



.U.S. Department of Energy
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Nevada Program
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JUL 18 2019

Frank Bonesteel, Chair
Nevada Site Specific Advisory Board
232 Energy Way
North Las Vegas, NV 89030

RESPONSE TO THE NEVADA SITE SPECIFIC ADVISORY BOARD (NSSAB)
RECOMMENDATION FOR APPROACH FOR PAHUTE MESA COMPLETION (WORK
PLAN ITEM #2)

Reference: Ltr Bonesteel to Myers, dtd 4/24/2019

I would like to thank the NSSAB for its recommendation on the Approach for Pahute Mesa Completion work plan item in the above-mentioned letter. The U.S. Department of Energy (DOE), Environmental Management (EM) Nevada Program appreciates the time that the NSSAB spent in review and tour of Pahute Mesa, and its subsequent support of the more pragmatic approach for completion for Pahute Mesa.

Below are responses to NSSAB recommendations for improvements to the Approach for Pahute Mesa Completion:

NSSAB Recommendation: Add new wells and monitoring at the Nevada Test and Training Range (NTTR).

DOE Response: DOE currently has 13 wells with a combined 38 intervals available for sampling on the NTTR. Of those sampling locations, no wells on the NTTR have tritium concentrations above the Safe Drinking Water Act (SDWA) standard. At the present time, DOE has confidence that the existing wells on the NTTR are sufficient to monitor radionuclide migration. At the completion of the Pahute Mesa investigation, DOE will conduct a needs assessment for new wells to be drilled on the NTTR.

NSSAB Recommendation: Set early warning monitoring standards.

DOE Response: DOE proposes to use an early warning monitoring standard for tritium of 1,000 picocuries per liter (pCi/L). At current rates of radionuclide migration observed on Pahute Mesa, an early warning level of 1,000 pCi/L will provide at least ten years warning that the tritium concentration at a location may exceed the SDWA standard in the future.

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NSSAB Recommendation: Continue researching cleanup technologies.

DOE Response: During the corrective action decision process for Pahute Mesa, DOE will be conducting an evaluation of alternative remedial strategies to include searching for innovations in cleanup technologies.

NSSAB Recommendation: Investigate possibility of a separate lower standard for tritium than the Safe Drinking Water Act standard.

DOE Response: Along with an early warning monitoring standard already mentioned, DOE intends to continue adhering to the SDWA standard for tritium of 20,000 pCi/L. In 1991, the U.S. Environmental Protection Agency (EPA) used improved calculations to conclude that more than three times the standard for tritium would yield a radiation dose still below where there is no known or expected risk to public health. At that time, the EPA decided to keep in its regulations the conservative 20,000 pCi/L standard for tritium.

Again, thank you for your willingness to going more in-depth regarding the more pragmatic approach for Pahute Mesa and providing recommendations for improvements. The EM Nevada Program was happy to learn that the special tour of Pahute Mesa and Rainier Mesa was helpful in providing these recommendations for improvements.

Please contact Kelly K. Snyder at (702) 295-2836 if further information on this matter is needed.



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