Department of Energy
National Nuclear Security Administration
Nevada Site Office
P.O. Box 98518
Las Vegas, NV 89193-8518

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

RESPONSE TO NEVADA SITE SPECIFIC ADVISORY BOARD (NSSAB) RECOMMENDATION REGARDING LONG-TERM MONITORING ACTIVITIES AT CLOSED INDUSTRIAL SITES

I would like to thank the NSSAB for taking the time to provide recommendations regarding the long-term monitoring activities at closed Industrial Sites. The Nevada Site Office Environmental Management Operations Activity appreciates the support of the NSSAB in this project and the efforts made by the Board to provide recommendations. The Board's specific recommendations are addressed below.

1. ***Identify ways to utilize resources efficiently to monitor high priority sites. For example, use solar-powered sources and line-of-sight communications to monitor sites with a closed circuit television system, and/or sensors to alarm if someone is in the area of the closed site.***
   There are currently multiple controls in place at closed corrective action sites to prevent inadvertent intrusion. These include: institutional controls for the entire Nevada National Security Site (NNSS) that prevent public access; education/training programs for all site personnel; land control systems that include notification to potential users of any use restriction requirements; and administrative/physical controls, such as signs and/or fences, at each site. The annual, semi-annual, or quarterly inspections confirm that the controls are working. The hazards at these sites are not significant enough to warrant real-time monitoring.

2. ***Find better means of barricading closed sites that can withstand arid weather conditions and keep animals out.***
   The main conditions at these sites that cause sign and fence damage are wind and sun. Heavy-duty sign posts are now being used to replace lighter sign posts as needed whenever posts are damaged. These heavier posts better withstand the windy conditions. The other common damage is faded wording on the signs from the sun. This is most often the red "WARNING" line. The rest of the sign text is black and not as prone to fading, and will stand up much longer than the red lettering. To save costs in replacing these signs, stickers are being applied to the signs over faded wording, which is much more cost-effective than replacing the signs with materials that might better withstand sun damage (see photos, below).

CAU 110 sign with faded red text

CAU 110 sign after sticker application

Animal intrusion is rare at closed corrective action sites. The time and resources required to replace all the fences and sign posts in order to better withstand infrequent animal intrusion is not justified compared to maintaining the current materials in place or replacing failed elements at these sites.

3. ***Create one document that outlines feasible options for closure monitoring in general, keeping site-specific decisions in applicable closure reports. This would allow a reader to identify the span of control that may be used at the NNSS.***
   There are very few Industrial Sites remaining to be closed. The range of monitoring that may be performed at these remaining sites is very narrow, and is expected to only include annual visual inspections. In addition, options for closure are detailed in the Corrective Action Decision Document (or other appropriate document) for each site.

4. ***Improve means of quality assurance by photographing, conducting aerial inspections, and have multiple people inspect the site prior to closure. This expanded process would prevent potential human error.***
   This is currently done for Industrial Sites; they are well-documented prior to closure. Documentation typically consists of notes regarding visual observations, photography, and site drawings, but may also consist of engineering surveys, as-built drawings, and/or radiological and geophysical surveys. These observations are recorded in the site closure documentation which is reviewed and approved by the State of Nevada Division of Environmental Protection (NDEP) and kept as part of the required record of Federal Facility Agreement and Consent Order (FFACO) activities. NDEP personnel typically conduct multiple inspections of each site prior to closure. In addition, during post-closure inspections, at least two inspectors are always present and a manager reviews and signs the completed checklists to verify that they are properly completed. The post-closure reports and associated checklists are also maintained as part of the FFACO records.

5. ***Expand the type of documentation completed during routine inspections to include photography.***
   Photographs are taken during inspections, reviewed after the inspections are completed, and kept on file. Photographs are taken from the same locations during each inspection as well as of any repairs or maintenance required.

Thank you again for the time taken to provide recommendations. As always, the NSSAB's input is valued and your efforts are greatly appreciated. Please direct comments and questions to Kelly Snyder at (702) 295-2836.

Robert F. Boehlecke, Manager
Environmental Management Operations

EMO:8854.TL

cc via e-mail:
C. B. Alexander, DOE/HQ (EM-3.2) FORS
M. A. Nielson, DOE/HQ (EM-3.2) FORS
B. K. Ulmer, N-I, Las Vegas NV
NSSAB Members and Liaisons
T. A. Lantow, EMO, NNSA/NSO,
Las Vegas, NV
K. K. Snyder, EMOS, NNSA/NSO,
Las Vegas, NV
NNSA/NSO Read File