

DATE: April 16, 2021
TO: Greg Lovato, Administrator
FROM: Christine Andres, Chief, Bureau of Federal Facilities
SUBJECT: Quarterly Report: January 1, 2021 to March 31, 2021

FEDERAL FACILITY AGREEMENT AND CONSENT ORDER

(FFACO) QUARTERLY REPORT

Due to the continuation of stay-at-home orders issued by the Governor of Nevada on March 15, 2020, because of the COVID-19 pandemic, both the Nevada Division of Environmental Protection (NDEP) and the Department of Energy's Nevada Offices continued mostly teleworking this reporting period. Teleworking continued to impact in-person meetings and field visits/in-person inspections this quarter. Teleworking did not however, impact submittal and review of documents, reports, letter, virtual meetings or teleconferences, as noted below.

Industrial Sites Activity

At the end of March 2021, there were 1962 historical Corrective Action Sites (CASs) (out of 1970 total) that have been closed, with two (2) CASs in Corrective Action Unit (CAU) 114 and six (6) CASs in CAU 572 held for future work. National Nuclear Security Administration/Nevada Field Office (NNSA/NFO) and/or the Department of Energy's (DOE) Environmental Management (EM) Nevada Program (NP) federal funding will dictate when these eight (8) Industrial Sites CASs are closed under the FFACO. However, during this quarter, planning by the EM NP continued for the needed remediation work on both of these CAUs, including submission of the Final Streamlined Approach for Environmental Restoration (SAFER) Plan for CAU 572 (see below).

The NDEP's Bureau of Federal Facilities (BFF) staff continued post-closure monitoring activities through report reviews and Use-Restrictions reviews for a number of closed Industrial Sites on the NNSS, as well as the following activities:

Document Reviews and Letters:

CAU 111 and Tribal Interaction – BFF staff reviewed the quarterly revegetation effort status letter report. The BFF also received the Tribal Revegetation Committee's final report *Tribal Revegetation Project Final Project Report, 92-Acre Area, Area 5 Radioactive Waste Management Complex, Nevada National Security Site, Nevada* on March 30, 2021. It will be reviewed and discussed with the NNSA/NFO and EM NP next quarter.

CAU 572 – BFF staff received the *Draft Streamlined Approach for Environmental Restoration (SAFER) Plan for Corrective Action Unit (CAU) 572: Test Cell C Ancillary Building and Structures, Nevada*

National Security Site (NNSS), Nevada, Revision 0, December 2020 late in the previous quarter. Following review of the documents, comments on the document were submitted to the EM NP this quarter.

CAU 577 – During the previous quarter, BFF staff reviewed and submitted comments to the EM NP on the *CAU 577 CADD/CAP August 2020 Revision 0* document following significant changes to earlier documents by the EM NP. Comment responses were received from the EM NP early this quarter. Upon approval of the responses, the EM NP submitted the *Final Corrective Action Decision Document/Corrective Action Plan (CADD/CAP) for Corrective Action Unit (CAU) 577: Area 5 Chromium Contaminated Waste Disposal Cells, Nevada National Security Site, (NNSS), Revision 0, Nevada, February 2021*. An approval letter for this document was subsequently issued by the BFF.

Inspections:

CAU 111 – BFF staff participated in a Post-Closure inspection for CAU 111 on March 16, 2021 with EM Nevada and Navarro personnel.

Meetings and Presentations:

CAU 572 – BFF staff participated in a comment resolution meeting with DOE/EM and Navarro staff regarding the SAFER Plan on February 10, 2021.

Soils Activity Sites

At the end of December 2019, all Soil CASSs, a total of 144, had been closed. All identified Soils Sites have been addressed under the FFACO.

Underground Test Area (UGTA) Activity

There are five (5) UGTA CAUs, all of which are either in the Corrective Action Investigation Stage or in long-term monitoring during the Closure Stage.

During this quarter, BFF staff participated in the process of document review, project evaluation, meetings and/or teleconferences for all five (5) of the CAUs in the following ways:

Document Reviews and Letters:

CAU 97 – Yucca Flat / Climax Mine – Late last quarter, the EM NP submitted the *Final Closure Monitoring Report for Corrective Action Unit (CAU) 97: Yucca Flat/Climax Mine, Underground Test Area (UGTA), Nevada National Security Site (NNSS), Nevada, Revision 0, December 2020*. Following review of the document early this quarter, the BFF submitted comments to be addressed in Revision 1 of the document. After responses were satisfactorily addressed, an approval letter was issued by the BFF, which included a Notice of Completion for the milestone established for submittal of Revision 0 of this document.

Last quarter, BFF staff reviewed a draft ROTC for the *Model Evaluation Report for Corrective Action Unit 97: Yucca Flat/Climax Mine, Nevada National Security Site, Nye County, Nevada* and provided comments to EM NP. Following a comment resolution meeting this quarter, the ROTC was finalized/signed by all parties.

The EM NP submitted a *Request to Delete Milestone for Corrective Action Unit (CAU) 97: Yucca Flat/Climax Mine*. BFF staff reviewed the request, and a letter was issued approving the request.

The ME NP submitted the *Draft Annual Post-Closure Monitoring Letter Report for Calendar Year 2020 for CAU 97: Yucca Flat/Climax Mine; CAU 98: Frenchman Flat; and CAU 99: Rainier Mesa/Shoshone Mountain, Underground Test Area, Nevada National Security Site, Nevada* very late this quarter. BFF staff will be reviewing this Letter Report early next quarter.

CAU 98 – Frenchman Flat – The EM NP submitted the *Draft Annual Post-Closure Monitoring Letter Report for Calendar Year 2020 for CAU 97: Yucca Flat/Climax Mine; CAU 98: Frenchman Flat; and CAU 99: Rainier Mesa/Shoshone Mountain, Underground Test Area, Nevada National Security Site, Nevada* very late this quarter. BFF staff will be reviewing this Letter Report early next quarter.

CAU 99 – Rainier Mesa / Shoshone Mountain – The EM NP submitted the *Draft Annual Post-Closure Monitoring Letter Report for Calendar Year 2020 for CAU 97: Yucca Flat/Climax Mine; CAU 98: Frenchman Flat; and CAU 99: Rainier Mesa/Shoshone Mountain, Underground Test Area, Nevada National Security Site, Nevada* very late this quarter. BFF staff will be reviewing the Letter Report early next quarter.

CAU 101/102 – Pahute Mesa (PM) – Following Review and submission of comments to the EM NP on the *Hydrologic Data for Groundwater Flow and Contaminant Transport Model of Corrective Action Units (CAUs) 101 and 102: Central and Western Pahute Mesa, Nye County, Nevada, Revision 0, September 2020* last quarter, BFF staff received and reviewed Revision 1 of the document this quarter. All comments were addressed, and a letter was issued to the EM NP thanking them for the opportunity to review this supplemental report and provide comments.

Meetings and Presentations:

CAU 97 – Yucca Flat / Climax Mine – BFF staff participated in a comment resolution virtual meeting for the draft ROTC for the *Model Evaluation Report for Corrective Action Unit 97: Yucca Flat/Climax Mine, Nevada National Security Site, Nye County, Nevada* on January 4, 2021.

CAU 101/102 – Pahute Mesa (PM) – The BFF participated in a comment resolution virtual meeting with the EM NP and Navarro staff concerning the *Hydrologic Data for Groundwater Flow and Contaminant Transport Model of Corrective Action Units (CAUs) 101 and 102: Central and Western Pahute Mesa, Nye County, Nevada, Revision 0, September 2020* document on January 11, 2021.

BFF staff participated in a virtual presentation by Navarro staff on *Shallow Test Evaluation for Pahute Mesa* on February 8, 2021.

General:

Use Restrictions (URs) – Staff continued to interact with EM NP and their contractors on modifications to current URs. This included requesting additional information and reviewing documentation concerning downgrading or removing URs for several CAUs. Staff provided comments and participated in comment resolution virtual meetings.

Underground Test Area (UGTA) Calendar Year (CY) 2019 Quality Assurance Report, Nevada National Security Site (NNSS), Nevada, Revision 0, November 2020 – BFF submitted comments on this Report early this quarter after receiving it the previous quarter.

File Management – This quarter, staff have continued to organize, complete, scan for electronic storage, and document files for closed FFACO sites.

FFACO Annual Meeting – BFF staff prepared for, and participated in, the Annual FFACO meeting via a virtual meeting on February 3, 2021 with the Defense Threat Reduction Agency (DTRA), U.S. Department of Energy (DOE) Environmental Management (EM) Nevada Program, DOE Office of Legacy Management (LM), DOE National Nuclear Security Administration/Nevada Field Office (NNSA/NFO), and Navarro Research and Engineering (Navarro). The meeting concluded with action items for EM NP, LM, and Navarro to complete.

FFACO Transition Meeting – BFF staff participated in a FFACO Transition meeting on February 3, 2021 with DTRA, EM NP, LM, NNSA/NFO, and Navarro.

Nevada Off-Sites

There are four (4) Nevada Off-Sites CAUs, two (2) Surface CAUs (CAU 416 and 417) and two (2) Subsurface CAUs (CAU 443 and 447). CAU 416 has been clean-closed. CAU 417 is in Post-Closure Monitoring. CAUs 443 and 447 are in the Closure Stage.

During this quarter, BFF staff participated in the process of document review and project evaluation with Office of Legacy Management (LM) personnel for two (2) of the CAUs in the following ways:

Document Reviews and Letters:

CAU 443 – Central Nevada Test Area (CNTA) – BFF staff reviewed a request for milestone extension for the *Draft Groundwater Monitoring Report for CNTA CY 2020*. Details and applicability of this request continue to be discussed with LM and BFF.

CAU 447 – Project Shoal Area (PSA) – BFF staff submitted comments to LM on the *Draft 2019 Groundwater Monitoring Report, Project Shoal Area: Subsurface, Corrective Action Unit (CAU) 447 Shoal, July 2020* last quarter. Satisfactorily addressing those comments, LM submitted the *Final 2019 Groundwater Monitoring Report* this quarter, which the BFF approved through a letter dated March 29, 2021.

Tonopah Test Range (TTR) and Nevada Test and Training Range (NTTR) – BFF staff reviewed the *Draft Post-Closure Inspection Report for TTR and NTTR for Calendar Year 2020, December 2020* and provided comments to DOE, which will be addressed during the following quarter.

Teleconference:

A Teleconference call was held on February 11, 2021 with LM regarding updates on the CNTA and PSA projects and sites on the TTR and NTTR that are now under LM purview as of October 1, 2020.

Miscellaneous:

The chief participated in monthly virtual NDEP Attorney General staff meetings, bi-weekly Division-Wide Chief's Staff Meetings and bi-weekly meetings with the Administrator via conference calls in January, February, and March 2021.

During this quarter, the bureau chief also attended/participated virtually in: (1) one NSSAB Intergovernmental Meeting, one full NNSAB meeting, and one call to discuss a NSSAB Work Plan item; (2) numerous calls as a member of the NGA's Federal Facilities Task Force (FFTF), the State, Tribal, Government Working Group (STGWG), and the Environmental Council of States (ECOS); (3) the FFTF Winter Meeting; (4) the Low-Level Waste Stakeholder's Forum Quarterly Meeting; (5) bureau staff meetings; and, (6) the annual Waste Management Symposium.

Training:

BFF staff has completed the NNSG GERT and Annual Security Refresher trainings.

BFF staff has completed the SMART21 and NDEP required trainings.

Agreement in Principle (AIP) Functional Areas Summary – Grant #DE-NA0003295

1. On-Site Discharges

Water Pollution Control

Document Reviews and Site Inspections:

Water Pollution Control Permit GNEV93001 – The Nevada Division of Environmental Protection's (NDEP) Bureau of Federal Facilities (BFF) staff reviewed the Fourth Quarter 2020 Quarterly Monitoring Report (QMR) received from the National Nuclear Security Administration/ Nevada Field Office (NNSA/NFO). BFF sent a letter to NNSA/NFO informing them that the monitoring report was in compliance with the limits set forth in the permit with the temporary waiver from the use of the calculated flow limit for the DAF sewage lagoon system as a permit limit, granted by the BFF in the first quarter of SFY 2016.

Permit GNEV93001 expired on August 5, 2020. The permit is currently administratively continued. In efforts to remain consistent with similar permits issued by the NDEP, BFF staff has attended weekly virtual permit meetings with NDEP's Bureau of Water Pollution Control (BWPC) to ensure BFF's groundwater discharge permits align with discharge permits issued by BWPC. BFF staff has completed updating the permit and it is under internal review. BFF staff has been in contact with NNSA/NFO staff to ask general questions on permitted activities and get updated permit information. The permit is scheduled to go to public notice at the end of April 2021.

Water Pollution Control Permit GNEV96021 – BFF staff reviewed the Fourth Quarter 2020 QMR and sent a letter to NNSA/NFO stating that the monitoring report was in compliance with the limits set forth in the permit.

Permit GNEV96021 expired on September 21, 2018. The permit is currently administratively continued. BFF staff has begun review of the renewal application and background information on the E-Tunnel activities to gain knowledge and history on the permit. BFF staff is currently working on updating the permit to ensure it aligns with other BWPC/NDEP permits.

As current COVID-19 pandemic restrictions allow, BFF staff is planning a site visit on April 29, 2021 to the E-Tunnel, located on NNSS, to better understand the complexities of the site and the permit.

Spills

A spill was reported verbally to the NDEP on February 17, 2021 and submitted in writing via the NDEP online reporting system on February 18, 2021 by the National Nuclear Security Administration/Sandia Field Office (NNSA/SFO). The diesel spill occurred at Station 24, Building 24-50, on the Tonopah Test Range (TTR), Sandia National Laboratories (SNL). The location has a 200-kW generator with a 280-gallon belly tank which is fed by a 1,000-gallon auxiliary aboveground storage tank. The worst-case scenario assumed approximately 117 gallons of fuel had discharged onto the surrounding gravel and soil area.

In accordance with NAC 445A.227(2) and 445A.227(2)(k), a 30-day A-K follow up report was received by the BFF on March 26, 2021 from NNSA/SFO. A letter response from the BFF is currently being drafted and will be issued in the next quarter.

Meetings

A meeting was held via teleconference with NNSA/NFO personnel and their contractors on January 21, 2021 to discuss asbestos cement pipe replacement technology, the interim plan for Area 25's water system, the status of the septic tank permit, owner/operator permit transfer, and lagoon permit status.

A water meeting was held via teleconference on April 1, 2021 due to scheduling conflicts at the end of March. During the call, NNSA/NFO contractors updated the BFF on sewage lagoon operations. Area 23, Yucca Lake, and the DAF lagoons were found to be in good condition after a recent NNSA/NFO staff visual inspection. The Yucca Lake flow meter that was recently installed was in good working order. The U1a new lagoon construction had not yet started. Lysimeters will be installed to measure the leakage rate of this new lagoon system. The monitoring requirements for the lysimeters will be included in the renewal of the GNEV93001 permit.

Several Onsite Sewage Disposal Systems (OSDSs) meetings were held with NNSA/NFO contractors and BWPC and BFF staff during this quarter to discuss the OSDSs at the NNSS. Currently, BWPC has no records or permits for the multiple OSDSs located on the NNSS. Working with the BFF, the BWPC is requesting the NNSA/NFO submit applications and supporting documentation for BWPC to permit the OSDSs, per NDEP protocol. The NNSA/NFO is currently gathering the supporting documentation to submit the applications for the BWPC to process.

2. Ground Water Monitoring

BFF received the *Transmittal of 2020 Data Report: Groundwater Monitoring Program, Area 5 Radioactive Waste Management Site* on March 24, 2021. BFF staff is currently reviewing the report and will send a response letter to the NNSA/NFO in the next quarter.

3. Air Quality Monitoring

The Bureau of Air Pollution Control (BAPC) contacted the NNSA/NFO to request records for all systems in the NNSS's Class II Air Quality Operating Permit by April 30, 2021, per NDEP protocol. The records request is part of a full compliance inspection that will be conducted at a later date due to the ongoing COVID pandemic. The BAPC will review the records provided by the NNSA/NFO until the inspection is scheduled. BFF staff will accompany BAPC staff on the inspection.

4. Low Level and Mixed Low-Level Waste Oversight

Conference Calls:

Staff participated in weekly Waste Acceptance Review Panel (WARP) meeting via teleconference during January, February, and March 2021. Review panel members discussed waste profile comments and waste-specific compliance issues for generator-submitted low-level and mixed low-level radioactive waste

profiles, along with Pre-Treatment Notifications, as they pertain to Nevada National Security Site Waste Acceptance Criteria (NSSWAC), Rev. 16-00, which became effective in February 2017. As applicable, BFF staff reviewed and provided comments on low-level radioactive waste and mixed waste profiles (for compliance with NNSSWAC, Rev. 16-00) and reviewed all comment responses submitted by the currently approved Low-Level Waste and Mixed Low-Level Waste generators.

PERMC00000016 Rev 00, Macroencapsulated Non-Radioactive Hazardous Classified Material/Matter - Staff participated in an unclassified teleconference with NNSA, EM, Navarro, MSTs, PermaFix and Pantex personnel. The meeting was requested by BFF staff to obtain further information on the classified matter associated with this profile. Pantex is the original generator of this classified matter and ships it to PermaFix for treatment. As Pantex is the original generator, they provided an unclassified overview of the classified matter. Subsequently, PermaFix described their processing of the classified material upon receipt.

Meetings:

Semi-Annual Waste Coordination Leadership Group (WCLG) Meeting - This semi-annual meeting was held virtually on March 24, 2021 with EM Headquarters, EM Nevada and the NDEP.

Site Visits/Radioactive Waste Generator Facility Evaluations:

NDEP staff participated virtually in tabletop surveillances at the Pantex Plant, Nuclear Fuel Services, Oak Ridge Reservation/URS CH2M OAK RIDGE, LLC, and Sandia National Laboratories, New Mexico. In-person waste surveillances and audits did not occur this quarter due to COVID-19 restrictions.

Waste Generators Violation Statutes:

CAU 577 – Area 5 Chromium-Contaminated Waste Disposal Cells – This CAU was created in March 2019 to address the closure of five (5) cells at the Radioactive Waste Management Complex at the NNSS that had received trivalent chromium-bearing waste in the past from Nuclear Fuel Services, located in Erwin, TN.

During the previous quarter, BFF staff reviewed and submitted comments to the EM NP on the CAU 577 CADD/CAP August 2020 Revision 0 document following significant changes to earlier documents by the EM NP. Comment responses were received from the EM NP early this quarter. Upon approval of the responses, the EM NP submitted the *Final Corrective Action Decision Document/Corrective Action Plan (CADD/CAP) for Corrective Action Unit (CAU) 577: Area 5 Chromium Contaminated Waste Disposal Cells, Nevada National Security Site (NNSS), Revision 0, Nevada, February 2021*. An approval letter for this document was subsequently issued by the BFF.

Y-12 National Security Complex – BFF and NDEP personnel continued to work on a waste issue originating at the Y-12 National Security Complex (Y-12), located in Oak Ridge. The NDEP was informed of a potential violation of RCRA Permit NEV HW0101 on July 3, 2019. Specific details of events that occurred between July 3, 2019 and December 31, 2020 are provided in the six previous quarterly reports. During this quarter, BFF staff, while continuing to participate in virtual sub-group negotiation meetings with NNSA/NFO and EM NP personnel and in a number of internal NDEP TEAMS meetings in order to reach resolution on a number of waste program improvements, also participated in

meetings with Environmental Protection Agency (EPA) Region 9 staff and/or DOE staff in order to arrive at resolution for observations EPA noted after a 2019 inspection at the NNSS (see below).

Document Reviews:

Staff completed review of, and submitted comments to DOE on, the Draft Versatile Test Reactor Environmental Impact Statement (DOE/EIS-0542).

5. Waste Management

Document Review / Letters Issued:

Staff reviewed and/or approved: (1) NNSS Quarterly Hazardous Waste Volume Report and Fee: Fourth Quarter Calendar Year (CY) 2020; (2) NNSS Area 5 Annual Asbestos Waste Disposal Report for Calendar Year (CY) 2020 for Permit HW0101; (3) Quarterly Progress Reports for Revegetation at CAU 111: Area 5 WMD Retired Mixed Waste Pits; (4) Uniform Hazardous Waste Manifests; (5) NNSS Area 5 Asbestos Waste Disposal Reports for Fourth Quarter of Calendar Year (CY) 2020 for Permit HW0101; (6) NNSS Area 5 Asbestos Waste Disposal Reports for Fourth Quarter of Calendar Year (CY) 2020 for Permit SW532; (7) NNSS Area 5 Annual Asbestos Waste Disposal Report for Calendar Year (CY) 2020 for Permit SW532; (8) Area 23 Semi-Annual Solid Waste Disposal Site (SWDS) Report for the NNSS - July 1, 2020 through December 31, 2020; (9) Area 9 Annual Solid Waste Disposal Site (SWDS) Report for the NNSS January 1, 2020 through December 31, 2020; (10) Area 6 Annual Solid Waste Disposal Site (SWDS) Report for the NNSS January 1, 2020 through December 31, 2020; (11) Transmittal of the NNSS 2019 Waste Management Monitoring Report, Area 3 and Area 5 Radioactive Waste Management Sites, September 2020; (12) NNSS Annual Summary/Waste Minimization Report Calendar Year 2020, RCRA Permit Number NEV HW0101; (13) Path Forward for Renewal of RCRA Permit NEV HW0101, EPA ID NV389009001; (14) Modification Request for Class III Solid Waste Disposal Site Permit SW 532; (15) 2020 Data Report: Groundwater Monitoring Program, Area 5 Radioactive Waste Management Site, March 2021; and, (16) Nevada Tribal Revegetation Project Final Project Report, 92-Acre Area, Area 5 RAD Waste Management Complex, NNSS, NV

RCRA Permit NEV HW0101 Annual Compliance Evaluation Inspection (CEI) – Staff submitted the BFF-produced CEI report to the DOE for the annual inspection conducted in October 2020.

RCRA Permit NEV HW0101 Renewal Application – Last quarter, BFF personnel reviewed and submitted comments on the RCRA Permit NEV HW0101 renewal application. This quarter, staff reviewed the responses to comments on the renewal application. The comment responses will be addressed and incorporated as needed in the revised permit application submitted to NDEP by the NNSA/NFO.

RCRA Permit NEV HW0101 Renewal Application, Waste Analysis Plan (WAP) – BFF personnel participated in an initial sub-group conference call to discuss planned changes to the WAP with DOE and its contractors.

Conference Calls:

Calls with EM NP and/or NNSA/NFO Staff – BFF personnel participated in conference calls regarding characterization and disposition of classified material/classified Waste at the NNSS.

Calls with EPA Region 9 and with EM NP and/or NNSA/NFO Staff – BFF personnel participated in conference calls/virtual meetings regarding potential resolution(s) to the April 10, 2020 EPA Region 9 Notice of Violation issued by EPA to the NNSA/NFO in response to the Y-12 incident.

Training and Site Visits:

Training – Training continues for newer BFF staff on waste profile review, the NNSWAC, NDEP issued permits and applicable federal and state regulations.

Radioactive Waste Management Complex (RWMC) – BFF staff visited the RWMC this quarter and discussed several different aspects of the RWMC with federal and contractor staff in regard to the various permits that are applicable to the RWMC.

6. Major Program Proposals

There was no activity in this category during this quarter.

7. Historic Preservation

Funding has been provided to the SHPO for historic reviews at DOE and/or the NNSS during the year.

8. Environmental Monitoring Program and Report

There was no activity in this category during this quarter.

9. Sampling

No sampling activities were conducted by the Bureau during this quarter.

10. Safe Drinking Water

Document Reviews and Site Inspections

BFF was copied on the following Bureau of Safe Drinking Water (BSDW) reports submitted by NNSA/NFO contractors:

- First Quarter Disinfection Report for PWS NV0000360
- January 2021 Potable Water Truck Coliform Results for PWS NV0000360
- February 2021 Potable Water Truck Coliform Results for PWS NV0000360
- March 2021 Portable Water Truck Coliform Results for PWS NV0000360

BFF reviewed the reports referenced above and had no comments. The drinking water wells for PWS NV0004098 and NV0004099 are out of service and BSDW placed an OUTs on those wells due to pump failure and pipe rehabilitation. The future of the wells is still unknown. The NNSA/NFO contractors will contact the BFF with future plans and decisions on those wells.

The sanitary survey and water hauling inspections have been postponed until further notice due to COVID-19. The BSDW, BFF, and NNSA/NFO will work together to see if virtual sanitary sewer survey inspections can be conducted.

Spills

No spills were reported.

Meetings

A water hauling meeting was held via teleconference on February 9, 2021 with NNSA/NFO contractors and BSDW personnel. During the call, NNSA/NFO contractors discussed their water hauling process, water monitoring, and needs with BSDW to ensure compliance with safe drinking water regulations. The BSDW is requiring the NNSA/NFO to submit a new water hauling plan to account for the well closures in Area 25, and they are requiring the NNSA/NFO to increase water monitoring to account for the increased water hauling due to the well closures.

BFF and BSDW staff have had numerous meetings to ensure BFF staff duties are consistent with for the BSDW facility manger duties. BFF staff will receive BSDW training in April and May.

Fiscal Analysis:

Estimate of personnel resources used (FTE or hours)

The bureau of Federal Facilities is made up of a Bureau Chief, one supervisor, one subject matter expert, three technical staff and an administrative assistant. The AIP grant funds activities for each of these individuals. For the quarter, that represents approximately 3.5 FTEs based on a review of grant related activities.

Total expenditures for each task area

A total of approximately \$90,000 was spent during this quarter for AIP work. This is the most current figure available at this time and includes personnel, operating, information services, DOE and DOE oversight and purchasing costs.

Comparison of estimate to budgeted expenses:

Expenses this quarter were within the legislatively approved spending limits.

Miscellaneous:

As the current AIP is set to expire on June 30, 2021, final comments on requested updates to the current AIP were submitted to the EM NP. The accompanying grant request for the next five (5) years was also submitted to Environmental Management for review and consideration.

This quarter, staff have continued to organize, complete, scan for electronic storage, and document files for Permits SW-532, NEV HW0101 and Radioactive Waste Acceptance Program.

Throughout the quarter, BFF staff has continued to read technical documents and regulations associated with newly assigned job duties in the area of waste management. Readings included the RCRA permit application, 40 CFR 260 to 268, the solid waste permit application and permits, a few select waste profiles, NRS 445A Water Controls, the E-Tunnel Permit, and, the NNSS water hauling O&M Manual.

The chief participated in monthly virtual NDEP Attorney General staff meetings, bi-weekly Division-Wide Chief's Staff Meetings and bi-weekly meetings with the Administrator via conference calls in January, February, and March 2021.

During this quarter, the bureau chief also attended/participated virtually in: (1) one NSSAB Intergovernmental Meeting, one full NSSAB meeting, and one call to discuss a NSSAB Work Plan item; (2) numerous calls as a member of the NGA's Federal Facilities Task Force (FFTF), the State, Tribal, Government Working Group (STGWG), and the Environmental Council of States (ECOS); (3) the FFTF Winter Meeting; (4) the Low-Level Waste Stakeholder's Forum Quarterly Meeting; (5) bureau staff meetings; and, (6) the annual Waste Management Symposium.

Training:

BFF staff has completed the NNSS GERT and Annual Security Refresher trainings.

BFF staff has completed the SMART21 and NDEP required trainings.

BFF staff has attended virtual Permit Writer Training sessions conducted by the BWPC Permits Branch.