitoring Report for Corrective Action Unit (CAU) 99: Rainier Mesa/Shoshone Mountain, Underground Test Area, Nevada National Security Site (NNSS), Nevada, Revision 0, April 2021*. Comments were submitted to the EM NP in a letter dated May 25, 2021.

BFF staff reviewed the *Draft Annual Post-Closure Monitoring Letter Report for Calendar Year 2020 for CAU 97: Yucca Flat/Climax Mine; CAU 98: Frenchman Flat; and CAU 99: Rainier Mesa/Shoshone Mountain, Underground Test Area, Nevada National Security Site, Nevada* submitted at the end of last quarter and submitted comments in April of this quarter. The Final Revision 1 of the Letter Report was submitted by the EM NP in early June and BFF issued an approval letter on June 9, 2021, approving the Letter Report.

CAU 101/102 – Pahute Mesa (PM) – BFF staff received and reviewed the *Contaminant Transport Parameters for the Groundwater Flow and Contaminant Transport Model of Corrective Action Units (CAUs) 101 and 102: Central and Western Pahute Mesa, Nye County, Nevada, Revision 0, April 2021* received from the EM NP. Comments on this document were provided in a May 25, 2021, letter.

The NDEP received the *Request for Nevada Division of Environmental Protection (NDEP) Review of the Pahute Mesa Corrective Action Units (CAUs) Data for Completeness* in late April. Following review of the document, comments were sent to the EM NP on May 27, 2021.

In April 2021, BFF staff received and reviewed the *Final Goldsim Modeling of Transport from Near-Surface Cratering Tests, Revision 0, November 2020*. A letter of acknowledgement for receipt of the *Evaluation of Near-Surface Cratering Tests on Pahute Mesa, Nevada National Security Site Summary*

and a subsequent presentation on this subject earlier in the year, as well as, the submission of the Transport Report this quarter, was sent to the EM NP.

Staff reviewed documents for Pre-emptive review meetings on Ground Water Flow and Transport Modeling for this CAU.

Meetings and Presentations:

CAU 98 – Frenchman Flat – Staff participated in a comment resolution meeting with the EM NP and its contractors regarding the *Calendar Year (CY) 2020 Closure Monitoring Report for Corrective Action Unit (CAU) 98: Frenchman Flat, Underground Test Area (UGTA), Nevada National Security Site (NNSS), Nevada (January 2020-December 2020)*.

CAU 101/102 – Pahute Mesa (PM) – Staff participated in several Pre-emptive review meetings on the Ground Water Flow and Transport Modeling for CAU 101/102.

Staff participated in a number of internal TEAMS meetings regarding comments on the:

- a) *Contaminant Transport Parameters for the Groundwater Flow and Contaminant Transport Model of Corrective Action Units (CAUs) 101 and 102: Central and Western Pahute Mesa, Nye County, Nevada, Revision 0, April 2021;*
- b) *Request for Nevada Division of Environmental Protection (NDEP) Review of the Pahute Mesa Corrective Action Units (CAUs) Data for Completeness; and,*
- c) *Calendar Year (CY) 2020 Closure Monitoring Report for Corrective Action Unit (CAU) 98: Frenchman Flat, Underground Test Area (UGTA), Nevada National Security Site (NNSS), Nevada (January 2020-December 2020).*

General:

Use Restrictions (URs) – Staff continued to review and interact with the EM NP and their contractors on modifications to current URs. This included reviewing proposed comment responses for previously reviewed UR packets and participating in several Teams meetings to discuss needed changes.

File Management – This quarter, staff have continued to organize, complete, scan for electronic storage, and document files for FFACO sites.

FFACO Milestones – The BFF received the *Fiscal Year (FY) 2021 – FY 2023 Planned Federal Facility Agreement and Consent Order (FFACO) Milestones and Due Dates* from the EM NP in early April and replied back in early May with a letter establishing milestones and due dates for FFACO sites for FY2021-FY2023. These established milestones included the Nevada Off-Sites CAUs, described below.

Electronic File Documents – Due to the COVID-19 pandemic and remote working, the EM NP was submitting copies of all documents to NDEP electronically with the intent that hard copies would be submitted once EM NP personnel returned to the office. However, as BFF is moving toward managing all files electronically, a joint decision was made between NDEP and the EM NP that the earlier electronic submissions are adequate, and no hard copies will be needed. As such, the EM NP submitted a listing of documents that are now considered final electronic submissions.

Nevada Off-Sites

There are four (4) Nevada Off-Sites CAUs, two (2) Surface CAUs (CAU 416 and 417) and two (2) Subsurface CAUs (CAU 443 and 447). CAU 416 has been clean-closed. CAU 417 is in Post-Closure Monitoring. CAUs 443 and 447 are in the Closure Stage.

During this quarter, BFF staff participated in the process of document review and project evaluation with Office of Legacy Management (LM) personnel for two (2) of the CAUs in the following ways:

Document Reviews and Letters:

CAU 443 – Central Nevada Test Area (CNTA) – LM submitted a request to BFF to rescind a previously submitted letter requesting a milestone extension for the *Draft Groundwater Monitoring Report for CNTA CY 2020*. The request to rescind was approved and the previously established milestone for the report was retained. As such, the *Draft 2020 Postclosure Groundwater Monitoring and Inspection Report, Central Nevada Test Area, Subsurface Corrective Action Unit 443* was submitted by the mid-May Deadline. Comments on the Draft Document and a Notice of Completion was issued in mid-June.

CAU 447 – Project Shoal Area (PSA) – BFF staff reviewed the *2021 Sampling Plan for Shoal Site in Nevada*, received on May 28, 2021. The sampling plan was in accordance with the requirements of the Final Closure Report for CAU 447 and BFF staff issued a letter in mid-June stating this fact.

Tonopah Test Range (TTR) and Nevada Test and Training Range (NTTR) – BFF staff reviewed the *Final Post-Closure Inspection Report for TTR and NTTR, Nevada, for Calendar Year 2020, Rev. 0, April 2021* after receiving and reviewing proposed comment responses to BFF's comments on the Draft Report, and subsequently the Final Report. A Notice of Completion for this Milestone was issued given that all comments were satisfactorily addressed in the Final Report.

Meetings:

Staff participated in several internal TEAMS meetings regarding comments on the:

- a) *Draft 2020 Postclosure Groundwater Monitoring and Inspection Report, Central Nevada Test Area, Subsurface Corrective Action Unit 443; and,*
- b) *Final Post-Closure Inspection Report for TTR and NTTR, Nevada, for Calendar Year 2020, Rev. 0, April 2021*

Miscellaneous:

The chief participated in monthly virtual NDEP Attorney General staff meetings, bi-weekly Division-Wide Chief's Staff Meetings and bi-weekly meetings with the Administrator via conference calls in April, May and June 2021.

During this quarter, the bureau chief or the Bureau's Subject Matter Expert attended/participated virtually in: (1) one NSSAB Intergovernmental Meeting and one full NNSAB meeting; (2) numerous calls, Zoom Meetings and/or webinars as a member of the NGA's Federal Facilities Task Force (FFTF), the State, Tribal, Government Working Group (STGWG), the Environmental Council of States (ECOS) and the

Combined Intergovernmental Working Group (CIWG); (3) the FFTF Spring Meeting; (4) the Low-Level Waste Stakeholder's Forum Quarterly Meeting; and, (5) weekly/bi-weekly bureau staff meetings.

Training:

BFF staff completed "Using a Collective Bargaining Agreement Training" and the 8-hour HAZWOPER Refresher Training.

Staff also participated in webinars on Natural Resources Damage Assessments and DOE EM's Strategic Vision, as well as a follow-up call with EM HQ personnel on the latter webinar.

Agreement in Principle (AIP) Functional Areas Summary – Grant #DE-NA0003295

1. On-Site Discharges

Water Pollution Control

Document Reviews and Site Inspections:

Water Pollution Control Permit GNEV93001 – The Nevada Division of Environmental Protection’s (NDEP) Bureau of Federal Facilities (BFF) staff reviewed the First Quarter 2021 Quarterly Monitoring Report (QMR) received from the National Nuclear Security Administration/Nevada Field Office (NNSA/NFO). BFF sent a letter to the NNSA/NFO informing them that the monitoring report was in compliance with the limits set forth in the permit with the temporary waiver from the use of the calculated flow limit for the DAF sewage lagoon system as a permit limit, granted by the BFF in the first quarter of SFY 2016.

Permit GNEV93001 expired on August 5, 2020. The permit is currently administratively continued. In efforts to remain consistent with similar permits issued by the NDEP, BFF staff has attended weekly virtual permit meetings with NDEP’s Bureau of Water Pollution Control (BWPC) to ensure BFF’s groundwater discharge permits align with discharge permits issued by BWPC. BFF staff held a number of internal review meetings, completed updating the permit and submitted a draft copy of the permit to NNSA/NFO and their M&O contractor, Mission Support and Test Services, Inc. (MSTS), staff for comment prior to issuance for public review. NNSA/NFO and MSTS staff had several questions that required follow-up on BFF’s part. A final comment resolution meeting will be held before the draft permit is issued for public review.

Water Pollution Control Permit GNEV96021 – BFF staff reviewed the First Quarter 2020 QMR and sent a letter to NNSA/NFO stating that the monitoring report was in compliance with the limits set forth in the permit.

Permit GNEV96021 expired on September 21, 2018. The permit is currently administratively continued. BFF staff has begun review of the renewal application and background information on the E-Tunnel activities to gain knowledge and history on the permit. BFF staff is currently working on updating the permit to ensure it aligns with other BWPC/NDEP permits.

BFF staff conducted a site visit to E-Tunnel on April 29, 2021, with MSTS and NNSA/NFO personnel after participating in an internal preparatory meeting. The purpose of the field visit was to better understand the complexities of the site and the permit prior to making significant permit changes.

Training – Training continued for newer BFF staff on NDEP Water Pollution Permits.

Spills

Last quarter, a spill was reported verbally to the NDEP and submitted in writing via the NDEP online reporting system by the National Nuclear Security Administration/Sandia Field Office (NNSA/SFO). Background information on the spill is in last quarter’s report. In late March 2021, a 30-day A-K follow

up report was received by the BFF from the NNSA/SFO in accordance with NAC 445A.227(2) and 445A.227(2)(k). A letter response from the BFF was sent to the NNSA/SFO on April 27, 2021, requesting further excavation of soil and determination of a root cause analysis. The BFF received and evaluated a second thirty-day follow-up report for the spill on June 2, 2021, and a separate *Total Petroleum Hydrocarbon (TPH) Results for Additional Questions to the Thirty-Day Follow-Up Report* on June 14, 2021, from the NNSA/SFO. After the removal of six and a half cubic yards of soil, TPH was not detected in any further soil samples. The BFF granted NNSA/SFO's request to fill in the excavation site and reconnect the generating equipment, via letter, on June 17, 2021.

Meetings

A meeting was held via teleconference with Bureau of Safe Drinking Water (BSDW), NNSA/NFO, and MSTs personnel on April 6, 2021, to discuss potable water hauling at the NNSS.

The quarterly water meeting was held via teleconference on June 16, 2021. During the call, MSTs staff updated the BFF on sewage lagoon operations. Area 23, Yucca Lake, and the DAF lagoons were operating in accordance with the permit, the meters are functioning properly and there were low flows due to many people working remotely. The U1a new lagoon construction is to begin this summer and this pond system will have a screening system for undesirable items, unlike any of the other pond systems on the NNSS.

Last quarter, several Onsite Sewage Disposal Systems (OSDSs) meetings were held with NNSA/NFO, MSTs, BFF, and BWPC staff to discuss the OSDSs at the NNSS. The BWPC has no records or permits for the multiple OSDSs located on the NNSS. Working with the BFF, the BWPC requested the NNSA/NFO submit applications and supporting documentation for BWPC to permit the OSDSs, per NDEP protocol. The NNSA/NFO and MSTs continue to gather the supporting documentation to submit the applications for the BWPC to process. It was reported this quarter that six areas will be permitted and several inactive systems will be closed. The O&M Plan is in draft as MSTs is waiting for maps from their GIS group.

2. Ground Water Monitoring

BFF received the *Transmittal of 2020 Data Report: Groundwater Monitoring Program, Area 5 Radioactive Waste Management Site* on March 24, 2021. BFF staff reviewed the report and sent a comment letter to the NNSA/NFO on April 28, 2021.

3. Air Quality Monitoring

It was reported last quarter that NDEP's Bureau of Air Pollution Control (BAPC) contacted the NNSA/NFO to request records for all systems in the NNSS's Class II Air Quality Operating Permit by April 30, 2021, per NDEP protocol. The records request was part of a full compliance inspection that will be conducted at a later date due to the ongoing COVID pandemic. The BAPC will review the records provided by the NNSA/NFO until the inspection is scheduled. BFF staff will accompany BAPC staff on the inspection. No further details were received by the BFF this quarter.

4. Low Level and Mixed Low-Level Waste Oversight

Conference Calls:

Staff participated in weekly Waste Acceptance Review Panel (WARP) meeting via teleconference during April, May, and June 2021. Review panel members discussed waste profile comments and waste-specific compliance issues for generator-submitted low-level and mixed low-level radioactive waste profiles, along with Pre-Treatment Notifications, as they pertain to Nevada National Security Site Waste Acceptance Criteria (NSSWAC), Rev. 16-00, which became effective in February 2017. As applicable, BFF staff reviewed and provided comments on low-level radioactive waste and mixed waste profiles (for compliance with NNSSWAC, Rev. 16-00) and reviewed all comment responses submitted by the currently approved Low-Level Waste and Mixed Low-Level Waste generators.

Site Visits/Radioactive Waste Generator Facility Evaluations:

Surveillances – BFF staff participated virtually in tabletop surveillances at the Sandia National Laboratories, New Mexico; Mid-America Conversion Services, LLC/Depleted Uranium Hexafluoride Conversion Project, Portsmouth, OH; Perma-Fix Environmental Services Inc. Diversified Scientific Services, Inc., Oak Ridge, TN; EnergySolutions, Oak Ridge, TN; Fluor Idaho, LLC/Advanced Mixed Waste Treatment Project, Idaho Falls, ID; and, Fluor Idaho, LLC/Idaho Cleanup Project, Idaho Falls, ID.

Audits – BFF staff participated in one in-person audit at Los Alamos National Laboratory, Los Alamos, NM.

Site Visits – Los Alamos National Laboratory (LANL) – The Environmental Management (EM) Nevada Program (NP) suspended waste profile LANL000000030 (Vault Cleanout) Revision 4, due to the presence of elevated hydrogen in sixteen (16) Model 9979 packages (manufactured by the Savannah River Site) at the Chemistry and Metallurgy Research (CMR) Facility at LANL. The waste contained in the 16 elevated hydrogen Model 9979 packages are marked “URE” and are the only ones with that designation. The profile suspension will only be lifted upon receipt and acceptance of information demonstrating that the waste will not generate flammable or explosive concentrations of gases within the Model 9979 packages and that the waste packages comply with other parameters of the profile. In addition to this information, the NNSS requested documentation to demonstrate institutional controls to ensure only waste packages in compliance with the profile are offered for shipment prior to lifting this suspension. BFF personnel participated in the RWAP Audit the week of June 21, 2021, noted above. During the Audit, NDEP personnel participated in several meetings with LANL, EM, RWAP, and the waste generator. Additionally, NDEP visited the CMR for a firsthand look at the waste packaging. The information provided by LANL was comprehensive, complete, and provided assurance that waste will not generate flammable or explosive concentrations of gases within the Model 9979 packages.

Waste Generators Violation Statuses:

CAU 577 – Area 5 Chromium-Contaminated Waste Disposal Cells – This CAU was created in March 2019 to address the closure of five (5) cells at the Radioactive Waste Management Complex at the NNSS that had received trivalent chromium-bearing waste in the past from Nuclear Fuel Services, located in

Erwin, TN. As the *Final Corrective Action Decision Document/Corrective Action Plan (CADD/CAP) for Corrective Action Unit (CAU) 577: Area 5 Chromium Contaminated Waste Disposal Cells, Nevada National Security Site (NNSS), Revision 0, Nevada, February 2021* was approved by BFF last quarter, NDEP now awaits the Closure Report for this CAU.

Y-12 National Security Complex – BFF and NDEP personnel continued to work on a waste issue originating at the Y-12 National Security Complex (Y-12), located in Oak Ridge. The NDEP was informed of a potential violation of RCRA Permit NEV HW0101 on July 3, 2019. Specific details of events that occurred between July 3, 2019, and March 31, 2021 are provided in the seven previous quarterly reports.

During this quarter, BFF staff, while continuing to participate in numerous virtual sub-group negotiation meetings with NNSA/NFO and EM NP personnel and in a number of internal NDEP TEAMS meetings in order to reach resolution on a number of waste program improvements, also continued participating in meetings with Environmental Protection Agency (EPA) Region 9 staff and/or DOE staff in order to arrive at resolution for observations EPA noted after a 2019 inspection at the NNSS. On April 21, 2021, the EPA deferred resolution of their observations to NDEP. A **Settlement Agreement and Administrative Order on Consent** was signed by the NDEP, NNSA/NFO and the EM NP on June 22, 2021, thereby initiating the implementation of 43 separate waste management improvements throughout the DOE complex. Two of the required improvements involved the preparation of Technical Basis Papers by EM NP's EPS contractor, Navarro, which were submitted to BFF staff for review and comment this quarter.

5. Waste Management

Document Review / Letters Issued:

Staff reviewed and/or approved: (1) 2020 Data Report: Ground Water Monitoring Report for Area 5 RWMS; (2) NNSS Area 5 Asbestos Waste Disposal Reports for First Quarter 2021 for Permit HW0101; (3) NNSS Area 5 Asbestos Waste Disposal Reports for First Quarter 2021 for Permit SW532; (4) Soil Moisture Monitoring Reports for the NNSS Area 6 Hydrocarbon and Area 9 U10C Landfills for Reporting Period CY 2019-2020; (5) Modification Request for Class III Solid Waste Disposal Site Permit SW 532; (6) Recertification for Conditional Exclusion for Chromium Dated May 8, 2019; (7) Final Post-Closure Report for Closed RCRA CAUs, NNSS, Nevada, for Calendar Year 2020, Revision 0, May 2021; (8) Quarterly Progress Report for Revegetation at CAU 111: Area 5 WMD Retired Mixed Waste Pits, NNSS, NV; (9) Close-Out of Order Actions Associated with the Finding of Alleged Violation; and, (10) NNSS Quarterly Hazardous Waste Volume Report and Fee: Second Quarter Calendar Year 2021.

RCRA Permit NEV HW0101 Renewal Application, Waste Analysis Plan (WAP) – BFF personnel participated in sub-group conference calls to discuss planned changes to the WAP with DOE and its contractors.

Permit SW532 Inspection – BFF staff conducted an annual inspection of waste cells covered under Permit Number SW532 in Area 5, Radioactive Waste Management Complex (RWMC), on June 9, 2021, with NNSA/NFO and MSTs personnel in attendance. BFF staff received and reviewed all required documentation (daily and weekly inspection checklists and waste manifests) from MSTs fourteen days

prior to the inspection in order to prepare for the inspection. No findings or observations were identified. BFF staff are currently working on the official inspection report with an anticipated completion date by the end of July 2021.

Waste Planning and Forecasting – BFF Personnel developed a waste planning and forecasting document outline to be discussed with the EM NP. It is anticipated that NDEP will meet with the EM NP in August to discuss the outline.

Intergovernmental Information Request – NDEP personnel reviewed the Nevada Intergovernmental Information Request and DOE responses to the request. Based on those reviews, NDEP personnel identified three potential avenues for the EM NP to provide the information requested. NDEP will present these potential avenues in a future meeting with EM.

Waste Profile Analysis – NDEP personnel developed tools to analyze radiological data, regulatory status, and waste profile lifecycle. There are currently 237 active profiles with 59 MLLW profiles, 27 LLW Solid Waste profiles and 151 LLW profiles.

Training and Site Visits:

SWDS Permit SW532 Annual Compliance Evaluation Inspection (CEI) – BFF staff conducted the annual CEI on June 9, 2021. See above for a description of the CEI.

6. Major Program Proposals

There was no activity in this category during this quarter.

7. Historic Preservation

Funding has been provided to the SHPO for historic reviews at DOE and/or the NNSS during the year.

8. Environmental Monitoring Program and Report

There was no activity in this category during this quarter.

9. Sampling

No sampling activities were conducted by the Bureau during this quarter.

10. Safe Drinking Water

Document Reviews and Site Inspections

BFF was copied on the following BSDW reports submitted by NNSA/NFO contractors. BFF reviewed the reports referenced above and had no comments.

- Second Quarter Disinfection Report for PWS NV0000360
- April 2021 Potable Water Truck Coliform Results for PWS NV0000360

- May 2021 Potable Water Truck Coliform Results for PWS NV0000360
- June 2021 Portable Water Truck Coliform Results for PWS NV0000360

Meetings:

The quarterly water meeting was held via teleconference on June 16, 2021.

The drinking water wells for PWS NV0004098 and NV0004099 are out of service and BSDW placed an OUTs on those wells due to pump failure and pipe rehabilitation. The future of the wells is still being determined. The NNSA/NFO contractors will contact the BFF with future plans and decisions on those wells.

The water hauling plan requested in the previous quarter was still in draft form. This plan is expected to be submitted to NDEP's BSDW expediently and account for the well closures in Area 25 (PWS NV0000360 system) and an increase in water monitoring to account for the increased water hauling due to the well closures. A teleconference was held to discuss particulars of this Plan.

The sanitary survey and water hauling inspections were set for September 14-15, 2021. The BSDW, BFF, NNSA/NFO, and MSTs will work together to conduct the sanitary sewer survey inspections.

Spills

No spills were reported.

Fiscal Analysis:

Estimate of personnel resources used (FTE or hours)

The bureau of Federal Facilities is made up of a Bureau Chief, one supervisor, one subject matter expert, three technical staff and an administrative assistant. The AIP grant funds activities for each of these individuals. For the quarter, that represents approximately 3.5 FTEs based on a review of grant related activities.

Total expenditures for each task area

A total of approximately \$123,000 was spent during this quarter for AIP work. This is the most current figure available at this time and includes personnel, operating, information services, DOE and DOE oversight and purchasing costs.

Comparison of estimate to budgeted expenses:

Expenses this quarter were within the legislatively approved spending limits.

Miscellaneous:

As the Agreement-in-Principle (AIP) expired June 30, 2021, notification was received this quarter that a final, updated version was approved by the EM NP and HQ, along with the accompanying grant request for the next five (5) years. Both documents will be effective from July 1, 2021 through June 30, 2026.

This quarter, staff have continued to organize, complete, scan for electronic storage, and document files for Permits SW-532, NEV HW0101 and the Radioactive Waste Acceptance Program.

Throughout the quarter, BFF staff has continued to read technical documents and regulations associated with assigned job duties in the area of waste management. Readings included the RCRA permit application, specifically the EODU section, the Solid Waste Permit Number SW532 application and permit, several waste profiles, NRS 445A Water Controls, and the E-Tunnel Permit.

The chief participated in monthly virtual NDEP Attorney General staff meetings, bi-weekly Division-Wide Chief's Staff Meetings and bi-weekly meetings with the Administrator via conference calls in April, May and June 2021.

During this quarter, the bureau chief or the Bureau's Subject Matter Expert attended/participated virtually in: (1) one NSSAB Intergovernmental Meeting and one full NNSAB meeting; (2) numerous calls, Zoom Meetings and/or webinars as a member of the NGA's Federal Facilities Task Force (FFTF), the State, Tribal, Government Working Group (STGWG), the Environmental Council of States (ECOS) and the Combined Intergovernmental Working Group (CIWG); (3) the FFTF Spring Meeting; (4) the Low-Level Waste Stakeholder's Forum Quarterly Meeting; and, (5) weekly/bi-weekly bureau staff meetings.

Training:

BFF staff completed "Using a Collective Bargaining Agreement Training" and the 8-hour HAZWOPER Refresher Training.

Staff also participated in webinars on Natural Resources Damage Assessments and DOE EM's Strategic Vision, as well as a follow-up call with EM HQ personnel on the latter webinar.

BFF staff has attended virtual Permit Writer Training sessions conducted by the BWPC Permits Branch.

BFF staff attended virtual Sanitary Survey Training session conducted by EPA Regions 9 and 10.

Staff participated in a DOE webinar on Order 435.1.