



Nevada Site Specific Advisory Board

September 20, 2017

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EM Nevada Program

Mr. Jhon Carilli
LLW Disposal Facility Technical Lead
U.S. Department of Energy, EM Nevada Program
P. O. Box 98518
Las Vegas, NV 89193-8518

SUBJECT: Recommendation for Radioactive Waste Acceptance Program
(RWAP) Assessment Improvement Opportunities (Work Plan Item #4)

Dear Mr. Carilli,

The Nevada Site Specific Advisory Board (NSSAB) was asked to provide a recommendation, from a community perspective, to the U.S. Department of Energy on ways to improve the RWAP assessment process.

In support of this work plan, you provided an extensive briefing on the RWAP assessment process at the April 19th NSSAB meeting. Also in August 2017, Dick Gardner and Richard Twiddy, NSSAB members, observed a surveillance of the generators for the Idaho National Laboratory.

Member Twiddy submitted a written report of his observations of the surveillance, although he was unable to attend the NSSAB meeting. Member Gardner provided a verbal narration of his two days of observations to the Board during the September 20th Full Board meeting.

Based on Member Gardner's comments and further Board discussion during the meeting, the NSSAB recommends that DOE includes NSSAB members to observe future facility evaluations of NNSS generators by scheduling the first day for a site tour and the second day to shadow RWAP auditors conducting interviews of generator staff and filling out the respective RWAP checklists, particularly for Quality Assurance and Waste Transportation.

Members Gardner and Twiddy's written reports are included as attachments. The NSSAB appreciates the opportunity to observe this surveillance and to provide this recommendation and extends a special thanks to the RWAP Team and Idaho staff who helped the NSSAB participate in the surveillance.

Sincerely,

Steven Rosenbaum, Chair

Jhon Carilli
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Enclosures:
As stated

cc: D. A. Borak, DOE/HQ (EM-3.2)
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September 4, 2017

NSSAB

Reference: Observation of the RWAP Surveillance of Fluor Idaho (AMWTP and ICP)
By Richard Twiddy and others, dated August 29/30, 2017.

Overview:

The surveillance team meeting was conducted on Thursday, August 24 at 9 am. I called in, while traveling toward Idaho Falls, to listen and learn of the details. The meeting was conducted by the lead auditor, Ann Koplou.

The team met early August 29 for badging at the Fluor Facilities in Idaho Falls and attended the entrance meeting with staff and management of the Fluor organization. After the meeting, we promptly departed for the Idaho Research facilities some miles away. At the site, we viewed several aspects of the identification, sorting and packaging of Low level/mixed waste as well as the compacting and preparing the packages for shipping.

The following day we again traveled to the site, early, to witness a demonstration of a bagging system to be deployed, when approved. Later in the afternoon, the entire team met again at the Fluor Facilities in Idaho Falls to debrief in preparation for an exit meeting to discuss any findings as well as observations.

During this visit, I had the opportunity to witness the entire process of packaging, including the identification and analysis of the various materials to be discarded as well as the final documentation that will proceed to disposal with the mixed waste.

Observations:

1. While attending the sessions and demonstrations I asked many questions. In no case was there any attempt to avoid a direct answer; and in fact, it seems everyone involved, including the DOE and State of Nevada representatives, were anxious to see that we observers were involved in the discussions and had accurate answers. If an answer could not be met immediately it was not very long that we had the proper personnel to provide the correct answer. Everyone we met and talked with including managers, foreman and workers were open and always friendly.

2. I was particularly impressed with the cleanliness and order at the facilities, especially the compacting and packaging area. I feel, you can tell the professionalism and attention to detail when things are in order. Safety was always first on everyone's mind at all times.
3. The surveillance team did a remarkable amount of work in a short amount of time available. At the exit briefing it became clear that all the items selected to overview and audit were in fact covered adequately. I have the opinion that the auditors were professional, detail oriented, fair and dedicated.
4. One special observation occurred at the entrance meeting. All the managers including the President of the Company Facilities were present. It became clear that Fluor Individuals had upper management support and were ready and willing to provide whatever necessary to see that the audit/surveillance was successful. It was clear this was a team effort.

Suggested Improvement:

As an NSSAB observer, I was to witness and possibly suggest improvement to the Surveillance Process. What I did see suggests that the process and detailed preparations leaves little room for improvement. The planning was impressive. The auditors knew what they wanted to see and went about their work in a professional manner with very limited disturbance to the normal work.

One positive observation. The Lead Auditor, after the team briefing, brought in the respective leads and managers, that were involved in the specifics of the surveillance activities, to give them an overview of what was found and what would be reported to upper management at the upcoming exit meeting. I felt this was a nice touch and helped remove the got-ya factor. If this is not normal, within the organization, I would suggest it become normal at all audits/surveillance in the future.

Final:

With this trip, I learned that it is essential to begin disposal at the very first identification of the waste materials. It may seem simple; but the start determines the successful final disposal. Those of us not involved in the day to day operation can be satisfied that there are procedures and processes in place to assure adequate protection to the civilian population in the receiving states.

This was a successful visit, from my viewpoint. I would do this again if the opportunity presents. My special thanks to the Navarro Audit/Surveillance Team and a special thanks to our host Jhon and Mark. A separate report will be coming from Dick Gardner who also attended.

Report of Observation
A-631 Idaho Falls

You have read the report by Dick Twiddy, of which I generally agree with. My remarks are mine and is a short narration of the two days of observations.

We met for a team meeting on Tuesday morning, in Idaho Falls, where the team leader, Ann Koplow from Navarro, briefed the participants, Hope Sexton and Lee Stevens both from Navarro and the observers, Jhon Carilli, DOE and Mark McLane, State of Nevada as well as Dick Twiddy and myself from NSSAB, on why we were here. After introduction and remarks from the head of Fluor Idaho, we loaded into a van for a 1 hour trip out to INL. First stop was to RWMC to watch the loading of MLLW for shipment. Unfortunately the backhoe/loader had a broken hydraulic hose. It happens. One thing to change a hose in normal conditions and something else when you are wearing protective gear. They did get the hose repaired but after we had left. We did get to talk to some of the operators and they answered any and all questions that were asked. Other than the loading area, in this huge building, you couldn't see anything else because of the lack of lighting. Oh well.

In the afternoon we went to the AMWTP to observe the crushing facility. Our guide gave a great tour of the control room and dismantling area. We then went into the crusher area, but the crusher was shut down for maintenance/repairs. Bummer. We still got to ask questions and received answers. The whole crusher was operated by remote control and automation. All the crushing was in a controlled environment behind plenty of windows. We were given a tour of the storage and shipping areas. After we left the site we were informed that the crusher was back in operation and they are trying to arrange a tour the next day.

One hour trip back to town.

Next day an one hour trip back out to the site.

First stop was INTEC, where we were going to watch the encapsulation of barrels of waste. This process has just recently been approved for use and they are still working on the procedure of bagging the barrel. This process includes bagging a barrel with 3 bags. A lift raises the barrel then the the three bags are slipped over and attached in various ways. The 5 or 6 people that were bagging looked like a Chinese fire drill. A lot of people for one barrel. I'm sure with time this process will become more refined.

Afterward we were taken back to the crusher. This crusher uses 220,000 lbs. of force to crush a 55 gallon barrel filled with waste to about 4 to 5 inches. This "puck" is moved by automation to an area where 4, 5, or 6 of these "pucks" are then loaded and sealed into another barrel for shipment. Labels or identification are added everywhere. All this power, I couldn't help wondering what this would do to a beer can? Oh well. Upon leaving the crusher room we were thoroughly checked, which I assumed were Geiger counters. Since none of us were glowing, I guess we were OK.

After another hour ride to town, we gathered for a meeting with the auditors, Lee, Hope and Ann. Where Mark, Jhon, Dick and myself went over the results of the audits. Afterward

we were invited to the exit meeting and were allowed to make comments. Part of which you are now hearing.

Overall, my most impressive impression was about safety. It was stressed everywhere. Signs, banners and posters were everywhere. At all entrances we were read safety warnings about the hazards of radioactivity. A key part to the safety was the overall cleanliness of all the sites we visited. Sort of a “place for everything and everything in its place” attitude.

Special kudos to Stuart Gerard, our chauffeur extraordinaire, and Jared Dominik for getting us to and making arrangements for the tours. Stuart for ICP and Jared for AMWTP.

Everywhere on the tour there are letter designations. In ten years you might remember all them. We had the RWMC, WCO, INTEC, INL, MLLW, AMWTP, SP&C, ICP, DOE and DOD. I am sure there are others I forgot. I did not hear FBI, CIA or NCIS but I am pretty sure their presence is there.

In summary, I learned a lot on the processing, packaging and the preparedness for shipping. Shipping not only to Nevada, but other destinations as well. I will finally end with my own letters AOK.

Dick Gardner