

Nevada Site Specific Advisory Board

February 16, 2011

Mr. Rob Boehlecke
Environmental Restoration Project Director
U.S. Department of Energy, Nevada Site Office
P. O. Box 98518
Las Vegas, NV 89193-8518

SUBJECT: Recommendation on Closure of Corrective Action Unit (CAU) 374

Dear Mr. Boehlecke:

The Nevada Site Specific Advisory Board has reviewed several potential closure scenarios for CAU 374. This CAU consists of the Corrective Action Site (CAS) for the Schooner test in Nevada National Security Site (NNSS) Area 20, and the CAS for the Danny Boy test in NNSS Area 18, as well as three additional CASs for drums and miscellaneous waste around the Danny Boy test.

The NSSAB considered three Corrective Action Alternatives as identified in the Federal Facility and Consent Order.

- Clean closure
- Closure in place with use restrictions
- No further action

For CAU 374 the NSSAB recommends closure in place with use restrictions. We understand, based on your letter of January 10, 2011, that this closure in place includes the removal and disposition of the drums and miscellaneous waste at Danny Boy.

The cost of clean closure is significantly greater than closure in place. While closure in place is estimated to cost about \$80,000, the cost estimate for clean closure is \$260 million. The total dose to workers under both scenarios is very low and the large cost for clean closure would likely adversely effect other clean up programs at the NNSS. We concluded that clean closure does not appear to be a prudent use of the limited available funds; and that the cost of closure in place is not so excessive that no further action would be justified.

The CAB also considered various use standards for the closure in place scenario. The standards considered included the same two previously evaluated in our recommendations for CAU 371 and 372.

- Industrial Use exposure of 2250 hours per year
- Remote Area Worker exposure of 400 hours per year
- Occasional Use exposure of 80 hours per year

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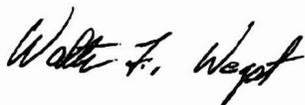
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& Engineering, Inc.*
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U.S. Department of Energy,
Nevada Site Office

The CAB recommends the Remote Area Worker exposure standard for CAU 374.

The Schooner and Danny Boy sites are in remote locations and there is no reasonable likelihood of their being developed into a project suggesting the Industrial Use standard to be the prudent choice. The likelihood of an NNS worker or visitor experiencing even 80 hours per year exposure (Occasional Use) at these sites is very low. However, since the Remote Area Worker exposure standard appears to be preferred by the State of Nevada, and there does not appear to be a significant cost difference between the Remote Area Worker standard and the Occasional Use standard it appears to be a better choice.

We are also confident there are sufficient administrative controls in place at the NNS to ensure that if a permanent project was ever proposed for these locations that an appropriate hazard or risk analysis would be performed to protect any worker permanently stationed at these locations.

Sincerely,

A handwritten signature in black ink that reads "Walter F. Wegst". The signature is written in a cursive style with a large initial 'W'.

Walter F. Wegst, Chair

cc: M. Nielson, DOE/HQ (EM-13) FORS
C. Alexander Brennan, DOE/HQ (EM-13) FORS
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