



# Nevada Site Specific Advisory Board

March 20, 2019

Mr. Kevin Cabble, DOE RWAP Manager  
U.S. Department of Energy, Environmental  
Management (EM) Nevada Program  
P.O. Box 98518  
Las Vegas, NV 89193-8518

SUBJECT: Recommendation for Evaluation of the Audit Determination  
Process (Work Plan Item #4)

Dear Mr. Cabble,

The Nevada Site Specific Advisory Board (NSSAB) was asked to provide a recommendation, from a community perspective, to the U.S. Department of Energy (DOE) regarding if the existing Radioactive Waste Acceptance Program (RWAP) risk-informed process for scheduling facility evaluations is supported and how it could be enhanced.

In support of this work plan item, Marilew Bartling, Navarro RWAP Manager, provided a briefing at the January 16, 2019 NSSAB Meeting on the Evaluation of the Audit Determination Process work plan item. At this meeting, the NSSAB requested additional information for more detail on the risk score calculations contained in the RWAP risk-informed spreadsheet. In response to this request, a white paper providing this detail, an updated Risk-Informed Spreadsheet, and a fiscal year 2019 facility evaluation schedule was provided to the NSSAB for its review.

After deliberation, the NSSAB makes the following recommendations for ways DOE should consider to enhance its risk-informed process for scheduling facility evaluations:

- Use a per unit score for risk attributes in place of assigning point values to the top generators.
- Conduct facility evaluations with no prior notice to the generators.
- Add the generator's overall ranking to the RWAP facility evaluation schedule.
- Include historical information from DOE's Occurrence Reporting and Processing System regarding near-miss incidents, primarily in transportation, although more study could be done to determine if other areas would also apply.

The NSSAB supports the risk-informed process for scheduling facility evaluations with consideration of the enhancements listed above.

## Members

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**Frank Bonesteel (Chair)**  
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Karen Eastman  
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## Liaisons

Clark County  
Consolidated Group of Tribes  
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Esmeralda County Commission  
Lincoln County Commission  
Nye County Commission  
Nye County Emergency  
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Nye County Nuclear Waste  
Repository Project Office  
State of Nevada Division of  
Environmental Protection  
U.S. National Park Service  
White Pine County Commission

## Administration

Kelly Snyder, Deputy Designated  
Federal Officer (DDFO)  
*U.S. Department of Energy,  
EM Nevada Program*  
Barbara Ulmer, Administrator  
*Navarro, Contractor for the U.S.  
Department of Energy,  
EM Nevada Program*

The NSSAB thanks Ms. Bartling for her time in briefing this work plan item and providing the additional requested information in order to provide this recommendation.

Sincerely,

A handwritten signature in dark ink, appearing to read "Frank Bonesteel". The signature is fluid and cursive, with a large initial "F" and "B".

Frank Bonesteel, Chair

cc: David Borak, DOE/HQ (EM-4.32)  
Michelle Hudson, DOE/HQ (EM-4.32)  
Marilew Bartling, Navarro  
Barbara Ulmer, Navarro  
NSSAB Members and Liaisons  
Robert Boehlecke, EM  
Jhon Carilli, EM  
Catherine Hampton, EM  
Kelly Snyder, EM  
Bill Wilborn, EM