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**OCT 16 2014**

Donna Hruska, Chair  
Nevada Site Specific Advisory Board  
232 Energy Way  
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**RECOMMENDATION FOR RADIOACTIVE WASTE ACCEPTANCE PROGRAM (RWAP)  
FACILITY EVALUATION IMPROVEMENT OPPORTUNITIES (WORK PLAN ITEM #7)**

Reference: Ltr Bienenstein to Boehlecke, dtd 09/10/2014

The Nevada Field Office (NFO), Office of Assistant Manager for Environmental Management (O/AMEM) received and reviewed the referenced letter. The O/AMEM replies are as follows:

- *Assess the integrity of containers bound for the Nevada National Security Site (NNSS)*

The NFO agrees that it is very important to verify the integrity of waste containers received for disposal and conducts visual assessments at the Area 5 Radioactive Waste Management Site. The NFO, NNSA/HQ, and DOE/EM/HQ have an uncompromised commitment to ensure compliance with Department of Transportation (DOT) packaging and transportation laws and regulations. This commitment is reflected in the NNSS Waste Acceptance Criteria (WAC). Container quality requirements can be found throughout the document with Section 2.4 specifically citing container integrity deficiencies as a reason to suspend a generator's NNSSWAC program. Prior to the next revision to the NNSSWAC, the NFO with its contractors and generator community will review the existing requirements concerning container integrity and security to determine if there are areas for improvement.

- *Increase unannounced visits to generators*

The NFO agrees that completely unannounced visits to generators should be considered. Unannounced visits have been conducted in the past, and will be considered when developing upcoming facility evaluation schedules. However, there are factors affecting the viability of scheduling this type of visit including security access, work control requirements, and safety. I would like to clarify that the facility evaluation schedule is currently not made available to the generators. As such, the current practice of providing a 7-day notice for a surveillance and 30-days for an audit still provides RWAP auditors an opportunity to "catch" the generators "off-guard" while making the most effective use of the RWAP team's time (historic unannounced visits resulted in the loss of valuable evaluation time because contacts were not available and/or access was delayed).

- *Review the process for assessing shipping and routing information from the transportation company to ensure that it provides robustness and confidence in NNSS waste transportation information.*

The NFO agrees that the process for assessing shipping and routing information should be reviewed, and proposals for additional verification activities will be solicited at upcoming internal meetings. Any specific suggestions by the Nevada Site Specific Advisory Board (NSSAB) are encouraged. Robust and DOT-compliant shipping and routing requirements are currently included in the NNSSWAC. For example, shipment drivers are currently required to document and certify the accuracy of routes taken. Any violations of the NNSSWAC will automatically result in the issuance of a Corrective Action Request to the generator and may result in suspension of its program to ship waste to the NNSS. It should be noted that the shippers contracted by the generators to transport waste were qualified through a national program that provides a framework for selection of responsible, effective, and efficient motor carriers.

I want to express my gratitude to the NSSAB for its recommendations regarding this work plan item. Please feel free to follow-up to our response with specific suggestions relating to your recommendations.

If you have any questions, please feel free to contact Robert F. Boehlecke at (702) 295-2099.



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