



# Nevada National Security Site Environmental Report 2010



September 2011



Nevada National Security Site

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### Front cover photographs ...

This 140-pound male puma (mountain lion) was captured April 19, 2011, on Timber Mountain in the west-central area of the NNSS. He is helping researchers understand where these elusive predators live, what they eat, and how best to manage the potential risks to workers who have experienced an increase in puma sightings over the past 5 years. The puma study began in December 2010 with the goal of tracking four pumas, fitted with Global Positioning System collars, over a 2-year period. Two female pumas were previously captured and collared in December 2010 and January 2011. Prior to collaring and releasing the animals, scientists collect several measurements as well as hair and blood samples. The study is led by Dr. David Mattson of the U.S. Geological Survey. Check NNSA/NSO news releases regarding this study at <http://www.nv.energy.gov/outreach/news/>.

### Back cover photograph ...

A Great Basin collared lizard (*Crotaphytus bicinctores*) on the NNSS watches for prey. This species occurs in the Mohave, Sonoran, and Great Basin deserts, usually in rocky desert scrub habitat. They have powerful jaws, are fast-moving ambush predators, and are commonly seen basking on rocks. They hunt smaller lizards and invertebrates such as beetles. Females usually lay one clutch of 3–7 eggs in loose sand or in crevices under rocks, and hatchlings appear in August.



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# Nevada National Security Site **Environmental Report** **2010**

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## ***Executive Summary***

This report was prepared to meet the information needs of the public and the requirements and guidelines of the U.S. Department of Energy (DOE) for annual site environmental reports. It was prepared by National Security Technologies, LLC (NSTec), for the U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office (NNSA/NSO). This and previous years' reports, called Annual Site Environmental Reports (ASERs), Nevada Test Site Environmental Reports (NTSERs), and, beginning in 2010, Nevada National Security Site Environmental Reports (NNSSERs), are posted on the NNSA/NSO website at <http://www.nv.energy.gov/library/publications/aser.aspx>.

### ***Purpose and Scope of the NNSSER***

This NNSSER was prepared to satisfy DOE Order DOE O 231.1B, "Environment, Safety and Health Reporting." Its purpose is to (1) report compliance status with environmental standards and requirements, (2) present results of environmental monitoring of radiological and nonradiological effluents, (3) report estimated radiological doses to the public from releases of radioactive material, (4) summarize environmental incidents of noncompliance and actions taken in response to them, (5) describe the NNSA/NSO Environmental Management System and characterize its performance, and (6) highlight significant environmental programs and efforts.

This NNSSER summarizes data and compliance status for calendar year 2010 at the Nevada National Security Site (NNS) (formerly the Nevada Test Site) and its two support facilities, the North Las Vegas Facility (NLVF) and the Remote Sensing Laboratory–Nellis (RSL–Nellis). It also addresses environmental restoration (ER) projects conducted at the Tonopah Test Range (TTR). Through a Memorandum of Agreement, NNSA/NSO is responsible for the oversight of TTR ER projects, and the Sandia Site Office of NNSA (NNSA/SSO) has oversight of all other TTR activities. NNSA/SSO produces the TTR annual environmental report available at <http://www.sandia.gov/news/publications/environmental/index.html>.

### ***Major Site Programs and Facilities***

NNSA/NSO directs the management and operation of the NNS and six sites across the nation. The six sites include two in Nevada (NLVF and RSL–Nellis) and four sites in other states (RSL–Andrews in Maryland, Livermore Operations in California, Los Alamos Operations in New Mexico, and Special Technologies Laboratory in California). Los Alamos, Lawrence Livermore, and Sandia National Laboratories are the principal organizations that sponsor and implement the nuclear weapons programs at the NNS. NSTec is the current Management and Operating contractor accountable for the successful execution of work and ensuring that work is performed in compliance with environmental regulations. The six sites all provide support to enhance the NNS as a location for weapons experimentation and nuclear test readiness.

The three major NNS missions include National Security/Defense, Environmental Management, and Nondefense. The major programs that support these missions are Stockpile Stewardship and Management, Nonproliferation and Counterterrorism, Nuclear Emergency Response, Work for Others, Environmental Restoration, Waste Management, Conservation and Renewable Energy, Other Research and Development, and Infrastructure. The major facilities that support the programs include the U1a Facility, the Big Explosives Experimental Facility (BEEF), the Device Assembly Facility, the Joint Actinide Shock Physics Experimental Research Facility, the Radiological/Nuclear Countermeasures Test and Evaluation Complex, the Area 5 Radioactive Waste Management Complex (RWMC), the Area 3 Radioactive Waste Management Site (RWMS), and the Nonproliferation Test and Evaluation Complex (NPTEC).

### ***Other Key Environmental Initiatives***

Aside from the environmental restoration efforts to clean up legacy contamination from historical nuclear testing activities, several other environmental key initiatives are pursued. They are components of the Nondefense mission of NNSA/NSO to prevent pollution, minimize waste generation, conserve water, advance energy



efficiency, reduce fossil fuel use, pursue renewable energy sources, and support the federal goals within all of these areas promulgated through executive orders and DOE orders. These initiatives are pursued through the Energy Management Program and the Pollution Prevention and Waste Minimization (P2/WM) Program discussed below.

## ***Environmental Performance Measures Programs***

During the conduct of the major programs mentioned above, NNSA/NSO complies with applicable environmental and public health protection regulations and strives to manage the NNSS as a unique and valuable national resource. For the identification of NNSS environmental initiatives, NNSA/NSO relies upon NSTec's Integrated Safety Management System (ISMS), contractual requirements, and the Environmental Management System (EMS). The ISMS is designed to ensure the systematic integration of environment, safety, and health concerns into management and work practices so that NNSS missions are accomplished safely and in a manner that protects the environment. NNSA/NSO oversees ISMS implementation through the Integrated Safety Management Council.

The EMS is designed to incorporate concern for environmental performance throughout all site programs and activities, with the ultimate goal being continual reduction of program impacts on the environment. The NNSS attained International Organization for Standardization (ISO) 14001 certification for its EMS in 2008, and continues to maintain certification. In addition to ISMS and EMS, two NSTec programs, the Energy Management Program and the P2/WM Program, operate specifically to support some of the key environmental initiatives.

## ***Environmental Management System***

An Environmental Working Group, composed of key employees in several NSTec organizations, helps determine what EMS objectives and targets will be implemented to address specific environmental aspects of NNSA/NSO operations. These are determined on a fiscal year (FY) (October 1 through September 30) basis. The FY 2010 targets were all met or exceeded and are summarized in Table 3-1 of Chapter 3.

Two surveillances were performed by the ISO 14001 certifying organization in 2010. The EMS program was found to meet all the requirements of the ISO 14001 standard with no major non-conformities, and it was recommended that the EMS maintain full certification. A 2010 independent audit conducted by NSTec's Performance Analysis and Improvement Division found minor issues that were corrected by updating existing EMS management documents.

In November 2010, the 2010 Facility EMS Annual Report Data for the NNSS was entered into a DOE Headquarters EMS database. The report includes a score card section that is a series of questions regarding a site's EMS effectiveness in meeting the objectives of federal EMS directives. The NNSS scored "green" (the highest score).

## ***Energy Management Program***

The NNSA/NSO Energy Management Program supports DOE goals that have been set to meet the requirements of DOE O 430.2B, "Departmental Energy, Renewable Energy and Transportation Management" and Executive Order EO 13514, "Federal Leadership in Environmental, Energy, and Economic Performance." The Energy Management Program accomplishes this by advancing energy efficiency, water conservation, and the use of solar and other renewable energy sources at the NNSS, NLVF, and RSL-Nellis. In September 2010, DOE released its Strategic Sustainability Performance Plan (SSPP) (DOE, 2010a) that identifies the long-term goals to address the requirements of DOE O 430.2B and EO 13514. In response, the Energy Management Program prepared the *FY 2011 NNSA/NSO Site Sustainability Plan* (SSP) (NSTec, 2010a) that identifies NNSA/NSO specific goals. Thus far, the Energy Management Program is exceeding the DOE long-term goals of reducing energy intensity, water intensity, and petroleum fuel use, and for increasing alternate fuel use and the acquisition of alternative fuel vehicles. The 2010 status of all the NNSA/NSO SSPs goals is summarized in Table 3-3 of Chapter 3.



## ***P2/WM Program***

The P2/WM Program has initiatives to eliminate or reduce the generation of waste, the release of pollutants to the environment, and the use of Class I ozone-depleting substances. These initiatives are identified in DOE O 450.1A, “Environmental Protection Program,” and EO 13423, “Strengthening Federal Environmental, Energy, and Transportation Management,” and are pursued through source reduction, re-use, segregation, and recycling, and by procuring recycled-content materials and environmentally preferable products and services. In 2010, the P2/WM Program was compliant with the requirements for implementing P2/WM processes but did not meet one goal under EO 13423. Only 52.6 percent of qualified items purchased by NNSA/NSO in 2010 contained the minimum amount of recycled materials instead of the 100 percent required, if possible, under EO 13423. This was an increase, however, from 2009 when the percentage of such items was only 40 percent.

The 2010 P2/WM activities resulted in reductions to the volume and/or toxicity of waste generated by NNSA/NSO activities. A reduction of 138.8 metric tons (mtons) (152.7 tons) of hazardous wastes (HW) was realized in 2010. The largest proportion of this reduction came from shipments of bulk used oil (82.3 mtons [90.5 tons]), lead acid batteries (29.0 mtons [31.9 tons]), and electronic equipment (16.6 mtons [18.3 tons]) to offsite vendors for recycling. A reduction of 648.5 mtons (713.3 tons) of solid wastes was realized in 2010. The largest proportion of this reduction came from shipping 476.3 mtons (523.9 tons) of mixed paper/cardboard/aluminum cans/plastic from the NLVF to a vendor for recycling, and shipping 101.5 mtons (111.6 tons) of mixed paper/cardboard from the NNSS to an offsite vendor for recycling.

## ***Environmental Awards***

Construction of a new Area 6 Fire Station was completed in 2010. In December 2010, the building received the Leadership in Energy and Environmental Design (LEED) Gold designation because of the many environmental sustainability features incorporated into the building. LEED certification is third-party verification from the U.S. Green Building Council that signifies a building is designed and is operating exactly as it was intended. LEED designated buildings cost less to operate and maintain, are energy- and water-efficient, and contribute to occupant health and productivity. The project was recognized with a DOE/NNSA award in the National Pollution Prevention Program. That award was the Environmental Stewardship Award in the category of Integrative Planning and Design. A second new station, the Mercury Fire Station, was also completed in 2010 and received the LEED Gold designation in February 2011.

## ***Compliance***

One measure of the effectiveness of the EMS is the degree of compliance with applicable environmental laws, regulations, and policies that protect the environment and the public from the effects of NNSS operations. The performance measures that are tracked annually to ensure compliance are consolidated and presented in Chapter 2, Compliance Summary. In 2010, environmental compliance was nearly 100 percent for all federal statutes, as shown below.

Federal Environmental Statute	What it Covers	2010 Status
<b>Waste and Hazardous Materials Management and Environmental Restoration</b>		
Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)/Superfund Amendments and Reauthorization Act (SARA)	Cleanup of waste sites containing hazardous substances	No HW cleanup operations on the NNSS are regulated under CERCLA or SARA; they are regulated under RCRA instead. The requirements of CERCLA applicable to the NNSS pertain to an emergency response program for hazardous substance releases (see Emergency Planning and Community Right-to-Know Act below) and to how state laws concerning the removal and remediation of hazardous substances apply to federal facilities (specifically, implementation of the Federal Facility Agreement and Consent Order (see below).
Federal Facility Agreement and Consent Order (FFACO)	Cleanup of waste sites containing hazardous substances	All 2010 milestones established under the FFACO with the State of Nevada were met for conducting corrective actions and closures of historical contaminated sites called corrective action sites (CASs).  A total of 14 CASs were closed in accordance with State-approved corrective action plans.
Resource Conservation and Recovery Act (RCRA)	Generation, management, and/or disposal of HW and mixed low-level waste (MLLW) and cleanup of inactive, historical waste sites	A total of 68,902 cubic feet equaling 1,266 tons of MLLW were received and disposed on site in accordance with state permits.  A total of 8.95 tons of HW were stored prior to shipment to an offsite disposal facility in accordance with the state permit.  Semiannual water samples from three groundwater monitoring wells at the Area 5 RWMC confirmed that buried MLLW remains contained.  All vadose zone monitoring and post-closure inspections of historical RCRA closure sites confirmed the sites' integrity to contain HW.
National Environmental Policy Act (NEPA)	Projects are evaluated for environmental impacts	NNSA/NSO continued preparation of a new <i>Site-Wide Environmental Impact Statement for the Nevada National Security Site and Offsite Locations in the State of Nevada</i> . It evaluates current and future NNSA/NSO operations in Nevada during the 10-year period beginning when the Record of Decision is published, scheduled for 2012.
Toxic Substances Control Act (TSCA)	Management and disposal of polychlorinated biphenyls (PCBs)	Forty-one drums of fluorescent light ballasts containing PCBs and approximately 490 tons of PCB-contaminated soil and debris were shipped off site to permitted disposal and treatment facilities.
Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)	Storage and use of pesticides and herbicides	Both restricted-use and nonrestricted-use pesticides were used in 2010 and were applied by State of Nevada certified personnel. Facility inspections indicated that the storage and use of pesticides were in compliance with federal and state regulations.



Federal Environmental Statute	What it Covers	2010 Status
<b>Waste and Hazardous Materials Management and Environmental Restoration (continued)</b>		
Emergency Planning and Community Right-to-Know Act (EPCRA)	The public's right to know about chemicals released into the community	<p>NNSA/NSO reported releases, waste disposal, and waste transfers of lead and mercury. As part of normal operations, 90,327 pounds (lb) of lead and 2,931.25 lb of mercury were received or generated on site and disposed on site; 10,683 lb of lead were released as spent ammunition at the Mercury Firing Range, which will be recycled in the future, and 6.4 lb of lead were released to the air from the Mercury Firing Range. Lead and mercury wastes generated on site and shipped off site for either disposal or recycling totaled 13,349.85 lb for lead and 0.03 lb for mercury.</p> <p>The chemical inventory for NNSS, NLVF, and RSL-Nellis was updated and submitted to the State of Nevada. No releases occurred that triggered state or federal reporting requirements.</p>
<b>Radiation Protection</b>		
DOE O 5400.5, "Radiation Protection of the Public and the Environment"	Measuring radioactivity in the environment and estimating radiological dose to the public due to NNSA/NSO activities	<p>Routine radiological monitoring was conducted at 19 onsite air stations, 18 offsite and 24 onsite groundwater sources, and 109 stations measuring direct gamma radiation. A combined total of 22 plant and 8 animal samples were collected from seven locations to monitor biota.</p> <p>The total annual dose to the maximally exposed individual (MEI) from all exposure pathways due to NNSA/NSO activities was estimated to be 1.69 millirems per year (mrem/yr), well below the DOE limit of 100 mrem/yr.</p>
Atomic Energy Act (through compliance with DOE O 435.1, "Radioactive Waste Management")	Management of low-level radioactive waste (LLW) and MLLW generated or disposed on site	<p>A total of 69,905 cubic feet of radioactive wastes, which included LLW, MLLW, and asbestiform LLW, were received and disposed on site.</p> <p>All volumes and weights of disposed radiological wastes for permitted disposal units were within permit limits.</p> <p>All vadose zone and groundwater monitoring continued to verify that disposed LLW and MLLW are not migrating to groundwater or threatening biota or the environment.</p>
<b>Air Quality and Protection</b>		
Clean Air Act: National Emission Standards for Hazardous Air Pollutants (NESHAP) National Ambient Air Quality Standards (NAAQS) New Source Performance Standards (NSPS) Stratospheric Ozone Protection	Air quality and emissions into the air from facility operations	<p>There are no major sources of criteria air pollutants and hazardous air pollutants at the NNSS, NLVF, or RSL-Nellis. Nonradiological air emissions from all permitted equipment and facilities were calculated and were all below permit emission limits; emissions from permitted equipment were all below opacity limits.</p> <p>No air permit exceedances, Notices of Violation, or other air quality noncompliances occurred. NLVF received a Letter of Noncompliance from Clark County concerning the maintenance of log books for two diesel generators at Building B-7.</p> <p>The 19 onsite continuous air sampling stations detected man-made radionuclides at levels comparable to previous years and well below the regulatory dose limit for air emissions to the public of 10 mrem/yr. The estimated dose from all 2010 NNSS air emissions to the MEI is 0.04 mrem/yr.</p>

Federal Environmental Statute	What it Covers	2010 Status
<b>Water Quality and Protection</b>		
Clean Water Act	Water quality and effluent discharges from facility operations	All required maintenance, monitoring, and reporting were conducted for permitted wastewater systems and monitoring wells. All domestic and industrial wastewater systems and groundwater monitoring well samples were within permit limits for regulated water contaminants and water chemistry parameters.  Pumped groundwater samples at the NLVF were all within National Pollutant Discharge Elimination System (NPDES) permit limits. NNSS operations do not require any NPDES permits.
Safe Drinking Water Act	Quality of drinking water	All concentrations of regulated water contaminants in drinking water from the three permitted public water systems on the NNSS were below state and federal permit limits.
<b>Other Environmental Statutes</b>		
Endangered Species Act (ESA)	Threatened or endangered species of plants and animals	Field surveys for 20 proposed projects were conducted to ensure no threatened desert tortoises would be harmed during land disturbance; 4.46 acres of tortoise habitat were disturbed, and no tortoises were harmed at or displaced from project sites. Two tortoises were killed on roads, and 13 were moved off of roads. All actions were in compliance with the U.S. Fish and Wildlife Service's requirements for work conducted in desert tortoise habitat.
National Historic Preservation Act (NHPA)	Identifying and preserving historic properties	NNSA/NSO maintained compliance with the NHPA. Archival research for 16 proposed projects was conducted. A total of 405 acres were surveyed for six of the projects, eight prehistoric/historical sites were identified, and one locomotive was determined eligible for the National Register of Historic Places.
Migratory Bird Treaty Act (MBTA)	Protecting migratory birds, nests, and eggs from harm	One raven nest with two chicks was found during a preactivity survey, and NNSS operations that would harm the nest were postponed until chicks had fledged. Two barn owls, three red-tailed hawks, and one raven were electrocuted by power lines; one barn owl was killed by a vehicle; and three cowbirds and five northern flickers were killed by accidental entrapment. Sites of entrapment were mitigated to avoid recurrence.

## Occurrences and Unplanned Releases

No unplanned airborne releases and no unplanned releases of radioactive liquids occurred from the NNSS, NLVF, or RSL-Nellis in 2010. Corrective actions were taken in 2010, however, for three environmental occurrences that were reported to the State. They included (1) a spill of an estimated 80 gallons of hydraulic fluid in Area 25 of the NNSS, (2) a spill of 100–200 gallons of diesel fuel in Area 20, and (3) a spill of 5–8 gallons of hydraulic fluid in Area 26. The State of Nevada was notified of each occurrence, all affected soil and debris were removed and disposed of on site, and damaged/worn equipment was repaired.

## ***Radiation Dose to the Public***

**Background Gamma Radiation** – Mean background gamma radiation exposure rates on the NNSS are calculated using ten thermoluminescent dosimeter (TLD) stations located away from radiologically contaminated sites. The average mean exposure rate among these ten stations in 2010 was 116 milliroentgen per year (mR/yr) and ranged from 64 to 160 mR/yr (Section 6.3). This equates to an annual estimated background external dose of 64 to 160 millirem per year (mrem/yr) to a hypothetical person residing at those locations all year. The Desert Research Institute (DRI) used TLDs at offsite locations in 2010 to measure background radiation, and these measurements ranged from 70 mR/yr at St. George, Utah, to 146 mR/yr at Twin Springs, Nevada (Section 7.1.2).

**Public Dose from Drinking Water** – Man-made radionuclides from past nuclear testing have not been detected in offsite drinking water supply wells or springs in the past or during 2010 (Section 5.1.6). The offsite public does not receive a radiation dose from NNSS operations from drinking water.

**Public Dose from Inhalation** – The radiation dose limit to the general public via just the air transport pathway is established by NESHAP under the Clean Air Act to be 10 mrem/yr. The U.S. Environmental Protection Agency (EPA), Region IX, has approved the use of six air sampling stations on the NNSS (called “critical receptor” stations) to verify compliance with the NESHAP dose limit. The following radionuclides were detected at four or more of the critical receptor samplers: americium-241 ( $^{241}\text{Am}$ ), plutonium-238 ( $^{238}\text{Pu}$ ), plutonium-239+240 ( $^{239+240}\text{Pu}$ ), uranium-233+234, uranium-235+236, uranium-238, and tritium ( $^3\text{H}$ ) (Section 4.1.5). Concentrations of these radionuclides at each of the stations indicated that the NESHAP dose limit to the public was not exceeded. The Schooner station in the far northwest corner of the NNSS experienced the highest concentrations of radioactive air emissions (Section 4.1.5). The Gate 510 sampler, however, is the closest station to a public receptor (3.5 kilometers [km] [2.2 miles (mi)]). The estimated effective dose equivalent from air emissions for a hypothetical individual living year-round at the Gate 510 sampler would be 0.04 mrem/yr.

**Public Dose from Direct Radiation** – Areas accessible to the public had direct external gamma radiation exposure rates in 2010 comparable to natural background rates. The TLD locations on the west and north sides of the parking area at Gate 100, the NNSS entrance gate, had estimated annual mean exposures of 91 and 64 mR/yr, respectively, similar to the range of background exposures observed on the NNSS (Section 6.3.1).

Military or other personnel on the Nevada Test and Training Range (NTTR) could be exposed to direct radiation from legacy sites on Frenchman Lake playa. A TLD location near the NNSS boundary with NTTR in the playa had an estimated annual exposure of 322 mR (Section 6.3.1). This represents an above-background dose of 162 to 262 mrem/yr (depending on which background radiation value is subtracted), which would exceed the 100 mrem/yr dose limit to a member of the public. However, there are no living quarters or full-time personnel in that area.

**Public Dose from Ingestion of Radionuclides in Game Animals and Pine Nuts** – Game animals and small mammals (used as models for small game animals) from different contaminated NNSS sites are trapped each year and analyzed for their radionuclide content to estimate the dose to hunters who might consume these animals if they moved off the NNSS. In 2010, samples from two jackrabbits captured near the Sedan Crater in Area 10, one accidental road-killed pronghorn antelope from Area 5, one accidental road-killed mountain lion from Area 8, and blood samples from two live mountain lions being studied, one from Area 12 and one from Area 30, were collected and analyzed for radionuclide content. Pine nuts were also collected from pinyon trees in Area 15 and Area 12 near areas potentially contaminated. The analysis of these animal and plant samples indicate that the highest annual dose to a member of the public consuming NNSS jackrabbits and pine nuts was estimated to be 1.65 mrem/yr (Section 9.1.3).

**Public Dose from All Pathways** – The radiation dose limit to the general public via all possible transport pathways (over and above background dose) established by DOE is 100 mrem/yr. The 2010 radiological monitoring data indicate that the dose to the public living in communities surrounding the NNSS is not expected to be significantly higher than the previous 10 years. The public dose from all pathways in 2010 was estimated to be 1.69 mrem/yr. This is 1.7 percent of the 100 mrem/yr dose limit and about 0.5 percent of the total dose the MEI receives from natural background radiation (360 mrem/yr) (Section 9.1.3).



## ***Offsite Monitoring of Radiological Releases into Air***

An offsite radiological air monitoring program is run by the Community Environmental Monitoring Program (CEMP) and is coordinated by DRI of the Nevada System of Higher Education under contract with NNSA/NSO (Chapter 7). It is a non-regulatory public informational and outreach program, and its purpose is to provide monitoring for radionuclides that might be released from the NNSS. A network of 29 CEMP stations, located in selected towns and communities within a 160,000 square kilometer (61,776 square mile) area of southern Nevada, southeastern California, and southwestern Utah, was operated during 2010. The CEMP stations monitored gross alpha and beta radioactivity in airborne particulates using low-volume particulate air samplers, penetrating gamma radiation using TLDs, gamma radiation exposure rates using pressurized ion chamber (PIC) detectors, and meteorological parameters using automated weather instrumentation.

As in previous years, no airborne radioactivity related to historical or current NNSS operations was detected in any of the samples from the CEMP particulate air samplers during 2010. TLD and PIC detectors measure gamma radiation from all sources: natural background radiation from cosmic and terrestrial sources and man-made sources. The offsite TLD and PIC results remained consistent with previous years' background levels and are well within background levels observed in other parts of the United States.

## ***Offsite Monitoring of Radionuclides in Water***

In October 2009, sampling of the Underground Test Area (UGTA) Sub-Project Well ER-EC-11, 716.3 meters (m) (2,350 feet [ft]) west of the NNSS boundary, confirmed the presence of tritium measuring approximately 13,180 picocuries per liter (pCi/L) (Section 12.3.2), which is below the EPA maximum contaminant level of 20,000 pCi/L for tritium in drinking water. This was the first time that radionuclides from NNSS underground tests had been detected in groundwater beyond NNSS boundaries. The sampling results are consistent with UGTA's Pahute Mesa transport model, which predicted migration of tritium off the NNSS within 50 years of the first nuclear detonation (1965) from the Central and Western Pahute Mesa corrective action units (Chapter 12; Figure 12-5). In 2010, a deeper zone of Well ER-EC-11 was sampled, and no tritium was detected. This was not unexpected, as the aquifer sampled is isolated from the overlying contaminated aquifer by a confining unit, which does not readily conduct water. Well sampling results to date have not detected the presence of man-made radionuclides farther downgradient of Pahute Mesa in any of the other nearby UGTA wells or in RREMP monitoring wells farther downgradient in Oasis Valley.

Routine offsite water monitoring conducted by NSTec under the *Routine Radiological Environmental Monitoring Plan* (RREMP) (Bechtel Nevada, 2003a) and by DRI (through the CEMP) continues to verify that there are no man-made radionuclides from NNSS underground contamination areas in any public or private water supply wells or springs being monitored. Under the RREMP, NSTec sampled 18 offsite locations (5 community water supply wells, 10 non-potable NNSA/NSO wells, and 3 springs) for tritium, man-made gamma-emitting radionuclides, and gross alpha and gross beta radioactivity. The DRI, through the CEMP, sampled 28 offsite private or community water supply locations (4 springs, 21 wells, and 3 surface water bodies) for tritium.

With the exception of Well PM-3, a non-potable NNSA/NSO well located 7,468 m (24,500 ft) northwest of Well ER-EC-11 on the NTTR, tritium was not detected in the offsite wells and springs sampled under the RREMP (Section 5.1.6). The level of tritium detected at the 475.5 m (1,560 ft)-depth sample from PM-3 was 48.3 pCi/L. The depth of the sample is within zeolitic nonwelded tuff, a tuff confining unit. Hydrogeologic data west of the NNSS are sparse, and thus groundwater flow predictions are uncertain. PM-3 will continue to be monitored under the RREMP and by the UGTA Sub-Project in 2011 to determine whether this is a one-time anomaly. Gross alpha and gross beta radioactivity were detected in all well and spring samples and likely represent natural radiation sources; levels were all below EPA limits set for drinking water.

Tritium concentrations for all the CEMP spring and surface water samples ranged from below detection to 23.5 pCi/L, well below the safe drinking water limit of 20,000 pCi/L (Section 7.2.3). The greatest activities were detected in samples from Boulder City and Henderson, where Lake Mead is the original water source. Slightly elevated tritium activities in Lake Mead have been documented in previous annual NNSS environmental reports and are due to residual tritium persisting in the environment that originated from global atmospheric

nuclear testing. Among the 21 offsite wells sampled under the CEMP, tritium ranged from -0.3 to 4.7 pCi/L (Section 7.2.4). Most samples yielded results that were statistically indistinguishable from laboratory background.

In April 2010, NNSA/NSO gave a second public presentation of the current state of knowledge of contaminant migration off the NNSS at the Beatty Community Center in Beatty, Nevada. Links to the regional transport model, to the Phase I Central and Western Pahute Mesa Transport Model, and to posters presented at the meeting about both the UGTA Sub-Project wells and the offsite RREMP monitored wells can be found at the NNSA/NSO web page at <http://www.nv.energy.gov/library/publications/Environmental/April2010GWOpenHousePosters.pdf>.

## Onsite Monitoring of Radiological Releases into Air

Radionuclide emissions on the NNSS in 2010 were from the following sources: (1) the release of tritium from laboratory operations at the Dense Plasma Focus facility in Area 11; (2) the evaporation of tritium from pumped groundwater at one UGTA Sub-Project well in Area 20; (3) the evaporation and transpiration of tritiated water from soil and vegetation, respectively, from the Area 3 and Area 5 RWMSs, the Schooner crater in Area 20, and the Sedan crater in Area 10; (4) the evaporation of tritiated water discharged from E Tunnel in Area 12; (5) the evaporation of tritiated water removed from the basement of Building A-1 at the NLVF and transported to the NNSS for disposal in the Area 23 Sewage Lagoon; (6) the resuspension of  $^{241}\text{Am}$ ,  $^{238}\text{Pu}$ , and  $^{239+240}\text{Pu}$  from past nuclear testing from soil deposits on the NNSS across all NNSS areas, and (7) the suspension of depleted uranium (DU) during experiments conducted at NPTEC in Area 5. A network of 19 air sampling stations and a network of 109 TLDs on the NNSS were used to monitor diffuse onsite radioactive emissions. Total radiological atmospheric releases for 2010 (Section 4.1.9) are shown in the table below.

$^3\text{H}$	$^{85}\text{Kr}$	Noble Gases ( $T_{1/2}$ * <40 days)	Short-Lived Fission and Activation Products ( $T_{1/2}$ <3 hr)	Fission and Activation Products ( $T_{1/2}$ >3 hr)	Total Radioiodine	Total Radiostrontium	Plutonium	Other Actinides	Other
625	0	0	0	**	0	0	0.050 ( $^{238}\text{Pu}$ ) 0.29 ( $^{239+240}\text{Pu}$ )	0.047 ( $^{241}\text{Am}$ )	0

\*  $T_{1/2}$  = half-life

\*\* Fission and activation products such as cobalt-60, strontium-90, cesium-137, and europium-152, -154, and -155 are in soil in various areas on the NNSS; however, their concentrations in air samples are generally below detection levels and collectively contribute less than 10 percent to the total dose from all radionuclide emissions based on resuspension calculations.

The mean tritium concentration from across the 19 air sampling stations was  $15.22 \times 10^{-6}$  pCi/mL and ranged from below detection to  $241.78 \times 10^{-6}$  pCi/mL at the Schooner crater station. The mean annual exposure rate for direct gamma radiation at the 41 TLDs located near active projects, working personnel, and public access areas was 114 mR, approximately the same as the mean for the 10 background radiation stations of 116 mR.

## Onsite Radiological Monitoring of Water

In 2010, 5 potable and 4 non-potable water supply wells, 14 monitoring wells, and 1 tritiated water containment pond system were sampled for man-made radiological contaminants. The 2010 data indicate that underground nuclear testing has not impacted the NNSS potable water supply network. None of the onsite water supply wells had detectable concentrations of tritium or detectable concentrations of man-made gamma-emitting radionuclides (Section 5.1.7). Gross alpha and gross beta radioactivity was detectable in the potable and non-potable water supply wells at levels below EPA limits for drinking water. The radioactivity likely represents the presence of naturally occurring radionuclides.

All monitoring wells measured for gross alpha and gross beta had detectable levels of one or both, most likely from natural sources. None of the monitoring wells had detectable gamma-emitting radionuclides. Of the 14 onsite monitoring wells, 10 had levels of tritium below detection and 4 had detectable levels ranging from

34.8 to 342 pCi/L (Section 5.1.8). These wells (PM-1, U-19BH, UE-7NS, and WW A) are each within 1 km (0.6 mi) of a historical underground nuclear test; all have consistently had detectable levels of tritium in past years. Their tritium levels are still less than 2 percent of the EPA maximum contaminant level for drinking water of 20,000 pCi/L, and tritium concentrations in these wells has been decreasing since 1999.

Five constructed basins collect and hold water discharged from E Tunnel in Area 12 where nuclear testing was conducted in the past. Tritium in E Tunnel effluent water was 505,000 pCi/L, which is lower than the limit allowed under a wastewater discharge permit for the site (1,000,000 pCi/L). Gross alpha and gross beta values were also less than their permitted limits (Section 5.1.9).

The UGTA Sub-Project pumps tritiated water into lined sumps during studies conducted at contaminated post-shot or near-cavity wells on the NNSS. One of these types of wells, Well ER-20-7, was sampled in 2010. The highest tritium level in this well was 19,100,000 pCi/L (Section 5.1.10). The primary purpose for Well ER-20-7 is to investigate contaminant plume migration downgradient from the TYBO and BENHAM underground nuclear tests. The TYBO and BENHAM tests were executed in drillholes U-20y (1975) and U-20c (1968), respectively.

### ***Onsite Nonradiological Releases into Air***

The release of air pollutants is regulated on the NNSS under a Class II air quality operating permit. Class II permits are issued for minor sources where annual emissions must not exceed 100 tons of any one criteria pollutant, 10 tons of any one of the 189 hazardous air pollutants (HAPs), or 25 tons of any combination of HAPs. Criteria pollutants include sulfur dioxide, nitrogen oxides (NO<sub>x</sub>), carbon monoxide, particulate matter, and volatile organic compounds. The NNSS facilities regulated by the permit include (1) over 15 facilities/160 pieces of equipment throughout the NNSS, (2) NPTEC, (3) Site-Wide Chemical Release Areas, (4) BEEF, (5) the Explosives Ordnance Disposal Unit, and (6) Explosives Activities Sites in Areas 5, 14, 25, 26, and 27.

An estimated 9.2 tons of criteria air pollutants were released on the NNSS in 2010 (Section 4.2.3). The majority was NO<sub>x</sub> from diesel generators. Total HAPs emissions from permitted operations was 0.02 tons (Section 4.2.3). Lead air emissions from non-permitted activities, such as weapons use, are reported to the EPA, and this quantity in 2010 was 6.4 lb (Section 13.3). No emission limits for any criteria air pollutants or HAPs were exceeded.

One chemical test series was conducted in 2010, consisting of 10 releases of chemicals at the Area 5 NPTEC facility and 34 releases at the Port Gaston Facility in Area 25 (Section 4.2.7). The majority of the chemicals released were non-hazardous, and no permit limits were exceeded. No ecological monitoring was performed because each test posed a very low level of risk to the environment and biota. In 2010, explosives were detonated at BEEF and Port Gaston, and no permit limits were exceeded.

### ***Onsite Nonradiological Releases into Water***

There are no liquid discharges to navigable waters, offsite surface water drainage systems, or publicly owned treatment works resulting from operations on the NNSS. Therefore, no Clean Water Act National Pollutant Discharge Elimination System (NPDES) permits are required for operations on the NNSS.

Industrial discharges on the NNSS are limited to two operating sewage lagoon systems, the Area 6 Yucca Lake and Area 23 Mercury systems. Sewage lagoon waters are sampled for a suite of toxic chemicals only in the event of specific or accidental discharges of potential contaminants. There were no such discharges that warranted sampling in 2010, and all water quality parameters monitored quarterly from lagoon samples were within permit limits (Section 5.2.3.1). E Tunnel effluent and holding pond waters sampled for nonradiological contaminants (mainly metals) had levels of contaminants below permit limits (Section 5.2.4).

### ***Nonradiological Releases into Air and Water at NLVF and RSL-Nellis***

Sources of air pollutants at the NLVF and RSL-Nellis are regulated by permits from the Clark County Department of Air Quality and Environmental Management. The regulated sources of air emissions include such equipment/facilities as sanders, blasters, diesel generators, fire pumps, cooling towers, and boilers. The calculated



total emissions of criteria pollutants at NLVF and RSL-Nellis were 0.651 and 1.229 tons per year, respectively. HAPs calculated emissions at NLVF and RSL-Nellis were 0.093 and 0.011 tons per year, respectively.

Water discharges at the NLVF are regulated by a permit with the City of North Las Vegas (CNLV) for sewer discharges and by an NPDES discharge permit issued by the Nevada Division of Environmental Protection for dewatering operations to control rising groundwater levels that surround the facility. The NPDES permit authorizes the discharge of pumped groundwater to the groundwater of the state via percolation and to the Las Vegas Wash via the CNLV storm drain system. Self-monitoring and reporting of the levels of nonradiological contaminants in sewage and industrial outfalls is conducted. In 2010, contaminant measurements were below established permit limits in all water samples from the NLVF sewage outfalls sampled (Appendix A, Section A.1.1.2). Water discharges at RSL-Nellis are required to meet permit limits set by the Clark County Water Reclamation District. All contaminants in the outfall samples were below permit limits (Appendix A, Section A.2.1).

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## **1.0 Introduction and Helpful Information**

### **1.1 Site Location**

The U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office (NNSA/NSO) directs the management and operation of the Nevada National Security Site (NNSS), which is located in Nye County in south-central Nevada (Figure 1-1). The southeast corner of the NNSS is about 88 kilometers (km) (55 miles [mi]) northwest of the center of Las Vegas in Clark County. By highway, it is about 105 km (65 mi) from the center of Las Vegas to Mercury. Mercury, located at the southern end of the NNSS, is the main base camp for worker housing and administrative operations for the NNSS.

The NNSS encompasses about 3,522 square kilometers (km<sup>2</sup>) (1,360 square miles [mi<sup>2</sup>], based on the most recent land survey). It varies from 46 to 56 km (28 to 35 mi) in width from west to east and from 64 to 88 km (40 to 55 mi) from north to south. The NNSS is surrounded on all sides by federal lands (Figure 1-1). It is bordered on the southwest corner by the Yucca Mountain Site, on the west and north by the Nevada Test and Training Range (NTTR), on the east by an area used by both the NTTR and the Desert National Wildlife Range, and on the south by Bureau of Land Management lands. The combination of the NTTR and the NNSS represents one of the larger unpopulated land areas in the United States, comprising some 14,200 km<sup>2</sup> (5,470 mi<sup>2</sup>).

### **1.2 Environmental Setting**

The NNSS is located in the southern part of the Great Basin, the northern-most sub-province of the Basin and Range Physiographic Province. The NNSS terrain is typical of much of the Basin and Range Physiographic Province, characterized by generally north-south trending mountain ranges and intervening valleys. These mountain ranges and valleys, however, are modified on the NNSS by very large volcanic calderas (Figure 1-2).

The principal valleys within the NNSS are Frenchman Flat, Yucca Flat, and Jackass Flats (Figure 1-2). Both Yucca and Frenchman Flat are topographically closed and contain dry lake beds, or playas, at their lowest elevations. Jackass Flats is topographically open, and surface water from this basin flows off the NNSS via the Fortymile Wash. The dominant highlands of the NNSS are Pahute Mesa and Rainier Mesa (high volcanic plateaus), Timber Mountain (a resurgent dome of the Timber Mountain caldera complex), and Shoshone Mountain. In general, the slopes of the highland areas are steep and dissected, and the slopes in the lowland areas are gentle and less eroded. The lowest elevation on the NNSS is 823 meters (m) (2,700 feet [ft]) in Jackass Flats in the southeast, and the highest elevation is 2,341 m (7,680 ft) on Rainier Mesa in the north-central region.

The topography of the NNSS has been altered by historic U.S. Department of Energy (DOE) actions, particularly underground nuclear testing. The principal effect of testing has been the creation of numerous collapse sinks (craters) in Yucca Flat basin and a lesser number of craters on Pahute and Rainier Mesas. Shallow detonations that created surface disruptions were also performed during Project Plowshare to determine the potential uses of nuclear devices for large-scale excavation.

The reader is directed to *Attachment A: Site Description*, a file on the compact disc of this report, where the geology, hydrology, climatology, ecology, and cultural resources of the NNSS are described.

### **1.3 Site History**

The history of the NNSS, as well as its current missions, directs the focus and design of the environmental monitoring and surveillance activities on and near the site. Between 1940 and 1950, the area known as the NNSS was under the jurisdiction of Nellis Air Force Base and was part of the Nellis Bombing and Gunnery Range. The site was established in 1950 to be the primary location for testing the nation's nuclear explosive devices. It was named the Nevada Test Site (NTS) in 1951 and supported nuclear testing from 1951 to 1992. The types of tests conducted during this period are briefly described below. On August 23, 2010, the NTS was named the NNSS to reflect the diversity of nuclear, energy, and homeland security activities now conducted at the site. Nuclear experiments conducted at the NNSS are currently limited to subcritical experiments.



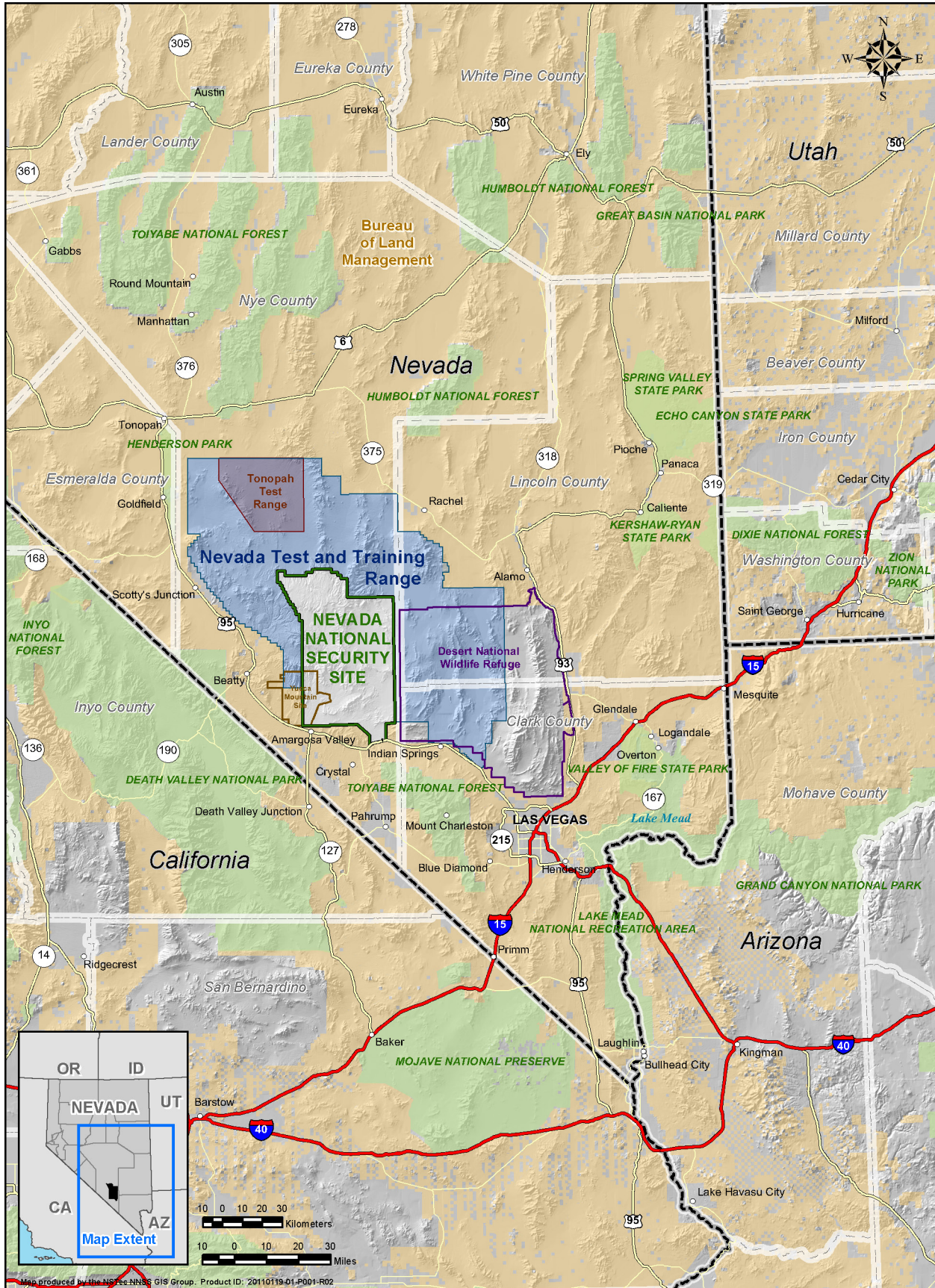


Figure 1-1. NNSS vicinity map



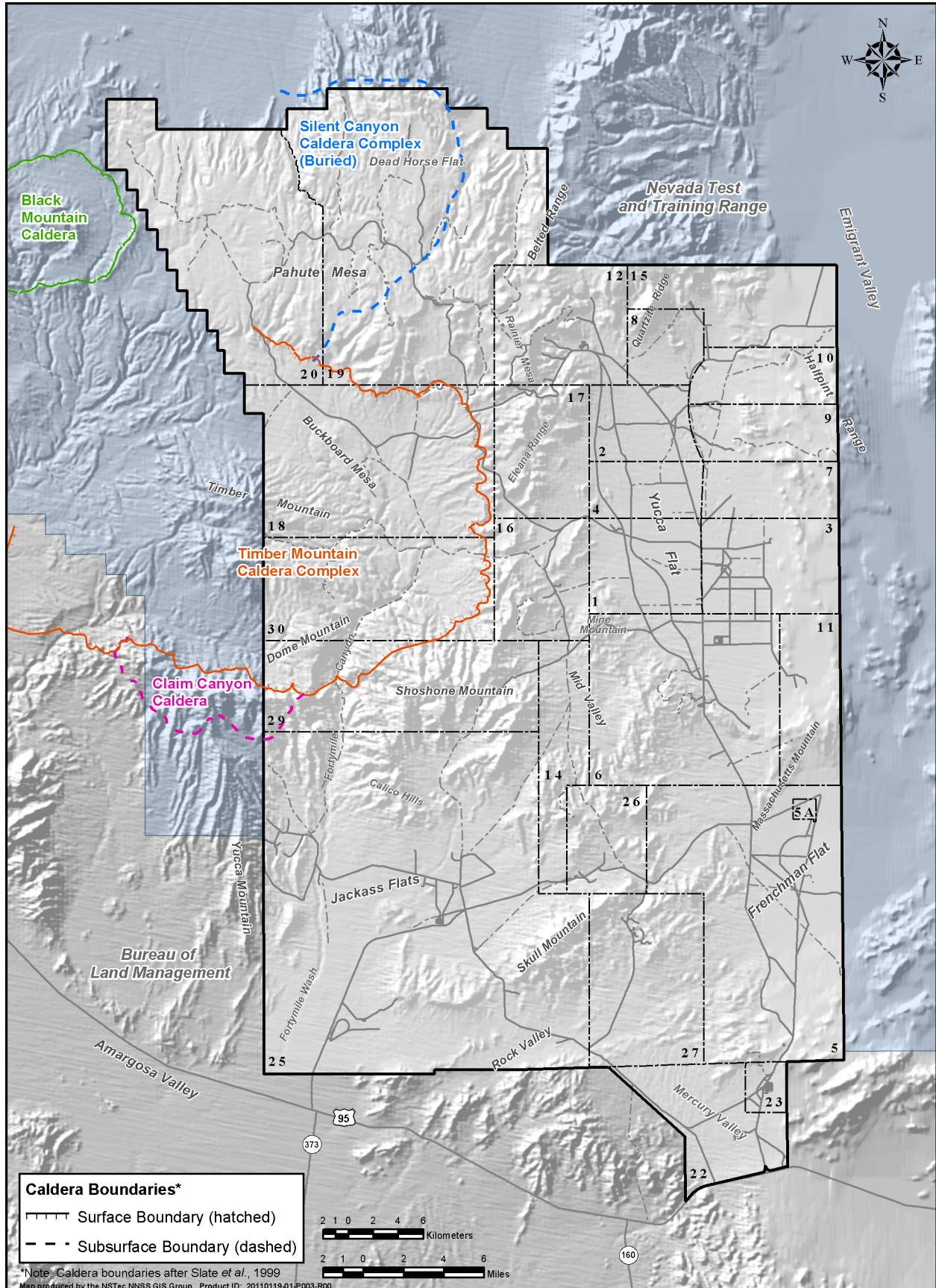


Figure 1-2. Major topographic features and calderas of the NNSS

**Atmospheric Tests** – Tests conducted through the 1950s were predominantly atmospheric tests. These tests involved a nuclear explosive device detonated while on the ground surface, on a steel tower, suspended from tethered balloons, dropped from an aircraft, or placed on a rocket. Several tests were categorized as “safety experiments” and “storage-transportation tests,” involving the destruction of a nuclear device with non-nuclear explosives. Some of these tests resulted in the dispersion of plutonium in the test vicinity. One of these test areas lies just north of the NNSS boundary at the south end of the NTTR, and four others involving storage-transportation tests are at the north end of the NTTR. These test areas have been monitored for radionuclides in the past (1996–2000) in support of remediation projects, two of which were completed. The three remaining sites will be monitored again once restoration of these sites begins. All nuclear device tests are listed in *United States Nuclear Tests, July 1945 through September 1992* (U.S. Department of Energy, Nevada Operations Office, 2000).

**Underground Tests** – The first underground test, a cratering test, was conducted in 1951. The first totally contained underground test was in 1957. Testing was discontinued during a bilateral moratorium that began October 31, 1958, but was resumed in September 1961 after the Union of Soviet Socialist Republics resumed nuclear testing. After late 1962, nearly all tests were conducted in sealed vertical shafts drilled into Yucca Flat and Pahute Mesa or in horizontal tunnels mined into Rainier Mesa. From 1951 to 1992, a total of 828 underground nuclear tests were conducted at the NNSS. Approximately one-third of these tests were detonated near or in the saturated zone (see Glossary, Appendix B); this has resulted in the contamination of groundwater in some areas. In 1996, DOE, the U.S. Department of Defense (DoD), and the State of Nevada entered into a Federal Facility Agreement and Consent Order, which established corrective action units on the NNSS that delineated and defined areas of concern for groundwater contamination.

**Cratering Tests** – Five earth-cratering (shallow-burial) tests were conducted from 1962 through 1968 as part of the Plowshare Program that explored peaceful uses of nuclear explosives. The first and highest yield Plowshare crater test, Sedan (U.S. Public Health Service, 1963), was detonated at the northern end of Yucca Flat on the NNSS. The second-highest yield crater test was Schooner, located in the northwest corner of the NNSS. From these tests, mixed fission products, tritium, and plutonium were entrained in the soil ejected from the craters and deposited on the ground surrounding the craters.

**Other Tests** – Other nuclear-related experiments at the NNSS have included the BREN [Bare Reactor Experiment–Nevada] series in the early 1960s conducted in Area 4. These tests were performed with a 14-million electron volt neutron generator mounted on a 465-m (1,527-ft) steel tower to produce neutron and gamma radiation for the purpose of estimating the radiation doses received by survivors of Hiroshima and Nagasaki. The tower was moved in 1966 to Area 25 and used for conducting Operation HENRE [High-Energy Neutron Reactions Experiment], jointly funded by the DoD and the Atomic Energy Commission (AEC) to provide information for the AEC’s Division of Biology and Medicine. From 1959 through 1973, a series of open-air nuclear reactor, nuclear engine, and nuclear furnace tests was conducted in Area 25, and a series of tests with a nuclear ramjet engine was conducted in Area 26. Erosion of metal cladding on the reactor fuel released some fuel particles that caused negligible deposition of radionuclides on the ground. Most of the radiation released from these tests was gaseous in the form of radio-iodines, radio-xenons, and radio-kryptons.

Fact sheets on many of the historical tests mentioned above can be found at <http://www.nv.energy.gov/library/factsheets.aspx>.

## 1.4 Site Mission

NNSA/NSO directs the management and operation of the NNSS and six sites across the nation. The six sites include the North Las Vegas Facility (NLVF), Remote Sensing Laboratory (RSL)–Nellis, RSL–Andrews, Livermore Operations, Los Alamos Operations, and Special Technologies Laboratory. These sites all provide support to enhance the NNSS as a site for national security and nondefense-related research, development, and testing programs. Los Alamos National Laboratory, Lawrence Livermore National Laboratory, and Sandia National Laboratories are the principal organizations that sponsor and implement the nuclear weapons programs at the NNSS. National Security Technologies, LLC, is the current Management and Operating contractor accountable for the successful execution of work and ensuring that work is performed in compliance with environmental regulations. The three major NNSS missions include National Security/Defense, Environmental Management, and Nondefense. The programs that support these missions are listed in the text box below.

## ***NNSS Missions and Programs***

### **National Security/Defense Missions**

Stockpile Stewardship and Management Program – Conducts high-hazard operations in support of defense-related nuclear and national security experiments and maintains the capability to resume underground nuclear weapons testing, if directed.

Nuclear Emergency Response, Nonproliferation and Counterterrorism Programs – Provides support facilities, training facilities, and capabilities for government agencies involved in emergency response, nonproliferation technology development, national security technology development, and counterterrorism activities.

Work for Others Program – Provides support facilities and capabilities for other agencies/organizations involved in defense-related activities.

### **Environmental Management Missions**

Environmental Restoration Program – Characterizes and remediates the environmental legacy of nuclear weapons and other testing at the NNSS and TTR locations, and develops and deploys technologies that enhance environmental restoration.

Waste Management Program – Manages and safely disposes of low-level waste and mixed low-level waste received from DOE- and DoD-approved facilities throughout the U.S. and wastes generated in Nevada by NNSA/NSO. Safely manages and characterizes hazardous and transuranic wastes for offsite disposal.

### **Nondefense Missions**

Infrastructure Program – Maintains the buildings, roads, utilities, and facilities required to support all NNSS programs and to provide a safe environment for NNSS workers.

Conservation and Renewable Energy Programs – Operates the pollution prevention program and supports renewable energy and conservation initiatives at the NNSS.

Other Research and Development – Provides support facilities and NNSS access to universities and organizations conducting environmental and other research unique to the regional setting.

## ***1.5 Primary Facilities and Activities***

NNSS activities in 2010 continued to be diverse. The primary activity was helping to ensure that the U.S. stockpile of nuclear weapons remains safe and reliable. Facilities that support the National Security/Defense missions include the U1a Facility, Big Explosives Experimental Facility, Device Assembly Facility, Joint Actinide Shock Physics Experimental Research (JASPER) Facility, Nonproliferation Test and Evaluation Complex (NPTEC), and the Radiological/Nuclear Countermeasures Test and Evaluation Complex (RNCTEC) (Figure 1-3). Facilities that support Environmental Management activities include the Area 5 Radioactive Waste Management Complex (RWMC) and the Area 3 Radioactive Waste Management Site (RWMS), currently in cold stand-by (Figure 1-3). Other NNSS activities include demilitarization activities; controlled spills of hazardous material at NPTEC; remediation of legacy contamination sites; processing of waste destined for the Waste Isolation Pilot Plant in Carlsbad, New Mexico, or the Idaho National Laboratory in Idaho Falls, Idaho; and disposal of radioactive and mixed waste. Land use by each of the NNSS missions occurs within designated zones (Figure 1-4).

## ***1.6 Scope of Environmental Report***

This report summarizes data and the compliance status of the NNSA/NSO environmental protection and monitoring programs for calendar year 2010 at the NNSS and at its two support facilities, the NLVF and RSL-Nellis. This report also addresses environmental restoration (ER) projects conducted at the Tonopah Test Range (TTR) (see Figure 1-1). Through a Memorandum of Agreement, NNSA/NSO is responsible for the oversight of TTR ER projects, and the Sandia Site Office of NNSA has oversight of all other TTR annual site environmental reports (e.g., Sandia National Laboratories, 2010), which are posted at <http://www.sandia.gov/news/publications/environmental/index.html>.



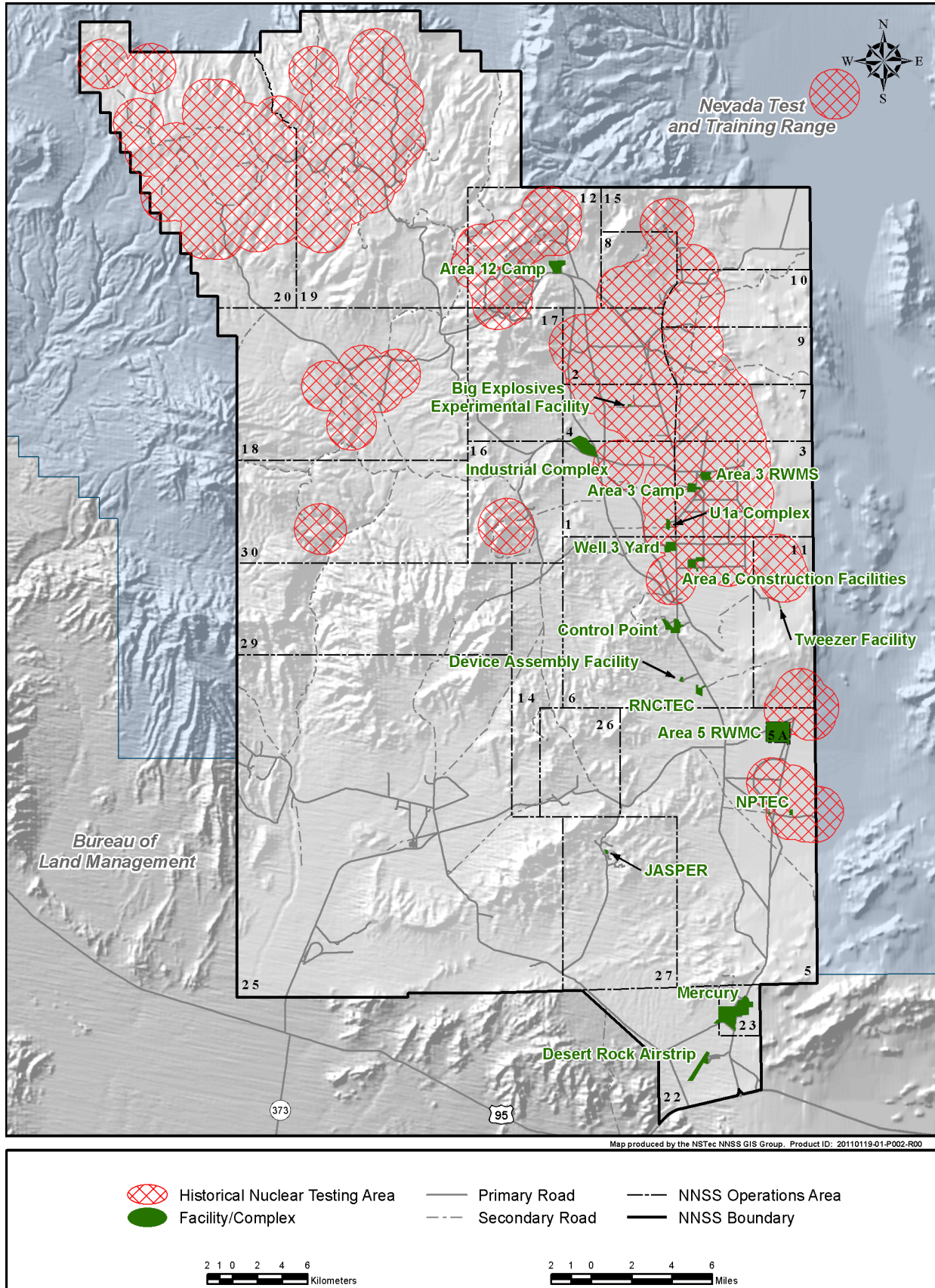


Figure 1-3. NNSS operational areas, principal facilities, and past nuclear testing areas

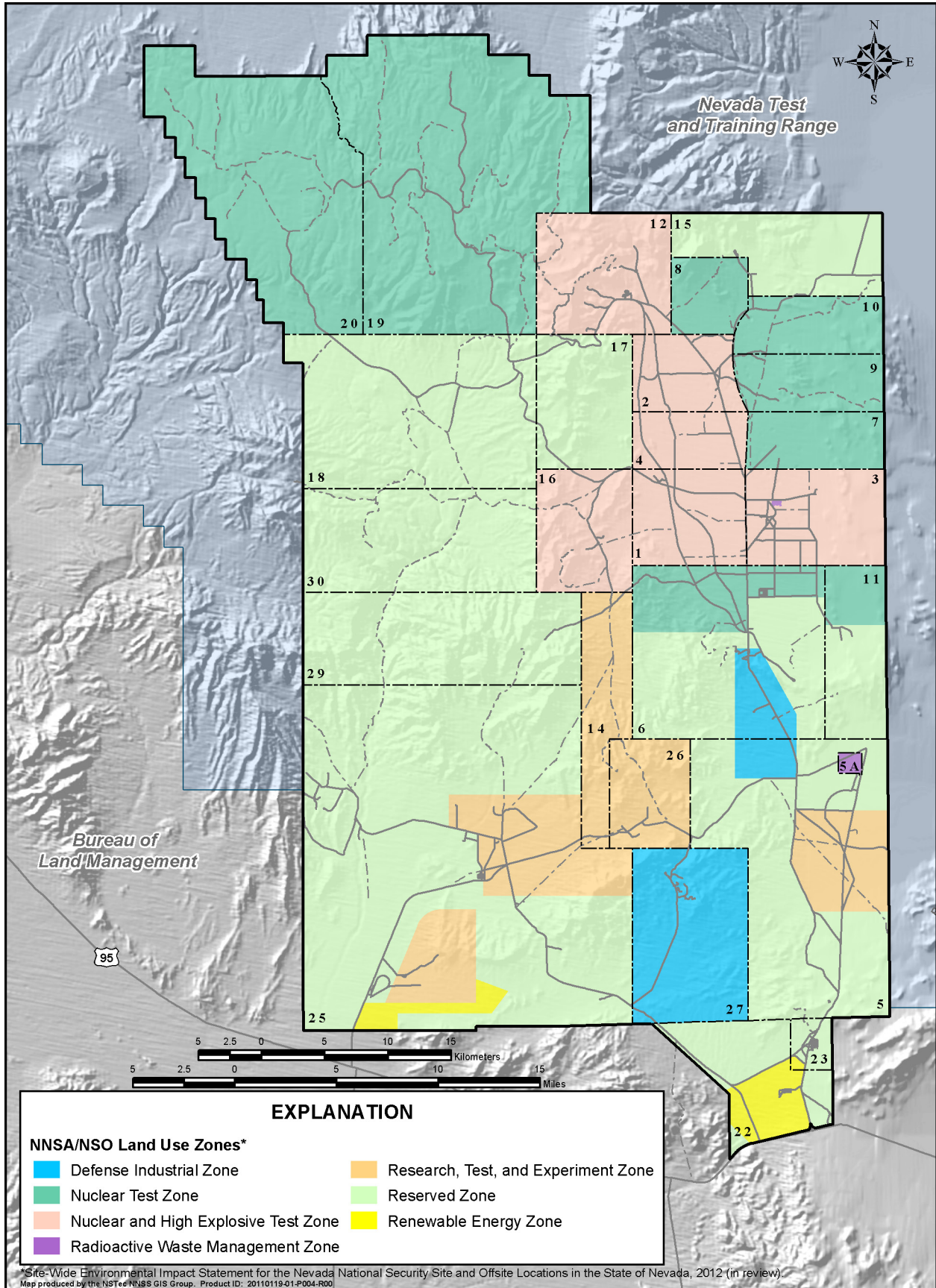


Figure 1-4. NNSO land-use map



## 1.7 Populations near the NNSS

The population of the area surrounding the NNSS (see Figure 1-1) is predominantly rural. Population estimates for Nevada communities are provided by the Nevada State Demographer's Office (2011). The 2010 population estimate for Nye County is 45,459, and the largest Nye County community is Pahrump (37,796), located approximately 80 km (50 mi) south of the NNSS Control Point facility near the center of the NNSS. Other Nye County communities include Tonopah (2,488), Amargosa (1,492), Beatty (924), Round Mountain (806), Gabbs (304), and Manhattan (133). Lincoln County to the east of the NNSS includes a few small communities including Caliente (1,144), Pioche (839), Panaca (626), and Alamo (503). Clark County, southeast of the NNSS, is the major population center of Nevada and has an estimated population of 1,968,831. The total annual population estimate for all Nevada counties, cities, and unincorporated towns is 2,724,634.

The Mojave Desert of California, which includes Death Valley National Park, lies along the southwestern border of Nevada. This area is still predominantly rural; however, tourism at Death Valley National Park swells the population to more than 5,000 on any particular day during holiday periods when the weather is mild.

The extreme southwestern region of Utah is more developed than the adjacent portion of Nevada. The population estimates for Utah communities are projections for 2010 made by the Utah Population Estimates Committee (2011) of the Governor's Office of Planning and Budget. The largest community is St. George, located 220 km (137 mi) east of the NNSS, with an estimated population of 72,897. The next largest town, Cedar City, is located 280 km (174 mi) east-northeast of the NNSS and has an estimated population of 28,857.

The northwestern region of Arizona is mostly rangeland except for that portion in the Lake Mead recreation area. In addition, several small communities lie along the Colorado River. The largest towns in the area are Bullhead City, 165 km (103 mi) south-southeast of the NNSS, with an estimated population of 39,540, and Kingman, 280 km (174 mi) southeast of the NNSS, with an estimated population of 28,068 (Arizona Workforce Informer, 2011).

## 1.8 Understanding Data in this Report

### 1.8.1 Scientific Notation

Scientific notation is used in this report to express very large or very small numbers. A very small number is expressed with a negative exponent, for example  $2.0 \times 10^{-5}$ . To convert this number from scientific notation to a more traditional number, the decimal point must be moved left by the number of places equal to the exponent (5 in this case). The number thus becomes 0.00002.

Very large numbers are expressed in scientific notation with a positive exponent. The decimal point should be moved to the right by the number of places equal to the exponent. The number 1,000,000,000 could be presented in scientific notation as  $1.0 \times 10^9$ .

### 1.8.2 Unit Prefixes

Units for very small and very large numbers are commonly expressed with a prefix. The prefix signifies the amount of the given unit. For example, the prefix k, or kilo-, means 1,000 of a given unit. Thus 1 kg (kilogram) is 1,000 g (grams). Other prefixes used in this report are listed in Table 1-1.

**Table 1-1. Unit prefixes**

Prefix	Abbreviation	Meaning
mega-	M	1,000,000 ( $1 \times 10^6$ )
kilo-	k	1,000 ( $1 \times 10^3$ )
centi-	c	0.01 ( $1 \times 10^{-2}$ )
milli-	m	0.001 ( $1 \times 10^{-3}$ )
micro-	$\mu$	0.000001 ( $1 \times 10^{-6}$ )
nano-	n	0.000,000,1 ( $1 \times 10^{-9}$ )
pico-	p	0.000,000,000,0001 ( $1 \times 10^{-12}$ )

### 1.8.3 Units of Radioactivity

Much of this report deals with levels of radioactivity in various environmental media. The basic unit of radioactivity used in this report is the curie (Ci) (Table 1-2). The curie describes the amount of radioactivity present, and amounts are usually expressed in terms of fractions of curies in a given mass or volume (e.g., picocuries per liter). The curie is historically defined as the rate of nuclear disintegrations that occur in 1 gram of the radionuclide radium-226, which is 37 billion nuclear disintegrations per second. For any other radionuclide, 1 Ci is the quantity of the radionuclide that decays at this same rate. Nuclear disintegrations produce spontaneous emissions of alpha or beta particles, gamma radiation, or combinations of these.

**Table 1-2. Units of radioactivity**

Symbol	Name
Ci	curie
cpm	counts per minute
mCi	millicurie ( $1 \times 10^{-3}$ Ci)
$\mu$ Ci	microcurie ( $1 \times 10^{-6}$ Ci)
nCi	nanocurie ( $1 \times 10^{-9}$ Ci)
pCi	picocurie ( $1 \times 10^{-12}$ Ci)

### 1.8.4 Radiological Dose Units

The amount of ionizing radiation energy absorbed by a living organism is expressed in terms of radiological dose. Radiological dose in this report is usually written in terms of effective dose equivalent and reported numerically in units of millirem (mrem) (Table 1-3). Millirem is a term that relates ionizing radiation to biological effect or risk to humans. A dose of 1 mrem has a biological effect similar to the dose received from an approximate one-day exposure to natural background radiation. An acute (short-term) dose of 100,000 to 400,000 mrem can cause radiation sickness in humans. An acute dose of 400,000 to 500,000 mrem, if left untreated, results in death approximately 50 percent of the time. Exposure to lower amounts of radiation (1,000 mrem or less) produces no immediate observable effects, but long-term (delayed) effects are possible. The average person in the United States receives an annual dose of approximately 300 mrem from exposure to naturally produced radiation. Medical and dental X-rays, air travel, and tobacco smoking add to this total.

**Table 1-3. Units of radiological dose**

Symbol	Name
mrad	millirad ( $1 \times 10^{-3}$ rad)
mrem	millirem ( $1 \times 10^{-3}$ rem)
R	roentgen
mR	milliroentgen ( $1 \times 10^{-3}$ R)
$\mu$ R	microroentgen ( $1 \times 10^{-6}$ R)

The unit "rad," for radiation absorbed dose, is also used in this report. The rad is a measure of the energy absorbed by any material, whereas a "rem," for roentgen equivalent man, relates to both the amount of radiation energy absorbed by humans and its consequence. A roentgen (R) is a measure of radiation exposure. Generally speaking, 1 R of exposure will result in an effective dose equivalent of 1 rem. Additional information on radiation and dose terminology can be found in the Glossary (Appendix B).

### 1.8.5 International System of Units for Radioactivity and Dose

In some instances in this report, radioactivity and radiological dose values are expressed in other units in addition to Ci and rem. These units are the becquerel (Bq) and the sievert (Sv), respectively. The Bq and Sv belong to the International System of Units (SI), and their inclusion in this report is mandated by DOE. SI units are the internationally accepted units and may eventually be the standard for reporting both radioactivity and radiation dose in the United States. One Bq is equivalent to one nuclear disintegration per second.

The unit of radiation absorbed dose (rad) has a corresponding SI unit called the gray (Gy). The roentgen measure of radiation exposure has no SI equivalent. Table 1-4 provides the multiplication factors for converting to and from SI units.

**Table 1-4. Conversion table for SI units**

To Convert From	To	Multiply By
becquerel (Bq)	picocurie (pCi)	27
curie (Ci)	becquerel (Bq)	$3.7 \times 10^{10}$
gray (Gy)	rad	100
mrem	millisievert (mSv)	0.01
msievert (mSv)	mrem	100
picocurie (pCi)	becquerel (Bq)	0.03704
rad	gray (Gy)	0.01
sievert (Sv)	rem	100

### 1.8.6 Radionuclide Nomenclature

Radionuclides are frequently expressed with the one- or two-letter chemical symbol for the element. Radionuclides may have many different isotopes, which are shown by a superscript to the left of the symbol. This number is the atomic weight of the isotope (the number of protons and neutrons in the nucleus of the atom). Radionuclide symbols, many of which are used in this report, are shown in Table 1-5 along with the half-life of each radionuclide. The half-life is the time required for one-half of the radioactive atoms in a given amount of material to decay. For example, after one half-life, half of the original atoms will have decayed; after two half-lives, three-fourths of the original atoms will have decayed; and after three half-lives, seven-eighths of the original atoms will have decayed, and so on. The notation  $^{236+238}\text{Ra}$  and similar notations in this report (e.g.,  $^{239+240}\text{Pu}$ ) are used when the analytical method does not distinguish between the isotopes, but reports the total amount of both.

### 1.8.7 Units of Measurement

Both metric and non-metric units of measurement are used in this report. Metric system and U.S. customary units and their respective equivalents are shown in Table 1-6 on the following page.

### 1.8.8 Measurement Variability

There is always uncertainty associated with the measurement of environmental contaminants. For radioactivity, a major source of uncertainty is the inherent randomness of radioactive decay events.

Uncertainty in analytical measurements is also the consequence of variability related to collecting and analyzing the samples. This variability is associated with reading or recording the result, handling or processing the sample, calibrating the counting instrument, and numerical rounding.

The uncertainty of a measurement is denoted by following the result with an uncertainty value, which is preceded by the plus-or-minus symbol,  $\pm$ . This uncertainty value gives information on what the measurement might be if the same sample were analyzed again under identical conditions. The uncertainty value implies that approximately 95 percent of the time, the average of many measurements would give a value somewhere between the reported value minus the uncertainty value and the reported value plus the uncertainty value.

If the reported concentration of a given constituent is smaller than its associated uncertainty (e.g.,  $40 \pm 200$ ), then the sample may not contain that constituent. Such low concentration values are considered to be below detection, meaning the concentration of the constituent in the sample is so low that it is undetected by the method and/or instrument.

**Table 1-5. Radionuclides and their half-lives**

Symbol	Radionuclide	Half-Life <sup>(a)</sup>
$^{241}\text{Am}$	americium-241	432.2 yr
$^7\text{Be}$	beryllium-7	53.44 d
$^{14}\text{C}$	carbon-14	5,730 yr
$^{134}\text{Cs}$	cesium-134	2.1 yr
$^{137}\text{Cs}$	cesium-137	30 yr
$^{51}\text{Cr}$	chromium-51	27.7 d
$^{60}\text{Co}$	cobalt-60	5.3 yr
$^{152}\text{Eu}$	europium-152	13.3 yr
$^{154}\text{Eu}$	europium-154	8.8 yr
$^{155}\text{Eu}$	europium-155	5 yr
$^3\text{H}$	tritium	12.35 yr
$^{129}\text{I}$	iodine-129	$1.6 \times 10^7$ yr
$^{131}\text{I}$	iodine-131	8 d
$^{40}\text{K}$	potassium-40	$1.3 \times 10^8$ yr
$^{85}\text{Kr}$	krypton-85	$10^7$ yr
$^{212}\text{Pb}$	lead-212	10.6 hr
$^{238}\text{Pu}$	plutonium-238	87.7 hr
$^{239}\text{Pu}$	plutonium-239	$2.4 \times 10^4$ yr
$^{240}\text{Pu}$	plutonium-240	$6.5 \times 10^3$ yr
$^{241}\text{Pu}$	plutonium-241	14.4 yr
$^{226}\text{Ra}$	radium-226	$1.62 \times 10^3$ yr
$^{228}\text{Ra}$	radium-228	5.75 yr
$^{220}\text{Rn}$	radon-220	56 s
$^{222}\text{Rn}$	radon-222	3.8 d
$^{103}\text{Ru}$	ruthenium-103	39.3 d
$^{106}\text{Ru}$	ruthenium-106	368.2 d
$^{125}\text{Sb}$	antimony-125	2.8 yr
$^{113}\text{Sn}$	tin-113	115 d
$^{90}\text{Sr}$	strontium-90	29.1 yr
$^{99}\text{Tc}$	technetium-99	$2.1 \times 10^5$ yr
$^{232}\text{Th}$	thorium-232	$1.4 \times 10^{10}$ yr
U <sup>(b)</sup>	uranium total	- - - <sup>(c)</sup>
$^{234}\text{U}$	uranium-234	$2.4 \times 10^5$ yr
$^{235}\text{U}$	uranium-235	$7 \times 10^8$ hr
$^{238}\text{U}$	uranium-238	$4.5 \times 10^9$ yr
$^{65}\text{Zn}$	zinc-65	243.9 d
$^{95}\text{Zr}$	zirconium-95	63.98 d

(a) From Shleien, 1992

(b) Total uranium may also be indicated by U-natural (U-nat) or U-mass

(c) Natural uranium is a mixture dominated by  $^{238}\text{U}$ ; thus, the half-life is approximately  $4.5 \times 10^9$  years

Table 1-6. Metric and U.S. customary unit equivalents

Metric Unit	U.S. Customary Equivalent Unit	U.S. Customary Unit	Metric Equivalent Unit
<b>Length</b>			
1 centimeter (cm)	0.39 inches (in.)	1 inch (in.)	2.54 centimeters (cm)
1 millimeter (mm)	0.039 inches (in.)		25.4 millimeters (mm)
1 meter (m)	3.28 feet (ft)	1 foot (ft)	0.3048 meters (m)
	1.09 yards (yd)	1 yard (yd)	0.9144 meters (m)
1 kilometer (km)	0.62 miles (mi)	1 mile (mi)	1.6093 kilometers (km)
<b>Volume</b>			
1 liter (L)	0.26 gallons (gal)	1 gallon (gal)	3.7853 liters (L)
1 cubic meter (m <sup>3</sup> )	35.32 cubic feet (ft <sup>3</sup> )	1 cubic foot (ft <sup>3</sup> )	0.028 cubic meters (m <sup>3</sup> )
	1.35 cubic yards (yd <sup>3</sup> )	1 cubic yard (yd <sup>3</sup> )	0.765 cubic meters (m <sup>3</sup> )
<b>Weight</b>			
1 gram (g)	0.035 ounces (oz)	1 ounce (oz)	28.6 gram (g)
1 kilogram (kg)	2.21 pounds (lb)	1 pound (lb)	0.373 kilograms (kg)
1 metric ton (mton)	1.10 short ton (2,000 lb)	1 short ton (2,000 lb)	0.90718 metric ton (mton)
<b>Geographic area</b>			
1 hectare	2.47 acres	1 acre	0.40 hectares
<b>Radioactivity</b>			
1 becquerel (Bq)	2.7 x 10 <sup>-11</sup> curie (Ci)	1 curie (Ci)	3.7 x 10 <sup>-10</sup> becquerel (Bq)
<b>Radiation dose</b>			
1 rem	0.01 sievert (Sv)	1 sievert (Sv)	100 rem
<b>Temperature</b>			
	$^{\circ}\text{C} = (^{\circ}\text{F} - 32)/1.8$		$^{\circ}\text{F} = (^{\circ}\text{C} \times 1.8) + 32$

### 1.8.9 Mean and Standard Deviation

The mean of a set of data is the usual average of those data. The standard deviation (SD) of sample data relates to the variation around the mean of a set of individual sample results; it is defined as the square root of the average squared difference of individual data values from the mean. This variation includes both measurement variability and actual variation between monitoring periods (weeks, months, or quarters, depending on the particular analysis). The sample mean and standard deviation are estimates of the average and the variability that would be seen in a large number of repeated measurements. If the distribution shape were “normal” (i.e., shaped as  $\wedge$ ), about 67 percent of the measurements would be within the mean  $\pm$  SD, and 95 percent would be within the mean  $\pm$  2 SD.

### 1.8.10 Standard Error of the Mean

Just as individual values are accompanied by counting uncertainties, mean values (averages) are accompanied by uncertainty. The standard deviation of the distribution of sample mean values is known as the standard error of the mean (SE). The SE conveys how accurate an estimate the mean value is based on the samples that were collected and analyzed. The  $\pm$  value presented to the right of a mean value is equal to 2 x SE (2 multiplied by the SE). The  $\pm$  value implies that approximately 95 percent of the time the average of many calculated means will fall somewhere between the reported value minus the 2 x SE value and the reported value plus the 2 x SE value.

### **1.8.11 Median, Maximum, and Minimum Values**

Median, maximum, and minimum values are reported in some sections of this report. A median value is the middle value when all the values are arranged in order of increasing or decreasing magnitude. For example, the median value in the series of numbers, 1 2 3 3 4 5 5 5 6, is 4. The maximum value would be 6 and the minimum value would be 1.

### **1.8.12 Less Than (<) Symbol**

The “less than” (<) symbol is used to indicate that the measured value is smaller than the number given. For example, <0.09 would indicate that the measured value is less than 0.09. In this report, < is often used in reporting the amounts of nonradiological contaminants in a sample when the measured amounts are less than the analytical laboratory’s reporting limit for that contaminant in that sample. For example, if a measurement of benzene in sewage lagoon pond water is reported as <0.005 milligrams per liter, this implies that the measured amount of benzene present, if any, was not found to be above this level, given the sample and analysis methods used. For some constituents, the notation “ND” is also used to indicate that the constituent in question was not detected. For organic constituents, in particular, this could mean that the compound could not be clearly identified, the level (if any) was lower than the reporting limit, or (as often happens) both. The measurements of radionuclide concentrations are reported whether or not they are below the usual reporting limit (the minimum detectable concentration [see Glossary, Appendix B]).

### **1.8.13 Negative Radionuclide Concentrations**

There is always a small amount of natural radiation in the environment. The instruments used in the laboratory to measure radioactivity in environmental media are sensitive enough to measure the natural, or background, radiation along with any contaminant radiation in a sample. To obtain an unbiased measure of the contaminant level in a sample, the natural, or background, radiation level must be subtracted from the total amount of radioactivity measured by an instrument. Because of the randomness of radioactive emissions and the very low concentrations of some contaminants, it is possible to obtain a background measurement that is larger than the actual contaminant measurement. When the larger background measurement is subtracted from the smaller contaminant measurement, a negative result is generated. The negative results are reported because they are useful when conducting statistical evaluations of the data.

### **1.8.14 Understanding Graphic Information**

Some of the data graphed in this report are plotted using logarithmic (log) scales. Log scales can be used in plots where the values are of widely different magnitudes at different locations and/or different times. In log scales equal distances represent equal ratios of values, whereas in linear scales equal distances represent equal differences in values. In a log scale an increase from 2 to 4 is shown by the same distance as an increase from 10 to 20 or from 700 to 1,400.

For example, Figure 1-5 (Figure 5-10 in Chapter 5) shows the annual means for tritium in groundwater samples from selected NNSS onsite monitoring wells using the log scale. Figure 1-6 shows the same data using a linear scale. The linear scale plot emphasizes the difference between the high early values in Well UE-7NS through 1987 and the rather lower values starting in 1991. The log scale plot de-emphasizes those high values and expands the portion of the plot containing lower values; in particular, it allows one to see the initial increase in Well WW A beginning in 1986 more clearly.

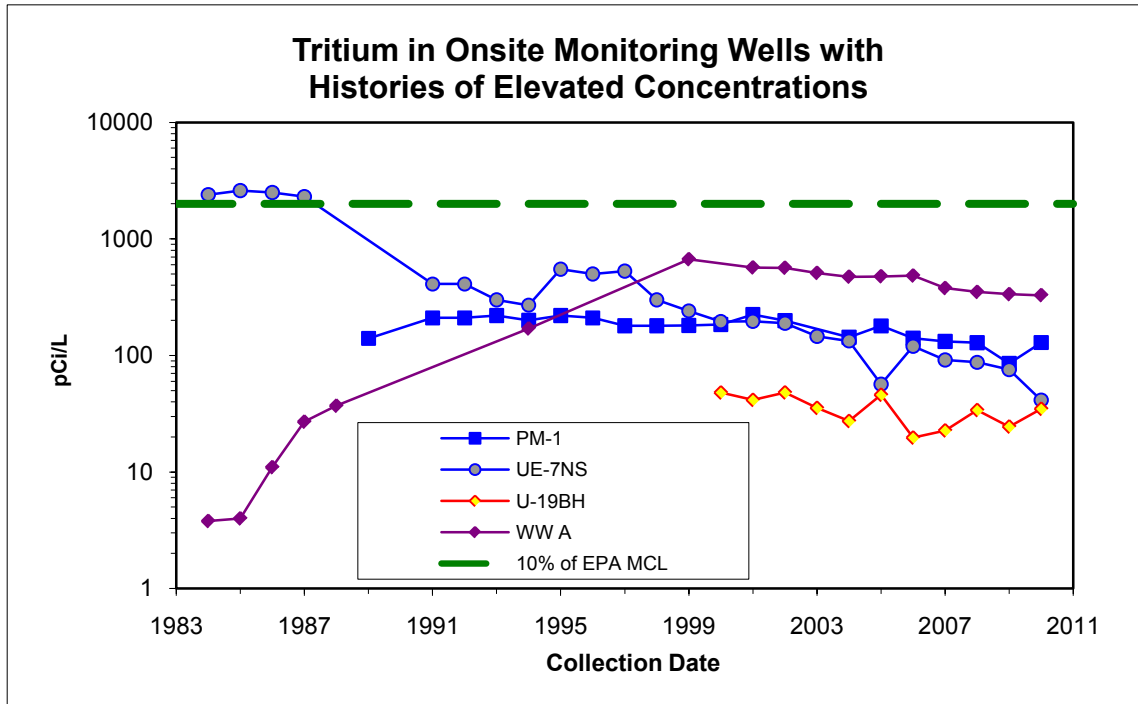


Figure 1-5. Data plotted using a log scale

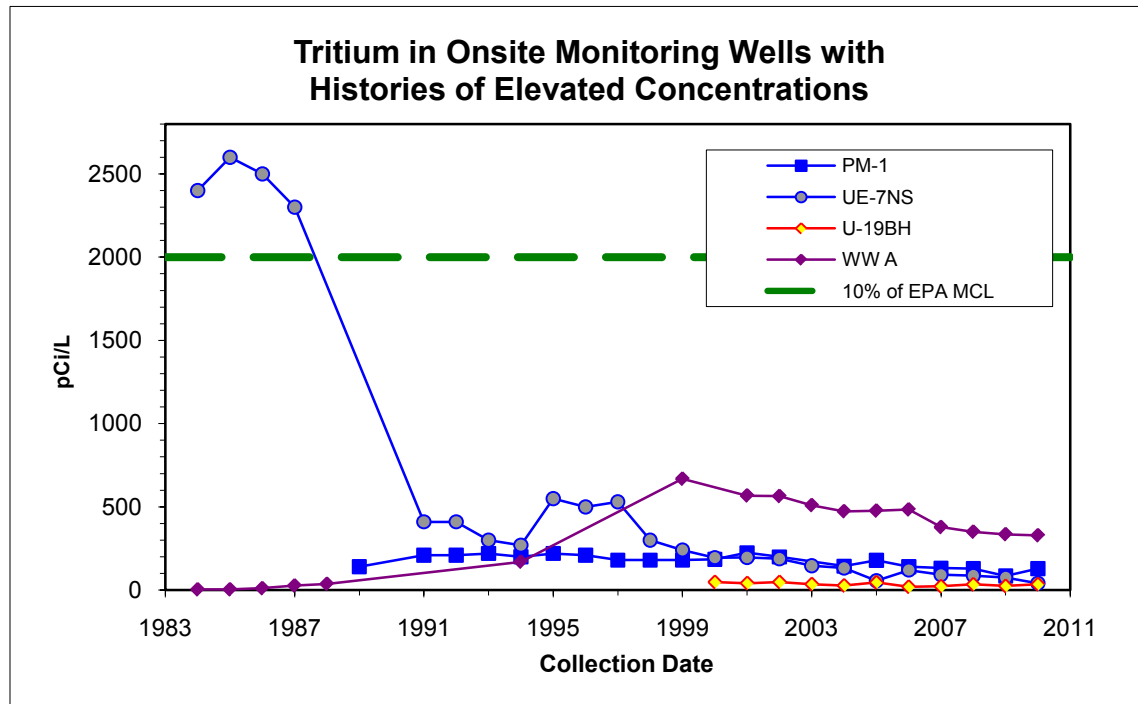


Figure 1-6. Data plotted using a linear scale

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## 2.0 Compliance Summary

Environmental regulations pertinent to operations on the Nevada National Security Site (NNSS), the North Las Vegas Facility (NLVF), and the Remote Sensing Laboratory–Nellis (RSL–Nellis) are listed in this chapter. They include federal and state laws, state permit requirements, executive orders (EOs), U.S. Department of Energy (DOE) orders, and state agreements. They dictate how the U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office (NNSA/NSO) conducts operations on and off the NNSS to ensure the protection of the environment and the public. The regulations are grouped by topic, and each topical subsection contains a brief description of the applicable regulations, a summary of noncompliance incidents, if any, a listing of compliance reports generated during or for the reporting year, and a compliance status table. Each table lists those measures or actions that are tracked or performed to ensure compliance with a regulation. A description of the field monitoring efforts, actions, and results that support the compliance status is found in subsequent chapters of this document, as noted in the “Reference Section” column of each table. At the end of this chapter, Table 2-13 presents the list of all environmental permits issued for the NNSS and the two Las Vegas area facilities.

### 2.1 Environmental Management; Renewable Energy and Transportation Management; Environmental, Energy, and Economic Performance; and Pollution Prevention and Waste Minimization

#### 2.1.1 Applicable Regulations

**EO 13423, “Strengthening Federal Environmental, Energy, and Transportation Management”** – This EO requires federal facilities to begin establishing goals to improve efficiency in energy and water use, procure goods and services that use sustainable environmental practices, reduce amounts of toxic materials acquired and maintain a cost-effective waste prevention and recycling program, ensure construction and major renovation of buildings that incorporate sustainable practices, reduce use of petroleum products in motor vehicles and increase use of alternative fuels, and acquire and dispose of electronic products using environmentally sound practices. These goals are to be incorporated into the Environmental Management System (EMS) of each federal facility. NNSA/NSO complies with this EO through adherence to DOE O 430.2B, “Departmental Energy, Renewable Energy and Transportation Management.”

**EO 13514, “Federal Leadership in Environmental, Energy, and Economic Performance”** – This EO was signed on October 5, 2009. It expands upon the energy reduction and environmental performance requirements of EO 13423. It requires all federal agencies to establish an integrated sustainability plan towards reducing greenhouse gas (GHG) emissions, using water more efficiently, promoting pollution prevention and eliminating waste, constructing high performance sustainable buildings, purchasing energy efficient and environmentally preferred products, and reducing the use of fossil fuels through improved fleet management. The GHGs targeted for emission reductions in the EO are carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. The EO establishes GHG emission reductions as an overarching, integrating performance metric for all federal agencies. The Secretary of Energy issued a memorandum in March 2010 creating DOE goals pertaining to EO 13514. It commits DOE to a 28 percent reduction in agency GHG emissions by fiscal year (FY) 2020. In September 2010, DOE released its Strategic Sustainability Performance Plan (SSPP) (DOE, 2010a). Site specific goals for the NNSS that support the SSPP and compliance with this EO are incorporated into the EMS implemented by National Security Technologies, LLC (NSTec).

**DOE O 450.1A, “Environmental Protection Program”** – This order requires each DOE or NNSA facility to implement an EMS and establishes the requirements for implementing EO 13423. It specifies that EMS objectives include sound stewardship practices that are protective of the air, water, land, and other natural and cultural resources impacted by DOE operations, by which DOE cost-effectively meets or exceeds compliance with applicable environmental, public health, and resource protection laws, regulations, and DOE requirements. The

EMS must be fully integrated into the site Integrated Safety Management System (ISMS). The EMS must include pollution prevention goals and objectives. Each DOE or NNSA site must have demonstrated validation of their EMS by an outside organization.

**DOE O 430.2B, “Departmental Energy, Renewable Energy and Transportation Management”** – This order provides requirements and responsibilities for DOE or NNSA sites to assist DOE in meeting its energy efficiency goals and objectives in electricity, water, and thermal consumption, conservation, and savings, including goals and objectives contained in EO 13423. This order requires sites to develop an energy management program and to have an Executable Plan for the program. An Executable Plan must be prepared each year thereafter and must be integrated with a site’s Ten-Year Site Plan.

**Resource Conservation and Recovery Act (RCRA)** – Under RCRA, generators of hazardous waste (HW) are required to have a program in place to reduce the volume or quantity and toxicity of such waste to the degree determined by the generator to be economically practicable. The U.S. Environmental Protection Agency (EPA) was required to develop a list of types of commercially available products (e.g., copy machine paper, plastic desktop items) and then specify that a certain minimum percentage of the product type’s content be composed of recycled materials if they are to be purchased by a federal agency. Federal facilities must also have a procurement process in place to ensure that they purchase product types that satisfy the EPA-designated minimum percentages of recycled material.

**Nevada Division of Environmental Protection (NDEP) Hazardous Waste Permit NEV HW0101** – This state permit replaced the previous permit of NEV HW0021 during 2010. It continues to require NNSA/NSO to generate an Annual Summary Report, which must include waste minimization information. This report should include a description of the efforts taken during the year to reduce the volume and toxicity of waste generated in accordance with RCRA, as well as a description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years to the extent such information is available for the years prior to 1984.

### **2.1.2 Compliance Reports**

The following reports were generated in 2010 for NNSA/NSO operations on the NNSS and at the two offsite facilities in compliance with regulations related to environmental protection; renewable energy and transportation management; environmental, energy, and economic performance; and pollution prevention and waste minimization:

- *FY 2011 NNSA/NSO Site Sustainability Plan* (NSTec, 2010a)
- *FY 2010 NNSA/NSO Energy Executable Plan* (NSTec, 2010b)
- *FY 2010 and Pollution Prevention Progress Report*, submitted to DOE Headquarters (HQ) via entry into DOE HQ database
- *CY 2010 Waste Minimization Summary Report*, submitted to NDEP
- *FY 2010 EMS Annual Report*, submitted to DOE HQ via entry into DOE HQ database

**Table 2-1. NNS compliance status with environmental management; renewable energy and transportation management; environmental, energy, and economic performance; and pollution prevention and waste minimization**

<b>Compliance Measure/Action</b>	<b>Compliance Limit/Goal</b>	<b>2010 Compliance Status</b>	<b>Section Reference<sup>(a)</sup></b>
<b>EO 13423, “Strengthening Federal Environmental, Energy and Transportation Management” and DOE O 430.2B, “Departmental Energy, Renewable Energy and Transportation Management”</b>			
Incorporate environmental, energy, and transportation management goals into the site EMS	EMS in place by June 30, 2009	Compliant	3.3
Update annually an Executable Plan integrated with the Ten-Year Site Plan	Due December 31	Compliant	3.3.1
Annually update and submit an Energy Management Plan to NNSA/NSO	Due December 31	Compliant	3.3.1
<b>DOE O 450.1A, “Environmental Protection Program” and EO 13514, “Federal Leadership in Environmental, Energy, and Economic Performance”</b>			
Prepare FY 2008 baselines for Scope 1 and 2 GHG emissions and then for Scope 3 GHG emissions	Due January 3 and June 2, 2010	Reported in NSTec (2010a)	3.3.1; Table 3-3
Report comprehensive GHG emissions inventory for FY 2010	Due January 5, 2011	Reported in NSTec (2010a)	Table 3-3
Develop and implement a validated EMS integrated with the site ISMS, which will be audited every 3 years by an outside qualified party	Due June 30, 2012	Compliant	3.6
Include objectives and targets in the EMS that contribute to achieving the DOE Sustainable Environmental Stewardship goals (Attachment 2 of DOE O 450.1A) and the goals in DOE O 430.2B and EO 13514	NA <sup>(b)</sup>	Compliant	3.3.1
Include in the EMS practices to maximize the use of safe alternatives to ozone-depleting substances (ODS)	NA	Compliant	3.3.2.1
Monitor EMS progress and make such information available annually through the NNSA/NSO to DOE HQ	Due November 30, 2010	Compliant	3.7
Submit a fiscal year Waste Generation and Pollution Prevention Progress Report to DOE HQ	Due December 31, 2010	Compliant	3.3.2.3
<b>Resource Conservation and Recovery Act (RCRA)</b>			
Have a program to reduce volume/quantity and toxicity of generated HW to the degree it is economically practicable	NA	Compliant	3.3.2.2; Table 3-4
Have a process to ensure that EPA-designated list products are purchased containing the minimum content of recycled materials	NA	Compliant	3.3.2
<b>NDEP Hazardous Waste Permit NEV HW0021 and new Permit NEV HW0101</b>			
Submit a 2010 calendar year Waste Minimization Summary Report to NDEP	Due March 1, 2011	Compliant	3.3.2.3

(a) The section(s) within this document that describe how compliance summary data were collected

(b) Not applicable

## 2.2 Air Quality and Protection

### 2.2.1 Applicable Regulations

**Clean Air Act (CAA), National Emission Standards for Hazardous Air Pollutants (NESHAP)** – Title III of the CAA establishes NESHAP to control those pollutants that might reasonably be anticipated to result in either an increase in mortality or an increase in serious irreversible or incapacitating but reversible illness. Industry-wide national emissions standards were developed for 22 of 189 designated hazardous air pollutants (HAPs). Radionuclides and asbestos are among the 22 HAPs for which standards were established. NNSA/NSO NESHAP compliance activities are limited to radionuclide air monitoring and reporting/notification of asbestos abatement. At the NNS, NESHAP requirements are met through adherence to State of Nevada Class II Air Quality Operating Permit (AP9711-2557); all approvals, requests for additional information, and reports required under Title 40 Code of Federal Regulations (CFR) Part 61 Subpart H must be submitted to the State, with a copy to the EPA, Region IX.

**CAA, National Ambient Air Quality Standards (NAAQS)** – Title I of the CAA establishes the NAAQS to limit levels of pollutants in the air for six “criteria” pollutants: sulfur dioxide, nitrogen oxides, carbon monoxide, ozone, lead, and particulate matter. Title V of the CAA authorizes states to implement permit programs to regulate emissions of these pollutants. For the NNS, there is one State-issued Class II Air Quality Operating Permit. The permit’s emission limits (except ozone and lead) are based on published emission values for other similar industries and on operational data specific to the NNS. Emissions from NNS operations are calculated and submitted each year to the State. Lead emissions are reported to the State as part of the total HAPs emissions. The NNS air permit also specifies visible emissions (opacity) limits for equipment/facilities as well as requirements for recordkeeping, performance testing, opacity field monitoring, particulate monitoring, and monitoring personnel certification. NLVF and RSL-Nellis operate under air quality permits that require annual reporting of hours of operation, emission quantities of criteria pollutants and HAPs, opacity for all operating equipment, certification of personnel who monitor opacity, and summaries of significant malfunctions and repairs.

**CAA, New Source Performance Standards (NSPS)** – Title I of the CAA establishes the NSPS to set minimum nationwide emission limitations for air pollutants from various industrial categories of facilities. NSPS pollutants are acid mist, carbon monoxide, particulate matter, fluorides, hydrogen sulfide in acid gas, lead, nitrogen oxides, sulfur oxides, total reduced sulfur, and volatile organic compounds. The NSPS impose more stringent standards, including a reduced allowance of visible emissions (opacity), than under NAAQS. On the NNS, some screens, conveyor belts, and bulk fuel storage tanks are subject to the NSPS, which Nevada regulates under Nevada Administrative Code (NAC) 445B, “Air Controls,” through the Class II Air Quality Operating Permit. No offsite facilities are subject to the NSPS.

**CAA, Stratospheric Ozone Protection** – Title VI of the CAA establishes production limits and a schedule for the phase-out of ozone-depleting substances (ODS). The EPA has established regulations for ODS recycling during servicing and disposal of air conditioning and refrigeration equipment, for repairing leaks in such equipment, and for safe ODS disposal. While there are no reporting requirements, recordkeeping to document the usage of ODS and technician certification is required, and the EPA may conduct random inspections to determine compliance. At the NNS, ODS are mainly used in air conditioning units in vehicles, buildings, refrigerators, drinking water fountains, vending machines, and laboratory equipment.

**DOE O 450.1A, “Environmental Protection Program”** – This order requires that a site’s EMS includes practices to maximize the use of safe alternatives to ODS.

**NAC 445B, “Air Controls”** – In addition to enforcing the CAA regulations mentioned above, NAC 445B.22037 requires fugitive dust to be controlled. The Class II Air Quality Operating Permit requires implementation of an ongoing control program at the NNS using the best practicable methods. Off the NNS, all NNSA/NSO surface-disturbing activities that cover 5 or more acres are regulated by stand-alone Class II Surface Area

Disturbance (SAD) permits issued by the State. NAC 445B.22067 prohibits the open burning of combustible refuse and other materials unless specifically exempted by an authorized variance. At the NNSS, Open Burn Variances are routinely obtained for various fire training and emergency management exercises.

**Other Air Quality Requirements** – Title V, Part 70 of the CAA requires owners or operators of air emission sources to pay annual state fees. Fees are based on a source’s “potential to emit,” and NNSS operations are subject to these fees. In addition, NNSA/NSO must allow Nevada’s Bureau of Air Pollution Control to conduct inspections of permitted NNSS facilities and allow the Clark County Department of Air Quality and Environmental Management (DAQEM) to conduct inspections of NLVF and RSL-Nellis permitted equipment.

### **2.2.2 Compliance Issues**

On April 15, 2010, DAQEM issued a Letter of Noncompliance regarding the maintenance of log books for two diesel generators at NLVF. Corrections were made that included redesigning logbook formats, training personnel in recordkeeping procedures, and instituting quarterly internal compliance inspections. A Letter of Compliance was then issued by DAQEM on October 18, 2010.

### **2.2.3 Compliance Reports**

The following reports were generated for 2010 NNSS operations in compliance with air quality regulations:

- *National Emission Standards for Hazardous Air Pollutants - Radionuclide Emissions, Calendar Year 2010*, submitted to EPA Region IX (NSTec, 2011a)
- *Annual Asbestos Abatement Notification Form*, submitted to EPA Region IX
- *Calendar Year 2010 Actual Production/Emissions Reporting Form*, submitted to NDEP
- Quarterly Class II Air Quality Reports, submitted to NDEP
- Nonproliferation Test and Evaluation Complex (NPTEC) Pre-test and Post-test Reports, submitted to NDEP

The following reports were generated for 2010 operations at offsite facilities in compliance with air quality regulations:

- *Clark County Air Emission Inventory for North Las Vegas Facility*, submitted to Clark County DAQEM
- *Clark County Air Emissions Inventory for Remote Sensing Laboratory*, submitted to Clark County DAQEM
- *Calendar Year 2010 Actual Production/Emissions Reporting Form*, submitted to NDEP for UGTA SAD Permit AP9711-2622 and AP9711-2659

Table 2-2. NNSS compliance status with applicable air quality regulations

Compliance Measure/Actions	Compliance Limit	2010 Compliance Status	Section Reference <sup>(a)</sup>
<b>Clean Air Act – NESHAP</b>			
Annual dose equivalent from all radioactive air emissions	10 mrem/yr <sup>(b)</sup>	Compliant	9.1.1.1
Notify EPA Region IX if the number of linear feet (ft) or square feet (ft <sup>2</sup> ) of asbestos to be removed from a facility exceeds limit	260 linear ft or 160 ft <sup>2(c)</sup>	Compliant	4.2.9
Maintain asbestos abatement plans, data records, activity/ maintenance records	For up to 75 years	Compliant	4.2.9
<b>Clean Air Act – NAAQS</b>			
Submit quarterly reports of calculated emissions at the NNSS to the State	Due 30 days after end of quarter	Compliant	4.2.3
Submit annual report of calculated emissions at the NNSS to the State	Due March 1	Compliant	4.2.3
Tons of emissions of each criteria pollutant produced by permitted equipment/facility at the NNSS based on calculations	PTE <sup>(d)</sup> varies	Compliant	4.2.3; Table 4-14
Conduct and pass performance emission tests on specified permitted equipment	Test after 100 hours of operation, emission limits vary	Compliant	4.3.4
Number of gallons of fuel used, hours of operation, and rate of aggregate/concrete production by permitted equipment/facility at the NNSS	Limit varies <sup>(e)</sup>	Compliant	4.2.5
Conduct opacity readings from permitted equipment/facility at the NNSS, NLVF, and RSL-Nellis	Conduct quarterly for NNSS equipment, conduct when being used for NLVF and RSL-Nellis equipment	Compliant	4.2.6
Percent opacity of emissions from permitted equipment/facility at the NNSS	20%	Compliant	4.2.6
Percent opacity of emissions from permitted equipment/facility at NLVF and RSL-Nellis	20%	Compliant	A.1.3; A.2.2
Conduct particulate monitoring for releases/detonations at permitted chemical release and detonation sites on the NNSS	Monitoring report due ≤ 30 days from end of each quarter	Compliant	4.2.7
Submit test plans/final analysis reports to the State for each chemical release test at permitted chemical release sites on the NNSS	Test plans due ≥ 30 days prior to test. Final reports due ≤ 30 days from end of each quarter	Compliant	4.2.7
Rate and quantity of chemicals released at permitted chemical release sites on the NNSS	Pounds per hour and tons per year; limits vary by chemical	Compliant	4.2.7
Tons of emissions of each criteria pollutant produced at permitted chemical release sites on the NNSS	PTE <sup>(d)</sup> varies	Compliant	4.2.7; Table 4-14
Submit annual report of calculated emissions at NLVF and RSL-Nellis to Clark County	Due March 31	Compliant	A.1.3; A.2.2
Tons of emissions of each criteria pollutant produced by permitted equipment/facility at NLVF and RSL-Nellis based on calculations	PTE <sup>(d)</sup> varies	Compliant	A.1.3; A.2.2

**Table 2-2. NNS compliance status with applicable air quality regulations (continued)**

<b>Compliance Measure/Actions</b>	<b>Compliance Limit</b>	<b>2010 Compliance Status</b>	<b>Section Reference<sup>(a)</sup></b>
<b>Clean Air Act - NSPS</b>			
Conduct opacity readings from permitted equipment/facility	Quarterly	Compliant	4.2.6
Percent opacity of emissions from permitted equipment/facility	10%	Compliant (No permitted equipment used)	4.2.6
<b>Clean Air Act - Stratospheric Ozone Protection</b>			
Maintain ODS technician certification records, approvals for ODS-containing equipment recycling/recovery, and applicable equipment servicing records	NA <sup>(f)</sup>	Compliant	4.2.8
<b>DOE O 450.1A, "Environmental Protection Program" - ODS Reduction</b>			
Include in the NNS EMS practices to maximize the use of safe alternatives to ODS		Compliant	4.2.8
<b>Other Nevada Air Quality Permit Regulations</b>			
Control fugitive dust for land disturbing activities	NA	Compliant	4.2.10

- (a) The section(s) within this document that describe how compliance summary data were collected
- (b) mrem/yr = millirem per year; mSv/yr = millisievert per year
- (c) 260 linear ft or 160 ft<sup>2</sup> = 79.3 linear meters (m) or 14.9 square meters
- (d) Potential to emit (PTE) = quantities of criteria pollutants that each facility/piece of equipment would emit annually if it were operated for the maximum number of hours specified in the state air permit
- (e) Compliance limit is specific for each piece of permitted equipment/facility
- (f) Not applicable

## 2.3 *Water Quality and Protection*

### 2.3.1 *Applicable Regulations*

**Clean Water Act (CWA)** – The CWA sets national water quality standards for contaminants in surface waters. It prohibits the discharge of contaminants from point sources to waters of the United States without a National Pollutant Discharge Elimination System (NPDES) permit. At the NNSS, CWA regulations are followed through compliance with permits issued by NDEP for wastewater discharges. NNSS operations do not require any NPDES permits. At the NLVF, an NPDES permit regulates the discharge of pumped groundwater (see Appendix A, Section A.1.1.2). NPDES compliance is summarized in a format requested by DOE in Table 2-4 below.

**Safe Drinking Water Act (SDWA)** – The SDWA protects the quality of drinking water in the United States and authorizes the EPA to establish safe standards of purity. It requires all owners or operators of public water systems (PWSs) (see Glossary, Appendix B) to comply with National Primary Drinking Water Standards (health standards). State governments are authorized to set Secondary Standards related to taste, odor, and visual aspects. NAC 445A ensures that PWSs meet both primary and secondary water quality standards. The SDWA standards for radionuclides currently apply only to PWSs designated as community water systems. The PWSs on the NNSS are permitted by the State as noncommunity water systems (see Glossary, Appendix B). However, all potable water supply wells are monitored on the NNSS for radionuclides in compliance with DOE O 5400.5, “Radiation Protection of the Public and the Environment” (see Section 2.2).

**NAC 445A, “Water Controls” (Public Water Systems)** – This NAC enforces the SDWA requirements and sets standards for permitting, design, construction, operation, maintenance, certification of operators, and water quality of PWSs. The NNSS has three PWSs and two potable water hauler trucks, which NDEP regulates through the issuance of permits.

**NAC 444, “Sanitation” (Sewage Disposal) and 445A, “Water Controls” (Water Pollution Control)** – This NAC regulates the collection, treatment, and disposal of wastewater and sewage at the NNSS. The requirements of this state regulation are issued in permits to NNSA/NSO for the E-Tunnel Waste Water Disposal System, active and inactive sewage lagoons, septic tanks, septic tank pumpers, and a septic tank pumping contractor’s license. NNSA/NSO also obtains underground injection control permits from NDEP for tracer tests in Underground Test Area (UGTA) Sub-Project characterization wells.

**NAC 534, “Underground Water and Wells”** – This NAC regulates the drilling, construction, and licensing of new wells and the reworking of existing wells to prevent the waste and contamination of underground waters. NNSA/NSO complies with this NAC as a matter of comity, holding to the position that state licensing requirements do not apply to the federal government and its contractors as a matter of law under the principle of federal supremacy and associated case law. Two current operations that voluntarily comply with this NAC are the UGTA Sub-Project, which drills new wells and reworks old wells, and the Borehole Management Project, which plugs abandoned NNSS boreholes.

**UGTA Fluid Management Plan** – UGTA Sub-Project wells are regulated by the State through an agreement between NNSA/NSO and NDEP called the UGTA Fluid Management Plan. The plan is followed in lieu of following separate state-issued water pollution control permits for each UGTA characterization well. Such permits ensure compliance with the CWA. The plan prescribes the methods of disposing groundwater pumped from UGTA wells during drilling, development, and testing based on the levels of radiological contamination. This plan is Attachment I of the UGTA Sub-Project Waste Management Plan (U.S. Department of Energy, National Nuclear Security Administration Nevada Operations Office [NNSA/NV], 2002a).



### 2.3.2 Compliance Reports

The following reports were generated for NNSS operations in 2010 in compliance with water quality regulations:

- *Quarterly Monitoring Report for Nevada National Security Site Sewage Lagoons*, submitted to NDEP
- Results of water quality analyses for PWS, sent to the State throughout the year as they were obtained from the analytical laboratory
- *Water Pollution Control Permit NEV 96021, Quarterly Monitoring Report* (for first, second, and third quarters of 2010 for E Tunnel effluent monitoring), submitted to NDEP
- *Water Pollution Control Permit NEV 96021, Quarterly Monitoring Report and Annual Summary Report for E-Tunnel Waste Water Disposal System* (NSTec, 2011b)

The following reports were generated for operations at the two offsite facilities in 2010 in compliance with water quality regulations:

- *Self-Monitoring Report for the National Nuclear Security Administration's North Las Vegas Facility: Permit VEH-112*, submitted to the City of North Las Vegas
- Quarterly reports titled *Remote Sensing Laboratory Self Monitoring Report - Permit No. CCWRD-080*, submitted to the Clark County Water Reclamation District
- Two monitoring reports titled *Remote Sensing Laboratory Additional Monitoring Reports - Permit No. CCWRD-080*, submitted to the Clark County Water Reclamation District

**Table 2-3. Summary of NPDES permit compliance at NLVF in 2010**

Permit Type	Outfall	Parameter <sup>(a)</sup>	Number of Permit Exceedances	Number of Samples Taken	Number of Compliant Samples	Percent Compliance	Date(s) Exceeded	Description/Solution
NV0023507	001 and 002	Daily maximum flow	0	365 (continuous)	365	100	NA <sup>(b)</sup>	NA
		TPH	0	1 (1/year)	1	100	NA	NA
		TSS	0	4 (1/quarter)	4	100	NA	NA
		TDS	0	4 (1/quarter)	4	100	NA	NA
		N	0	4 (1/quarter)	4	100	NA	NA
		pH	0	4 (1/quarter)	4	100	NA	NA
		Tritium	MR <sup>(c)</sup>	1 (1/year)	1	100	NA	NA

(a) TPH = total petroleum hydrocarbons, TSS = total suspended solids, TDS = total dissolved solids, N = total inorganic nitrogen

(b) NA = not applicable

(c) MR = monitor and report, no specified daily maximum or 30-day average limit, just the requirement that there shall be no discharge of substances that would cause a violation of State water quality standards

Table 2-4. NNSS compliance status with applicable water quality and protection regulations

Compliance Measure/Action	Compliance Limit	2010 Compliance Status	Section Reference <sup>(a)</sup>
<b>Safe Drinking Water Act and NAC 445A, "Water Controls" (Public Water Systems)</b>			
Number of water samples containing coliform bacteria	1 per month per PWS	Compliant	5.2.1.1; Table 5-8
Concentration of inorganic and organic contaminants and disinfection byproducts in permitted NNSS PWSs	Limit varies <sup>(b)</sup>	Compliant	5.2.1.1; Table 5-8
Adhere to design, construction, maintenance, and operation regulations specified by permits	NA <sup>(c)</sup>	Compliant	-
Allow NDEP access to conduct inspections of PWS and water hauling trucks	NA	Compliant	5.2.1.2
<b>Clean Water Act - NPDES/State Pollutant Discharge Elimination System Permits</b>			
Value of water chemistry parameters measured quarterly and annually and the value of over 100 contaminants measure biennially in pumped groundwater at the NLVF	Limit varies	Compliant	Appendix A, A.1.1.2; Table A-3
<b>Clean Water Act and NAC 444, "Sanitation" (Sewage Disposal)</b>			
Adhere to all design/construction/operation requirements for new systems and those specified in septic system permits, septic tank pump truck permits, and septic tank pumping contractor permit	NA	Compliant	5.2.2
<b>Clean Water Act and NAC 445A, "Water Controls" (Water Pollution Control)</b>			
Value of 5-day biological oxygen demand (BOD <sub>5</sub> ), total suspended solids (TSS), and pH in one sewage lagoon water sample sampled quarterly	BOD <sub>5</sub> : varies TSS: no limit pH: 6.0–9.0 S.U.	Compliant	5.2.3.1; Table 5-9
Concentration of 29 contaminants in permitted sewage lagoons only if specific or accidental discharges of potential contaminants occur	Limit varies	Compliant	5.2.3.1
Submit quarterly monitoring reports for 2 active sewage lagoons (for Areas 6 and 23)	Due end of April, July, October, and January	Compliant	5.2.3.1
Inspection by operator of active sewage lagoon systems	Weekly	Compliant	5.2.3.2
Inspection by operator of inactive sewage lagoon systems	Quarterly	Compliant	5.2.3.2

**Table 2-4. NNSS compliance status with applicable water quality and protection regulations (continued)**

<b>Compliance Measure/Action</b>	<b>Compliance Limit</b>	<b>2010 Compliance Status</b>	<b>Section Reference<sup>(a)</sup></b>
<b>Clean Water Act and NAC 445A, "Water Controls" (Water Pollution Control) (continued)</b>			
Concentrations of tritium ( <sup>3</sup> H), gross alpha (α), gross beta (β) (in picocuries per liter [pCi/L]); 14 nonradiological contaminants/water quality parameters collected quarterly; and flow rate, pH, and specific conductance (SC) collected monthly from E Tunnel discharge water samples	<sup>3</sup> H: 1,000,000 pCi/L α: 35 pCi/L β: 100 pCi/L Non-rad: Limit varies	Compliant - All contaminants were within permit limits. One water quality indicator, SC, was below permissible limits	5.1.9; Table 5-5; 5.2.4; Table 5-10
Concentrations of <sup>3</sup> H, α, β, and 16 nonradiological contaminants/water quality parameters in Well ER-12-1 water samples collected every 24 months	<sup>3</sup> H: 20,000 pCi/L α: 15 pCi/L β: 50 pCi/L Non-rad: Limit varies	Well ER-12-1 not sampled in 2010; last sampled in April 2009	5.1.9; 5.2.4
Concentrations of 20 contaminants in water samples from NLVF sewage outfalls	Limit varies	Compliant	A.1.1.1
Concentrations of 12 contaminants and in water samples from sewage outfall at the RSL-Nellis	Limit varies	Compliant	A.2.1; Table A-7
<b>NAC 534, "Underground Water and Wells," and UGTA Fluid Management Plan</b>			
Maintain state well-drilling license for personnel supervising well construction/reconditioning	NA	Compliant	12.2.4
For UGTA well drilling fluids, monitor tritium (in pCi/L) and lead levels (in milligrams per liter [mg/L]), manage the fluids, and notify NDEP as required based on the decision criteria limits in the UGTA Fluid Management Plan	Decision Criteria Limits: <sup>3</sup> H >200,000 pCi/L, Lead >5 mg/L	Compliant	12.2.3
File notices of intent and affidavits of responsibility for plugging	NA	Compliant	-
Adhere to well construction requirements/waivers	NA	Compliant	-
Maintain required records and submit required reports	NA	Compliant	-

- (a) The section(s) within this document that describe how compliance summary data were collected
- (b) Compliance limit is specific for each contaminant; see referenced tables for specific limits
- (c) Not applicable

## 2.4 Radiation Protection

### 2.4.1 Applicable Regulations

**Clean Air Act (CAA), National Emission Standards for Hazardous Air Pollutants (NESHAP)** – NESHAP (40 CFR 61 Subpart H) establishes a radiation dose limit of 10 millirem per year (mrem/yr) (0.1 millisievert per year [mSv/yr]) to individuals in the general public from the air pathway. NESHAP also specifies “Concentration Levels for Environmental Compliance” (abbreviated as compliance levels [CLs]) for radionuclides in air. A CL is the annual average concentration of a radionuclide that could deliver a dose of 10 mrem/yr. The CLs are provided for facilities, such as the NNSS, which use air sampling at offsite receptor locations to demonstrate compliance with the NESHAP public radiation dose limit. Sources of radioactive air emissions on the NNSS include containment ponds, Area 5 Radioactive Waste Management Complex, Sedan crater, Schooner crater, calibration of analytical equipment, and contaminated soil at nuclear device safety test and atmospheric test locations.

**Safe Drinking Water Act (SDWA)** – The National Primary Drinking Water Regulations (40 CFR 141), promulgated by the SDWA, require that the maximum contaminant level goal for any radionuclide be zero. But, when this is not possible (e.g., in groundwater containing naturally occurring radionuclides), the SDWA specifies that the concentration of one or more radionuclides should not result in a whole body or organ dose greater than 4 mrem/yr (0.04 mSv/yr). Sources of radionuclide contamination in groundwater at the NNSS are the underground nuclear tests detonated near or below the water table (see Glossary, Appendix B).

**DOE O 450.1A, “Environmental Protection Program”** – Requires federal facilities to (1) conduct environmental monitoring to detect, characterize, and respond to releases from DOE activities, (2) assess impacts, (3) estimate dispersal patterns in the environment, (4) characterize the pathways of exposure to members of the public, (5) characterize the exposures and doses to individuals and to the population, and (6) evaluate the potential impacts to the biota in the vicinity of a DOE activity. Such releases, exposures, and doses apply to radiological contaminants.

**DOE O 5400.5, “Radiation Protection of the Public and the Environment”** – This order and its flow-down procedural standards establish requirements for (1) measuring radioactivity in the environment, (2) applying the ALARA [as low as reasonably achievable] process to all operations, (3) using mathematical models for estimating radiation doses, (4) releasing property having residual radioactive material, and (5) maintaining records to demonstrate compliance with the requirements. This order sets a radiation dose limit of 100 mrem/yr (1 mSv/yr) above background levels to individuals in the general public from all pathways of exposure combined. It also provides the Derived Concentration Guides (DCGs) for all radionuclides. The DCGs are the annual average concentrations of a radionuclide that could deliver a dose of 100 mrem/yr.

**DOE Standard DOE-STD-1153-2002, “A Graded Approach for Evaluating Radiation Doses to Aquatic and Terrestrial Biota”** – Provides methods, computer models, and guidance in implementing a graded approach to evaluating the radiation doses to populations of aquatic animals, terrestrial plants, and terrestrial animals residing on DOE facilities. Dose limits of 1 rad per day (rad/d) (10 milligray per day [mGy/d]) for terrestrial plants and aquatic animals, and of 0.1 rad/d (1 mGy/d) for terrestrial animals are specified by this DOE standard. Dose rates below these levels are believed to cause no measurable adverse effects to populations of plants and animals.

**DOE O 435.1, “Radioactive Waste Management”** – This order ensures that all DOE radioactive waste is managed in a manner that is protective of the worker, public health and safety, and the environment. It directs how radioactive waste management operations are conducted on the NNSS. The manual for this order (DOE M 435.1-1) specifies that operations at the Area 3 and Area 5 Radioactive Waste Management Sites (RWMSs) must not contribute a dose to the general public in excess of 25 mrem/yr.

## 2.4.2 Compliance Reports

- *National Emission Standards for Hazardous Air Pollutants - Radionuclide Emissions, Calendar Year 2010*, submitted to EPA Region IX (NSTec, 2011a)
- This document, the *Nevada National Security Site Environmental Report 2010*, was generated to report 2010 compliance with DOE O 5400.5 and DOE-STD-1153-2002.

**Table 2-5. NNS compliance status with regulations for radiation protection of the public and the environment**

Compliance Measure	Compliance Limit	2010 Compliance Status	Section Reference <sup>(a)</sup>
<b>Clean Air Act - NESHAP</b>			
Annual dose above background levels to the general public from radioactive air emissions	10 mrem/yr	Compliant	9.1.1.1
<b>Safe Drinking Water Act</b>			
Annual dose to the general public from drinking water	4 mrem/yr	Compliant <sup>(b)</sup>	9.1.1.4
<b>DOE O 5400.5, "Radiation Protection of the Public and the Environment"</b>			
Annual dose above background levels to the general public from all pathways	100 mrem/yr	Compliant	9.1.3
Total residual surface contamination of property released offsite (in disintegrations per minute per 100 square centimeters [dpm/100 cm <sup>2</sup> ])	300–15,000 dpm/100 cm <sup>2</sup> depending on the radionuclide	Compliant	9.1.5
<b>DOE-STD-1153-2002, "A Graded Approach for Evaluating Radiation Doses to Aquatic and Terrestrial Biota"</b>			
Absorbed radiation dose to terrestrial plants and aquatic animals	1 rad/d	Compliant	9.2
Absorbed radiation dose to terrestrial animals	0.1 rad/d	Compliant	9.2
<b>DOE O 435.1, "Radioactive Waste Management"</b>			
Annual dose to the general public due to RWMS operations	25 mrem/yr	Compliant	9.1.2
<b>DOE O 450.1A, "Environmental Protection Program"</b>			
Conduct radiological environmental monitoring	NA <sup>(c)</sup>	Compliant	4.1; 5.1; 6.0; 7.0
Detect and characterize radiological releases	NA	Compliant	4.1; Table 4-13; 5.1; 6.0
Characterize pathways of exposure to the public	NA	Compliant	9.1.1
Characterize exposures and doses to individuals, the population, and biota	NA	Compliant	9.1; 9.2

(a) The section(s) within this document that describe how compliance summary data were collected

(b) Migration of radioactivity in groundwater to offsite public or private drinking water wells has never been detected

(c) Not applicable

## **2.5 Waste Management and Environmental Restoration**

### **2.5.1 Applicable Regulations**

**Atomic Energy Act (AEA) of 1954 (42 United States Code Section 2011 et seq.)** – The AEA ensures the proper management of source, special nuclear, and byproduct material. At the NNSS, AEA regulations are followed through compliance with DOE O 435.1 and 10 CFR 830, “Nuclear Safety Management.”

**10 CFR 830, “Nuclear Safety Management”** – This CFR establishes requirements for the safe management of work at DOE’s nuclear facilities. It governs the possession and use of special nuclear and byproduct materials. It also covers activities at facilities where no nuclear material is present, such as facilities that prepare the non-nuclear components of nuclear weapons, but that could cause radiological damage at a later time. It governs the conduct of the management and operating contractor and other persons at DOE nuclear facilities, including facility visitors. When coupled with the Price-Anderson Amendments Act (PAAA) of 1988, it provides DOE with authority to assess civil penalties for the violation of rules, regulations, or orders relating to nuclear safety by contractors, subcontractors, and suppliers who are indemnified under PAAA.

**DOE O 435.1, “Radioactive Waste Management”** – This order ensures that all DOE radioactive waste is managed in a manner that is protective of the worker, public health and safety, and the environment. Activities conducted on the NNSS subject to this order include (1) characterization of low-level waste (LLW) and mixed low-level waste (MLLW) generated by DOE within the state of Nevada; (2) disposal of LLW and MLLW at the Area 3 and Area 5 RWMSs; (3) characterization, visual examination, and repackaging of transuranic (TRU) waste at the Waste Examination Facility south of the Area 5 RWMS; and (4) loading of TRU waste at the Area 5 RWMS for shipment to the Idaho National Environmental Engineering Laboratory.

**Resource Conservation and Recovery Act (RCRA) – 40 CFR 239–282** – RCRA is the nation’s primary law governing the management of solid and hazardous waste (HW). RCRA regulates the storage, transportation, treatment, and disposal of such wastes to prevent contaminants from leaching into the environment from landfills, underground storage tanks (USTs), surface impoundments, and HW disposal facilities. The EPA authorizes the State of Nevada to administer and enforce RCRA regulations. RCRA also requires generators of HWs to have a program in place to reduce the volume or quantity and toxicity of HWs generated. Such NNSS programs are addressed in Sections 2.6 and 3.3.2 on Pollution Prevention and Waste Minimization.

**Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)/Superfund Amendments and Reauthorization Act (SARA)** – These acts provide a framework for the cleanup of waste sites containing hazardous substances and an emergency response program in the event of a release of a hazardous substance to the environment. No HW cleanup operations on the NNSS are regulated under CERCLA; they are regulated under RCRA instead. The applicable requirements of CERCLA pertain to an emergency response program for hazardous substance releases (see Emergency Planning and Community Right-to-Know Act in Section 2.5) and to how state laws concerning the removal and remediation of hazardous substances apply to federal facilities (specifically, implementation of the Federal Facility Agreement and Consent Order discussed below).

**Federal Facility Compliance Act (FFCA)** – The FFCA extends the full range of enforcement authorities in federal, state, and local laws for management of HWs to federal facilities. The FFCA of 1992, signed by NNSA/NSO and the State of Nevada, requires the identification of existing quantities for mixed waste, the proposal of methods and technologies of mixed waste treatment and management, the creation of enforceable timetables, and the tracking and completion of deadlines.

**Federal Facility Agreement and Consent Order (FFACO), as amended (March 2010)** – Pursuant to Section 120(a)(4) of CERCLA and to Sections 6001 and 3004(u) of RCRA, this consent order, agreed to by the State of Nevada, DOE Environmental Management, the U.S. Department of Defense, and DOE Legacy Management became effective in May 1996. It addresses the environmental restoration of historically

contaminated sites at the NNSS, parts of the Tonopah Test Range, parts of the Nevada Test and Training Range (NTTR), the Central Nevada Test Area, and the Project SHOAL Area. Under the FFACO, hundreds of sites have been identified for cleanup and closure. An individual site is called a corrective action site (CAS). Multiple CASs are often grouped into corrective action units (CAUs). NNSA/NSO is responsible for the CASs included in the UGTA Sub-Project, the Soils Sub-Project, and the Industrial Sites Sub-Project, while DOE Legacy Management is responsible for the CASs at the Central Nevada Test Area and the Project SHOAL Area.

**Settlement Agreement for Mixed Transuranic Waste** – This agreement between NNSA/NSO and the State of Nevada requires NNSA/NSO to operate the Area 5 TRU Storage Pad in accordance with 40 CFR 264 Subpart I. Mixed TRU is stored in compliance with RCRA requirements, and weekly inspections are conducted.

**Mutual Consent Agreement** – This agreement between NNSA/NSO and the State of Nevada covers the storage and management of mixed waste on the NNSS that was generated or identified after March 1996. It requires NNSA/NSO to develop and submit specific treatment and disposal plans for mixed waste within 9 months of identification.

**NAC 444.850–444.8746, “Disposal of Hazardous Waste”** – This NAC regulates the operation of HW disposal facilities on the NNSS to comply with federal RCRA regulations. Through this NAC, RCRA Part B Permits regulate the operation of the Hazardous Waste Storage Unit (HWSU) in Area 5, the Explosive Ordnance Disposal Unit (EODU) in Area 11, the storage of onsite and offsite MLLW in designated Area 5 locations prior to treatment and/or disposal, and the disposal of MLLW received from DOE offsite facilities into P03 (closed November 30, 2010) and into Cell 18, the newly permitted Mixed Waste Disposal Unit. The state permit requires groundwater monitoring of three wells downgradient of the MLLW disposal cells, prescribes post-closure monitoring for HW sites that were closed under RCRA prior to enactment of the FFACO, and requires preparation of an EPA Hazardous Waste Report of all HW and MLLW volumes generated and disposed annually at NNSS and all HW generated annually at the NLVF.

**NAC 444.570–444.7499, “Solid Waste Disposal”** – This Nevada regulation sets standards for solid waste management systems, including the storage, collection, transportation, processing, recycling, and disposal of solid waste. The NNSS has one inactive and four active permitted landfills. Active units include the Area 5 Asbestiform Low-Level Solid Waste Disposal Unit (P06), Area 6 Hydrocarbon Disposal Site, Area 9 U10 Solid Waste Disposal Site, and Area 23 Solid Waste Disposal Site. These landfills are designed, constructed, operated, maintained, and monitored in adherence to the requirements of their state-issued permits. The Area 5 Asbestiform Low-Level Solid Waste Disposal Unit P07 is inactive.

**NAC 459.9921–459.999, “Storage Tanks”** – This NAC enforces the federal regulations under RCRA pertaining to the maintenance and operation of fuel tanks (including underground fuel storage tanks) so as to prevent environmental contamination. The NNSS has five USTs and RSL-Nellis has seven USTs. The tanks are either (1) fully regulated under RCRA and registered with the State, (2) regulated under RCRA and registered with the State but deferred from leak detection requirements, or (3) excluded from federal and state regulation. At RSL-Nellis, NDEP allows Clark County to enforce this NAC with the issuance of county permits to NNSA/NSO.

## 2.5.2 Compliance Reports

The following reports were prepared and submitted to NDEP to comply with environmental regulations for waste management and environmental restoration operations conducted on the NNSS in 2010.

- *Area 5 Asbestiform Low-Level Solid Waste Disposal Annual Report for CY 2010*
- Quarterly LLW/MLLW Disposal Reports (for all active LLW and MLLW disposal cells)
- *Conditionally Exempt Small Quantity Generator 2010 Hazardous Waste Report* (for the NNSS and NLVF)
- *Annual Transportation Report for Radioactive Waste Shipments to and from the Nevada National Security Site – Fiscal Year 2010* (NNSA/NSO, 2011a)

- *Annual Waste Minimization Summary Report (CY 2010)*
- *Nevada National Security Site 2010 Data Report: Groundwater Monitoring Program Area 5 Radioactive Waste Management Site (NSTec, 2011c)*
- *Nevada National Security Site 2010 Waste Management Monitoring Report, Area 3 and Area 5 Radioactive Waste Management Sites (NSTec, 2011d)*
- *Post-closure monitoring reports for RCRA Part B Permit-identified CAUs*
- *Biannual Neutron Monitoring Report for the Nevada National Security Site Area 9 U10 and Area 6 Hydrocarbon Landfills*
- *January–June 2010 Biannual Solid Waste Disposal Site Report for the Nevada National Security Site Area 23 Sanitary Landfill*
- *July–December 2010 Biannual Solid Waste Disposal Site Report for the Nevada National Security Site Area 23 Sanitary Landfill*
- *2010 Annual Solid Waste Disposal Site Report for the NNSS Area 6 Hydrocarbon Landfill and Area 9 U10 Landfill*

The following Environmental Restoration reports for CAUs were submitted to NDEP in 2010 in accordance with the FFACO schedule.

- *CAU 97: Yucca Flat/Climax Mine Phase I Flow Model Presentation #3*
- *CAU 98: Frenchman Flat Document for External Peer Review Presentation*
- *CAU 98: Frenchman Flat Model Document for External Peer Review*
- *CAU 98: Frenchman Flat Model Evaluation Plan*
- *CAU 99: Rainier Mesa/Shoshone Mountain Phase I Source Term Presentation #2*
- *CAU 101: Central Pahute Mesa Phase II Drilling Operations Presentation #2*
- *CAU 102: Western Pahute Mesa Phase II Drilling Operations Presentation #2*
- *CAU 106: Areas 5, 11 Frenchman Flat Atmospheric Sites, Corrective Action Investigation Plan (CAIP)*
- *CAU 111: Area 5 WMD Retired Mixed Waste Pits, Corrective Action Decision Document (CADD) / Corrective Action Plan, Rev. 1*
- *CAU 114: Area 25 EMAD Facility, Streamlined Approach for Environmental Restoration (SAFER) Plan, Rev. 1*
- *CAU 365: Baneberry Contamination Area, CAIP*
- *CAU 371: Johnnie Boy Crater and Pin Stripe, CADD/ Closure Report (CR)*
- *CAU 374: Area 20 Schooner Unit Crater, CAIP*
- *CAU 375: Area 30 Buggy Unit Craters, CAIP*
- *CAU 408: Bomblet Target Area (TTR), CR*
- *CAU 408: Bomblet Target Area (TTR), SAFER Plan, Rev. 1*
- *CAU 539: Area 25 and 26 Railroad Tracks, SAFER Plan*
- *CAU 544: Cellars, Mud Pits, and Oil Spills, SAFER Plan*
- *CAU 560: Septic Systems, CADD/CR*
- *CAU 562: Waste Systems, CADD*
- *CAU 563: Septic Systems, CR*
- *CAU 566: EMAD Compound, SAFER Plan*



Table 2-6. NNSS compliance status with applicable waste management and environmental restoration regulations

Compliance Measure/Action	Compliance Limit	2010 Compliance Status	Section Reference <sup>(a)</sup>
<b>10 CFR 830, “Nuclear Safety Management”</b>			
Completion and maintenance of proper conduct of operations documents required for Class II Nuclear Facility for disposal/characterization/storage of radioactive waste	Six types of guiding documents required	Compliant	10.1.6
<b>DOE O 435.1, “Radioactive Waste Management”</b>			
Establishment of Waste Acceptance Criteria for radioactive wastes received for disposal/storage at Area 3 and 5 RWMSs	NA <sup>(b)</sup>	Compliant	10.1.4
Track annual volume of disposed LLW at Area 3 and Area 5 RWMSs (in cubic meters [m <sup>3</sup> ])	NA	Compliant	10.1.1; Table 10-1
Vadose zone monitoring at Area 3 and Area 5 RWMSs	Not required by order - Performed to validate performance assessment criteria of RWMSs	Conducted	10.1.8
<b>Resource Conservation and Recovery Act (as enforced through permits issued by the State of Nevada)</b>			
pH, specific conductance (SC), total organic carbon (TOC), total organic halides (TOX), and tritium ( <sup>3</sup> H) and 11 general water chemistry parameters in groundwater sampled semi-annually from wells UE5 PW-1, UE5 PW-2, and UE5 PW-3 to verify performance of Pit 3 Mixed Waste Disposal Unit (P03, closed November 30, 2010) and the new Area 5 MWDU (Cell 18)	pH: 7.6 to 9.2 SC: 0.440 mmhos/cm <sup>(c)</sup> TOC: 1 mg/L <sup>(d)</sup> TOX: 50 µg/L <sup>(e)</sup> H <sup>3</sup> : 2,000 pCi/L	Compliant	10.1.7
Volume of MLLW disposed in P03 (in cubic meters [m <sup>3</sup> ] or cubic feet [ft <sup>3</sup> ])	20,000 m <sup>3</sup> (706,293 ft <sup>3</sup> )	Compliant	10.1.1; Table 10-1
Volume of MLLW disposed in Area 5 MWDU (Cell 18)	25,485 m <sup>3</sup> (899,994 ft <sup>3</sup> )	Compliant	10.1.1; Table 10-1
Volume of nonradioactive HW stored at the HWSU	61,600 liters (16,280 gallons)	Compliant	10.2.2; Table 10-4
Weight of approved explosive ordnance wastes detonated at the EODU (in kilograms [kg] or pounds [lb])	45.4 kg (100 lb) at a time, not to exceed 1 detonation event/hour	Compliant	10.2.3; Table 10-4
Submit quarterly reports of volume of wastes disposed in P03 and annual report of volumes and cubic meters of wastes received at the Area 5 MWSU, HWSU, EODU, and Cell 18 to the State of Nevada.	Due April, July, October, January; annual report due March 1	Compliant	10.2
Submit EPA Biennial Hazardous Waste Report for NNSS and NLVF to the State of Nevada (after P03 closure in November 2010, report became an annual requirement)	Due the following February for odd-numbered years	Not prepared for 2010	--

Table 2-6. NNSS Compliance Status with Applicable Waste Management and Environmental Restoration Regulations (continued)

Compliance Measure/Action	Compliance Limit	2010 Compliance Status	Section Reference <sup>(a)</sup>
<b>Resource Conservation and Recovery Act (as enforced through permits issued by the State of Nevada) (continued)</b>			
Conduct vadose zone monitoring for RCRA closure site U-3ax/bl Subsidence Crater	Continuous monitoring using TDR <sup>(f)</sup> sensors	Compliant	10.1.8
Periodic post-closure site inspection of five historic RCRA closure sites (CAUs 90, 91, 92, 110, 112)	NA	Compliant	11.1.1
Upgrade, remove, and report on USTs at NNSS and RSL-Nellis	NA	Compliant	10.3
<b>Federal Facility Agreement and Consent Order</b>			
Adherence to calendar year work scope for site characterization, remediation, and closures	21 CAUs identified for some phase of action in 2010	Compliant	11.4
Post-closure monitoring and inspections of closed sites	58 CAUs required monitoring/inspecting	Compliant	11.1.1
<b>NAC 444.750-8396, "Solid Waste Disposal"</b>			
Track weight and volume of waste disposed each calendar year	Area 6 - No limit Area 9 - No limit Area 23 - 20 tons/day	Compliant	10.4.1
Monitor vadose zone for the Area 6 Hydrocarbon and Area 9 U10c Solid Waste disposal sites	Annually using neutron logging through access tubes	Compliant	10.4.1

- (a) The section(s) within this document that describe how compliance summary data were collected  
 (b) Not applicable  
 (c) mmhos/cm = micromhos (a measure of conductance) per centimeter  
 (d) mg/L = milligram per liter  
 (e) µg/L = micrograms per liter  
 (f) Time domain reflectometry

## 2.6 Hazardous Materials Control and Management

### 2.6.1 Applicable Regulations

**Toxic Substances Control Act (TSCA)** – This act requires testing and regulation of chemical substances that enter the consumer market. Since the NNSS does not produce chemicals, compliance is primarily directed toward the management of polychlorinated biphenyls (PCBs). At the NNSS, remediation activities and maintenance of fluorescent lights can result in the disposal of PCB-contaminated waste and light ballasts. Disposal of these items and recordkeeping requirements for PCB activities are regulated on the NNSS by the State of Nevada.

**Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)** – This act sets forth procedures and requirements for pesticide registration, labeling, classification, devices for use, and certification of applicators. The use of certain pesticides (called “restricted-use pesticides”) is regulated. The use of non-restricted-use pesticides (as available in consumer products) is not regulated. On the NNSS, both restricted-use and non-restricted-use pesticides are applied under the direction of a State of Nevada certified applicator.

**Emergency Planning and Community Right-to-Know Act (EPCRA)** – This act is a provision of the 1986 SARA Title III amendments to CERCLA. It requires that federal, state, and local emergency planning authorities be provided information regarding the presence and storage of hazardous substances and their planned and unplanned environmental releases, including provisions and plans for responding to emergency situations involving hazardous materials. EO 12856, “Federal Compliance with Right-to-Know Laws and Pollution Prevention Requirements,” requires all federal facilities to comply with the provisions of EPCRA. NNSA/NSO is required to submit reports pursuant to Sections 302, 304, 311, 312, and 313 of SARA Title III described below. Compliance with these EPCRA reporting requirements is summarized in a format requested by DOE in Table 2-7.

**Section 302–303, Planning Notification** – Requires that the state emergency response commission and the local emergency planning committee be notified when an extremely hazardous substance (EHS) is present at a facility in excess of the threshold planning quantity. An inventory of the location and amounts of all hazardous substances stored on the NNSS and at the two offsite facilities is maintained. Inventory data are included in an annual report called the Nevada Combined Agency (NCA) Report. Also, NNSA/NSO monitors hazardous materials while they are in transit on the NNSS through a hazardous materials notification system called HAZTRAK.

**Section 304, Extremely Hazardous Substances Release Notification** – Requires that the local emergency planning committee and state emergency response agencies be notified immediately of accidental or unplanned releases of an EHS to the environment. Also, the national response center is notified if the release exceeds the CERCLA reportable quantity for the particular hazardous substance.

**Section 311–312, Material Safety Data Sheet (MSDS)/Chemical Inventory** – Requires facilities to provide applicable emergency response agencies with MSDSs, or a list of MSDSs for each hazardous chemical stored on site. This is essentially a one-time reporting unless chemicals or products change. Any new MSDSs are provided annually in the NCA Report. Section 312 requires facilities to report maximum amounts of chemicals on site at any one time. This report is submitted to the State Emergency Response Commission, the Local Emergency Planning Committee, and the local fire departments.

**Section 313, Toxic Release Inventory (TRI) Reporting** – Requires facilities to submit an annual report entitled “Toxic Chemical Release Inventory, Form R” to the EPA and to the State of Nevada if annual usage quantities of listed toxic chemicals exceed specified thresholds. Toxic chemical releases on the NNSS above threshold limits are reported to the EPA and the State Emergency Response Commission in the TRI, Form R report.

**NAC 555, “Control of Insects, Pests, and Noxious Weeds”** – This NAC provides the regulatory framework for certification of several classifications of registered pesticide and herbicide applicators in the state of Nevada. The Nevada Department of Agriculture (NDOA) administers this program and has the primary role to enforce FIFRA in Nevada. Inspections of pesticide/herbicide applicator programs are carried out by NDOA.

**NAC 444, “Sanitation” – Polychlorinated Biphenyls (PCBs)** – This code enforces the federal requirements for the handling, storage, and disposal of PCBs and contains recordkeeping requirements for PCB activities.

**State of Nevada Chemical Catastrophe Prevention Act** – This act directed NDEP to develop and implement a program called the Chemical Accident Prevention Program (CAPP). The act requires registration of facilities storing EHSs above listed thresholds. NNSA/NSO submits a CAPP report to NDEP if any storage quantity thresholds are exceeded.

### 2.6.2 Compliance Reports

The following reports were generated for 2010 NNSA/NSO operations on the NNSS and at the two offsite facilities in compliance with hazardous materials control and management regulations:

- *Nevada Combined Agency Report - Calendar Year (CY) 2010*, submitted to state and local agencies
- *Toxic Release Inventory Report, Form R for CY 2010 Operations*, submitted to the EPA and the State
- *Calendar Year (CY) 2010 Polychlorinated Biphenyls (PCBs) Report for the Nevada National Security Site (NNSS)*, submitted to NNSA/NSO
- *2010 Chemical Accident Prevention Program Report*, submitted to NDEP

**Table 2-7. Status of EPCRA reporting**

<b>EPCRA Section</b>	<b>Description of Reporting</b>	<b>2010 Status<sup>(a)</sup></b>
Section 302–303	Planning Notification	Yes
Section 304	EHS Release Notification	Not required
Section 311–312	MSDS/Chemical Inventory	Yes
Section 313	TRI Reporting	Yes

(a) “Yes” indicates that NNSA/NSO reported under the requirements of the EPCRA section specified.

Table 2-8. NNSS compliance status with applicable regulations for hazardous substance control and management

Compliance Measure/Action	Compliance Limit	2010 Compliance Status	Section Reference <sup>(a)</sup>
<b>Toxic Substances Control Act (TSCA) and NAC 444, "Sanitation" - Polychlorinated Biphenyls</b>			
Storage and offsite disposal of PCB materials	Required if >50 ppm <sup>(b)</sup> PCBs	Compliant	13.1
Storage and onsite disposal of PCB materials	Allowed if <50 ppm PCBs	No onsite storage or disposal	13.1
Onsite disposal of bulk product waste containing PCBs generated by remediation and site operations	Case-by-case approval by NDEP	No bulk product wastes were generated for onsite disposal	13.1
Generate report of quantities of PCB liquids and materials disposed off site during previous calendar year	Due July 1 of following year	Compliant	13.1
<b>Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and NAC 555, "Control of Insects, Pests, and Noxious Weeds"</b>			
Application of restricted-use pesticides is conducted under the direct supervision of a state-certified applicator	NA <sup>(c)</sup>	Compliant	13.2
Maintain state certification of onsite pesticide and herbicide applicator	NA	Compliant	13.2
<b>Emergency Planning and Community Right-to-Know Act (EPCRA)</b>			
Adhere to reporting requirements	NCA Report due in February for previous CY; TRI Report, Form R due July 1 for previous CY; Notification Report due immediately after a release	Compliant	13.3
<b>State of Nevada Chemical Catastrophe Prevention Act</b>			
Registration of NNSS with the State if highly hazardous substances are stored above listed threshold quantities	NDEP-CAPP <sup>(d)</sup> Report due June 21, 2011	Compliant	13.4

(a) The section(s) within this document that describe how compliance summary data were collected

(b) ppm = parts per million

(c) Not applicable

(d) Chemical Accident Prevention Program

## 2.7 National Environmental Policy Act

DOE O 451.1B, “National Environmental Policy Act Program,” establishes DOE requirements and responsibilities for implementing the National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality Regulations Implementing the Procedural Provisions of NEPA (40 CFR 1500–1508), and the DOE NEPA Implementing Procedures (10 CFR 1021). Under NEPA, federal agencies are required to consider environmental effects and values and reasonable alternatives before making a decision to implement any major federal action that may have a significant impact on the human environment. Before any project or activity is initiated at the NNSS, it is evaluated for possible impacts to the environment. NNSA/NSO uses four levels of documentation to demonstrate compliance with NEPA:

- Environmental Impact Statement (EIS) – a full disclosure of the potential environmental effects of proposed actions and the reasonable alternatives to those actions. An EIS must be prepared by a federal agency when a “major” federal action that will have “significant” environmental impacts is planned.
- Environmental Assessment (EA) – a concise discussion of proposed actions and alternatives and the potential environmental effects to determine if an EIS is necessary
- Supplement Analysis (SA) – a collection and analysis of information for an action already addressed in an existing EIS or EA used to determine whether a supplemental EIS or EA should be prepared, a new EIS or EA should be prepared, or no further NEPA documentation is required
- Categorical Exclusion (CX) – a category of actions that do not have a significant adverse environmental impact based on similar previous activities and for which, therefore, neither an EA nor an EIS is required

A NEPA Environmental Evaluation Checklist (Checklist) is required for all proposed projects or activities on the NNSS. The Checklist is reviewed by the NNSA/NSO NEPA Compliance Officer to determine if the activity’s environmental impacts have been addressed in existing NEPA documents. If a proposed project has not been covered under any previous NEPA analysis and it does not qualify as a CX, then a new NEPA analysis is performed. The NEPA analysis may result in preparation of a new EA or a new SA to the existing programmatic NNSS EIS (U.S. Department of Energy, Nevada Operations Office [DOE/NV], 1996a). The NEPA Compliance Officer must approve each Checklist before a project proceeds. Table 2-9 presents a summary of how NNSA/NSO complied with NEPA in 2010.

On January 20, 2011, NNSA/NSO submitted to DOE HQ the *NNSA/NSO NEPA Annual Planning Document*. It provides the status of all EAs and EISs being developed or planned in the next 12–24 months and the budget and major milestone information for the NNSS Site-Wide EIS.

**Table 2-9. NNSS NEPA compliance activities conducted in 2010**

<b>Results of NEPA Checklist Reviews/NEPA Compliance Activities</b>
Work continued on the <i>Site-Wide Environmental Impact Statement for the Nevada National Security Site and Offsite Locations in the State of Nevada</i> to replace the current programmatic NNSS EIS (DOE/NV, 1996a) and address impacts from NNSA/NSO operations in Nevada for the 10-year period from the Record of Decision (estimated to be published in 2012).
15 projects were exempted from further NEPA analysis because they were of CX status.
30 projects were exempted from further NEPA analysis due to their inclusion under previous analysis in the NNSS EIS (DOE/NV, 1996a) and its Record of Decision.
1 project was exempted from further NEPA analysis due to its inclusion under previous analysis in the <i>Environmental Assessment for Hazardous Materials Testing at the Materials Spill Center, Nevada Test Site</i> (NNSA/NV, 2002b).
2 projects were exempted from further NEPA analysis due to their inclusion under previous analysis in the <i>Final Environmental Assessment for Activities Using Biological Simulants and Releases of Chemicals at the Nevada National Security Site</i> (NNSA/NSO, 2004).
1 project, the Solar Demonstration Project, was determined to need an EA.

## 2.8 *Historic Preservation and Cultural Resource Protection*

### 2.8.1 *Applicable Regulations*

**National Historic Preservation Act of 1966, as amended** – This act presents the goals of federal participation in historic preservation and delineates the framework for federal activities. Section 106 requires federal agencies to take into account the effects of their undertakings on properties included in, or eligible for inclusion in, the National Register of Historic Places (NRHP) and to consult with interested parties. The Section 106 process involves the agency reviewing background information, identifying eligible properties for the NRHP within the area of potential effect through consultation with the Nevada State Historic Preservation Office (SHPO), making a determination of effect (when applicable), and developing a mitigation plan when an adverse effect is unavoidable. Determinations of eligibility, effect, and mitigation are conducted in consultation with the SHPO and, in some cases, the federal Advisory Council on Historic Preservation. Section 110 sets out the broad historic preservation responsibilities of federal agencies and is intended to ensure that historic preservation is fully integrated into the ongoing programs of all federal agencies. It requires federal agencies to develop and implement a Cultural Resources Management Plan, to identify and evaluate the eligibility of historic properties for long-term management as well as for future project-specific planning, and to maintain archaeological collections and their associated records at professional standards. At the NNSA, a long-term management strategy includes (1) monitoring NRHP-listed and eligible properties to determine if environmental or other actions are negatively affecting the integrity or other aspects of eligibility and (2) taking corrective actions if necessary.

**EO 11593, “Protection and Enhancement of the Cultural Environment”** – This EO directs the federal agencies to inventory their cultural resources and establish policies and procedures to ensure the protection, restoration, and maintenance of federally owned sites, structures, and objects of historical, architectural, or archaeological significance.

**DOE Policy DOE P 141.1, “Department of Energy Management of Cultural Resources”** – The purpose of this policy is to ensure that DOE programs, including the NNSA, integrate cultural resources management into their missions and activities.

**Archaeological Resources and Protection Act of 1979** – The purpose of this act is to secure, for the present and future benefit of the American people, the protection of archaeological resources and sites that are on public and Indian lands, and to address the irreplaceable heritage of archaeological sites and materials. It requires the issuance of a federal archaeology permit to qualified archaeologists for any work that involves excavation or removal of archaeological resources on federal and Indian lands and notification to Indian tribes of these activities. Unauthorized excavation, removal, damage, alteration, or defacement of archaeological resources is prohibited, as is the sale, purchase, exchange, transport, receipt of, or offer for sale of such resources. Criminal and civil penalties apply to such actions. Information concerning the nature and location of any archaeological resource may not be made available to the public unless the federal land manager determines that the disclosure would not create a risk of harm to the resources or site. The Secretary of the Interior is required to submit an annual report at the end of each fiscal year to Congress that reports the scope and effectiveness of all federal agencies’ efforts on the protection of archaeological resources, specific projects surveyed, resources excavated or removed, damage or alterations to sites, criminal and civil violations, the results of permitted archaeological activities, and the costs incurred by the federal government to conduct this work. All archaeologists working at the NNSA must have qualifications that meet federal standards and must work under a permit issued by NNSA/NSO. In the event of vandalism, NNSA/NSO would need to investigate the actions.

**American Indian Religious Freedom Act of 1978** – This law established the government policy to protect and preserve for American Indians their inherent right of freedom to believe, express, and exercise the traditional religions, including but not limited to access to sites, use and possession of sacred objects, and the freedom to worship through ceremonials and traditional rites. Locations exist on the NNSA that have religious significance to Western Shoshone and Southern Paiute; visits to these places involve prayer and other activities. Access is provided by NNSA/NSO as long as there are no safety or health hazards.

**Native American Graves Protection and Repatriation Act (NAGPRA) of 1990** – This act requires federal agencies to identify Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony in their possession. Agencies are required to prepare an inventory of human remains and associated funerary objects, as well as a summary with a general description of sacred objects, objects of cultural patrimony, and unassociated funerary objects. Through consultation with Native American tribes, the affiliation of the remains and objects is determined and the tribes can request repatriation of their cultural items. The agency is required to publish a notice of inventory completion in the Federal Register. The law also protects the physical location where human remains are placed during a death rite or ceremony. The NNSS artifact collection is subject to NAGPRA, and the locations of American Indian human remains at the NNSS must be protected from NNSS activities.

### 2.8.2 Reporting Requirements

NNSA/NSO submits Section 106 cultural resources inventory reports and historical evaluations to the Nevada SHPO for review and concurrence. Mitigation plans and mitigation documents are also submitted to the Nevada SHPO, and some types of documents go to the Advisory Council on Historic Preservation and the National Park Service. Reports containing restricted data on site locations are not available to the public. Some technical reports, however, are available to the public upon request and can be obtained from the National Technical Information Service. The 2010 reports submitted to agencies are discussed in Chapter 12.

**Table 2-10. NNSS compliance status with applicable historic preservation regulations**

Compliance Action	2010 Compliance Status	Section Reference <sup>(a)</sup>
<b>National Historic Preservation Act of 1966; EO 11593, “Protection and Enhancement of the Cultural Environment”; and DOE P 141.1, “Department of Energy Management of Cultural Resources”</b>		
Maintain and implement NNSS Cultural Resources Management Plan	Compliant	15.0
Conduct cultural resources inventories and evaluations of historic structures	Compliant	15.1, 15.2, Table 15-1, Table 15-2
Make determinations of eligibility to the National Register	Compliant	15.1, Table 15-1
Make assessments of impact to eligible properties	Compliant	15.1
Manage artifact collection as per required professional standards	Compliant	15.4
<b>Archaeological Resources and Protection Act of 1979</b>		
Conduct archaeological work by qualified personnel	Compliant	15.0
Document occurrences of damage to archaeological sites	Compliant	15.1
Complete and submit Secretary of the Interior Archaeology Questionnaire	Compliant	15.3
<b>American Indian Religious Freedom Act of 1978</b>		
Allow American Indians access to NNSS locations for ceremonies and traditional use	Compliant	15.6
<b>Native American Graves Protection and Repatriation Act</b>		
Consult with affiliated American Indian tribes regarding repatriation of cultural items	Compliant	15.6
Protect American Indian burial locations on NNSS	Compliant	15.6
<b>Overall Requirement</b>		
Consult with tribes regarding various cultural resources issues	Compliant	15.6



## 2.9 Conservation and Protection of Biota and Wildlife Habitat

### 2.9.1 Applicable Regulations

**Endangered Species Act (ESA)** – Section 7 of this act requires federal agencies to ensure that their actions do not jeopardize the continued existence of federally listed endangered or threatened species or their critical habitat. The threatened desert tortoise is the only animal protected under the ESA that may be impacted by NNSS operations. NNSS activities within tortoise habitat are conducted so as to comply with the terms and conditions of Biological Opinions issued by the U.S. Fish and Wildlife Service (FWS) to NNSA/NSO.

**Migratory Bird Treaty Act (MBTA)** – This act prohibits the harming of any migratory bird, their nest, or eggs without authorization by the Secretary of the Interior. All but 5 of the 239 bird species observed on the NNSS are protected under this act. Biological surveys are conducted for projects to prevent direct harm to protected birds, nests, and eggs.

**Bald Eagle Protection Act** – This act prohibits the capture or harming of bald and golden eagles without special authorization. Both bald and golden eagles occur on the NNSS. Biological surveys are conducted for projects to prevent direct harm to eagles and their nests and eggs.

**Wild Free-Roaming Horse and Burro Act** – This act makes it unlawful to harm wild horses and burros. It requires the U.S. Bureau of Land Management (BLM) to protect, manage, and control wild horses and burros within designated herd management areas (HMAs) in a manner that is designed to achieve and maintain a thriving natural ecological balance. Although the NNSS is not within an active HMA, a Five-Party Cooperative Agreement exists between NNSA/NSO, NTTR, FWS, BLM, and the State of Nevada Clearinghouse that calls for cooperation in conducting resource inventories and developing resource management plans for wild horses and burros and maintaining favorable habitat for them on federally withdrawn lands. BLM considers NNSS a zero herd-size management area. NNSA/NSO consults with BLM regarding any issue of NNSS horse management. Biologists conduct periodic horse census surveys on the NNSS.

**Clean Water Act (CWA), Section 404, Wetlands Regulations** – This act regulates land development affecting wetlands by requiring a permit obtained from the U.S. Army Corps of Engineers (USACE) to discharge dredged or fill material into waters of the United States, which includes most wetlands on public and private land. NNSS projects are evaluated for their potential to disturb wetlands and their need for a Section 404 permit application. Based on recent rulings, no natural NNSS wetland may meet the criteria of a “jurisdictional” wetland subject to Section 404 regulations. However, final determination from the USACE regarding the status of NNSS wetlands has yet to be received.

**National Wildlife Refuge System Administration Act** – This act forbids a person to knowingly disturb or injure vegetation or kill vertebrate or invertebrate animals or their nests or eggs on any National Wildlife Refuge lands unless permitted by the Secretary of the Interior. The boundary of the Desert National Wildlife Refuge (DNWR), land administered within this system, is approximately 5 km (3.1 mi) downwind of the NPTEC in Area 5. Biological monitoring is conducted to verify that tests conducted at the NPTEC do not disperse toxic chemicals that could harm biota on the DNWR.

**EO 11990, “Protection of Wetlands”** – This EO requires governmental agencies to minimize the destruction, loss, or degradation of wetlands and to preserve and enhance the natural and beneficial values of wetlands in carrying out the agency’s responsibilities, including managing federal lands and facilities. Projects are evaluated for their potential to disturb the natural water sources on the NNSS. NNSS wetlands are monitored to document their status and use by wildlife, even though they may not meet the criteria for “jurisdictional” status under the CWA.

**EO 11988, “Floodplain Management”** – This EO ensures protection of property and human well-being within a floodplain and protection of floodplains themselves. The Federal Emergency Management Agency publishes guidelines and specifications for assessing alluvial fan flooding. NNSA/NSO generally satisfies EO 11988 through DOE O 420.1B, “Facility Safety,” and invoked standards. DOE O 420.1B and the associated

implementation guide for mitigation of natural phenomena hazards call for a graded approach to assessing risk to all facilities (structures, systems, and components [SSC]) from potential natural hazards. Chapter 4 of DOE-STD-1020-2002, “Natural Phenomena Hazards Design and Evaluation Criteria for Department of Energy Facilities,” provides flood design and evaluation criteria for SSC. Evaluations of flood hazards at the NNSS are generally conducted to ensure protection of property and human well-being.

**EO 13186, “Responsibilities of Federal Agencies to Protect Migratory Birds”** – Directs federal agencies to take certain actions to further implement the MBTA if agencies have, or are likely to have, a measurable negative effect on migratory bird populations. It also directs federal agencies to support the conservation intent of the MBTA and conduct actions, as practicable, to benefit the health of migratory bird populations. NNSS projects are evaluated for their potential to impact such bird populations.

**EO 13112, “Invasive Species”** – This EO directs federal agencies to act to prevent the introduction of, or to monitor and control, invasive (non-native) species; to provide for restoration of native species; and to exercise care in taking actions that could promote the introduction or spread of invasive species. Land-disturbing activities on the NNSS have resulted in the spread of numerous invasive plant species. Habitat reclamation and other controls are evaluated and conducted, when feasible, to control such species and meet the purposes of this EO.

**DOE O 450.1A, “Environmental Protection Program”** – This order requires federal facilities to address the protection of site resources from wildland and operational fires and the protection of the environment and biota from site activities. Annual surveys of vegetation fuel hazards, ecosystem mapping, surveys for protected and important species, and habitat revegetation are conducted to meet the intent of this order.

**NAC 503.010–503.104, “Protection of Wildlife”** – This code identifies Nevada animal species, both protected and unprotected, and prohibits the harm of protected species without special permit. Over 200 bird species, 1 reptile species, 6 bat species, and 2 small mammal species on the NNSS are State-protected. Biological surveys are conducted for projects to prevent direct harm to protected birds, nests, eggs, and protected animals.

**NAC 527, “Protection and Preservation of Timbered Lands, Trees and Flora”** – This code requires that the State Forester Firewarden determine the protective status of Nevada plants and prohibits removal or destruction of protected plants without special permit. Currently, no State-protected plants are known to occur on the NNSS. Annual reviews of the status of NNSS plants are conducted.

## 2.9.2 Compliance Reports

The following reports were prepared in 2010 or 2011 to meet regulation requirements or to document compliance for all activities conducted in 2010:

- *Annual Report of Actions Taken under Authorization of the Biological Opinion on NNSS Activities (File Nos. 84320-2008-F-0416 and B-0015) – January 1, 2010, through December 31, 2010*
- *Annual Report for Handling Permit S31808*, submitted to Nevada Division of Wildlife
- *Annual Report for Federal Migratory Bird Scientific Collecting Permit MB008695-0*, submitted to FWS Portland Office
- *Annual Report for Federal Migratory Bird Special Purpose Possession Permit (Dead Permit) MB037277-1*, submitted to FWS Portland Office

**Table 2-11. NNSS compliance status with applicable biota and wildlife habitat regulations**

<b>Compliance Measure/Action</b>	<b>Compliance Limit</b>	<b>2010 Compliance Status</b>	<b>Section Reference<sup>(a)</sup></b>
<b>Endangered Species Act – 1996 Opinion for NNSS Programmatic Activities</b>			
Number of tortoises accidentally injured or killed due to NNSS activities and number captured and displaced from project sites	Limit varies by project/activity	Compliant	16.1
Number of tortoises taken by way of injury or mortality on NNSS paved roads by vehicles other than those in use during a project	4 per year not to exceed 15 by 2019	Compliant	16.1
Number of total acres (ac) of desert tortoise habitat disturbed during NNSS project construction from 2009 to 2019	2,710 ac	Compliant	16.1
Follow all terms and conditions of the Biological Opinion during construction and operation of NNSS projects	NA <sup>(b)</sup>	Compliant	16.1
Conduct biological surveys at proposed project sites to assess presence of protected species	NA	Compliant	16.2
<b>Migratory Bird Treaty Act</b>			
Number of birds/nests/eggs harmed by NNSS project activities	0	15 accidental bird deaths	16.3; Table 16-4
<b>National Wildlife Refuge System Administration Act</b>			
Number of animals, their nests, or eggs killed and amount of vegetation disturbed or injured on System lands (the DNWR) as a result of NNSS activities	0	Compliant	16.7
<b>Wild Free-Roaming Horse and Burro Act and Five-Party Cooperative Agreement</b>			
Number of horses harassed or killed due to NNSS activities	0	Compliant	16.3; Table 16-4
Cooperate in conducting resource inventories and developing resource management plans for horses on the NNSS, NTTR, and DNWR	NA	Compliant	16.3; Table 16-4
<b>EO 11988, “Floodplain Management”</b>			
Conduct flood hazard assessments	NA	NA – No floodplain projects	--
<b>Clean Water Act, Section 404 -Wetlands Regulations and EO 11990, “Protection of Wetlands”</b>			
Number of wetlands disturbed by NNSS activity	NA	0	16.3; Table 16-4
<b>EO 13112, “Invasive Species”</b>			
Evaluate feasibility of conducting habitat reclamation and other controls to control spread of invasive species	NA	Compliant	16.5
<b>NAC 503.010–503.104 and NAC 527 - Nevada Protective Measures for Wildlife and Flora</b>			
Number of State-protected animals harmed or killed and number of State-protected plants collected or harmed due to NNSS activities	0	15 accidental bird deaths	16.3; Table 16-4

(a) The sections within this document that discuss the compliance summary data

(b) Not applicable

## ***2.10 Occurrences, Unplanned Releases, and Continuous Releases***

### ***2.10.1 Applicable Regulations***

**Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)** – Continuous release reporting under Section 103 requires that a non-permitted hazardous substance release that is equal to or greater than its reportable quantity be reported to the National Response Center. The EPA requires all facilities that release a hazardous substance meeting the Section 103(f) requirements to report annually to the EPA and perform an annual evaluation of releases. CERCLA requirements applicable to NNSS operations also pertain to an emergency response program for hazardous substance releases to the environment (see discussion of EPCRA in Section 2.5).

**Emergency Planning and Community Right-to-Know Act (EPCRA)** – This act is described in Section 2.5. See Table 2-5 for summary of compliance to EPCRA pertaining to unplanned environmental releases of hazardous substances.

**40 CFR 302.1–302.8, “Designation, Reportable Quantities, and Notification”** – This CFR requires facilities to notify federal authorities of spills or releases of certain hazardous substances designated under CERCLA and the CWA. It specifies what quantities of hazardous substance spills/releases must be reported to authorities and delineates the notification procedures for a release that equals or exceeds the reportable quantities.

**DOE O 231.1B, “Environment, Safety, and Health Reporting”** – This order includes the requirement for reporting environmental occurrences. Along with DOE M 231.1-2, “Occurrence Reporting and Processing of Operations Information,” it requires the establishment and maintenance of a system for reporting operations information related to DOE-owned and -leased facilities, for processing that information to identify the root causes of environmental occurrences, and for providing appropriate corrective action for such occurrences.

**NAC 445A.345–445.348, “Notification of Release of Hazardous Substance”** – This NAC requires state notification for the unplanned or accidental releases of specified quantities of pollutants, hazardous wastes, and contaminants.

**Water Pollution Control General Permit GNEV93001** – This general wastewater discharge permit issued by the State to the NNSS specifies that no petroleum products will be discharged into treatment works without first being processed through an oil/water separator or other approved methods. It also specifies how NNSA/NSO shall report each bypass, spill, upset, overflow, or release of treated or untreated sewage.

**Other NNSS Permits/Agreements** – As with General Permit GNEV93001, other state permits and agreements are cited in previous subsections of this chapter (e.g., FFACO) that specify that accidents or events of non-compliance must be reported. These include events that may create an environmental hazard.

### ***2.10.2 Compliance Status***

There are no continuous releases on the NNSS or at the NLVF and RSL-Nellis.

In 2010, three reportable environmental occurrences happened. They included two hydraulic fluid leaks and a diesel fuel release. They are described in Table 2-12.

Table 2-12. Environmental occurrences in 2010

Description of Occurrence	Reporting Criteria <sup>(a)</sup>	Corrective Actions Taken
<b>ORPS Number/Date of Occurrence: EM--NVSO-NST-NTS-2010-0001, January 5, 2010</b>		
On January 4, 2010, during demolition activities in Area 25, an excavator was traveling over a ramp constructed of building debris when a hydraulic line was cut by debris. The ramp is constructed over a preexisting asphalt pad. An estimated 80 gallons of hydraulic fluid was spilled into the debris.	5A(4) - Any release (onsite or offsite) of a hazardous substance, material, waste, or radionuclide from a DOE facility that must be reported to outside agencies in a format other than routine periodic reports. (However, oil spills of less than 10 gallons and with negligible environmental impact need not be reported in ORPS.)	NDEP was verbally notified. A berm was immediately placed around the spill. The affected soil and debris was removed and disposed of on site at the Area 5 RWMC, an approved landfill, and the excavator was repaired.
<b>ORPS Number/Date of Occurrence: NA--NVSO-NST-NTS-2010-0015, May 3, 2010</b>		
On May 1, 2010, a diesel fuel spill of 100–200 gallons was discovered at a primary two-megawatt generator in Area 20. It was caused by a failed automatic float system for the generator’s fuel tank. The float shut-off device failed, and the pump continued to fill the tank until it overflowed.	5A(4) (same as above)	NDEP was verbally notified. The failed float device was replaced. The affected soil was removed and disposed of on site at U10c, an approved landfill.
<b>ORPS Number/Date of Occurrence: NA--NVSO-NST-NTS-2010-0026, October 7, 2010</b>		
On October 4, 2010, a hydraulic oil release of approximately 5–8 gallons from a high pressure hose on an excavator in Area 26 was discovered. The area of impacted soil was 30 x 50 feet.	5A(4) (same as above)	NDEP was verbally notified. The affected soil was removed and disposed of on site at U10c, an approved landfill, and the high pressure hose and seal on the excavator were repaired.

(a) Reporting requirements provided in DOE M 231.1-2, “Occurrence Reporting and Processing of Operations Information”

## ***2.11 Environment, Safety, and Health Reporting***

### ***2.11.1 Applicable Regulations***

**DOE O 231.1B, “Environment, Safety and Health Reporting”** – This order calls for the “timely collection, reporting, analysis, and dissemination of information on environment, safety, and health issues as required by law or regulations or as needed to ensure that the DOE and the NNSA are kept fully informed on a timely basis about events that could adversely affect the health and safety of the public or the workers, the environment, the intended purpose of DOE facilities, or the credibility of the Department.” The order specifically requires DOE and NNSA sites to prepare an annual calendar year report, referred to as the Annual Site Environmental Report (ASER).

**DOE M 231.1-1A Chg 2, “Environment, Safety and Health Reporting Manual”** – This manual provides detailed requirements for implementing DOE O 231.1B.

The data to be included in an ASER are air emissions, effluent releases, environmental monitoring, and estimated radiological doses to the public from releases of radioactive material at DOE or NNSA sites. The annual report must also summarize environmental occurrences and responses reported during the calendar year, confirm compliance with environmental standards and requirements, and highlight significant programs and efforts. Environmental performance indicators and/or performance measures programs are to be included. The breadth and detail of this reporting should reflect the size and extent of programs at a particular site. The ASER for the calendar year is to be completed and made available to the public by October 1 of the following year. DOE’s Office of Analysis is to issue annual guidance to all field elements regarding the preparation of the report.

For NNSA/NSO, reporting is accomplished through the publication of the NNSS ASER, which, beginning in 2010, is now titled the Nevada National Security Site Environmental Report (NNSSER).

### ***2.11.2 Compliance Status***

In 2010, the 2009 NNSS ASER was prepared and published under the title *Nevada Test Site Environmental Report (NTSER) 2009* (NSTec, 2010c). It was published and posted on the NNSA/NSO, NSTec, and DOE Office of Scientific and Technical Information websites by September 16, 2010. The 2009 NTSER was mailed to all recipients (on a compact disc accompanied by a 24-page summary) on September 29, 2010.

## 2.12 Summary of Permits

Table 2-13 presents the complete list of all federal and state permits active during calendar year 2010 that were issued to NNSA/NSO and to NSTec for NNSS, NLVF, and RSL-Nellis operations and that have been referenced in previous subsections of this chapter. The table includes those pertaining to air quality monitoring, operation of drinking water and sewage systems, hazardous materials and HW management and disposal, and endangered species protection. Some 2010 permit names retain the “NTS” acronym for the NNSS because they have not been officially changed with the regulatory agencies. Reports associated with permits are submitted to the appropriate designated state or federal office. Copies of reports may be obtained upon request.

**Table 2-13. Environmental permits required for NNSS and NNSS site facility operations**

<b>Permit Number</b>	<b>Permit Name or Description</b>	<b>Expiration Date</b>	<b>Reporting</b>
<b>Air Quality</b>			
<b>NNSS</b>			
AP9711-2557	NTS Class II Air Quality Operating Permit	June 25, 2014	Annually
09-30 and 10-27	NTS Open Burn Variance, Fire Extinguisher Training (Various Locations)	March 14, 2010/ March 16, 2011	None
09-31 and 10-26	NTS Open Burn Variance, NNSS, A-23, Facility #23-T00200 (NNSS Fire & Rescue Training Center)	March 14, 2010/ March 16, 2011	None
<b>UGTA Offsite</b>			
AP9711-2622	NTTR Class II Air Quality Operating Permit, Surface Area Disturbance, Well ER-EC-12	November 4, 2014	Annually
AP9711-2659	NTTR Class II Air Quality Operating Permit, Surface Area Disturbance, Wells ER-EC-13 and ER-EC-15	March 5, 2015	Annually
<b>NLVF</b>			
Facility 657, Mod. 5, Rev. 2	Clark County Authority to Construct/Operating Permit for a Minor Source Commercial Building (superseded in November 2010 by permit below)	None	Annually
Source 657	Clark County Minor Source Permit, Source: 657 (Issued November 2010)	November 1, 2015	Annually
<b>RSL-Nellis</b>			
Facility 348, Mod. 3	Clark County Authority to Construct/Operating Permit for a Non-Major Testing Laboratory	None	Annually
<b>Drinking Water</b>			
<b>NNSS</b>			
NY-0360-12NTNC	Areas 6 and 23	September 30, 2010/2011	None
NY-4098-12NC	Area 25	September 30, 2010/2011	None
NY-4099-12NC	Area 12	September 30, 2010/2011	None
NY-0835-12NP	NNSS Water Hauler #84846	September 30, 2010/2011	None
NY-0836-12NP	NNSS Water Hauler #84847	September 30, 2010/2011	None
<b>Septic Systems/Pumpers</b>			
<b>NNSS</b>			
NY-1054	Septic System, Area 3 (Waste Management Offices)	None	None
NY-1069	Septic System, Area 18 (820 <sup>th</sup> Red Horse Squadron)	None	None
NY-1076	Septic System, Area 6 (Airborne Response Team Hangar)	None	None
NY-1077	Septic System, Area 27 (Baker Compound)	None	None
NY-1079	Septic System, Area 12 (U12g Tunnel)	None	None
NY-1080	Septic System, Area 23 (Building 1103)	None	None
NY-1081	Septic System, Area 6 (Control Point-170)	None	None
NY-1082	Septic System, Area 22 (Building 22-01)	None	None
NY-1083	Septic System, Area 5 (Radioactive Material Management Site)	None	None
NY-1084	Septic System, Area 6 (Device Assembly Facility)	None	None
NY-1085	Septic System, Area 25 (Central Support Area)	None	None

**Table 2-13. Environmental permits required for NNSS and NNSS site facility operations (continued)**

Permit Number	Permit Name or Description	Expiration Date	Reporting
<b>Septic Systems/Pumpers (cont.)</b>		<b>NNSS</b>	
NY-1086	Septic System, Area 25 (Reactor Control Point)	None	None
NY-1087	Septic System, Area 27 (Able Compound)	None	None
NY-1089	Septic System, Area 12 (Camp)	None	None
NY-1090	Septic System, Area 6 (Los Alamos National Laboratory Construction Camp Site)	None	None
NY-1091	Septic System, Area 23 (Gate 100)	None	None
NY-1103	Septic System, Area 22 (Desert Rock Airport)	None	None
NY-1106	Septic System, Area 5 (Hazmat Spill Center)	None	None
NY-1110-HAA-A	Individual Sewage Disposal System, A-12, Building 12-910	None	None
NY-1112	Commercial Sewage Disposal System, U1a, Area 1	None	None
NY-1113	Commercial Sewage Disposal System, Area 1, Building 121	None	None
NY-1124	Commercial Individual Sewage Disposal System, NNSS, Area 6	None	None
NY-1128	Commercial Individual Sewage Disposal System, NNSS, Area 6, Yucca Lake Project	None	None
NY-17-06839	Septic Tank Pumper E 106785	July 31, 2010/2011	None
NY-17-06839	Septic Tank Pumper E 107105	July 31, 2010/2011	None
NY-17-06839	Septic Tank Pumper E-105918	July 31, 2010/2011	None
NY-17-06839	Septic Tank Pumping Contractor (one unit)	July 31, 2010/2011	None
NY-17-06839	Septic Tank Pumper E-106169	July 31, 2010/2011	None
NY-17-06839	Septic Tank Pumper E-107103	July 31, 2010/2011	None
<b>Wastewater Discharge</b>		<b>NNSS</b>	
GNEV93001	Water Pollution Control General Permit	August 5, 2010/2015	Quarterly
NEV96021	Water Pollution Control for E-Tunnel Waste Water Disposal System and Monitoring Well ER-12-1	October 1, 2013	Quarterly
		<b>NLVF</b>	
VEH-112	NLVF Wastewater Contribution Permit	December 31, 2013	Annually
NV0023507	North Las Vegas National Pollutant Discharge Elimination System Permit	November 2, 2011	Quarterly
		<b>RSL-Nellis</b>	
CCWRD-080	Industrial Wastewater Discharge Permit	June 30, 2010/2011	Quarterly
<b>Hazardous Materials</b>		<b>NNSS</b>	
2058 and 8501	NNSS Hazardous Materials	February 28, 2010/2011	Annually
2059 and 8506	Nonproliferation Test and Evaluation Complex	February 28, 2010/2011	Annually
		<b>NLVF</b>	
2045 and 8508	NLVF Hazardous Materials Permit	February 28, 2010/2011	Annually
		<b>RSL-Nellis</b>	
2055 and 8512	RSL-Nellis Hazardous Materials Permit	February 28, 2010/2011	Annually
<b>Hazardous Waste</b>		<b>NNSS</b>	
NEV HW0021	NNSS Hazardous Waste Management Permit (RCRA)	On September 30, 2010, was superseded by permits listed below	Biennially



Table 2-13. Environmental permits required for NNSS and NNSS site facility operations (continued)

Permit Number	Permit Name or Description	Expiration Date	Reporting
<b>Hazardous Waste (cont.)</b>			
NEV HW0101	RCRA Permit for NNSS Hazardous Waste Management (Area 5 Mixed Waste Disposal Unit, Area 5 Mixed Waste Storage Unit, Hazardous Waste Storage Unit, and Explosive Ordnance Disposal Unit)	December 1, 2015	Biennially and annually
<b>Waste Management</b>			
<b>NNSS</b>			
SW 13 000 01	Area 5 Asbestiform Low-Level Solid Waste Disposal Site	Post-closure <sup>(a)</sup>	Annually
SW 13 097 02	Area 6 Hydrocarbon Disposal Site	Post-closure	Annually
SW 13 097 03	Area 9 U10c Solid Waste Disposal Site	Post-closure	Annually
SW 13 097 04	Area 23 Solid Waste Disposal Site	Post-closure	Biannually
<b>RSL-Nellis</b>			
U1576-33N-01	RSL-Nellis Waste Management Permit-Underground Storage Tank	December 31, 2010	None
<b>Endangered Species/Wildlife</b>			
File Nos. 84320-2008-F-0416 and B-0015	U.S. Fish and Wildlife Service – Desert Tortoise Incidental Take Authorization (Biological Opinion for Programmatic NNSS Activities)	February 12, 2019	Annually
MB008695-0	U.S. Fish and Wildlife Service – Migratory Bird Scientific Collecting Permit	March 31, 2012	Annually
MB037277-1	U.S. Fish and Wildlife Service – Migratory Bird Special Purpose Possession – Dead Permit	March 31, 2010 (permit renewal requested but not issued for remainder of 2010)	Annually
S31808	Nevada Division of Wildlife – Scientific Collection of Wildlife Samples	December 31, 2010	Annually

(a) Permit expires 30 years after closure of the landfill

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## 3.0 *Environmental Management System*

The U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office (NNSA/NSO) conducts activities on the Nevada National Security Site (NNSS) while ensuring protection of the environment, the worker, and the public. This is accomplished, in part, through the implementation of an Environmental Management System (EMS). An EMS is a business management practice that incorporates concern for environmental performance throughout an organization, with the ultimate goal being continual reduction of the organization's impact on the environment. An EMS ensures that environmental issues are systematically identified, controlled, and monitored, and it provides mechanisms for responding to changing environmental conditions and requirements, reporting on environmental performance, and reinforcing continual improvement. National Security Technologies, LLC (NSTec), the current Management and Operating contractor for the NNSS, designed an EMS to meet the 17 requirements of the globally recognized International Organization for Standardization (ISO) 14001:2004 Environmental Management Standard, and in 2008, NSTec obtained ISO 14001:2004 certification.

The NNSS EMS incorporates environmental stewardship goals that are identified in federal EMS directives applicable to all U.S. Department of Energy (DOE) and U.S. Department of Energy, National Nuclear Security Administration (NNSA) sites. In 2010, they included DOE Order DOE O 450.1A, "Environmental Protection Program"; DOE O 430.2B, "Departmental Energy, Renewable Energy and Transportation Management"; Executive Order EO 13423, "Strengthening Federal Environmental, Energy, and Transportation Management"; and EO 13514, "Federal Leadership in Environmental, Energy, and Economic Performance" (see Section 2.1). This chapter describes the 2010 progress made towards improving overall environmental performance and meeting sustainable environmental stewardship goals. Reported progress applies to operations on the NNSS as well as to support activities conducted at the NNSA/NSO-managed North Las Vegas Facility (NLVF) and Remote Sensing Laboratory–Nellis (RSL–Nellis).

### 3.1 *Environmental Policy*

The NSTec Environmental Protection Policy is posted on the NSTec Programs website available to the public (<http://www.nstec.com/programs/index.htm>). The policy contains the following key goals and commitments:

- Protect environmental quality and human welfare by implementing EMS practices.
- Identify and comply with all applicable DOE orders and federal, state, and local environmental laws and regulations.
- Identify and mitigate environmental aspects early in project planning.
- Establish environmental objectives, targets, and performance measures.
- Collaborate with employees, customers, subcontractors, and key suppliers on sustainable development and pollution prevention efforts.
- Communicate and instill an organizational commitment to environmental excellence in company activities through processes of continual improvement.

### 3.2 *Environmental Aspects*

NSTec evaluates whether operations have an environmental aspect and implements the EMS to minimize or eliminate any potential impacts. Operations are evaluated by performing Hazard Assessments, preparing Health and Safety Plans and Execution Plans, and preparing and reviewing National Environmental Policy Act documents. All of these documents require that mitigation actions be identified to minimize the risk of adverse impacts. NSTec has determined that the following aspects of site operations have the potential to affect the environment:

#### **Significant aspects:**

- Air emissions
- Drinking water contamination
- Energy and fuel use
- Environmental restoration
- Non-hazardous waste management (generation, storage, and disposal)

- Greenhouse gas emissions
- Groundwater protection
- Hazardous, radioactive, and mixed waste management (generation, storage, and disposal)
- Wastewater management (generation and disposal)
- Water Use

**Other aspects:**

- Building construction and renovation
- Electronics stewardship
- Industrial chemical storage and use
- Purchase of materials and equipment
- Building demolition
- Recycling and management of surplus property and materials
- Resource protection (cultural, biological, and raw materials)
- Surface water and stormwater runoff

### 3.3 Environmental Objectives, Targets, and Programs

An NSTec Environmental Working Group (EWG), composed of key employees in several NSTec organizations, with management approval, determines what EMS objectives and targets will be implemented to address specific environmental aspects of NNSA/NSO operations. These are determined on a fiscal year (FY) (October 1 through September 30) basis. These targets are tracked by the various responsible NSTec organizations, and reported quarterly to the NSTec Executive Leadership Council. The FY 2010 EMS objectives and targets are presented in Table 3-1. Those selected in 2010 to be implemented and tracked in FY 2011 are presented in Table 3-2.

NNSA/NSO programs developed and maintained to address the specific efficiency and sustainability goals of DOE O 430.2B, DOE O 450.1A, and EO 13514 are the Energy Management Program and the Pollution Prevention and Waste Minimization (P2/WM) Program.

**Table 3-1. FY 2010 NNSA/NSO EMS objectives and targets**

Environmental Aspect	Objective	Target	Result
Energy Use	Reduce energy use.	Keep energy usage at or below the FY 2009 level.	MET TARGET – Energy use reduced 5.6% below the FY 2009 level.
		Perform High Performance Sustainable audits on 20% of enduring buildings.	EXCEEDED TARGET – Audits were performed on 25.6% of enduring buildings.
Fuel Use	Increase use of alternative fuels.	E-85 fuel to be 35% of total E-85 and gasoline fuel used at the NNS.	EXCEEDED TARGET – E-85 fuel was 41.4% of total fuels used at the NNS.
	Decrease petroleum fuel use.	Reduce usage of unleaded and diesel fuels by 2% of that used in FY 2009.	EXCEEDED TARGET – Usage was reduced by 31.7%
Environmental Restoration	Remediate sites identified in the Federal Facility Agreement and Consent Order (FFACO).	Meet the FY 2010 FFACO deadlines for Corrective Action Unit (CAU) 563, Septic Systems.	EXCEEDED TARGET – CAU 563 closure report was submitted to the State on February 17, 2010, and approved on March 4, 2010, prior to its due date of March 31, 2010.
Groundwater Protection	Protect groundwater quality.	Prepare 60 boreholes for plugging and plug 50 boreholes.	MET TARGET – Prepared 60 and plugged 50 boreholes.
Hazardous, Radioactive, and Mixed Waste Management	Reduce environmental contamination risk at vulnerable sites.	As funding is available, reduce or eliminate risks at NNS sites on the Vulnerable Sites List (see Glossary, Appendix B).	MET TARGET – Funding was provided to begin draining refrigerant containing ozone-depleting substances from 112 refrigerant tanks of 62 chillers no longer in use; by end of FY 2010, 56 tanks had been drained; task scheduled for completion in FY 2011 (see Table 3-2 target for the Greenhouse Gas Emissions environmental aspect).
Water Use	Reduce water usage.	Keep potable water usage at or below the FY 2009 level.	MET TARGET – Potable water use was reduced by 0.6% from FY 2009 levels.

**Table 3-2. FY 2011 proposed NNSA/NSO objectives and targets**

Environmental Aspect	Objective	Target
Energy Use	Reduce energy use.	Meet the DOE goal of 30% reduction of energy intensity in buildings <sup>(a)</sup> by FY 2015, from an FY 2003 baseline.
Fuel Use	Increase use of renewable fuels.	Meet the DOE goal of 10% annual increase in fleet alternative fuel consumption by FY 2015, from an FY 2005 baseline.
	Decrease petroleum-based fuel use.	Meet the DOE goal of 2% annual reduction in fleet petroleum consumption by FY 2015, from an FY 2005 baseline (i.e., FY 2010 consumption should be 10% less than the FY 2005 baseline).
Environmental Restoration	Remediate sites identified in the FFACO.	Meet the following FY 2010 FFACO deadlines: Complete Corrective Action Plan by May 9, 2011, for CAU 562, Waste Systems; submit completed Closure Report to the State by September 30, 2011, for CAU 116, Area 25 Test Cell C Facility.
Greenhouse Gas Emissions	Reduce the risk of releasing refrigerants to the atmosphere.	Complete draining refrigerant from 112 tanks of 62 chillers or put them on a maintenance schedule.
Groundwater Protection	Protect groundwater quality.	Prepare 41 boreholes for plugging and plug 57 boreholes.
Purchasing Materials	Purchase products that meet NNSA Environmentally Preferable Purchasing (EPP) standards (see Section 3.3.2).	Include in all subcontracts the requirement to meet NNSA EPP standards.
		Achieve 50% increase in number of bio-based janitorial supplies.
Water Use	Reduce water usage.	Meet the DOE goals of 16% reduction in water intensity by FY 2015, from an FY 2007 baseline.

(a) Energy intensity in buildings is measured as British thermal units (BTUs) per square foot of building space.

### 3.3.1 Energy Management Program

The Energy Management Program's goal is to implement DOE's goals through reducing the use of energy and water at NNSA/NSO facilities by advancing energy efficiency, water conservation, and the use of solar and other renewable energy sources. The Energy Management Program is performance oriented and strives to ensure continuous life-cycle, cost-effective improvements to increase energy efficiency and effective management of energy, water, and transportation fleets, while increasing the use of clean energy sources. NNSA/NSO currently uses electricity, fuel oil, and natural gas at the NNSA, NLVF, and RSL-Nellis. Vehicles and equipment are powered by unleaded gasoline, diesel, bio-diesel, E-85, and jet fuel. Cost avoidances realized through implementation of energy efficiencies are captured and used to fund additional projects, which will eventually enable the Energy Management Program to be self-sustaining.

In January 2010, the Energy Management Program completed the *FY 2010 NNSA/NSO Energy Executable Plan*. It discusses projects and activities, funding plans, and milestones for achieving the goals of DOE O 430.2B. In September 2010, DOE released its Strategic Sustainability Performance Plan (SSPP) (DOE, 2010a) to address the requirements of both DOE O 430.2B and EO 13514 within the department. In response, and to assist DOE in meeting the goals of this new SSPP, the Energy Management Program completed the *FY 2011 NNSA/NSO Site Sustainability Plan* (SSP) in December 2010 (NSTec, 2010a). The SSP serves as a contract between NNSA/NSO and NNSA Headquarters in terms of how to meet the DOE and executive orders, and the SSP satisfies the requirement of EO 13423 for an Energy Management Plan. The SSP discusses program, planning, and budget assumptions; each DOE SSPP goal; NNSA/NSO's current performance status for each DOE SSPP goal; and planned actions to meet each goal.

To implement the NNSA/NSO SSP, an Energy Management Council (EMC), composed of key employees in various NSTec organizations, meets monthly to discuss the requirements and track and facilitate their completion. The EMC and the EWG coordinate in identifying EMS targets. The FY EMS objectives and targets (Tables 3-1 and 3-2) mirror annual goals in the SSP to ensure consistency. Table 3-3 presents a summary of the Energy Management Program goals presented in the SSP and the status in FY 2010 of reaching them.

**Table 3-3. NNSA/NSO FY 2011 Site Sustainability Plan goals and FY 2010 performance status**

<b>DOE Agency Goal<sup>(a)</sup></b>	<b>NNSA/NSO Performance Status</b>
<b>Greenhouse Gas (GHG) Baseline</b>	
Prepare baseline of Scope 1 and 2 GHG emissions <sup>(b)</sup> for FY 2008 by January 3, 2010, and for Scope 3 emissions for FY 2008 by June 2, 2010	FY 2008 baseline for Scope 1 and 2 GHG emissions was determined to be 68,678 mTCO <sub>2</sub> e <sup>(c)</sup> and 3,405 mTCO <sub>2</sub> e for Scope 3 GHG emissions; deadlines for their preparation were met. For the Scope 3 GHG baseline, DOE guidance did not require the inclusion of emissions due to transmission and distribution losses, offsite wastewater treatment, and municipal waste disposal; the baseline will be updated when these emissions are quantified.
<b>GHG Emission Reduction</b>	
28% reduction of Scope 1 and 2 GHG emissions <sup>(b)</sup> by FY 2020, from an FY 2008 baseline	Established goal of 2.8% reduction per year to meet the FY 2020 goal; FY 2010 emissions were determined to be 61,054 mTCO <sub>2</sub> e, an 8.9% reduction from the FY 2008 baseline.
13% reduction in Scope 3 <sup>(b)</sup> GHG emissions by FY 2020, from an FY 2008 baseline	Established goal of 1.68% reduction in FY 2011 from the FY 2008 baseline; updating P2 Tracking and Reporting system to collect specific Scope 3 emissions; FY 2011 data will include emissions due to transmission and distribution losses, offsite wastewater treatment, and municipal waste disposal.
<b>GHG Emission Reporting</b>	
Report comprehensive GHG inventory of Scope 1, Scope 2, and specified Scope 3 emissions by January 5, 2011, and annually thereafter by the end of January	Comprehensive inventory was reported in NSTec (2010a).
<b>Energy Intensity Reduction</b>	
30% reduction of energy intensity in buildings (BTUs [British thermal units] per square foot of building space) by FY 2015, from an FY 2003 baseline	Exceeded goal; reduced energy intensity overall by 36.74% from the FY 2003 baseline (26% reduction in electrical consumption, 83% in diesel, and 16.8% in natural gas).
<b>Renewable Energy Consumption</b>	
7.5% of a site's annual electricity consumption from renewable sources by FY 2010 (or 3.75% if electricity is produced from renewable sources on site)	Exceeded goal; 9.6% of purchased electrical power for NNSA/NSO facilities comes from renewable energy sources <sup>(d)</sup> .
Every site to have at least one onsite renewable energy generating system by FY 2010	0.5% of power produced on site is from 153 photovoltaic and 25 wind turbine systems; they provide power to environmental air samplers and remote communications sites.
<b>Transportation and Fleet Management</b>	
10% annual increase in fleet alternative fuel consumption by FY 2015, relative to an FY 2005 baseline (i.e., FY 2010 increase should be 50% above the FY 2005 baseline)	Exceeded goal; consumption is 153.85% above the FY 2005 baseline.
2% annual reduction in fleet petroleum consumption by FY 2015, relative to an FY 2005 baseline (i.e., FY 2010 consumption should be 10% less than the FY 2005 baseline)	Exceeded goal; consumption is 48% less than the FY 2005 baseline.
75% of light duty vehicle purchases must consist of alternative fuel vehicles (AFVs) by FY 2015	Exceeded goal; 100% of all light duty vehicle acquisitions are AFVs.
<b>Metering</b>	
Advanced metering, to the maximum extent practicable, for electricity (by October 2012), steam, and natural gas (by October 2016), and standard meters for water (no due date was set)	411 meters of all types (60.7% of total identified for installation) were installed at NNSA/NSO managed facilities, 73 of which were advanced; remaining meters to be installed include 226 water meters on the NNS.

**Table 3-3. NNSA/NSO FY 2011 Site Sustainability Plan goals and FY 2010 performance status (continued)**

DOE Agency Goal <sup>(a)</sup>	NNSA/NSO Performance Status
<b>Cool Roofs</b>	
<p>“Cool roofs” (see Glossary, Appendix B), unless determined uneconomical<sup>(e)</sup>, for roof replacements, and new roofs must have a thermal resistance of at least R-30</p>	<p>320,765 gross square feet (gsf) of building space is under cool roofs, representing 10% of all NNSA/NSO building gsf.</p>
<b>Training</b>	
<p>DOE facility energy managers to be Certified Energy Managers by September 2012, and pursue energy management training and outreach among employees</p>	<p>NSTec appointed an Energy Program Manager and an Energy Manager to implement required training; several energy conservation training initiatives for facility managers were launched; Energy Program personnel took courses to understand new technologies, energy metering, and analysis of energy data; both a Performance Evaluation Plan and an Award Team Incentive to reward employees were developed; and an employee outreach program was established.</p>
<b>Sulfur Hexafluoride (SF<sub>6</sub>) Reduction</b>	
<p>SF<sub>6</sub> gas capture program by September 2012</p>	<p>Planning for this program was initiated in December 2010.</p>
<b>High Performance Sustainable Buildings</b>	
<p>All new construction and major renovations greater than \$5 million are to achieve U.S. Green Building Council’s Leadership in Energy and Environmental Design (LEED) Gold certification. Buildings less than \$5 million must meet the Guiding Principles for Federal Leadership in High Performance Sustainable Buildings design (Interagency Sustainability Working Group [ISWG], 2008)</p>	<p>Two new fire stations at the NNSS were completed and received LEED Gold certification; for design category, both stations exceeded the American Society of Heating, Refrigeration, and Air-Conditioning Engineers Standards by 42%.</p>
<p>15% of existing buildings larger than 5,000 gsf to be compliant with the Guiding Principles for Federal Leadership in High Performance Sustainable Buildings design (ISWG, 2008) by FY 2015</p>	<p>5.6% of NNSA/NSO enduring buildings over 5,000 gsf meet the Guiding Principles; sustainability assessments of 18 buildings representing over 25% of the gsf of enduring buildings were performed, and energy conservation measures were identified; Energy Star status was sought for the Nevada Support Facility at the NLVF and Building 23-118 in Mercury on the NNSS in preparation for pursuing LEED certification.</p>
<b>Regional and Local Planning</b>	
<p>Participate in regional transportation planning</p>	<p>NNSA/NSO worked with the Regional Transportation Commission of Southern Nevada to investigate the use of the Northwest Regional Transportation Center in northwest Las Vegas as a site to park fleet vehicles instead of having to travel an additional 25 miles (roundtrip) to the NLVF.</p>
<b>Water Use Efficiency and Management<sup>(f)</sup></b>	
<p>16% reduction in water intensity<sup>(g)</sup> by FY 2015, from an FY 2007 baseline; 26% by FY 2020</p>	<p>Exceeded goal; water production<sup>(f)</sup> of potable and non-potable water was reduced by 17.3% across all NNSA/NSO facilities in 2010 from the FY 2007 baseline; a new water efficient car wash was installed at the NNSS; the installation of water meters, predominantly on the NNSS, will continue as funding allows (see Section 14.4, Groundwater Conservation, for a listing of other accomplishments in 2010).</p>
<p>20% reduction in water consumption of industrial, landscaping, and agricultural water by FY 2020, from an FY 2010 baseline</p>	<p>An FY 2010 baseline for non-potable water use was determined based on non-potable water production on the NNSS—the only site where non-potable water is used. Data capture and tracking methods used for baseline development will be assessed in 2011; the revised FY 2010 baseline will be reported in 2011.</p>
<b>Pollution Prevention/Waste Minimization</b>	
<p>Minimize generation of waste and pollutants through source reduction</p>	<p>Approvals of chemical purchases and environmental review of projects facilitates minimizing the generation of waste and pollutants through source reduction.</p>

**Table 3-3. NNSA/NSO FY 2011 Site Sustainability Plan goals and FY 2010 performance status (continued)**

DOE Agency Goal <sup>(a)</sup>	NNSA/NSO Performance Status
<b>Pollution Prevention/Waste Minimization (continued)</b>	
Maintain cost-effective waste prevention and recycling programs	Continued to implement recycling within the P2/WM Program (see Section 3.3.2).
Divert 50% of non-hazardous solid waste, excluding construction and demolition materials and debris, from disposal by the end of FY 2015	30% of non-hazardous solid waste was diverted from disposal through recycling (see Section 3.3.2.2).
Divert at least 55% of construction and demolition materials and debris from disposal by the end of FY 2015	No such materials were diverted from disposal in 2010 based on concerns for residual radiological contamination. An assessment will be conducted in 2011 to identify materials that can be cleared for unrestricted reuse or recycling.
Reduce printing paper use and acquire uncoated printing and writing paper containing at least 30% post-consumer fiber	Default settings for printers and copiers are set to duplex; NNSA/NSO requires the purchase of printing paper that meets the uncoated and fiber content goals.
Reduce and minimize the quantity of toxic and hazardous chemicals and materials acquired, used, and disposed of	Approvals of chemical purchases and environmental review of projects are current strategies used to reduce and minimize the quantity of toxic and hazardous chemicals and materials acquired, used, or disposed of.
Increase the diversion of compostable and organic material from the waste stream	The majority of food wastes at the NNSA were collected and taken to a pig farm in Las Vegas in 2010, but will be composted in 2011.
Implement integrated pest management and other appropriate landscape management practices	Only native landscaping exists at the NNSA, and xeric landscaping is predominant at the NLVF and RSL-Nellis. Most herbicide use is around buildings and other structures for fire prevention, and most pesticide use is inside buildings.
Increase agency use of acceptable alternative chemicals and processes in keeping with agency's procurement policies	Requisition Compliance Review approvals of chemical purchases and environmental review of projects facilitates meeting this goal.
Decrease agency use of chemicals where such decrease will assist agency in achieving GHG reduction targets	GHG reduction chemicals are used for equipment whenever possible, and some equipment is modified to be able to use non-GHG chemicals.
Report in accordance with the requirements of the Emergency Planning and Community Right-to-Know Act (EPCRA)	A hazardous substance inventory database is updated annually, and information is provided to the State (see Section 13.3 for 2010 EPCRA compliance activities).
<b>Sustainable Acquisition</b>	
Ensure that 95% of new contract actions require the supply or use of products and services that are energy efficient, water efficient, bio-based, environmentally preferable, non-ozone depleting, contain recycled content, or are non-toxic or less toxic alternatives; update affirmative procurement plans (i.e., green purchasing plans or EPP plans), policies, and programs to ensure that all federally mandated designated products and services are included in all relevant acquisitions	NSTec developed language to include in all applicable subcontracts that will require NSTec subcontractors to meet DOE's sustainable acquisition goals.
<b>Electronic Stewardship and Data Centers</b>	
Ensure procurement preference for Electronic Product Environmental Assessment Tool (EPEAT) registered electronic products	100% of the 2,100 leased computers managed by NSTec for NNSA/NSO are EPEAT registered.
Enable power management, duplex printing, and other energy-efficient or environmentally preferable features on all eligible DOE electronic products	Printers and copiers are set to duplex by default; digital storage of records and files and the use of thinner paper are encouraged; electronic document management, display, and storage have been implemented; the applicability of electronic filing and transmittal of documents continues to be assessed; thin client computer terminals will replace retired personal computers to reduce overall computing power use by 85%.



**Table 3-3. NNSA/NSO FY 2011 Site Sustainability Plan goals and FY 2010 performance status (continued)**

DOE Agency Goal <sup>(a)</sup>	NNSA/NSO Performance Status
<b>Electronic Stewardship and Data Centers (continued)</b>	
Employ environmentally sound disposition of excess or surplus electronic products	All leased computer equipment contracts require that returned equipment be refurbished and reused, disassembled, and the parts reused or recycled through an International Association of Electronic Recyclers-certified recycler.
Reduce the use of office paper and reduce energy consumption of data center and server operations	All leased computers are Energy Star 4.0 compliant and EPEAT registered; continued investigating the use of thin clients and a common server to replace personal computers and feasibility of using virtual servers and of transferring data centers located at the NLVF to a commercial data farm.
<b>Site Innovation</b>	
Innovation to maintain U.S. global leadership in science and engineering and to research, develop, demonstrate, and deploy solutions and initiatives to advance sustainability	Reflective paint was purchased and applied to 19 rooftop unit air conditioners on Building B-3 at the NLVF, and the effect of the paint will be monitored to assess effectiveness to reduce energy consumption; a new technology developed by an NSTec employee to cool and heat buildings without refrigerants or consumption of water through the use of a high-volume, low-pressure air turbine was researched for patentability, and further machining, experimentation, and testing was planned.

- (a) These are department-wide goals of the DOE, which NNSA/NSO, or any single DOE site, is not required to specifically meet. NNSA/NSO is committed, however, towards striving to meet these department target goals.
- (b) The GHGs targeted for emission reductions are carbon dioxide, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. Scope 1 GHG emissions include direct emissions from sources that are owned or controlled by a federal agency. Scope 2 includes direct emissions resulting from the generation of electricity, heat, or steam purchased by a federal agency. Scope 3 includes emissions from sources not owned or directly controlled by a federal agency but related to agency activities, such as vendor supply chains, delivery services, employee business air and ground travel, employee commuting, contracted solid waste disposal, contracted waste water discharge, and transmission and distribution losses related to purchased electricity.
- (c) mTCO<sub>2</sub>e = metric tons of carbon dioxide equivalents.
- (d) 80% of all power purchased for NNSA/NSO facilities is provided by NV Energy, which gets 12 percent of its power from 27 renewable energy sources (i.e., plants using geothermal-, solar-, hydro-, and bio-fuel). The remaining 20% of purchased power is from Valley Electric and regional power companies where auxiliary sites are located.
- (e) A cool roof is also not required for a new DOE project if the project has already received mission need approval, alternative selection and cost range approval, and performance baseline approval and is ready for the start of construction.
- (f) Water intensity is gallons consumed per total gross square footage of facility space.
- (g) On the NNS, production of onsite water wells was used to estimate water consumption because none of the NNS facilities had water meters in 2011.

### 3.3.2 Pollution Prevention and Waste Minimization Program

The P2/WM Program has initiatives to eliminate or reduce the generation of waste, the release of pollutants to the environment, and the use of Class I ozone-depleting substances (ODS). These initiatives are pursued through source reduction, reuse, segregation, and recycling, and by procuring recycled-content materials and environmentally preferable products and services. They also ensure that proposed methods of treatment, storage, and disposal of waste minimize potential threats to human health and the environment. These initiatives address the requirements of DOE orders, federal laws, and state regulations applicable to operations at the NNS, NLVF, and RSL-Nellis (see Section 2.6). The following strategies are employed to meet P2/WM goals:

**Source Reduction** – Waste minimization activities eliminate or reduce the generation of radioactive, hazardous, or solid waste and/or reduce the toxicity of those wastes. The preferred method of waste minimization is source reduction, i.e., the minimization or elimination of waste before it is generated by a project or operation. NNSA/NSO’s Integrated Safety Management System requires that every project/operation address waste minimization issues during the planning phase and ensure that adequate funds are allocated to perform any identified waste minimization activities.

**Recycling** – For some recyclable waste streams generated, NNSA/NSO maintains a recycling program. Items recycled in 2010 included paper, cardboard, aluminum cans, toner cartridges, inkjet cartridges, used oil, food waste from the cafeteria, plastic, scrap metal, computer equipment, rechargeable batteries, lead-acid batteries, fluorescent light bulbs, mercury lamps, metal hydride lamps, and sodium lamps.

One recycling program has been NSTec's Material Exchange Program. Created in 1998, the Material Exchange Program diverts supplies, chemicals, and equipment from landfills. These unwanted, but usable, items are made available through electronic mail or postings on the intranet so that individuals in need can obtain the items at no cost. If items are not placed with another user, they can be returned to the vendor for recycle/reuse or given to other DOE sites, other government agencies, or local schools. In 2010, no materials were recycled through the program. From its inception in 1998, the Material Exchange Program has diverted 194 metric tons (mtons) (213 tons) of chemicals, office supplies, and equipment from disposal in solid and hazardous waste landfills.

NSTec Property Management manages an Excess Property Program. New users may include NSTec employees, employees from NNSA/NSO and other NNSS contractors/laboratories, other DOE sites, other federal agencies, state and local government agencies, and local schools. If new users are not found for these items, they are made available to the public for recycle/reuse through periodic Internet sales.

**Environmentally Preferable Purchasing (EPP)** – Section 6002 of the Resource Conservation and Recovery Act (RCRA), as amended (Title 42 United States Code Section 6962), requires federal agencies to develop and implement an affirmative procurement program (APP). NNSA/NSO maintains an APP that stimulates a market for recycled-content products and closes the loop on recycling. The U.S. Environmental Protection Agency (EPA) maintains a list of items containing recycled materials that should be purchased. The EPA determines what the minimum content of recycled material should be for each item. Federal facilities must have a process in place for purchasing the EPA-designated items containing the minimum content of recycled materials. EO 13423 requires federal facilities to ensure, where possible, that 100 percent of purchases of items on the EPA-designated list contain recycled materials at the specified minimum content. Of these items which NNSA/NSO purchased in 2010, about 52.6 percent contained recycled materials at the specified minimum content. The U.S. Department of Agriculture now designates types of materials that have a required minimum amount of bio-based chemicals. Products that meet this requirement are being added to procurement lists, and the percentage of those that are purchased will be tracked in 2011.

**Employee and Public Awareness** – The NNSA/NSO P2/WM initiatives also include an employee and public awareness program. Awareness of P2/WM issues is accomplished by dissemination of articles through electronic mail, contractor and NNSA/NSO newsletters, the maintenance of a P2/WM intranet website, employee training courses, and participation at employee and community events. These activities are intended to increase awareness of P2/WM and environmental issues and highlight the importance of P2/WM for improving environmental conditions in the workplace and community.

### ***3.3.2.1 Reduction of Ozone Depleting Substances***

DOE O 450.1A requires that a site's EMS include practices to maximize the use of safe alternatives to ODS. Also, EO 13423 has a requirement to reduce ODS at all DOE sites and to phase out the procurement of Class I ODS for all non-exempted uses by December 31, 2010. The NNSS achieved this procurement phase-out in 2009. In 2010, only environmentally preferable alternatives to ODS were purchased. All procurement of freons must be approved by the environmental oversight organization, which verifies that only approved products are purchased. Existing freons in equipment are being phased out as equipment is drained for repair or replaced by new equipment with approved alternative freons. There are no halon-containing fire extinguishers or equipment remaining at NNSS or NLVF. All halons have been removed from RSL-Nellis, with the exception of halon fire extinguishers in the aircraft.

### 3.3.2.2 Reduction of Wastes

P2/WM techniques and practices are evaluated for all activities that may generate waste. Those that are implemented result in reductions to the volume and/or toxicity of waste generated on site for disposal. Table 3-4 shows a summary of the waste reduction activities during 2010. An estimated 138.8 mtons (152.7 tons) of hazardous wastes (including RCRA, Toxic Substance Control Act, and state-regulated hazardous wastes) and 648.5 mtons (713.4 tons) of solid waste (sanitary waste) were diverted from disposal facilities in 2010, all through recycling and reuse. Table 3-5 compares the amounts of radioactive, hazardous, and solid wastes reduced in 2010 to the amounts in prior years.

**Table 3-4. Waste reduction activities in 2010**

Activity	Reduction (mtons) <sup>(a)</sup>
<b>Hazardous Waste</b>	
Bulk used oil was sent to an offsite vendor for recycling	82.3
Lead acid batteries were shipped to an offsite vendor for recycling	29.0
Electronic equipment, including computer towers, monitors, laptops, and televisions, was sent to an offsite vendor	16.6
Computer equipment was returned to the vendor where it is refurbished and sold for reuse	5.8
Rechargeable batteries were sent to an offsite vendor for recycling	4.1
Spent fluorescent light bulbs, mercury lamps, metal hydride lamps, and sodium lamps were sent to an offsite vendor for recycling	1.0
<b>Total</b>	<b>138.8</b>
<b>Solid Waste</b>	
Single stream mixed paper/cardboard/cans/plastic from the NLVF were sent off site for recycling	476.3
Mixed paper and cardboard from the NNSS were sent off site for recycling	101.5
Food waste from the NNSS cafeterias was sent off site to be reused as pig feed for a local pig farmer	34.9
Tires were sent off site for recycling	26.5
Shipping materials including pallets, styrofoam, bubble wrap, and shipping containers were reused	7.8
Aluminum cans from the NNSS were sent off site for recycling	0.8
Spent toner cartridges were sent off site for recycling	0.7
<b>Total</b>	<b>648.5</b>

(a) 1 mton = 1.1 ton

**Table 3-5. Quantities of waste reduced through P2/WM activities by waste type and year**

Calendar Year	Radioactive (m <sup>3</sup> ) <sup>(a)</sup>	Hazardous (mtons) <sup>(b)</sup>	Solid (mtons)
2010	0	138.8	648.5
2009	45.2	114.0	153.5
2008	28.9	268	311
2007	0	167	1,698
2006	0	149	803
2005	0	13,992	1,194
2004	0	115	1,438
2003	40.0	207	1,547
2002	63.2	177	904

(a) 1 cubic meter (m<sup>3</sup>) = 1.3 cubic yards

(b) 1 mton = 1.1 ton

### 3.3.2.3 Major P2/WM Accomplishments

In November 2010, NSTec completed the FY 2010 Waste Generation and Pollution Prevention Progress Report for the NNSS. This was done by entering the site’s data, including annual recycling totals and waste minimization accomplishments, into the DOE Headquarters Pollution Prevention Tracking and Reporting System electronic database. NSTec also submitted the calendar year (CY) 2010 Waste Minimization Summary Report to NNSA/NSO in February 2011 for its subsequent transmittal to the Nevada Division of Environmental Protection. There were five major P2/WM accomplishments in 2010 that were reported to DOE Headquarters:

- Two fire stations on the NNSS received LEED Gold designation (see Section 3.8, Awards and Recognition).
- A Tier 1 engine that reduces GHG emissions and reduces fuel usage was installed in an existing Caterpillar tractor/dozer.
- A new car wash was installed that recycles the majority of its water, saving 13 gallons of water for each car wash. The car wash also accommodates a larger portion of the fleet vehicles.
- The NNSA/NSO Energy Management Program is exceeding the DOE long-term environmental goals of reducing energy intensity, water intensity, and petroleum fuel use, and for increasing alternate fuel use and acquisition of AFVs (see Table 3-4).
- A large volume of waste from a demolition project was efficiently transported, minimizing the number of waste shipments and saving fuel and cost.

### 3.3.3 Other Major Environmental Programs

Multiple programs that serve to protect public health and the environment are implemented by NSTec on the NNSS (Table 3-6). They address the environmental protection requirements supported under the EMS as specified in DOE O 450.1A. Work conducted in CY 2010 by these programs is summarized throughout various chapters of this report (see Table 3-6, “Section Reference” column).

**Table 3-6. Major environmental programs of NNSA/NSO**

NNSA/NSO Environmental Program	DOE O 450.1A Requirement Addressed	Program Description	Section Reference <sup>(a)</sup>
Routine Radiological Environmental Monitoring Program	Conduct environmental monitoring to detect releases from DOE activities  Estimate contaminant dispersal patterns in the environment  Characterize the pathways of exposure to members of the public  Estimate the exposures and doses to individuals and nearby population	Monitors direct ambient radiation and monitors man-made radionuclides in air, groundwater, surface water, and biota samples  Identifies pathways of exposure to the public  Estimates dose to public from NNSA/NSO air emissions, groundwater contamination, direct radiation, and ingestion of NNSS game animals	Sections 4.1, 5.1, 6.0, 8.0, 9.1
Underground Test Area Sub-Project	Conduct environmental monitoring to detect, characterize, and respond to releases from DOE activities  Estimate contaminant dispersal patterns in the environment	Characterizes radiological groundwater contamination from past NNSS activities and develops contaminant flow models needed to design a network of long-term monitoring wells for the protection of public and private water supply wells	Section 12.0
Industrial Sites Sub-Project	Conduct environmental monitoring to detect, characterize, and respond to releases from DOE activities	Characterizes and remediates contamination from radiological and hazardous wastes or materials located at past NNSS industrial sites	Section 11.1
Soils Sub-Project	Conduct environmental monitoring to detect, characterize, and respond to releases from DOE activities	Characterizes and remediates radiological soil contamination from past NNSS activities	Section 11.2

Table 3-6. Major environmental programs of NNSA/NSO (continued)

NNSA/NSO Environmental Program	DOE O 450.1A Requirement Addressed	Program Description	Section Reference <sup>(a)</sup>
Community Environmental Monitoring Program	Conduct environmental monitoring to detect releases from DOE activities	Monitors ambient gross alpha and beta radioactivity, gamma radiation, and gamma-emitting radionuclides in offsite community air sampling stations and tritium in offsite water supply sources	Section 7.0
Radiological Waste Management	Public health and environmental protection and compliance <sup>(b)</sup>	Manages and safely disposes of low-level waste and mixed low-level waste generated by NNSA/NSO, other DOE, and selected U.S. Department of Defense operations	Section 10.1
Air Quality Protection (Non-radiological)	Conduct environmental monitoring to detect releases from DOE activities  Conform to Nevada's air quality implementation plan to attain and maintain national ambient air quality standards	Collects and reports air quality data to ensure that NNSA/NSO operations comply with all air quality permits and federal and state standards	Section 4.2
Water Quality Protection (Non-radiological)	Conduct environmental monitoring to detect releases from DOE activities	Collects and reports drinking water and wastewater quality to ensure that NNSA/NSO operations comply with all water quality permits and federal and state standards	Section 5.2
National Environmental Policy Act Compliance	Assess environmental impacts of NNSA/NSO activities	Assesses the environmental effects, values, and reasonable alternatives of proposed projects before deciding to implement any major NNSA/NSO action	Section 2.7
Cultural Resources Management Program and Historic Preservation	Assess environmental impacts of NNSA/NSO activities  Identify and protect cultural resources	Collects and provides information used to evaluate and mitigate potential impacts of proposed projects on NNSO cultural resources and ensures compliance with all state and federal requirements pertaining to cultural resources on the NNSO	Section 15.0
Ecological Monitoring and Compliance Program	Assess environmental impacts of NNSA/NSO activities  Evaluate the potential impacts to biota in the vicinity of a DOE activity  Protect natural resources	Collects ecological information used to evaluate and mitigate potential impacts of proposed projects on NNSO ecosystems and biota and ensures compliance with all state and federal requirements to protect NNSO biota and habitats	Section 16.0
Emergency Services and Operations Support – Wildland Fire Management	Protect site resources from wildland fires	Minimizes the vulnerability of NNSO personnel, property, and wildlife to wildland fire damage	Section 16.5
Groundwater Protection Program	Implement a site-wide approach for groundwater protection	Integrates site-wide groundwater-related activities across multiple programs	Section 14.0
Hazardous Materials Management	Assist in meeting the chemical emergency planning, release, and reporting requirements of the EPCRA and the Pollution Prevention Act of 1990	Safely manages hazardous materials used and stored for NNSA/NSO activities	Section 13.0

**Table 3-6. Major environmental programs of NNSA/NSO (continued)**

NNSA/NSO Environmental Program	DOE O 450.1A Requirement Addressed	Program Description	Section Reference <sup>(a)</sup>
Hazardous and Solid Waste Management	Public health and environmental protection and compliance <sup>(b)</sup>	Safely manages and disposes of hazardous and solid wastes generated by NNSA/NSO operations	Section 10.2, 10.3, 10.4
Meteorological Monitoring	Public health and environmental protection <sup>(b)</sup>	Conducted by the Air Resources Laboratory, Special Operations and Research Division (SORL) of the National Oceanic and Atmospheric Administration; provides air dispersion and atmospheric sciences support to NNSA/NSO operations at the NNSS and elsewhere, as needed	Section A.3 of <i>Attachment A: Site Description</i> (electronic file included on compact disc of this report); see also SORL website <a href="http://www.sord.nv.doe.gov">http://www.sord.nv.doe.gov</a>
Quality Assurance Program	Ensure that analytical work for environmental and effluent monitoring supports data quality objectives, using a documented approach for collecting, assessing, and reporting environmental data	Ensures that quality is integrated into the environmental monitoring data collected and analyzed	Sections 17.0 and 18.0

- (a) The section(s) within this document that present environmental protection and compliance activities of the listed program.
- (b) DOE O 450.1A contains no specific text that addresses the major activities of the program. Program activities, however, include public health and environmental protection and regulatory compliance.

### 3.4 Legal and Other Requirements

Environmental requirements that apply throughout the NSTec enterprise are documented and available through the NSTec intranet home page, company policies and procedures, and the NNSS Prime Contract. NNSA/NSO and its contractors comply with all applicable laws and regulations. Baseline laws and regulations are supplemented on an activity-specific basis as needed. Operating directives and procedures are developed to meet all legal requirements through controlled processes.

Company planning documents, policies, and procedures implement the directives in the NNSS Prime Contract, as applicable. Procedures exist at both the company and organization levels. These documents integrate legal, regulatory, and other company-accepted standards and operating practices into daily work planning and execution activities. Programs conforming to company business management, quality assurance, and environment, safety, and health management processes have been established to ensure that company-accepted standards are implemented, business objectives are achieved, and the workers, public, and environment are protected.

NNSA/NSO and its contractors operate within the constraints of various federal, state, and local environmental permits. These permits often prescribe operational controls, records management, and monitoring and measuring requirements. A current list of the environmental permits is maintained on an Environmental Programs Department Web page. Approved operations and maintenance plans may also exist to comply with permit and non-permit regulatory requirements. There are regulatory agreements, agreements in principle between NNSA/NSO and the State of Nevada, memoranda of understanding, and tenant support agreements that are considered in planning and executing work.

### 3.5 EMS Competence, Training, and Awareness

All NSTec personnel received ISO 14001:2004 awareness training in 2008 provided by an environmental subcontractor as part of obtaining certification. EMS awareness is also included as part of the orientation training required for all new NSTec employees. A working group representing all parts of the company was formed to assist in meeting the requirements of the ISO standard to achieve certification; working group members received a

week of training on the environmental and quality ISO standards. Ongoing EMS awareness is accomplished by publishing environmental articles in electronic newsletters and in a printed newsletter that is mailed to NSTec employees' homes. Focused environmental briefings are given at tail-gate meetings in the field prior to work with high or non-routine environmental risk.

### **3.6 Audits and Operational Assessments**

The ISO 14001 certifying organization for NSTec conducts semi-annual surveillances of the EMS. Findings and recommendations in those reports are also entered and tracked in caWeb. Corrective actions taken to close the issues help to continually improve the EMS program. In 2010, the surveillances were conducted in January and July, and certification was maintained.

The NSTec EMS Description document states that an independent internal audit of portions of the EMS program will be performed each year. The 2010 independent audit conducted by NSTec's Performance Analysis and Improvement Division found a few minor issues, and these were entered into the company-wide issues management tracking program, caWeb, and will be tracked until the issues are closed.

Additionally, NSTec's Environment, Safety, Health, and Quality Division conducts internal management assessments and compliance evaluations on focused portions of the EMS program. These assessments and evaluations determine the extent of compliance with environmental compliance and identify areas for overall improvement.

### **3.7 EMS Effectiveness and Reporting**

The ISO 14001:2004 certification of the EMS program has enabled NSTec to continually improve its environmental program, and also enabled NNSA/NSO to declare meeting executive and DOE order requirements. The ISO 14001:2004 certifying organization stated after both 2010 semi-annual surveillances that the EMS program remains effective and that certification is maintained.

The EMS training and awareness discussed in Section 3.5 have improved the overall environmental knowledge of the workforce. Many times the operational workers in the company, rather than the environmental organization, identify problems and recommend preventive or corrective actions. These actions driven by the EMS program have improved performance and reduced costs frequently.

The establishment of annual environmental EMS targets assists in identifying NNSS sites eligible for inclusion on the Vulnerable Sites List (see Glossary, Appendix B); reducing water, fuel, and energy usages; avoiding waste production; recycling wastes generated from environmental restoration activities; purchasing environmentally preferable products; and making infrastructure improvements on environmental systems such as water lines and boilers.

One of the benefits of the EMS program is a monthly meeting between the NSTec Executive Leadership Council and the environmental organization that coordinates the EMS. Each meeting includes a discussion of current issues, status of key activities and reports, schedule and/or results of external assessments, and status of open caWeb issues. Quarterly status reports on environmental target performance and updates to environmental metrics being tracked for trending are also presented. This monthly EMS briefing has been recognized as a best practice by the ISO 14001:2004 assessor, and is an excellent way to inform upper management of emerging issues and obtain their input and support. NNSA/NSO representatives also attend these briefings, so they can contribute input, observe management involvement, and participate in emerging issue discussions and decisions.

On November 29, 2010, the 2010 Facility EMS Annual Report Data for the NNSS was entered into the DOE Headquarters EMS database accessed through the FedCenter.gov website (<http://www.fedcenter.gov/programs/ems/>). This database gathers information in several EMS areas from all DOE sites to produce a combined report reflecting DOE's overall performance compared to other federal agencies. The report includes a score card section, which is a series of questions regarding a site's EMS effectiveness in meeting the objectives of federal EMS directives. The NNSS scored "green" (the highest score).

### ***3.8 Awards and Recognition***

Construction of a new Area 6 Fire Station was completed in 2010. In December 2010, the building received the LEED Gold designation because of the many environmental sustainability features incorporated into the building. The project was recognized with a DOE/NNSA award in the National Pollution Prevention Program. That award was the Environmental Stewardship Award in the category of Integrative Planning and Design. A new Mercury Fire Station was also completed later in 2010 and received the LEED Gold designation in February 2011.



## 4.0 Air Monitoring

Section 4.1 presents the results of radiological air monitoring conducted on the Nevada National Security Site (NNSS) to verify compliance with radioactive air emission standards. Measurements of radioactivity in air samples are also used to assess radiological dose to the general public. The assessed dose to the public from all exposure pathways is presented in Chapter 9. Section 4.2 presents the results of nonradiological air quality assessments that are conducted to ensure compliance with NNSS air quality permits (see Section 2.2).

The U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office (NNSA/NSO) has also established an independent Community Environmental Monitoring Program to monitor radionuclides in air within communities adjacent to the NNSS. It is managed by the University of Nevada's Desert Research Institute (DRI) of the Nevada System of Higher Education. DRI's offsite air monitoring results are presented in Chapter 7.

### 4.1 Radiological Air Monitoring

NNSS sources of radioactive air emissions include evaporation of tritiated water from containment ponds; diffusion of tritiated water vapor from soil at the Area 3 Radioactive Waste Management Site (RWMS), the Area 5 Radioactive Waste Management Complex (RWMC), the Sedan Crater, and the Schooner Crater; release of tritium gas during equipment calibrations; release of and resuspension of contaminated soil at historical nuclear device safety test and atmospheric test locations; and release of radionuclides from current facility operations. The NNSS air monitoring network consists of samplers placed near sites of soil contamination, at facilities that may produce radioactive air emissions, and along the NNSS boundaries. The objectives and design of the network are described in the *Routine Radiological Environmental Monitoring Plan* (Bechtel Nevada, 2003a).

Data from NNSS sampling stations are analyzed to meet the specific goals listed below. The analytes monitored to perform dose assessments are also listed and include the radionuclides most likely to be present in the air as a result of past or current NNSS operations based on inventories of radionuclides in surface soil (McArthur, 1991) and on the volatility and availability of radionuclides for resuspension (see Table 1-5 for the half-lives of these radionuclides). Uranium is included on this list because depleted uranium (DU) is used during exercises in specific areas of the NNSS. Therefore, air samples from sampling locations near these areas are analyzed for uranium. Gross alpha and beta readings are used in air monitoring as a rapid screening measure.

<b>Radiological Air Monitoring Goals</b>	<b>Analytes Monitored</b>
<p>Measure radionuclide concentrations in air at or near historical or current operation sites that have the potential to release airborne radioactivity to (1) detect and identify local and site-wide trends, (2) quantify radionuclides emitted to air, and (3) detect accidental and unplanned releases.</p> <p>Measure radionuclide concentrations in air to determine if the air pathway dose to any member of the public from past or current NNSS activities complies with the Clean Air Act (CAA) National Emission Standards for Hazardous Air Pollutants (NESHAP) standard of 10 millirem per year (mrem/yr) (0.1 millisievert per year [mSv/yr]) (see Chapter 9 for the estimate of public dose from the air pathway).</p> <p>Provide point-source operational monitoring as required under NESHAP for any facility that has the potential to emit radionuclides into the air and cause a dose greater than 0.1 mrem/yr (0.1 mSv/yr) to any member of the public.</p> <p>Provide the inhalation exposure pathway data to determine if the total radiation dose to any member of the public from all pathways (air, water, food) complies with the 100 mrem/yr standard set by U.S. Department of Energy (DOE) Order DOE O 5400.5, "Radiation Protection of the Public and the Environment" (see Chapter 9 for estimates of dose from all pathways).</p>	<p>Americium-241 (<math>^{241}\text{Am}</math>)</p> <p>Cesium-137 (<math>^{137}\text{Cs}</math>)</p> <p>Tritium (<math>^3\text{H}</math>)</p> <p>Plutonium-238 (<math>^{238}\text{Pu}</math>)</p> <p>Plutonium-239+240 (<math>^{239+240}\text{Pu}</math>)</p> <p>Uranium-233+234 (<math>^{233+234}\text{U}</math>)</p> <p>Uranium-235+236 (<math>^{235+236}\text{U}</math>)</p> <p>Uranium-238 (<math>^{238}\text{U}</math>)</p> <p>Gross alpha radioactivity</p> <p>Gross beta radioactivity</p> <p><math>^{239+240}\text{Pu}</math>, <math>^{233+234}\text{U}</math>, and <math>^{235+236}\text{U}</math> are reported as the sum of isotope concentrations because the analytical method cannot readily distinguish the individual isotopes.</p>

The surveillance of offsite sources from historic nuclear testing on the Tonopah Test Range (TTR) (Clean Slate 1, 2, and 3) are reported by Sandia National Laboratories (SNL) in the TTR annual environmental report (SNL, 2011). In July 2008, NNSA/NSO began conducting environmental and radiological monitoring at Clean Slate 3 and the Sandia compound in Area 3. The purpose is to assess current site conditions in preparation for monitoring when active site remediation begins. These monitoring efforts are reported by SNL in the TTR annual environmental report. Double Tracks, on the Nevada Test and Training Range (NTTR) is currently not being monitored; however, air sampling was conducted at Double Tracks during 1996–1999 in support of its remediation and at Project 57 in 1997–2000 for surveillance purposes. NTTR air sampling results were reported in past NNS Annual Site Environmental Reports available at <http://www.nv.energy.gov/library/publications/environmental.aspx>.

### 4.1.1 Monitoring System Design

**Environmental Samplers** – There are 19 environmental sampling stations: 15 have both air particulate and tritium samplers (atmospheric moisture), 3 stations have only air particulate samplers, and 1 station has only a tritium sampler (Figure 4-1). They are located throughout the NNS in or near the highest diffuse radiation sources. Predominant winds were a factor in station placement (for NNS wind rose data, see Section A.3 of *Attachment A: Site Description*, included as a separate file on the compact disc of this report). Diffuse radiation sources include areas with (1) radioactivity in surface soil that can be resuspended by the wind, (2) tritium in water (tritiated water) transpiring or evaporating from plants and soil at the sites of past nuclear tests, and (3) tritiated water evaporating from ponds receiving water either from contaminated wells or from tunnels that cannot be sealed shut. Sampling and analysis of air particulates and tritium were performed at these stations as described in Section 4.1.2. Radionuclide concentrations measured at these stations are used for trending, determining ambient background concentrations in the environment, and monitoring for unplanned releases of radioactivity. Air concentrations approaching 10 percent of the NESHAP Concentration Levels for Environmental Compliance (compliance levels [CLs]) (second column of Table 4-1) are investigated for causes that may be mitigated in order to avoid exceeding regulatory dose limits.

**Critical Receptor Samplers** – Six stations with both air particulate and tritium samplers, located near the boundaries and center of the NNS, are approved by the U.S. Environmental Protection Agency (EPA) Region IX as critical receptor samplers (Figure 4-1). Radionuclide concentrations measured at these stations are used to assess compliance with the NESHAP dose limit to the public of 10 mrem/yr (0.1 mSv/yr). The annual average concentrations from each station were compared with the CLs listed in Table 4-1. Compliance with NESHAP is demonstrated when the sum of the fractions, determined by dividing each radionuclide's concentration by its CL and then adding the fractions together, is less than 1.0 at all stations.

**Table 4-1. Regulatory concentration limits for radionuclides in air**

Radionuclide	Concentration ( $\times 10^{-15}$ microcuries/milliliter [ $\mu\text{Ci}/\text{mL}$ ])	
	NESHAP Concentration Level for Environmental Compliance (CL) <sup>(a)</sup>	10% of Derived Concentration Guide (DCG) <sup>(b)</sup>
<sup>241</sup> Am	1.9	2
<sup>137</sup> Cs	19	40,000
<sup>3</sup> H	1,500,000	10,000,000
<sup>238</sup> Pu	2.1	3
<sup>239</sup> Pu	2	2
<sup>233</sup> U	7.1	9
<sup>234</sup> U	7.7	9
<sup>235</sup> U	7.1	10
<sup>236</sup> U	7.7	10
<sup>238</sup> U	8.3	10

Note: Both the CL values and 10% of the DCG values represent an annual average resulting in a total effective dose equivalent (TEDE) of 10 mrem/yr, the federal dose limit to the public from all radioactive air emissions. They are computed using different dose models; the more conservative CLs are used in this report.

(a) From Table 2, Appendix E of Title 40 Code of Federal Regulations (CFR) Part 61, 1999

(b) From Chapter 3 of DOE O 5400.5; see Glossary, Appendix B for definition

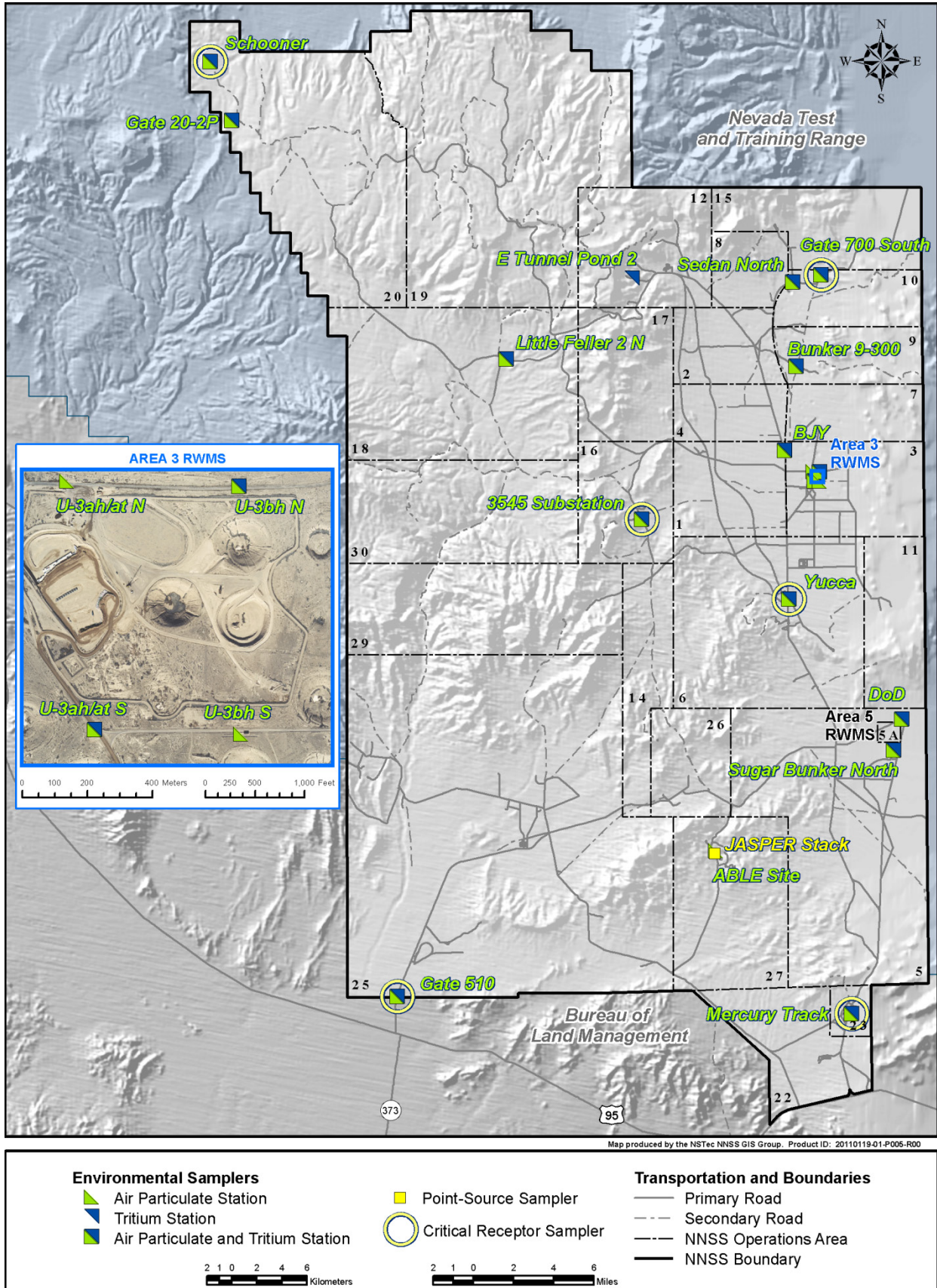


Figure 4-1. Radiological air sampling network on the NNSS in 2010

**Point-Source (Stack) Sampler** – One facility on the NNSS, the Joint Actinide Shock Physics Experimental Research (JASPER) facility in Area 27 (Figure 4-1), requires stack monitoring while operating because it has the potential to emit airborne radionuclides that could result in an offsite radiation dose  $\geq 0.1$  mrem/yr. However, JASPER did not operate during 2010.

### 4.1.2 Air Particulate and Tritium Sampling Methods

A weekly sample is collected from each air particulate sampler by drawing air through a 10-centimeter (cm) (4-inch [in.]) diameter glass-fiber filter at a flow rate of about 85 liters per minute (L/min) (3 cubic feet [ft<sup>3</sup>] per minute). The particulate filter is mounted in a filter holder that faces downward at a height of 1.5 meters (m) (5 feet [ft]) above ground. A timer measures the operating time. The run time multiplied by 85 L/min yields the volume of air sampled, which is about 860 cubic meters (m<sup>3</sup>) (30,000 ft<sup>3</sup>) during a typical 7-day sampling period. The air sampling rates are measured at the start and end of each sampling period with mass-flow meters that are calibrated annually.

The 10 cm (4 in.) diameter filters are analyzed for gross alpha and gross beta radioactivity after a 5-day holding time to allow for the decay of naturally occurring radon progeny. The filters collected within each month are composited for each station, analyzed by gamma spectroscopy for gamma-emitting radionuclides, and then analyzed for <sup>238</sup>Pu, <sup>239+240</sup>Pu, and <sup>241</sup>Am by alpha spectroscopy after chemical separation. To monitor for any potential emissions from activities using DU, the filter composites from Sugar Bunker North (Area 5), Yucca (Area 6), 3545 Substation (Area 16), Gate 20-2P (Area 20), Gate 510 (Area 25), and Able Site (Area 27) are also analyzed for uranium isotopes by alpha spectroscopy.

Tritiated water vapor in the form of <sup>3</sup>H<sup>3</sup>HO or <sup>3</sup>HHO (collectively referred to as HTO) is sampled continuously over 2-week periods at each tritium sampling station. Tritium samplers are operated with elapsed time meters at a flow rate of about 566 cubic centimeters per minute (1.2 ft<sup>3</sup> per hour). The total volume sampled is determined from the product of the sampling period and the flow rate (about 11 m<sup>3</sup> [14.4 cubic yards] over a 2-week sampling period). The HTO is removed from the airstream by two molecular sieve columns connected in series (one for routine collection and a second to indicate if breakthrough occurred through the first column during collection). These columns are exchanged biweekly. An aliquot of the total moisture collected is extracted from the first column and analyzed for tritium by liquid scintillation counting. In all cases, measured activity in units per sample is converted to units per volume of air prior to reporting in the following sections.

Routine quality control air samples (e.g., duplicates, blanks, and spikes) are also frequently incorporated into the analytical suites. Chapter 17 contains a discussion of quality assurance/quality control protocols and procedures utilized for radiological air monitoring.

### 4.1.3 Presentation of Air Sampling Data

The 2010 annual average radionuclide concentrations at each air sampling station are presented in the following sections. The annual average concentration for each radionuclide was calculated from uncensored analytical results for individual samples; i.e., values less than their analysis-specific minimum detectable concentrations (MDCs; see Glossary, Appendix B) were included in the calculation.

In graphs of concentration data, the CL (second column of Table 4-1) or a fraction of the CL is included as a green horizontal line. The CL or fraction thereof is shown in graphs for reference only for those graphs displaying individual measurements, rather than to demonstrate compliance with NESHAP dose limits, since assessment of NESHAP compliance is based on annual average concentrations rather than individual measurements.

For convenience in reporting, values shown in the tables in the following sections are frequently formatted to a greater number of significant digits than can be justified by the inherent accuracy of the measurements, which is typically two significant figures (e.g., 2500, 25, 2.5, or 0.025).

#### 4.1.4 Air Sampling Results from Environmental Samplers

All of the elevated radionuclide concentrations in the air samples shown in the tables and graphs are attributed to the resuspension of legacy contamination in surface soils and to the upward flux of tritium from the soil at sites of past nuclear tests and low-level radioactive waste burial.

##### 4.1.4.1 Americium-241

The mean  $^{241}\text{Am}$  concentration for environmental sampler stations is  $6.99 \times 10^{-18}$   $\mu\text{Ci/mL}$ , slightly higher than 2009 ( $6.33 \times 10^{-18}$   $\mu\text{Ci/mL}$ ) and 2008 ( $4.54 \times 10^{-18}$   $\mu\text{Ci/mL}$ ), but lower than preceding years. As usual, the highest concentrations are detected at the Bunker 9-300 sampling station in Area 9 (Table 4-2 and Figure 4-2). This sampler is located within areas of known soil contamination from past nuclear tests. The annual mean concentration at Bunker 9-300 is  $44.36 \times 10^{-18}$   $\mu\text{Ci/mL}$ , 2.3 percent of the CL. In Figure 4-2, the measurements at Bunker 9-300 are shown individually. The plot also shows the mean monthly concentrations at remaining stations, with vertical bars extending from the lowest to highest measurements at the other stations.

**Table 4-2. Concentrations of  $^{241}\text{Am}$  in air samples collected in 2010**

Area	Sampling Station	Number of Samples	$^{241}\text{Am}$ ( $\times 10^{-18}$ $\mu\text{Ci/mL}$ )			
			Mean	Standard Deviation	Minimum	Maximum
1	BJY	12	6.06	8.65	-1.06	29.97
3	U-3ah/at N	12	6.77	6.71	-2.75	20.08
3	U-3ah/at S	12	10.98	6.28	0.18	22.30
3	U-3bh N	12	4.92	7.35	-2.79	23.01
3	U-3bh S	12	10.43	14.02	0.79	53.39
5	DoD	12	2.91	2.01	-0.71	5.62
5	Sugar Bunker N	12	2.20	3.82	-3.16	10.23
6	Yucca*	12	3.48	3.58	-1.49	10.74
9	Bunker 9-300	12	44.36	28.67	3.61	108.16
10	Gate 700 S*	12	4.09	5.65	-1.75	17.11
10	Sedan N	12	9.74	11.85	-0.72	41.19
16	3545 Substation*	12	1.46	2.65	-2.79	5.52
18	Little Feller 2 N	12	3.33	2.53	0.23	7.09
20	Gate 20-2P	12	1.90	3.79	-4.27	7.92
20	Schooner*	12	4.75	6.50	-3.66	16.04
23	Mercury Track*	12	3.66	4.56	-4.33	10.00
25	Guard Station 510*	12	2.95	3.66	-1.01	10.48
27	ABLE Site	12	1.87	3.43	-1.33	9.47
<b>All Environmental Locations</b>		<b>216</b>	<b>6.99</b>	<b>13.04</b>	<b>-4.33</b>	<b>108.16</b>
<b>CL = <math>1,900 \times 10^{-18}</math> <math>\mu\text{Ci/mL}</math></b>						
<b>* EPA-approved Critical Receptor Station</b>						



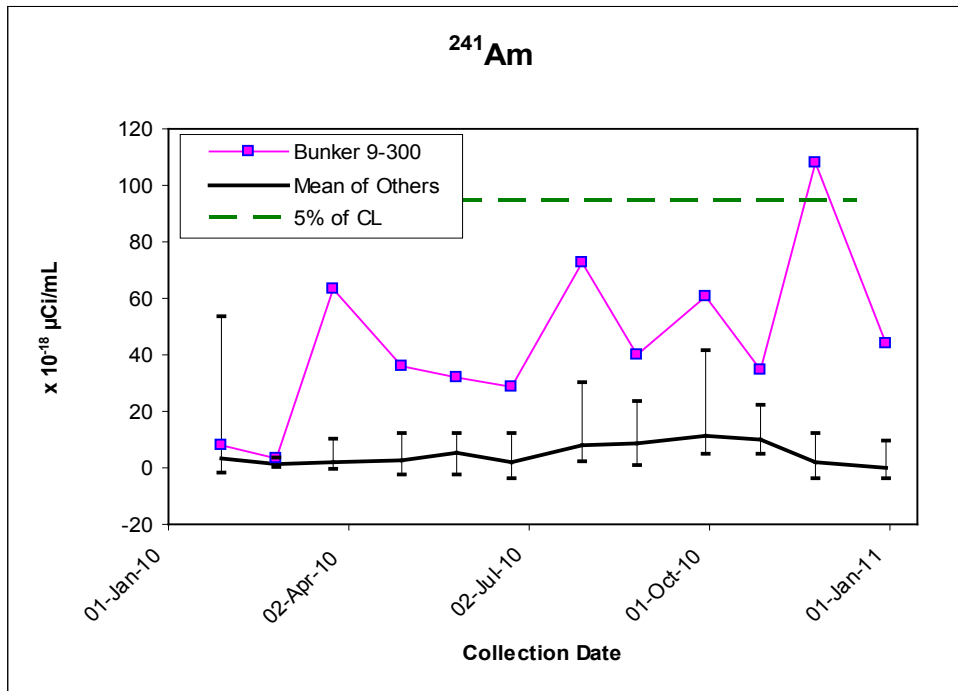


Figure 4-2. Concentrations of <sup>241</sup>Am in air samples collected in 2010

4.1.4.2 Cesium-137

There were no <sup>137</sup>Cs measurements above the minimum detection concentration level of the instrumentation during 2010. Mean values for all environmental samplers are near or below zero. No plot is provided because of the low measurement levels.

Table 4-3. Concentrations of <sup>137</sup>Cs in air samples collected in 2010

Area	Sampling Station	Number of Samples	<sup>137</sup> Cs (× 10 <sup>-17</sup> μCi/mL)			
			Mean	Standard Deviation	Minimum	Maximum
1	BJY	12	-1.75	15.96	-26.64	30.80
3	U-3ah/at N	12	-14.81	16.13	-38.61	15.31
3	U-3ah/at S	12	-10.38	19.42	-37.78	19.25
3	U-3bh N	12	-5.11	21.31	-46.08	20.53
3	U-3bh S	12	-7.31	8.83	-21.34	8.05
5	DoD	12	-7.23	23.88	-53.92	25.13
5	Sugar Bunker N	12	0.95	25.03	-41.51	52.62
6	Yucca*	12	-9.90	16.86	-36.32	14.72
9	Bunker 9-300	12	-6.89	15.76	-36.38	16.79
10	Gate 700 S*	12	-15.69	30.41	-72.30	18.24
10	Sedan N	12	-11.11	30.23	-69.52	35.33
16	3545 Substation*	12	-6.54	25.93	-59.01	45.34
18	Little Feller 2 N	12	-6.12	23.05	-70.64	16.32
20	Gate 20-2P	12	6.86	22.55	-18.42	49.58
20	Schooner*	12	-2.23	24.66	-60.83	28.66
23	Mercury Track*	12	6.14	21.19	-33.21	46.54
25	Guard Station 510*	12	-7.14	16.53	-37.62	20.07
27	ABLE Site	12	-0.50	20.36	-50.32	24.39
<b>All Environmental Locations</b>		<b>216</b>	<b>-5.49</b>	<b>21.66</b>	<b>-72.30</b>	<b>52.62</b>
<b>CL = 1,900 × 10<sup>-17</sup> μCi/mL</b>						
<b>* EPA-approved Critical Receptor Station</b>						

#### 4.1.4.3 Plutonium Isotopes

The overall mean concentration for  $^{238}\text{Pu}$  at environmental stations during 2010 ( $1.88 \times 10^{-18}$   $\mu\text{Ci/mL}$ ) is slightly higher than was measured for 2009 ( $1.15 \times 10^{-18}$   $\mu\text{Ci/mL}$ ) but is slightly lower than those for recent years. Bunker 9-300 (Area 9) measurements are slightly higher than those of other stations, although not so prominently as is the case with  $^{241}\text{Am}$  and  $^{239+240}\text{Pu}$  (see Figure 4-3). The highest mean concentration at environmental stations is only 0.3 percent of the CL.

Plutonium isotopes  $^{239+240}\text{Pu}$  (analytical methods cannot readily distinguish between  $^{239}\text{Pu}$  and  $^{240}\text{Pu}$ ) are of greater abundance and hence greater interest. The overall mean of  $33.5 \times 10^{-18}$   $\mu\text{Ci/mL}$  is higher than for 2008 ( $22.2 \times 10^{-18}$   $\mu\text{Ci/mL}$ ), but similar to levels seen in several recent years (40, 39, 48, 38, and  $55 \times 10^{-18}$   $\mu\text{Ci/mL}$  in 2009, 2007, 2004, 2003, and 2002, respectively), and considerably lower than those of 2006 and 2005 ( $138$  and  $148 \times 10^{-18}$   $\mu\text{Ci/mL}$ , respectively). The location with the highest mean, as expected, is Bunker 9-300 ( $289 \times 10^{-18}$   $\mu\text{Ci/mL}$ , 14.5 percent of the CL; see Table 4-5 and Figure 4-4). The higher plutonium values at this station are due to diffuse sources of radionuclides from historical nuclear testing in Area 9 and surrounding Areas 4 and 7.

The temporal patterns for  $^{241}\text{Am}$ ,  $^{239+240}\text{Pu}$ , and to some extent  $^{238}\text{Pu}$  at Bunker 9-300, shown in Figures 4-2, 4-4, and 4-3, are correlated. This is because  $^{241}\text{Am}$  is the long-lived daughter product obtained when  $^{241}\text{Pu}$  (a short-lived isotope created along with the more common Pu isotopes) decays by beta emission. Hence,  $^{239+240}\text{Pu}$  and  $^{241}\text{Am}$  (and also  $^{238}\text{Pu}$  to some extent) tend to be found together in particles of Pu remaining from past nuclear tests. The half-life of  $^{241}\text{Pu}$  is 14.4 years, whereas that of  $^{241}\text{Am}$  is 432 years; consequently, the amount of  $^{241}\text{Am}$  will gradually increase as  $^{241}\text{Pu}$  decays, then it will decrease at a rate of half every 432 years.

**Table 4-4. Concentrations of  $^{238}\text{Pu}$  in air samples collected in 2010**

Area	Sampling Station	Number of Samples	$^{238}\text{Pu}$ ( $\times 10^{-18}$ $\mu\text{Ci/mL}$ )			
			Mean	Standard Deviation	Minimum	Maximum
1	BJY	12	1.89	3.07	-1.93	8.65
3	U-3ah/at N	12	1.83	2.73	-1.50	7.17
3	U-3ah/at S	12	2.18	2.91	-1.63	7.44
3	U-3bh N	12	1.14	2.38	-3.63	5.14
3	U-3bh S	12	1.73	2.54	-3.83	5.36
5	DoD	12	1.43	3.09	-5.23	7.12
5	Sugar Bunker N	11	1.15	1.80	-1.08	5.55
6	Yucca*	12	0.73	1.87	-2.97	3.28
9	Bunker 9-300	11	5.64	3.33	0.00	12.77
10	Gate 700 S*	12	2.21	2.93	-1.10	7.86
10	Sedan N	12	2.95	4.00	-2.30	9.83
16	3545 Substation*	11	1.00	2.07	-1.22	4.89
18	Little Feller 2 N	11	0.72	1.52	-2.11	3.04
20	Gate 20-2P	12	0.24	2.51	-3.14	4.11
20	Schooner*	12	4.10	3.55	0.00	9.65
23	Mercury Track*	12	1.90	2.36	-1.27	6.01
25	Guard Station 510*	12	2.19	2.39	-0.36	7.78
27	ABLE Site	12	0.92	3.06	-6.26	5.18
<b>All Environmental Locations</b>		<b>212</b>	<b>1.88</b>	<b>2.92</b>	<b>-6.26</b>	<b>12.77</b>
<b>CL = <math>2100 \times 10^{-18}</math> <math>\mu\text{Ci/mL}</math></b>						
<b>* EPA-approved Critical Receptor Station</b>						

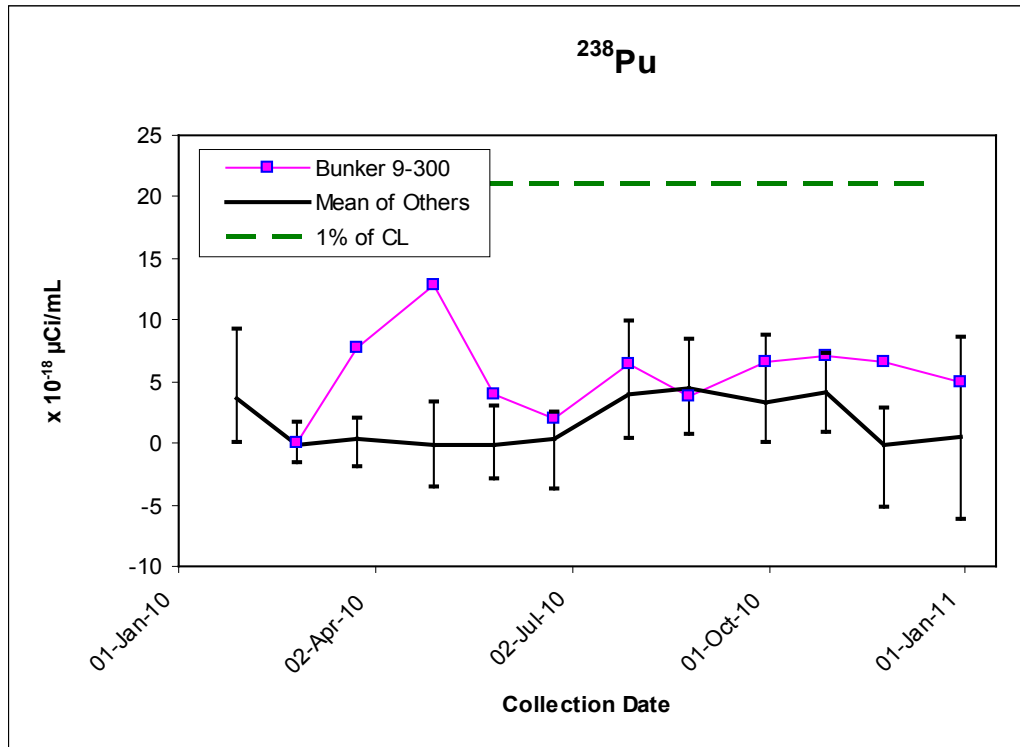


Figure 4-3. Concentrations of <sup>238</sup>Pu in air samples collected in 2010

Table 4-5. Concentrations of <sup>239+240</sup>Pu in air samples collected in 2010

Area	Sampling Station	Number of Samples	<sup>239+240</sup> Pu (x 10 <sup>-18</sup> μCi/mL)			
			Mean	Standard Deviation	Minimum	Maximum
1	BJY	12	38.70	73.85	0.57	269.01
3	U-3ah/at N	12	34.24	29.58	2.42	97.80
3	U-3ah/at S	12	60.72	32.16	2.17	100.67
3	U-3bh N	12	25.31	33.78	-1.08	118.89
3	U-3bh S	12	59.10	110.78	3.51	404.64
5	DoD	12	4.28	4.70	-1.80	15.91
5	Sugar Bunker N	12	3.62	3.33	0.00	11.19
6	Yucca*	12	4.29	4.87	-1.60	14.39
9	Bunker 9-300	12	289.07	229.06	10.73	780.33
10	Gate 700 S*	12	11.72	16.16	0.52	60.63
10	Sedan N	12	44.53	55.78	-1.26	193.16
16	3545 Substation*	12	4.42	5.87	-3.87	17.89
18	Little Feller 2 N	12	5.80	5.18	-1.44	14.28
20	Gate 20-2P	12	2.10	3.09	-4.51	6.74
20	Schooner*	12	6.69	9.99	-3.29	33.56
23	Mercury Track*	12	1.74	3.28	-6.35	5.90
25	Guard Station 510*	12	3.71	3.33	-2.04	9.70
27	ABLE Site	12	2.47	3.16	-2.03	8.26
<b>All Environmental Locations</b>		<b>216</b>	<b>33.47</b>	<b>90.47</b>	<b>-6.35</b>	<b>780.33</b>
<b>CL = 2000 × 10<sup>-18</sup> μCi/mL</b>						
<b>* EPA-approved Critical Receptor Station</b>						



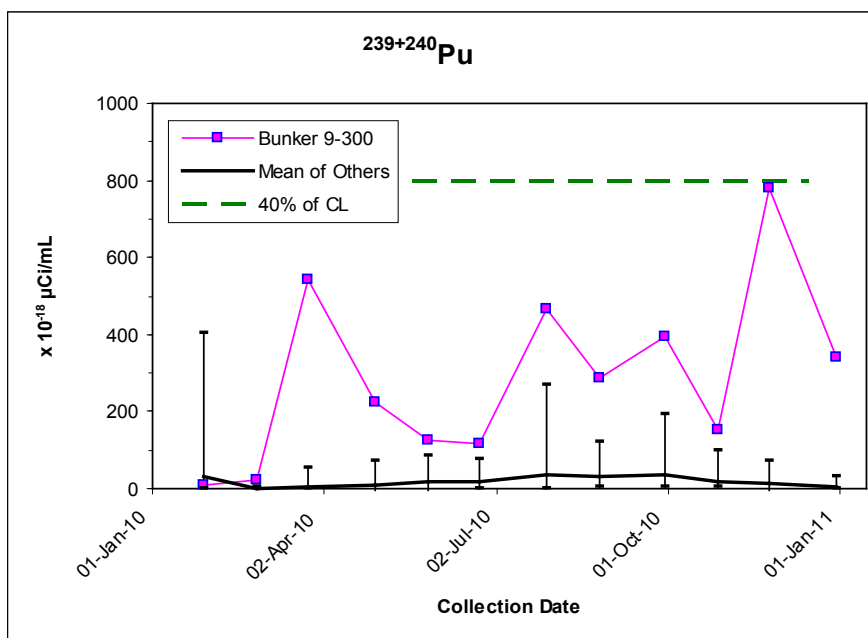


Figure 4-4. Concentrations of <sup>239+240</sup>Pu in air samples collected in 2010

Figure 4-5 shows long-term trends in <sup>239+240</sup>Pu annual mean concentrations at locations with at least 15-year data histories since 1970. Rather than showing the time histories for all 44 locations, Figure 4-5 shows the average (geometric mean) trend lines for Areas 1 and 3, Area 5, Areas 7, 9, 10, and 15, as well as other areas. Areas 1, 3, 7, 9, 10, and 15, in the northeast portion of the NNSS, have a legacy of soil contamination from surface and atmospheric nuclear tests and safety shots. The estimated average annual rates of decline for the area groups range from 3.1 percent (Areas 1 and 3) and 3.4 percent (Areas 7, 9, 10, and 15) to over 9 percent (Other Areas group). This equates to an environmental half-life in air for <sup>239+240</sup>Pu of 16.1 years for Areas 1 and 3; 14.5 years for Areas 7, 9, 10, and 15; and about 4 years for the Other Areas group. Declining rates are not attributed to radioactive decay, as the physical half-lives of <sup>239</sup>Pu and <sup>240</sup>Pu are 24,110 and 6,537 years, respectively. The decreases are primarily due to immobilization and dilution of Pu particles in soil resulting in reduced concentrations suspended in air. The half-life of the less abundant <sup>238</sup>Pu is 88 years.

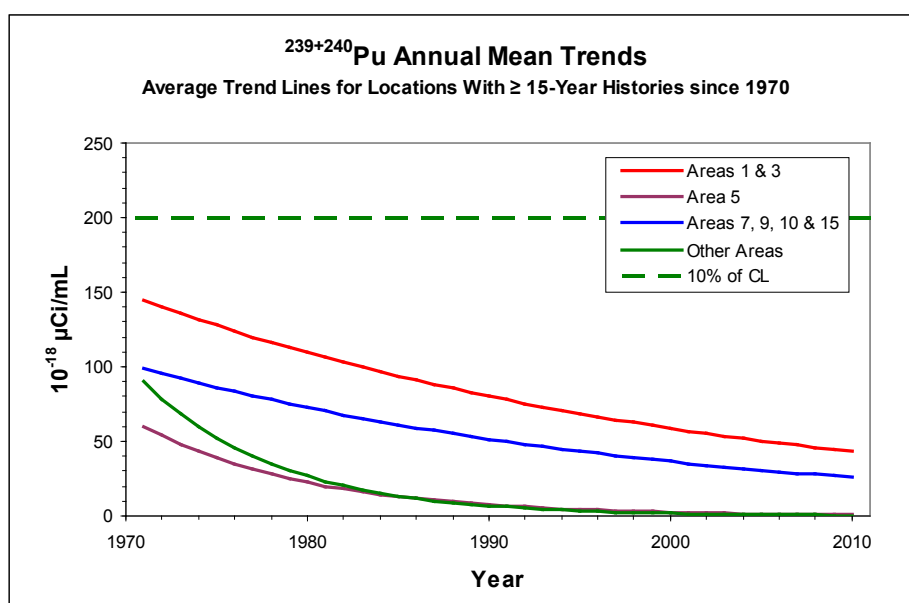


Figure 4-5. Average trends in <sup>239+240</sup>Pu in air annual means, 1971–2010

#### 4.1.4.4 Uranium Isotopes

Uranium analyses by radiochemistry are performed for samples from six stations; Sugar Bunker North (Area 5) was added in 2009 to the stations previously used. Exercises using DU ordnance have been conducted in the past in Areas 20 and 25. The annual mean concentrations are shown in Table 4-6; note that the scale factor in Table 4-6 is the same for  $^{233+234}\text{U}$  and  $^{238}\text{U}$ , but an order of magnitude lower for  $^{235+236}\text{U}$ . Overall mean concentrations of  $^{233+234}\text{U}$ ,  $^{235+236}\text{U}$ , and  $^{238}\text{U}$  are about the same as in 2009. These mean concentrations remain around 2.1–3.1 percent of the CLs for  $^{233+234}\text{U}$  and  $^{238}\text{U}$  and at most 0.26 percent of the CL for  $^{235+236}\text{U}$ . Concentrations are slightly higher at Sugar Bunker N than at the other stations.

**Table 4-6. Concentrations of uranium isotopes in air samples collected in 2010**

Area	Sampling Station	Number of Samples	$^{233+234}\text{U}$ by Radiochemistry (x $10^{-17}$ $\mu\text{Ci/mL}$ )			
			Mean	Standard Deviation	Minimum	Maximum
5	Sugar Bunker N	12	22.02	4.17	17.45	31.48
6	Yucca*	12	19.62	3.40	15.46	26.62
16	3545 Substation*	12	18.37	4.48	8.27	25.90
20	Gate 20-2P	12	19.31	4.87	8.27	23.76
25	Guard Station 510*	12	19.38	3.09	15.43	24.22
27	ABLE Site	12	19.40	3.04	16.30	26.33
<b>All Environmental Locations</b>		<b>72</b>	<b>19.68</b>	<b>3.93</b>	<b>8.27</b>	<b>31.48</b>
<b>CL = 710 x <math>10^{-17}</math> <math>\mu\text{Ci/mL}</math></b>						
Area	Sampling Station	Number of Samples	$^{235+236}\text{U}$ by Radiochemistry (x $10^{-18}$ $\mu\text{Ci/mL}$ )			
			Mean	Standard Deviation	Minimum	Maximum
5	Sugar Bunker N	12	18.29	7.67	8.20	31.61
6	Yucca*	12	11.99	4.89	2.95	22.52
16	3545 Substation*	12	12.41	7.81	0.00	25.86
20	Gate 20-2P	12	9.64	5.50	2.89	25.03
25	Guard Station 510*	12	10.65	7.03	1.90	24.42
27	ABLE Site	12	9.88	3.56	4.26	15.82
<b>All Environmental Locations</b>		<b>72</b>	<b>12.15</b>	<b>6.73</b>	<b>0.00</b>	<b>31.61</b>
<b>CL = 7100 x <math>10^{-18}</math> <math>\mu\text{Ci/mL}</math></b>						
Area	Sampling Station	Number of Samples	$^{238}\text{U}$ by Radiochemistry (x $10^{-17}$ $\mu\text{Ci/mL}$ )			
			Mean	Standard Deviation	Minimum	Maximum
5	Sugar Bunker N	12	22.78	5.54	16.66	36.84
6	Yucca*	12	18.42	2.20	13.76	22.92
16	3545 Substation*	12	17.58	2.63	11.56	21.18
20	Gate 20-2P	12	20.21	5.26	7.67	28.75
25	Guard Station 510*	12	18.73	2.98	14.05	22.22
27	ABLE Site	12	19.14	3.60	10.59	24.54
<b>All Environmental Locations</b>		<b>72</b>	<b>19.48</b>	<b>4.14</b>	<b>7.67</b>	<b>36.84</b>
<b>CL = 830 x <math>10^{-17}</math> <math>\mu\text{Ci/mL}</math></b>						
<b>* EPA-approved Critical Receptor Station</b>						

The ratios of the uranium isotope concentrations are given in Table 4-7; Table 4-8 presents the values expected of those ratios for uranium from different sources. Natural uranium is believed to be the predominant source of uranium in air samples based on the median  $^{235+236}\text{U}/^{238}\text{U}$  ratio being most consistent with natural uranium, although the median  $^{233+234}\text{U}/^{238}\text{U}$  ratio is below the target values for both natural and depleted uranium.

**Table 4-7. Observed values of uranium isotope ratios in 2010**

	Isotope Ratio Values	
	$^{233+234}\text{U} / ^{238}\text{U}$	$^{235+236}\text{U} / ^{238}\text{U}$
Median (95% CI)	1.01 (0.95, 1.07)	0.057 (0.050, .064)

**Table 4-8. Expected ratios of uranium isotopes by type of source**

Source	Expected Isotope Ratios	
	$^{233+234}\text{U} / ^{238}\text{U}$	$^{235+236}\text{U} / ^{238}\text{U}$
Natural	~1.29	~0.047
Enriched	~6.8	~0.19
Depleted	~1.13	~0.016

#### 4.1.4.5 Tritium

Measurements of tritium in air vary widely across monitoring stations on the NNSS (Table 4-9). The highest mean concentration was detected at the Schooner station ( $242 \times 10^{-6}$  picocuries per milliliter [pCi/mL]). The next highest are  $5.1 \times 10^{-6}$  pCi/mL at Sedan N and  $4.6 \times 10^{-6}$  pCi/mL at E Tunnel Pond 2; all of these are similar to 2009 and 2008 values. Figure 4-6 shows these data with the Schooner data plotted at one-tenth of their actual values to allow the variation at other locations to be visible. The Schooner annual mean is 16.1 percent of the CL; mean concentrations at other locations are less than 0.4 percent of the CL.

**Table 4-9. Concentrations of  $^3\text{H}$  in air samples collected in 2010**

Area	Sampling Station	Number of Samples	$^3\text{H}$ Concentration ( $\times 10^{-6}$ pCi/mL)			
			Mean	Standard Deviation	Minimum	Maximum
1	BJY	26	0.80	0.84	-0.55	2.72
3	U-3ah/at S	26	0.83	0.96	-0.47	3.72
3	U-3bh N	26	0.40	0.62	-0.35	1.80
5	DoD	26	0.27	0.49	-0.43	1.66
5	Sugar Bunker N	26	0.82	0.78	-0.73	2.45
6	Yucca*	26	0.27	0.41	-0.58	1.64
9	Bunker 9-300	26	1.48	1.46	-0.09	5.06
10	Gate 700 S*	25	0.29	0.37	-0.30	1.00
10	Sedan N	25	5.07	5.57	-0.16	16.70
12	E Tunnel Pond	25	4.60	3.17	0.81	10.20
16	3545 Substation*	26	0.12	0.33	-0.82	0.94
18	Little Feller 2 N	25	0.07	0.36	-0.38	1.00
20	Gate 20-2P	23	0.24	0.37	-0.40	1.28
20	Schooner*	24	241.78	246.03	11.10	676.00
23	Mercury Track*	26	0.22	0.42	-0.48	1.25
25	Guard Station 510*	26	-0.04	0.31	-0.70	0.64
<b>All Environmental Locations</b>		<b>407</b>	<b>15.22</b>	<b>81.60</b>	<b>-0.82</b>	<b>676.00</b>
<b>CL = <math>1500 \times 10^{-6}</math> pCi/mL</b>						
<b>* EPA-approved Critical Receptor Station</b>						

The tritium found at Schooner, Sedan N, and E Tunnel Pond 2 comes from past nuclear tests. Tritium associated with these tests quickly oxidized into tritiated water, which remains in the surrounding soil and rubble until it moves to the surface and evaporates. Higher tritium concentrations in air are generally observed during the summer months. At E Tunnel Pond, this increase is due to the rate of evaporation increasing as the temperature

increases. At Schooner and Sedan, increased tritium emissions are likely due to the movement of relatively deep soil moisture (> 2 m) containing relatively high concentrations of tritium to the surface when temperatures are the highest and when shallow (< 2 m) soil moisture is the lowest. Rainfall can temporarily suppress these emissions by diluting the shallow soil moisture. Figure 4-6 shows the relationship between tritium measurements and the average daily temperature at the Pahute Mesa and Schooner Crater meteorological stations. Figure 4-7 shows the amount of precipitation occurring during monitoring periods in Pahute Mesa; note the dip in tritium emissions following the rains of late July and early August.

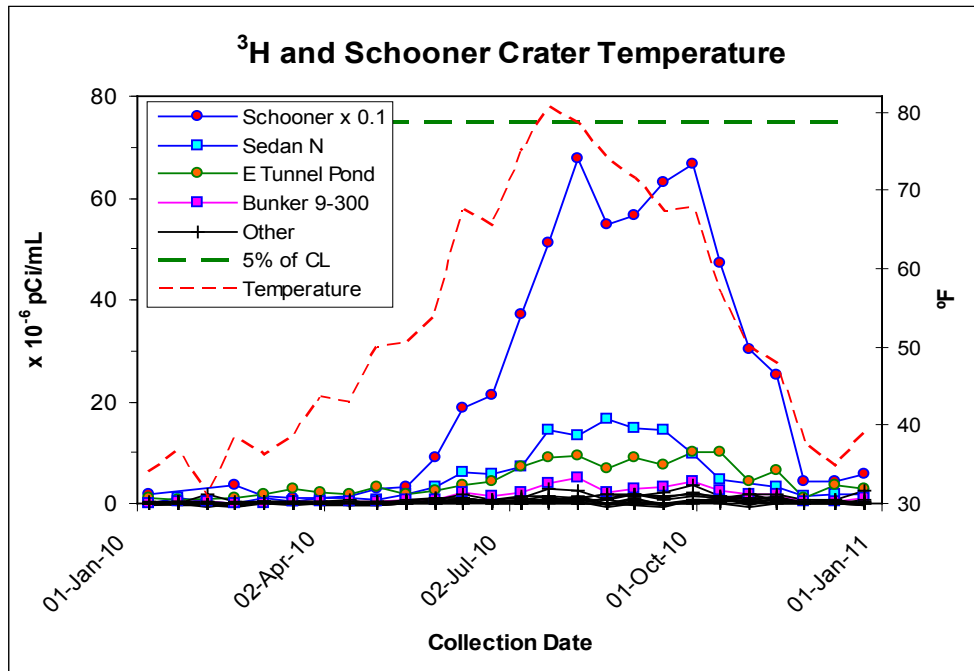


Figure 4-6. Concentrations of  $^3\text{H}$  in air samples collected in 2010 with Schooner Crater average air temperature per collection period

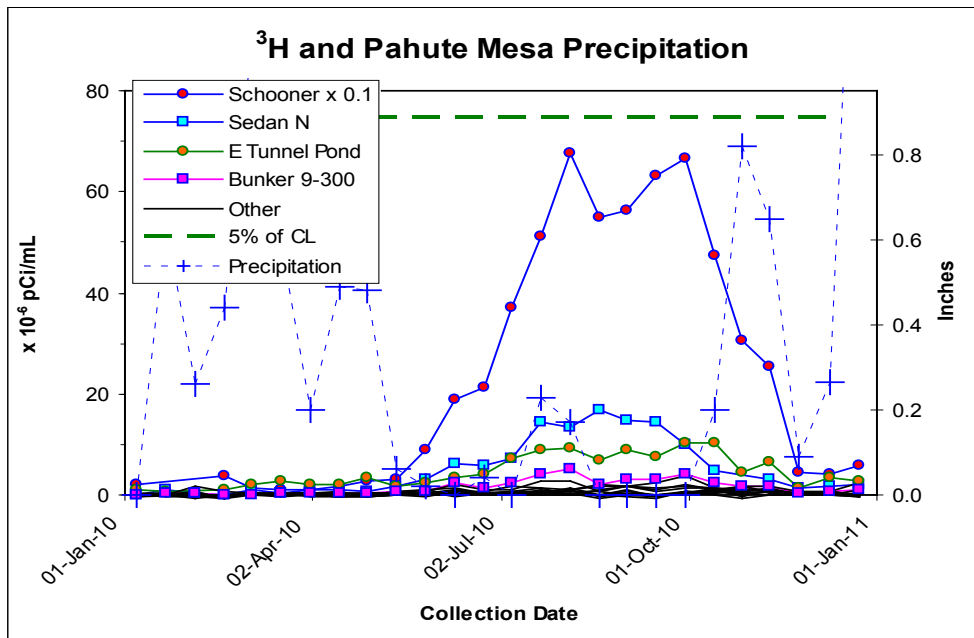


Figure 4-7. Concentrations of  $^3\text{H}$  in air samples collected in 2010 with Pahute Mesa precipitation

Figure 4-8 shows average (geometric mean) long-term trends for the annual mean tritium levels at locations with at least 7-year histories since 1989. Tritium measurements have been decreasing fairly rapidly at most locations; the overall (excluding Schooner) average decline rate is around 15 percent per year.

Figure 4-9 shows the annual maxima for all stations by Area group. The relatively high values in 1997 and 1998 occurred at the Area 6 Decon Pad.

The exception to the generally decreasing trend occurs at Schooner. As Figure 4-10 shows, Schooner tritium data do not show a consistent trend; rather, tritium emissions appear to be related to the average temperatures on Pahute Mesa during the summer months.

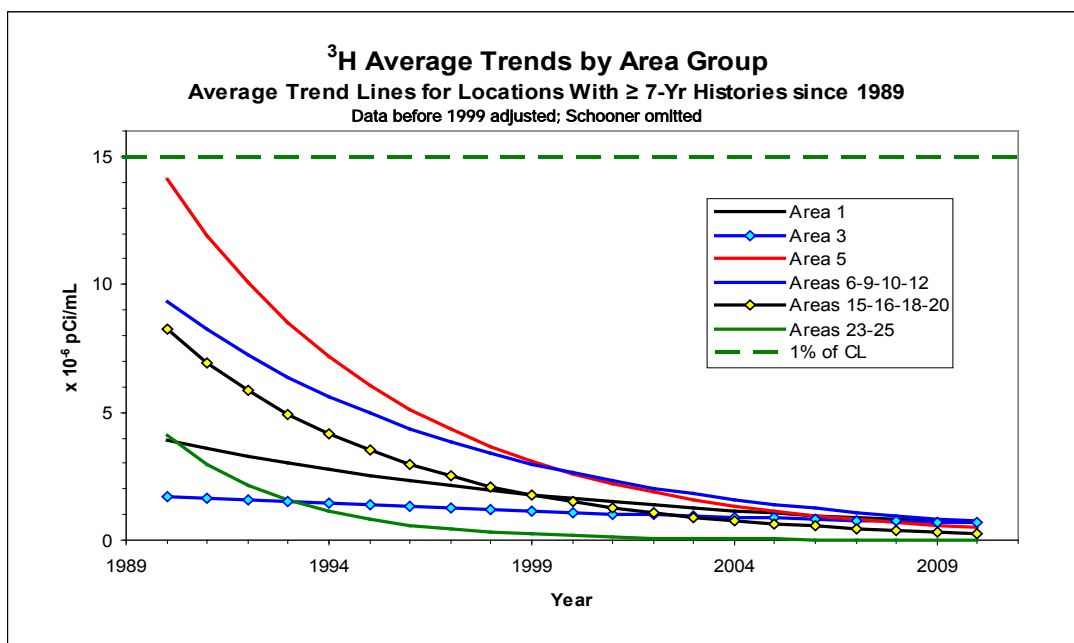


Figure 4-8. Average trends in  $^3\text{H}$  in air annual means, 1990–2010, Schooner excluded

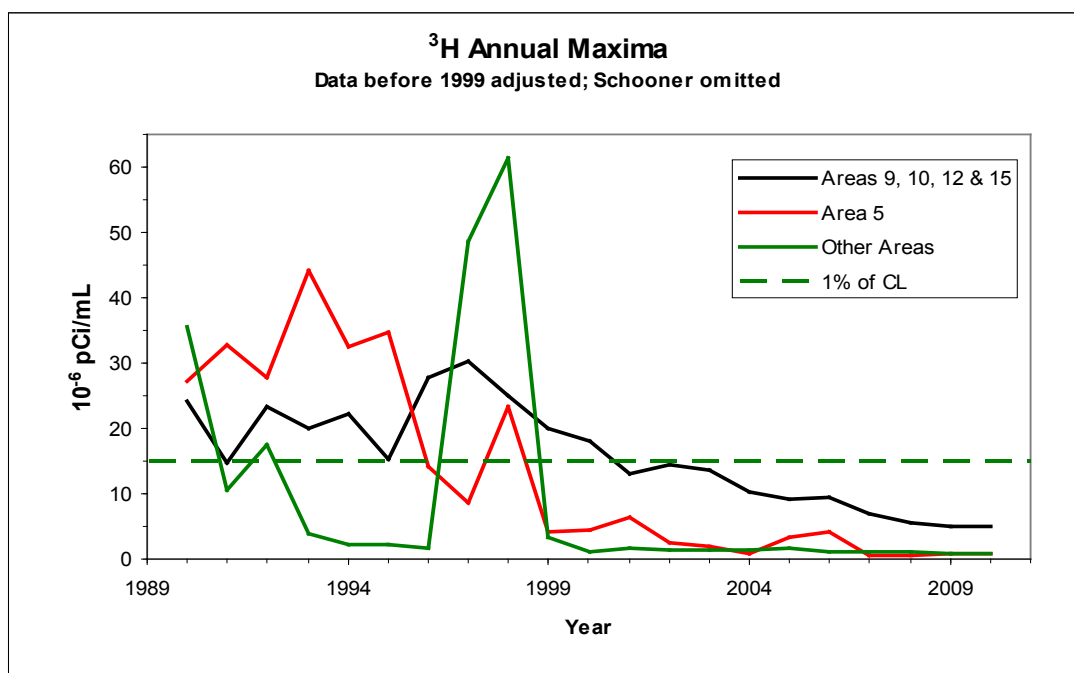


Figure 4-9. Annual maxima in  $^3\text{H}$  in air annual means, 1990–2010, Schooner excluded

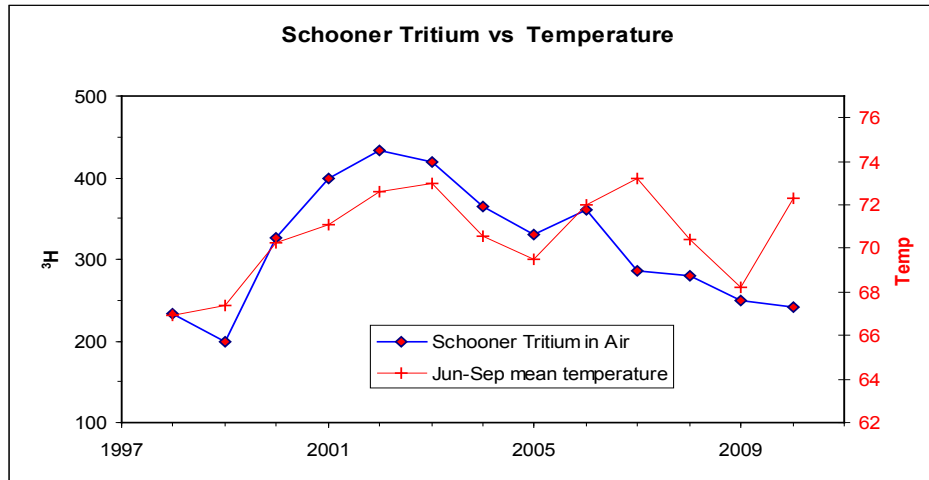


Figure 4-10. Concentrations of  $^3\text{H}$  at Schooner Crater and June–September mean temperatures at Schooner/Pahute Mesa, 1998–2010

4.1.4.6 Gross Alpha and Gross Beta

The gross alpha and gross beta radioactivity in air samples collected in 2010 are shown in Tables 4-10 and 4-11. Because these radioactivity measurements include naturally occurring radionuclides (e.g., potassium-40, beryllium-7, uranium, thorium, and the daughter isotopes of uranium and thorium) in uncertain proportions, a meaningful CL cannot be constructed. These analyses are useful in that they can be performed just 5 days after weekly sample collection to identify any increases requiring investigation.

Overall, the gross alpha mean for 2010 is somewhat lower than in preceding years. The distribution of measurement means across the network is comparable with those of the past few years. The gross beta measurements resembled those of prior years: the mean values are similar, and there are no stations with data that stand out from the rest.

Table 4-10. Gross alpha radioactivity in air samples collected in 2010

Area	Sampling Station	Number of Samples	Gross Alpha ( $\times 10^{-16} \mu\text{Ci/mL}$ )			
			Mean	Standard Deviation	Minimum	Maximum
1	BJY	52	18.38	14.08	-5.95	56.04
3	U-3ah/at N	52	19.68	10.49	-1.17	46.98
3	U-3ah/at S	50	20.92	10.99	-5.75	43.60
3	U-3bh N	52	16.81	10.19	-6.70	44.09
3	U-3bh S	52	20.34	10.00	-1.01	42.93
5	DoD	52	18.89	11.61	1.12	44.01
5	Sugar Bunker N	52	26.32	19.51	-30.20	74.06
6	Yucca*	52	20.58	11.08	-2.23	40.75
9	Bunker 9-300	52	25.53	19.27	-17.94	87.53
10	Gate 700 S*	52	17.49	12.16	-7.03	66.74
10	Sedan N	52	18.21	12.94	-10.37	47.37
16	3545 Substation*	51	15.21	12.49	-15.20	34.34
18	Little Feller 2 N	49	15.79	9.59	-14.97	39.53
20	Gate 20-2P	46	15.87	10.68	-16.42	40.55
20	Schooner*	48	16.62	9.56	-9.07	39.09
23	Mercury Track*	52	17.34	11.50	-4.60	54.39
25	Guard Station 510*	52	18.33	11.12	-6.71	41.14
27	ABLE Site	52	15.52	9.21	-4.47	42.62
<b>All Environmental Locations</b>		<b>920</b>	<b>18.81</b>	<b>12.66</b>	<b>-30.20</b>	<b>87.53</b>
* EPA-approved Critical Receptor Station						

Table 4-11. Gross beta radioactivity in air samples collected in 2010

Area	Sampling Station	Number of Samples	Gross Beta ( $\times 10^{-15}$ $\mu\text{Ci/mL}$ )			
			Mean	Standard Deviation	Minimum	Maximum
1	BJY	52	19.64	5.62	5.51	34.02
3	U-3ah/at N	52	20.06	5.75	9.04	34.75
3	U-3ah/at S	50	20.16	4.77	11.05	33.12
3	U-3bh N	52	19.52	5.46	6.14	31.97
3	U-3bh S	52	19.88	5.74	4.62	32.17
5	DoD	52	21.10	6.28	8.25	36.48
5	Sugar Bunker N	52	22.27	6.85	1.33	44.76
6	Yucca*	52	21.28	6.38	5.52	37.84
9	Bunker 9-300	52	19.88	5.43	7.24	32.10
10	Gate 700 S*	52	19.74	5.92	4.02	34.26
10	Sedan N	52	19.51	5.66	2.58	34.59
16	3545 Substation*	51	18.43	5.57	3.72	33.75
18	Little Feller 2 N	49	18.39	5.21	3.76	33.59
20	Gate 20-2P	46	18.76	5.15	6.04	33.38
20	Schooner*	48	19.02	5.10	6.89	32.35
23	Mercury Track*	52	20.20	5.88	6.90	35.59
25	Guard Station 510*	52	20.68	6.11	6.42	35.82
27	ABLE Site	52	19.07	5.66	4.54	34.55
<b>All Environmental Locations</b>		<b>920</b>	<b>19.88</b>	<b>5.76</b>	<b>1.33</b>	<b>44.76</b>

\* EPA-approved Critical Receptor Station

#### 4.1.5 Air Sampling Results from Critical Receptor Samplers

The following radionuclides were detectable at one or more of the critical receptor samplers:  $^{241}\text{Am}$ ,  $^{238}\text{Pu}$ ,  $^{239+240}\text{Pu}$ ,  $^{233+234}\text{U}$ ,  $^{235+236}\text{U}$ ,  $^{238}\text{U}$ , and tritium. All measured concentrations of these radionuclides were well below their CLs during 2010. The uranium isotopes have been attributed to naturally occurring uranium (see Section 4.1.4.4). The concentration of each measured radionuclide (excluding uranium) at each of the six critical receptor stations is divided by its respective CL (see Table 4-1) to obtain a “percent of CL.” These are then summed for each station. The sum of these fractions at each critical receptor sampler is far less than 1.0, demonstrating that the NESHAP dose limit (10 mrem/yr) at these critical receptor locations was not exceeded. The highest radiation total effective dose equivalent (TEDE) (see Glossary, Appendix B) at a critical receptor location would be approximately 1.69 mrem from air to a hypothetical individual residing at Schooner for the entire calendar year.

Table 4-12. Sum of fractions of compliance levels for man-made radionuclides at critical receptor samplers

Radionuclides Included in Sum of Fractions <sup>(a)</sup>	NNSS Area	Sampling Station	Sum of Fractions of Compliance Levels (CLs) <sup>(b)</sup>
$^{241}\text{Am}$ , $^{238}\text{Pu}$ , $^{239+240}\text{Pu}$ , $^3\text{H}$	6	Yucca	0.004
	10	Gate 700 S	0.009
	16	3545 Substation	0.004
	20	Schooner	0.169 <sup>(b)</sup>
	23	Mercury Track	0.004
	25	Gate 510	0.004

(a)  $^{233+234}\text{U}$ ,  $^{235+236}\text{U}$ , and  $^{238}\text{U}$  are not included in sum of fractions. If uranium is included as well, the sum of fractions increases to 0.056, 0.052, and 0.056 for Yucca, 3545 Substation, and Gate 510, respectively.

(b) This equates to a hypothetical receptor at this location receiving a TEDE of 1.69 mrem from air.

#### **4.1.6 Air Sampling Results from Point-Source (Stack) Sampler**

The JASPER system was disassembled for repairs during 2010, so there were no operations or stack monitoring January through December 2010.

#### **4.1.7 Emission Evaluations for Planned Projects**

During 2010, NESHAP evaluations were completed for potential suspension of radionuclides in soil due to the use of explosives at the Baker Blast Pad (Area 27); for suspension of radionuclides from the demolition of Test Cell C, Building 3210 (Area 25); and for the emission of radionuclides from the handling of radioactive materials at the Nonproliferation Test and Evaluation Complex (NPTEC) in Area 5 and at the Device Assembly Facility (DAF) in Area 6. These evaluations were completed in order to determine if these projects have the potential to release airborne radionuclides that would expose the public to a dose equal to or greater than 0.1 mrem/yr. For any project or facility with this potential, the EPA requires approval prior to operation and point-source operational monitoring. The predicted radiation dose at the nearest NNSS boundary for each potential release was less than the 0.1 mrem/yr level specified in 40 CFR 61.96. It was therefore concluded that these activities constituted minor sources. The detailed air emission dose evaluations for each project are reported separately in the NESHAP annual report for 2010 (National Security Technologies, LLC [NSTec], 2011a).

#### **4.1.8 Unplanned Releases**

No unplanned radionuclide releases occurred on the NNSS during 2010.

#### **4.1.9 Estimate of Total NNSS Radiological Atmospheric Releases in 2010**

Each year existing operations, new construction projects, and modifications to existing facilities that have the potential for airborne emissions of radioactive materials are reviewed. The following quantities are measured or calculated to obtain the total annual quantity of radiological atmospheric releases from the NNSS:

- The quantity of  $^3\text{H}$  gas released during laboratory or facility operations
- The quantity of  $^3\text{H}$  released through evaporation from ponds or open tanks, estimated from the measured  $^3\text{H}$  concentrations in water discharged into them, assuming that all water evaporates during the year
- The quantity of  $^3\text{H}$  released from Area 3 RWMS, Area 5 RWMC, and from Schooner and Sedan Crater sites, estimated using (1) the EPA-approved atmospheric diffusion model called CAP88-PC and (2) the annual mean concentration of  $^3\text{H}$  in air measured by environmental air samplers at locations near these sources
- The quantity of other radionuclides released during environmental restoration, waste management, or research operations/activities estimated using predicted volumes of material to be moved or released, radionuclide concentrations in those materials, and emission factors supplied by the EPA (Eastern Research Group, 2004)
- The quantity of other radionuclides resuspended in air from areas of known soil contamination, calculated from an inventory of radionuclides in surface soil determined by the Radionuclide Inventory and Distribution Program (McArthur, 1991), a resuspension model (U.S. Nuclear Regulatory Commission, 1983), and equation parameters derived at the NNSS (U.S. Department of Energy, Nevada Operations Office, 1992)

NNSS emission sources identified in 2010 are presented in Table 4-13. Their locations, in relation to critical receptor air monitoring locations are shown in Figure 4-11. The amounts of  $^{241}\text{Am}$ ,  $^{238}\text{Pu}$ , and  $^{239+240}\text{Pu}$  emissions from soil resuspension are the sum of emission rates computed for each area of the NNSS with surface contamination (Areas 1–13, 15–20, and 30). Other radionuclides (cobalt-60, strontium-90, cesium-137, europium-152, europium-154, and europium-155), although found in surface soils during past radiation surveys, were not included because, combined, they contributed less than 10 percent to the total dose to the public.



In 2010, an estimated 625.387 Ci of radionuclides were released as air emissions; 625 Ci were tritium (Table 4-13). Detailed descriptions of the methods used for estimating the quantities shown in Table 4-13 are reported in NSTec (2011a).

**Table 4-13. Radiological atmospheric releases from NNSS for 2010**

<b>Emission Source</b>	<b>Nuclide</b>	<b>Annual Quantity (Ci)</b>
<b><u>Legacy Weapon Test and Plowshare Crater Locations</u></b>		
Sedan	$^3\text{H}$	24
Schooner	$^3\text{H}$	8.3
Grouped Area Sources – All NNSS Ops Areas	$^{241}\text{Am}$	0.047
Grouped Area Sources – All NNSS Ops Areas	$^{238}\text{Pu}$	0.050
Grouped Area Sources – All NNSS Ops Areas	$^{239+240}\text{Pu}$	0.29
<b><u>Defense, Security, and Stockpile Stewardship Facilities</u></b>		
Dense Plasma Focus at Los Alamos Technical Facility (LATF)	$^3\text{H}$	400
NPTEC	DU	0.00015
<b><u>Environmental Restoration Projects</u></b>		
Reactor Maintenance, Assembly, and Disassembly (R-MAD) Demolition	MFA <sup>(a)</sup>	negligible
Pluto Demolition	MFA	negligible
Test Cell C Demolition	MFA	negligible
E-Tunnel Ponds	$^3\text{H}$	8.1
<b><u>Underground Test Area (UGTA) Sub-Project Well Sumps</u></b>		
Well ER-20-7	$^3\text{H}$	153
<b><u>North Las Vegas Facility (NLVF) Groundwater Control</u></b>		
NLVF, evaporative coolers, north side of A-01	$^3\text{H}$	0.00028
NNSS Area 23 Sewage Lagoons	$^3\text{H}$	0.00056
<b><u>Radioactive Waste Management Facilities</u></b>		
Area 3 RWMS	$^3\text{H}$	29
Area 5 RWMC	$^3\text{H}$	3.0
<b><u>Support Facility Operations</u></b>		
Buildings 23-650 and 23-652	$^3\text{H}$	negligible
RAMATROL, Building 23-180	various	negligible
<b>Total Curies</b>	$^3\text{H}$ : 625 Ci $^{241}\text{Am}$ : 0.047 $^{238}\text{Pu}$ : 0.050 $^{239+240}\text{Pu}$ : 0.29	

(a) MFA = mixed fission and activation products, actinides

#### 4.1.10 Environmental Impact

The concentrations of man-made radionuclides in air on the NNSS are all less than the regulatory concentration limits specified by federal regulations. Also, air monitoring data at the six critical receptor samplers indicate that the radiological dose to the general public from the air pathway is below the NESHAP standard of 10 mrem/yr (see Chapter 9 for a discussion of dose to the public from all pathways). All radionuclides detected by environmental air samplers in 2010 appear to be from legacy deposits of radioactivity on and in the soil from past nuclear tests. Long-term trends of  $^{239+240}\text{Pu}$  and tritium in air continue to show a decline with time. Radionuclide concentrations in plants and animals on the NNSS and their potential impact are discussed in Chapter 8.

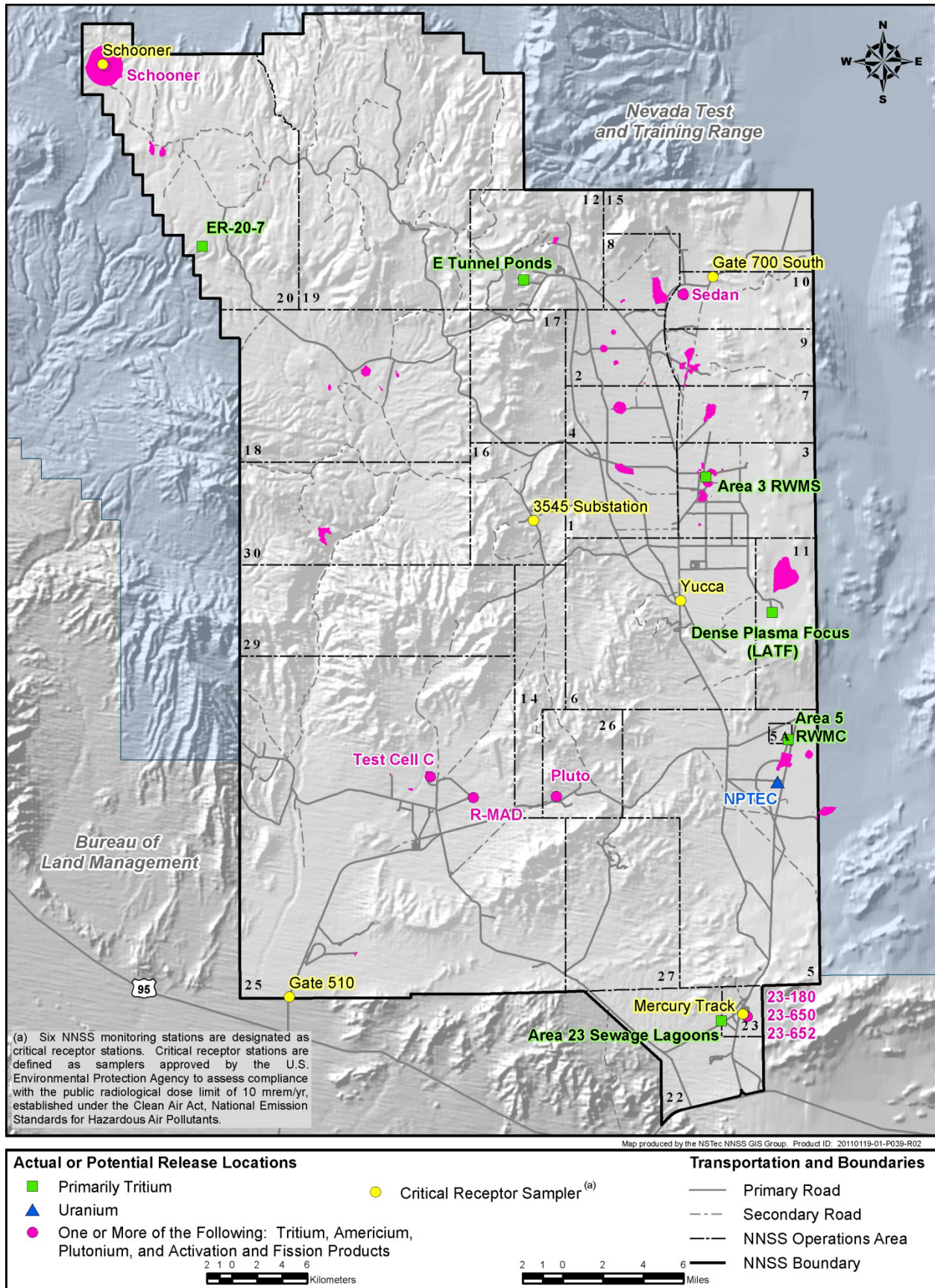


Figure 4-11. Sources of radiological air emissions on the NNSS in 2010

## 4.2 Nonradiological Air Quality Assessment

NNSS operations that are potential sources of nonradiological air pollution include aggregate production, surface disturbance (e.g., construction), release of fugitive dust from driving on unpaved roads, use of fuel-burning equipment, open burning, venting from bulk fuel storage facilities, explosives detonations, and releases of various chemicals during testing at NPTEC or at other release areas. Nonradiological air quality assessments are conducted to document compliance with the current State of Nevada air quality permit that regulates specific operations or facilities on the NNSS. The State of Nevada has adopted the CAA standards, which include NESHAP, National Ambient Air Quality Standards (NAAQS), and New Source Performance Standards (NSPS) (see Section 2.1). Specifically omitted from this section is NESHAP compliance for radionuclide emissions, which is presented in Section 4.1. Data collection, opacity readings, recordkeeping, and reporting activities related to air quality on the NNSS are conducted by NSTec personnel to meet the program goals and to track the compliance measures summarized in the table below.

<i>Air Quality Assessment Program Goals</i>	<i>Compliance Measures</i>
<p>Ensure that NNSS operations comply with all the requirements of the current air quality permit issued by the State of Nevada.</p> <p>Ensure that air emissions of criteria pollutants (sulfur dioxide [SO<sub>2</sub>]), nitrogen oxides [NO<sub>x</sub>], carbon monoxide [CO], volatile organic compounds [VOCs], and particulate matter) do not exceed limits established under NAAQS.</p> <p>Ensure that emissions of permitted NNSS equipment meet the opacity criteria to comply with NAAQS and NSPS.</p> <p>Ensure that NNSS operations comply with the asbestos abatement reporting requirements under NESHAP.</p> <p>Document usage of ozone-depleting substances (ODS) to comply with Title VI of the CAA.</p>	<p>Tons of emissions of criteria and hazardous air pollutants produced annually</p> <p>Tons of explosives detonated annually</p> <p>Gallons of fuel burned annually</p> <p>Hours of operation of equipment per year</p> <p>Rate at which aggregate and concrete is produced</p> <p>Quarterly opacity readings on specified equipment</p> <p>Amount of asbestos in existing structures removed or scheduled for removal</p> <p>Maintenance of ODS usage, disposition, and certification records</p>

### 4.2.1 Permitted NNSS Facilities

NNSA/NSO maintains a Class II Air Quality Operating Permit (AP9711-2557) for NNSS activities. State of Nevada Class II permits are issued for sources of air pollutants considered “minor,” i.e., where annual emissions must not exceed 100 tons of any one criteria pollutant (see Glossary, Appendix B), 10 tons of any one hazardous air pollutant (HAP), or 25 tons of any combination of HAPs. The NNSS facilities regulated by permit AP9711-2557 include the following:

- Approximately 15 facilities/160 pieces of equipment in Areas 1, 3, 5, 6, 12, 14, 23, 25, 26, and 27
- NPTEC in Area 5
- Chemical Releases site-wide throughout the NNSS and in Port Gaston in Area 26
- Big Explosives Experimental Facility (BEEF) in Area 4
- Explosives Ordnance Disposal Unit (EODU) in Area 11
- Explosives Activities Sites at NPTEC in Area 5, High Explosives Simulation Test (HEST) in Area 14, Test Cell C in Area 25, Port Gaston in Area 26, and Baker in Area 27

### **4.2.2 Permit Maintenance Activities**

The NNSS air permit (AP9711-2557) underwent several modifications in 2010. In February 2010, the Nevada Division of Environmental Protection (NDEP) issued a modification that added several low-level explosives activities locations. They included NPTEC, the HEST Facility, Test Cell C, and Port Gaston. In May 2010, diesel generators for the new fire stations in Areas 6 and 23 were added to the permit, and four facilities that have not been used since 1992 were deleted from it. In October 2010, a permit modification included the addition of a new fire pump at the JASPER facility, inclusion of the Baker facility for explosives activities, the addition of open burning to the Port Gaston explosives activities location, and the deletion of several diesel generators. BEEF was modified to allow multiple firing locations within the facility borders, with no change in emission limits.

In 2010, a Class II Surface Area Disturbance (SAD) permit for activities off the NNSS was obtained by the UGTA Sub-Project to regulate the release of fugitive dust during construction and operation of Wells ER-EC-13 and ER-EC-15. The wells are located west of the NNSS on the NTTR.

### **4.2.3 Emissions of Criteria Air Pollutants and Hazardous Air Pollutants**

A source's regulatory status is determined by the maximum number of tons of criteria air pollutants and nonradiological HAPs it may emit in a 12-month period if it were operated for the maximum number of hours and at the maximum production amounts specified in the source's air permit. This maximum emission quantity, known as the potential to emit (PTE), is specified in an Air Emissions Inventory of all permitted NNSS facilities and equipment. Each year, the State issues to NNSA/NSO Actual Production/Emissions Reporting Forms for the NNSS air permit. They are used to report the actual hours of operation, gallons of fuel burned, etc., for each permitted facility/piece of equipment. Using these data, emissions of the criteria air pollutants and HAPs are calculated and reported to the State. The State uses the information to determine annual maintenance and emissions fees and to document that calculated emission quantities do not exceed the PTEs. Because lead is considered a HAP as well as a criteria air pollutant, NNSS lead emissions for permitted operations are reported to the State as part of the total HAPs emissions. Lead emissions from non-permitted activities, such as soldering and weapons use, are covered under the Emergency Planning and Community Right-to-Know Act and are reported to the EPA (see Section 13.3).

In 2010, examination of records for permitted facilities and equipment indicated that all operational parameters were being properly tracked. A total of 9.20 tons of criteria air pollutants were emitted from NNSS permitted facilities and equipment in 2010 (Table 4-14). No PTEs were exceeded. The majority of the emissions were NO<sub>x</sub> from diesel generators. Only 0.024 tons of HAPs were released in 2010 (Table 4-14). Table 4-15 shows the calculated tons of air pollutants released on the NNSS since 2000. Quarterly reports of emission quantities were submitted to NDEP in April, July, and October 2010, and January 2011. The Calendar Year 2010 Actual Production/Emissions Reporting Form was submitted in February 2011.

Field measurements of particulate matter equal to or less than 10 microns in diameter (PM<sub>10</sub>) are required for BEEF, NPTEC, EODU, and the explosives pads located at the HEST Facility, Test Cell C, Port Gaston, and Baker. The sampling systems must operate and record ambient PM<sub>10</sub> concentrations at least each day a detonation or chemical release occurs. The PM<sub>10</sub> emissions are reported to the State in reports specific to each series of detonations or chemical releases (see Section 4.3).

Unless specifically exempted, the open burning of any combustible refuse, waste, garbage, or oil, or for salvage operations, is prohibited. Open burning for other purposes, including personnel training, is allowed if approved in advance by the State through issuance of an Open Burn Variance prior to each burn. Exceptions to this include the Open Burn Variances issued to NNSA/NSO for fire extinguisher training at the NNSS and for support-vehicle live-fire training evolutions. These Open Burn Variances are renewed annually and require 24-hour advance notification to the State prior to each burn. There were 27 fire extinguisher training sessions and 24 vehicle burns conducted in 2010. Quantities of criteria air pollutants produced by open burns are not required to be calculated.

The Port Gaston Facility received an exemption in a 2010 permit modification that allows open burning for purposes of research and as an integral part of a chemical release or detonation. Emissions, when combined with those from explosives activities, did not exceed permit limits.

**Table 4-14. Tons of criteria air pollutant emissions released on the NNSS from permitted facilities operational in 2010**

Facility	Calculated Tons <sup>(a)</sup> of Emissions										
	Particulate Matter (PM10) <sup>(b)</sup>		Carbon Monoxide (CO)		Nitrogen Oxides (NO <sub>x</sub> )		Sulfur Dioxide (SO <sub>2</sub> )		Volatile Organic Compounds (VOCs)		
	Actual	PTE <sup>(c)</sup>	Actual	PTE	Actual	PTE	Actual	PTE	Actual	PTE	
<b>Construction Equipment</b>											
Wet Aggregate Plant	0.53	6.80	NA <sup>(d)</sup>	NA	NA	NA	NA	NA	NA	NA	NA
Concrete Batch Plant	0.02	3.64	NA	NA	NA	NA	NA	NA	NA	NA	NA
Cementing Services Equipment	0.02	23.18	NA	NA	NA	NA	NA	NA	NA	NA	NA
Portable Bins (Area 6)	0.02	0.32	NA	NA	NA	NA	NA	NA	NA	NA	NA
Paint Booth	NA	NA	NA	NA	NA	NA	NA	NA	NA	0.001	0.21
<b>Fuel Burning/Storage</b>											
Diesel Fired Generators	0.41	2.43	1.31	10.38	6.08	46.80	0.35	2.98	0.31	2.66	
Boilers	0.00	0.44	0.00	1.10	0.00	4.40	0.008	0.01	0.00	0.13	
Bulk Gasoline Storage Tank	NA	NA	NA	NA	NA	NA	NA	NA	0.003	1.249	
Bulk Diesel Fuel Storage Tank	NA	NA	NA	NA	NA	NA	NA	NA	0.015	0.017	
<b>Chemical Releases</b>											
NPTEC	0.00	3.00	0.00	3.26	0.00	3.02	0.00	3.00	0.00	10.0	
Site-Wide <sup>(e)</sup>	NA	NA	NA	NA	NA	NA	NA	NA	0.004	10.0	
<b>Detonations</b>											
BEEF	0.09	8.00	0.00	0.54	0.00	0.05	0.00	0.003	0.000	0.007	
Port Gaston	0.00	0.210	0.02	1.485	0.006	0.085	0.001	0.010	0.00	0.013	
<b>Total by Pollutant</b>	<b>1.09</b>	<b>48.02</b>	<b>1.33</b>	<b>16.77</b>	<b>6.09</b>	<b>54.36</b>	<b>0.36</b>	<b>6.00</b>	<b>0.33</b>	<b>24.29</b>	
<b>Total Emissions</b>	<b>9.20 Actual, PTE 149.44</b>										

(a) For metric tons (mtons), multiply tons by 0.9072

(b) Particulate matter equal to or less than 10 microns in diameter

(c) Potential to emit: the quantity of criteria air pollutant that each facility/piece of equipment would emit annually if it were operated for the maximum number of hours at the maximum production rate specified in the air permit

(d) Not applicable: the facility does not emit the specified pollutant(s); therefore, there is no emission limit set forth in the air permit

(e) Releases were from the Port Gaston facility but reported under the Site-Wide System because it was prior to the inclusion of Port Gaston as a separate permitted chemical release facility

**Table 4-15. Criteria air pollutants and HAPs released on the NNSS since 2000**

Pollutant	Total Emissions (tons/yr) <sup>(a)</sup>										
	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010
Particulate Matter (PM10) <sup>(b)</sup>	1.46	2.05	3.61	2.39	0.94	0.84	0.69	0.54	0.22	0.49	1.09
Carbon Monoxide (CO)	2.76	4.84	4.6	1.79	0.24	0.15	0.43	0.51	0.94	0.55	1.33
Nitrogen Oxides (NO <sub>x</sub> )	12.75	22.23	21.09	8.11	1.01	0.69	2.02	1.21	3.36	2.45	6.09
Sulfur Dioxide (SO <sub>2</sub> )	0.98	1.68	1.62	0.76	0.12	0.04	0.03	0.01	0.06	0.10	0.36
Volatile Organic Compounds (VOCs)	1.89	2.01	2.1	1.21	4.60	1.94	1.40	1.14	0.60	0.71	0.33
Hazardous Air Pollutants (HAPs)	0.01	0.03	0.01	0	0.41	0.05	1.87	0.02	0.09	0.30	0.02 <sup>(d)</sup>

(a) For mtons, multiply tons by 0.9072

(b) Particulate matter equal to or less than 10 microns in diameter

(c) Not reported

(d) The PTE for all HAPs combined for the equipment and facilities used was 23.30 tons



#### **4.2.4 Performance Emission Testing and State Inspection**

The NNSS air permit requires performance emission testing of equipment that vents emissions through stacks (called “point sources”). The tests must be conducted once during the 5-year life of the NNSS air permit for each specified source. Once a source accumulates 100 hours of operation (since issuance of the permit in June 2002), it must be tested within 90 days. Testing is conducted by inserting a probe into the stack while the equipment is operating. Visible emissions readings must also be conducted by a certified evaluator during the tests. In August 2010, tests were conducted for two diesel generators located at the new fire stations in Area 6 and Area 23. Their emissions were within permit limits. There were no State inspections conducted during 2010.

#### **4.2.5 Production Rates/Hours of Operation**

Compliance with operational parameters such as production rates and hours of operation is verified through an examination of the data generated for the annual report to the State. The number of hours that equipment operates throughout a year is determined either by meter readings or by recording the operating hours in a logbook each time the equipment is operated. Permit requirements specific to each piece of equipment dictate the frequency in which readings are obtained. Production rates for construction facilities such as the aggregate-producing plant are calculated using the hours of operation and amount of material produced. Logbooks are maintained to record this information. Gallons of fuel used are calculated preferably by recording tank levels each time that the tank is filled. If this is not possible, then calculations are performed by using industry standards and the hours of operation. In 2010, production rates, hours of operation, and gallons of fuel used all were within the specified permit limits and were used to calculate the tons of air pollutants emitted (see Table 4-14).

#### **4.2.6 Opacity Readings**

Personnel that take opacity readings must be certified semiannually by a qualified organization. Visual opacity readings are taken every 15 seconds, and a minimum of 24 consecutive readings is required. The average of the 24 readings must not exceed the permit-specified limit (20 percent for NAAQS, 10 percent for NSPS). The NNSS air permit requires that readings be obtained once each quarter that the equipment is used and be kept on file. This applies to construction equipment only. Readings are taken for all other permitted facilities and equipment periodically, but are not always recorded. In 2010, four NSTec employees were certified by Carl Koontz Associates to take opacity readings. Readings were taken for the following NNSS facilities regulated under the NAAQS opacity limit of 20 percent: Area 1 Concrete Batch Plant, Area 1 Wet Aggregate Plant, Area 6 Storage Silos, Areas 6 and 23 Fire Station Diesel Generators, and diesel generators temporarily located at the RMAD and Pluto Environmental Restoration sites. Readings for these facilities ranged from 0 to 10 percent. NNSS equipment that is regulated by the 10 percent opacity limit under the NSPS includes miscellaneous conveyor belts, screens and hoppers, and the Area 1 Pugmill. None of this equipment was used in 2010.

#### **4.2.7 Chemical Releases and Detonations Reporting**

The NNSS air permit regulates the release of chemicals at specific locations under three separate “systems”: NPTEC in Area 5 (System 29), Site-Wide Releases throughout the NNSS (System 81), and Port Gaston in Area 26 (System 95). The types and amounts of chemicals that may be released vary depending on the system. In 2010, the Tarantula V chemical test series was conducted at the Area 5 NPTEC and consisted of 10 releases. Thirty-four releases were also conducted at the Port Gaston Facility as part of the same series. The majority of the chemicals released were non-hazardous, and no permit limits were exceeded (see Table 4-14).

The number of locations where explosives detonations can take place on the NNSS was expanded in 2010 from two (BEEF in Area 4 and EODU in Area 11) to seven with the addition of NPTEC, Port Gaston, HEST, Test Cell C, and Baker. BEEF is permitted to detonate large quantities of explosives (up to 41.5 tons per detonation with a limit of 50.0 tons per 12-month period), while the other locations are limited to much smaller quantities (1 ton per detonation with a limit of 10 tons per 12-month period). Permitted limits exist also for the amounts of criteria air pollutant and HAP emissions generated by the detonations. In 2010, explosives were detonated only at BEEF and Port Gaston, and no permit limits were exceeded (see Table 4-14).

PM10 monitoring was conducted for each chemical release test and detonation at NPTEC, Port Gaston, and BEEF in 2010. Monitoring was conducted in accordance with permit requirements.

In addition to annual reporting, the NNSS air quality operating permit requires the submittal of test plans and final analysis reports to the State for detonations and chemical releases or release series. For BEEF, quarterly test plans and final reports must be submitted for the types and weights of explosives used and estimated emissions that may be released. Completion reports are submitted to NNSA/NSO for transmittal to NDEP's Bureau of Air Pollution Control at the end of each calendar quarter for all chemical releases and detonations. All required reports were submitted prior to their deadlines.

#### **4.2.8 ODS Recordkeeping**

At the NNSS, refrigerants containing ODS are mainly used in air conditioning units in vehicles, buildings, refrigerators, drinking water fountains, vending machines, and laboratory equipment. Halon 1211 and 1301, classified as ODS, have been used in the past in fire extinguishers and deluge systems, but all known occurrences of these halons have been removed from the NNSS. ODS recordkeeping requirements applicable to NNSS operations include maintaining for 3 years evidence of technician certification, recycling/recovery equipment approval, and servicing records for appliances containing 22.7 kilograms (50 pounds) or more of refrigerant. Compliance with recordkeeping and certification requirements is verified through periodic self-assessments. The EPA may conduct random inspections to determine compliance with ODS regulations under the CAA.

A Management Assessment of the NNSS ODS program was initiated in May 2010. It identified 62 chillers containing 112 refrigerant tanks that were being retained as an NNSA/NSO "readiness requirement" but were not on a scheduled maintenance program. As a result, work began in 2010 to remove refrigerants and oils from the 62 chillers, and some chillers retained for future use were filled with nitrogen. The fiscal year 2011 environmental target list (see Section 3.3, Table 3-2) was revised to include the completion of this project. This target was met in January 2011. In July 2010, an auditor for the International Organization for Standardization (ISO) 14001 Environmental Management Standard conducted an assessment of the ODS program, and no nonconformities against the ODS management program were noted.

#### **4.2.9 Asbestos Abatement**

A Notification of Demolition and Renovation Form is submitted to the EPA at least 10 working days prior to the start of a demolition or renovation project if the quantities of asbestos-containing material (ACM) to be removed are estimated to equal or exceed 260 linear feet, 160 square feet, or 1 cubic meter. Small asbestos abatement projects are conducted throughout the year consisting of the removal of lesser quantities of ACM within a single facility per project, and a Notification of Demolition and Renovation Form is not required for these projects.

The recordkeeping requirements for asbestos abatement activities include maintaining air and bulk sampling data records, abatement plans, and operations and maintenance activity records for up to 75 years, and maintaining location-specific records of ACM for a minimum of 75 years. Compliance is verified through periodic internal assessments. The assessments include a records review and interviews with managers and technicians associated with asbestos abatement. NNSA/NSO informal reviews are performed periodically.

A total of 11 Notification of Demolition and Renovation Forms were submitted during 2010. They included five demolition projects and six renovation projects. Each project was performed in a closely supervised and rigidly controlled environment, and personal air monitoring and/or environmental air sampling were conducted. The remaining asbestos abatement activities throughout the NNSS complex were minor in scope, involving the removal of quantities of ACM less than the reporting threshold per facility. ACM were buried in both the Area 9 U10c and Area 23 solid waste disposal sites. Asbestos abatement records continued to be maintained as required.

#### **4.2.10 Fugitive Dust Control**

The NNSS Class II Air Quality Operating Permit states that the best practical methods should be used to prevent particulate matter from becoming airborne prior to the construction, repair, demolition, or use of unpaved or

untreated areas. At the NNSS, the main method of dust control is the use of water sprays. During 2010, NSTec personnel observed operations throughout the NNSS that included the Area 1 Batch Plant and construction of the Areas 6 and 23 Fire Stations. No excessive fugitive dust was noted. Water controls were in place and were increased to control the dust.

Off the NNSS, all NNSA/NSO surface-disturbing activities that cover 5 or more acres are regulated by stand-alone Class II SAD permits issued by the State. In 2009 and 2010, SADs were issued for the construction and operation of three UGTA Sub-Project wells on NTTR: ER-EC-12, ER-EC-13, and ER-EC-15. No excessive fugitive dust from these activities was noted, and all requirements of the SADs were met.

#### ***4.2.11 Environmental Impact***

During 2010, NNSS activities produced a total of 9.20 tons of criteria air pollutants and 0.024 tons of HAPs. These small quantities had little, if any, impact to air quality on the NNSS and at offsite locations. Emissions of pollutants for 2010 were significantly less than those generated during the heightened activity that occurred in the years prior to the nuclear weapons testing moratorium.

Impacts of the chemical release tests at NPTEC are minimized by controlling the amount and duration of each release. Biological monitoring at NPTEC is performed whenever there is a risk of significant exposure to downwind plants and animals from the planned tests (see Section 16.7). NSTec biologists review all chemical release test plans to determine the level of field monitoring needed for each test. To date, chemical releases at NPTEC have used such small quantities (when dispersed into the air) that downwind test-specific monitoring has not been necessary. No measurable impacts to downwind plants or animals have been observed.



## 5.0 Water Monitoring

This chapter presents radiological and nonradiological monitoring results for surface water and groundwater from on and off the Nevada National Security Site (NNSS), including water sampled from natural springs, drinking water, non-potable groundwater, and water discharged into domestic and wastewater systems on the NNSS. Several programs and projects were involved in water monitoring during 2010. These included (1) routine radiological monitoring conducted by National Security Technologies, LLC (NSTec), Ecological and Environmental Monitoring (E&EM) under the *Routine Radiological Environmental Monitoring Plan* (RREMP) (Bechtel Nevada [BN], 2003a); (2) water quality assessments of permitted water systems conducted by NSTec Environmental Programs (EP); and (3) water sampling and analysis conducted by the Underground Test Area (UGTA) Sub-Project. Water monitoring is conducted to comply with applicable state and federal regulations and U.S. Department of Energy (DOE) directives (see Section 2.2) and to address the concerns of stakeholders residing in the vicinity of the NNSS.

The Community Environmental Monitoring Program, established by the U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office (NNSA/NSO), annually performs independent monitoring of offsite springs and water supply systems in communities surrounding the NNSS (see Chapter 7). This independent community outreach program is managed by the Desert Research Institute (DRI). In addition to the annual onsite monitoring conducted by NSTec, the Nevada State Health Division's Bureau of Health Care Quality and Compliance is allowed access to the NNSS to independently sample onsite water supply wells at its discretion (see, e.g., NSTec, 2008a).

### 5.1 Radiological Surface Water and Groundwater Monitoring

The RREMP (BN, 2003a) describes the design, methods, and quality assurance procedures for routine radiological monitoring of water on and off the NNSS. The RREMP monitoring goals are shown below. The UGTA Sub-Project water monitoring goals are provided in detail in Chapter 12.

<b><i>Radiological Surface Water and Groundwater Monitoring Program Goals</i></b>	<b><i>Analytes Monitored</i></b>
<p>Measure radionuclide concentrations in offsite and onsite water supply wells to (1) monitor for trends, (2) compare concentrations with the safe drinking water standards established by the U.S. Environmental Protection Agency (EPA) under the Safe Drinking Water Act, and (3) provide data to determine compliance with the dose limits to the general public set by DOE Order DOE O 5400.5, "Radiation Protection of the Public and the Environment" (see Chapter 9 for the estimate of public dose from the water pathway).</p> <p>Collect and analyze water samples to determine if radionuclide concentrations in surface waters on the NNSS expose animals to doses less than those set by DOE Standard DOE-STD-1153-2002, "A Graded Approach for Evaluating Radiation Doses to Aquatic and Terrestrial Biota," to protect wildlife populations (see Section 9.2 for biota dose estimates).</p> <p>Determine if permitted facilities on the NNSS are in compliance with permit discharge limits for radionuclides.</p> <p>Determine if radionuclide concentrations in natural springs and non-potable water wells (monitoring wells) indicate that NNSA/NSO activities have had an impact on the environment.</p>	<p>Tritium (<math>^3\text{H}</math>)</p> <p>Gross alpha radioactivity</p> <p>Gross beta radioactivity</p> <p>Gamma-emitting radionuclides</p> <p>Plutonium-238 (<math>^{238}\text{Pu}</math>)</p> <p>Plutonium-239+240 (<math>^{239+240}\text{Pu}</math>)</p> <p>Carbon-14 (<math>^{14}\text{C}</math>)</p> <p>Strontium-89+90 (<math>^{89+90}\text{Sr}</math>)</p> <p>Technetium-99 (<math>^{99}\text{Tc}</math>)</p>

### **5.1.1 Areas of Radiological Groundwater Contamination**

The NNSS is located in a complex hydrogeologic setting (see *Attachment A: Site Description* included on the compact disc version of this report). Within this setting, a total of 828 underground nuclear tests were conducted between 1951 and 1992. Approximately one-third of these tests were detonated near or in the saturated zone (U.S. Department of Energy, Nevada Operations Office [DOE/NV], 1996a; DOE/NV, 2000), resulting in contamination of groundwater in some areas. The Federal Facility Agreement and Consent Order (FFACO) established corrective action units (CAUs) that delineate areas of concern for groundwater contamination on the NNSS (DOE/NV, 1996a). Figure 5-1 shows the locations of historical underground nuclear tests and the areas of potential groundwater contamination designated as CAUs.

### **5.1.2 RREMP Water Monitoring Locations**

The RREMP monitoring well network includes onsite and offsite wells selected from those drilled in support of nuclear testing or other site missions that have met specific criteria based on monitoring objectives. It also includes some offsite private/community drinking water wells as well as offsite springs. The purpose of monitoring is to detect man-made radionuclides in wells that are downgradient from the UGTA CAUs (i.e., contaminant migration) and that penetrate an aquifer. Other selection criteria involve well condition, the ability to obtain representative water samples of acceptable quality, and well access. Sometimes new monitoring wells are added to the network. UGTA characterization wells that are no longer needed by the Sub-Project are added if they are not highly contaminated and they meet all other selection criteria. It is important to note that the RREMP aquifer monitoring network is an interim program and is not designed to meet the requirements of the FFACO for a long-term monitoring network for the closure of UGTA CAUs (see Chapter 12). Wells in the RREMP network will be evaluated as candidate elements of the long-term monitoring program as UGTA CAUs proceed to closure.

Table 5-1 provides the current list of water sources sampled under the RREMP. They include 54 wells and 8 springs or surface waters that are sampled at frequencies ranging from once every 3 months to once every 3 years for specified radiological and water chemistry parameters. Figure 5-2 shows the location of wells, and Figure 5-3 shows the locations of surface waters (e.g., springs, containment ponds) sampled within the RREMP monitoring network.

Onsite springs are sampled for radionuclides only on request by NNSA/NSO and are not listed in Table 5-1. Ten NNSS springs have been monitored periodically and reported in past annual environmental reports. They include Cane Springs, Captain Jack, Cottonwood, Gold Meadows, John's, Tipipah, Topopah, Tub, Twin, and Whiterock Springs; see Figure A-4 of *Attachment A: Site Description* included on the compact disc of this report for the location of NNSS springs and seeps. The groundwater that feeds the onsite springs is locally derived and is not hydrologically connected to any of the aquifers that may be impacted by underground nuclear tests. Detectable man-made radionuclides in onsite springs are primarily from historical atmospheric testing activities, including radioactive fallout.

During 2010, 42 locations were sampled for radionuclides (Table 5-1, Figures 5-2 and 5-3):

- 5 offsite community water supply wells
- 10 offsite non-potable NNSA/NSO wells
- 3 offsite springs
- 9 onsite water supply wells (5 potable, 4 non-potable or inactive)
- 14 onsite monitoring wells (including 3 pilot wells)
- 1 onsite discharge system (E Tunnel)

The UGTA Sub-Project sampled seven wells in 2010. These samples were analyzed for radionuclides; the results are presented in Section 5.1.10.

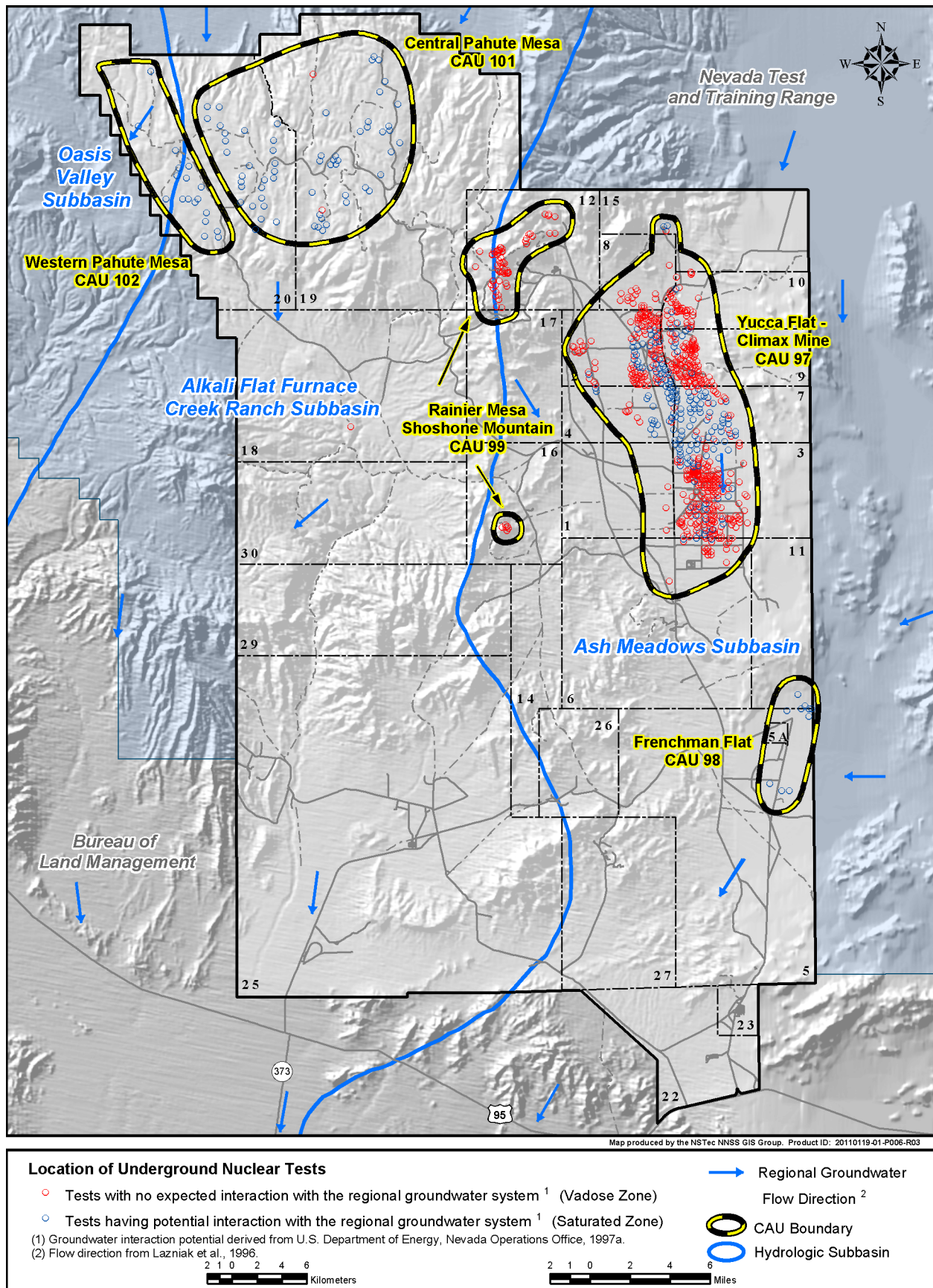


Figure 5-1. Areas of potential groundwater contamination on the NNSS

Table 5-1. RREMP groundwater sources and sampling regimes

Location	Area	Tritium	Gross Alpha/ Gross Beta	Gamma Spectroscopy	Pu Isotopes	Water Chemistry <sup>(a)</sup>	Other <sup>(b)</sup>
<b>11 Offsite Non-potable NNSA/NSO Monitoring Wells</b>							
Ash-B	-	3 years	3 years	-	-	-	-
ER-OV-01	-	6 months	1 year	1 year	1 year	1 year	-
ER-OV-02	-	6 months	1 year	1 year	1 year	1 year	-
ER-OV-03A	-	1 year	2 years	-	-	-	-
ER-OV-03A3	-	1 year	2 years	-	-	-	-
ER-OV-03C	-	6 months	1 year	1 year	1 year	1 year	-
ER-OV-03C2	-	6 months	1 year	1 year	1 year	1 year	-
ER-OV-04A	-	1 year	2 years	-	-	-	-
ER-OV-05	-	1 year	2 years	-	-	-	-
ER-OV-06A	-	6 months	1 year	1 year	1 year	1 year	-
PM-3	-	1 year	2 years	2 years	2 years	2 years	3 years
<b>15 Offsite Private/Community Drinking Water Wells</b>							
Amargosa Valley RV Park	-	3 years	3 years	-	-	-	-
Cind-R-Lite Mine	-	3 years	3 years	-	-	-	-
Cook's Ranch Well	-	3 years	3 years	-	-	-	-
Crystal Trailer Park	-	3 years	3 years	-	-	-	-
DeLee Ranch	-	3 years	3 years	-	-	-	-
EW-4 Well	-	3 years	3 years	-	-	-	-
Fire Hall #2 Well	-	3 years	3 years	-	-	-	-
Fuller Property	-	3 years	3 years	-	-	-	-
Last Trail Ranch	-	3 years	3 years	-	-	-	-
Longstreet Casino Well	-	3 years	3 years	-	-	-	-
Ponderosa Dairy	-	3 years	3 years	-	-	-	-
Roger Bright Ranch	-	1 year	2 years	-	-	-	-
School Well	-	1 year	2 years	-	-	-	-
Tolicha Peak	-	1 year	2 years	-	-	-	-
U.S. Ecology	-	1 year	2 years	-	-	-	-
<b>7 Offsite Springs/Surface Waters</b>							
Big Springs	-	3 years	3 years	-	-	-	-
Crystal Pool	-	3 years	3 years	-	-	-	-
Fairbanks Spring	-	3 years	3 years	-	-	-	-
Longstreet Spring	-	3 years	3 years	-	-	-	-
Peacock Ranch	-	1 year	2 years	-	-	-	-
Revert Spring	-	1 year	2 years	-	-	-	-
Spicer Ranch	-	1 year	2 years	-	-	-	-
<b>5 NNSP Permitted Drinking Water Wells<sup>(c)</sup></b>							
J-12 WW	25	3 months	3 months	1 year	1 year	1 year	3 years
WW #4	6	3 months	3 months	1 year	1 year	1 year	3 years
WW #4A	6	3 months	3 months	1 year	1 year	1 year	3 years
WW 5B	5	3 months	3 months	1 year	1 year	1 year	3 years
WW 8	18	3 months	3 months	1 year	1 year	1 year	3 years
<b>3 NNSP Non-potable Water Wells</b>							
UE-16D WW	16	3 months	3 months	1 year	1 year	1 year	3 years
WW 5C	5	3 months	3 months	1 year	1 year	1 year	3 years
WW C-1	6	3 months	3 months	1 year	1 year	1 year	3 years
<b>1 NNSP Inactive Water Wells</b>							
Army #1 WW	22	3 months	3 months	1 year	1 year	1 year	3 years

Table 5-1. RREMP groundwater sources and sampling regimes (continued)

Location	Area	Tritium	Gross Alpha/ Gross Beta	Gamma Spectroscopy	Pu Isotopes	Water Chemistry <sup>(a)</sup>	Other <sup>(b)</sup>
<b>19 NNSS Monitoring Wells</b>							
ER-12-1	12	2 years	2 years	-	-	2 years <sup>(d)</sup>	-
ER-19-1	19	1 year	2 years	2 years	2 years	2 years	3 years
ER-20-1	20	1 year	2 years	2 years	2 years	2 years	3 years
ER-20-2 #1	20	1 year	2 years	2 years	2 years	2 years	3 years
HTH #1	17	1 year	2 years	2 years	2 years	2 years	3 years
PM-1	20	1 year	2 years	2 years	2 years	2 years	3 years
SM-23-1	23	1 year	2 years	2 years	2 years	2 years	3 years
TW D	2	1 year	2 years	2 years	2 years	2 years	3 years
U-19BH	19	1 year	2 years	2 years	2 years	2 years	3 years
UE-18R	18	1 year <sup>(e)</sup>	2 years	2 years	2 years	2 years	3 years
UE-1Q	1	1 year	2 years	2 years	2 years	2 years	3 years
UE-25P #1	25	3 years <sup>(f)</sup>	3 years	-	-	-	-
UE-25WT #6	25	3 years <sup>(f)</sup>	3 years	-	-	-	-
UE5 PW-1	5	6 months	-	-	-	6 months <sup>(g)</sup>	-
UE5 PW-2	5	6 months	-	-	-	6 months <sup>(g)</sup>	-
UE5 PW-3	5	6 months	-	-	-	6 months <sup>(g)</sup>	-
UE-5N	5	by request	-	-	-	-	-
UE-7NS	7	1 year	2 years	2 years	2 years	2 years	3 years
WW A	3	1 year	2 years	2 years	2 years	2 years	3 years
<b>1 Containment Pond System</b>							
E Tunnel <sup>(h)</sup>	12	1 year	1 year	-	-	1 year <sup>(d)</sup>	-

Shaded locations were sampled during 2010.

- (a) Unless otherwise noted for certain sample locations, the RREMP water chemistry parameters include alkalinity, calcium, chloride, fluoride, magnesium, nitrate, pH, potassium, silicon, sodium, specific conductivity, sulfate, total dissolved solids, and water temperature.
- (b) <sup>14</sup>C, <sup>90</sup>Sr, and <sup>99</sup>Te
- (c) Only five of the six permitted NNSS water supply wells (see Figure 5-12) are currently monitored; the permitted well, J-13 WW, is inoperable and was last sampled in 2006.
- (d) The water chemistry parameters analyzed in ER-12-1 groundwater and E Tunnel discharge point samples for the permitted E Tunnel Waste Water Disposal System (ETDS) are arsenic, barium, cadmium chloride, chromium, copper, fluoride, iron, lead, magnesium, manganese, mercury, nitrate nitrogen, selenium, specific conductance, sulfate, and zinc.
- (e) UE-18R is inaccessible due to poor road conditions; sampling will resume when road is repaired; it was last sampled in 2007.
- (f) UE-25P #1 and UE-25WT #6 were last sampled in 2005; water quality is poor in both wells, and alternate monitoring well locations to replace them are being investigated.
- (g) The water chemistry parameters analyzed for permitted UE5 wells at the Area 5 Radioactive Waste Management Site (RWMS) include the RREMP parameters in footnote (a) as well as total organic carbon, total organic halides, and volatile organic compounds.
- (h) Discharge point of water flowing out of E Tunnel into a series of man-made containment ponds.



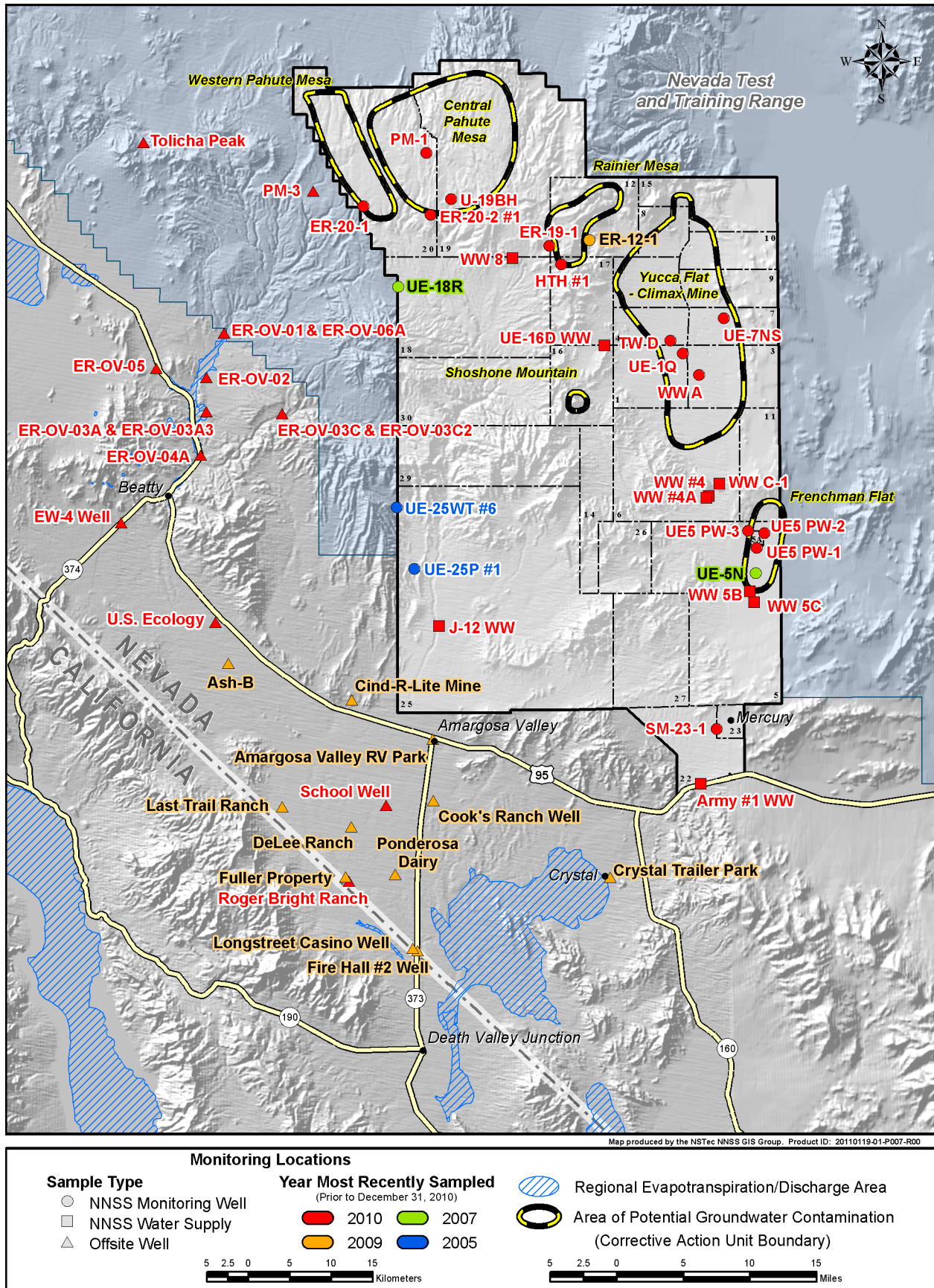


Figure 5-2. 2010 RREMP well monitoring network



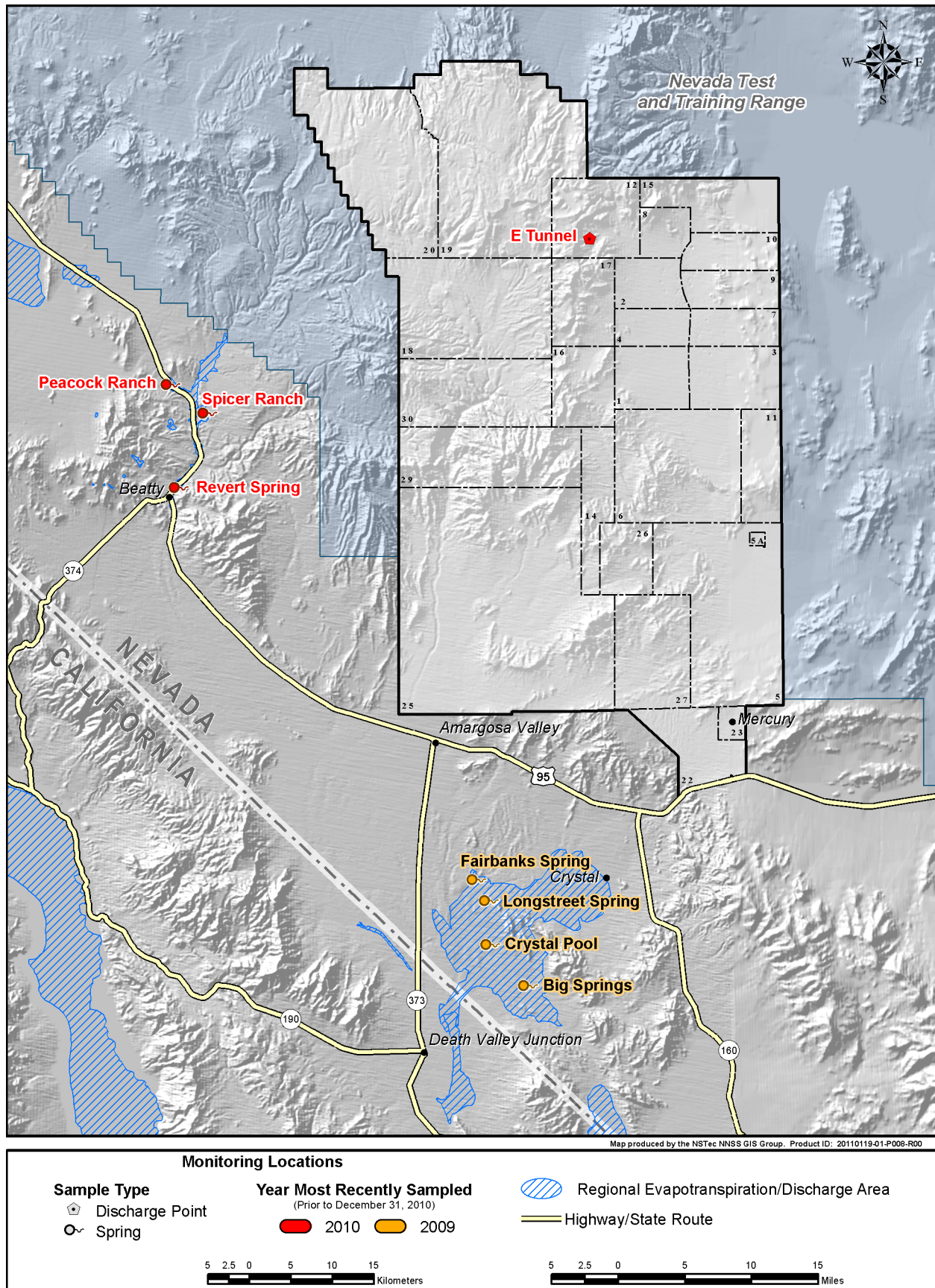


Figure 5-3. 2010 RREMP surface water monitoring network

### 5.1.3 RREMP Analytes Monitored

The selection of analytes for groundwater monitoring under the RREMP is based on the radiological source term from historical nuclear testing, regulatory and permit requirements, and characterization needs. The isotopic inventory remaining from nuclear testing is presented in the 1996 environmental impact statement for NNSS activities (DOE/NV, 1996a) and in a Los Alamos National Laboratory (LANL) document (Bowen et al., 2001). Many of the radioactive species generated from subsurface testing have very short half-lives, sorb strongly onto the solid phase, or are bound into what is termed “melt glass,” and are therefore not available for groundwater transport in the near term (Smith, 1993; Smith et al., 1995). Tritium ( $^3\text{H}$ ) is the radioactive species created in the greatest quantities and is widely believed to be the most mobile. Tritium is therefore the primary target analyte; every water sample is analyzed for this radionuclide.

Gross alpha and gross beta radioactivity analyses are also conducted on water samples from all locations in the monitoring network, but less frequently than tritium at some locations. Gross alpha and gross beta radioactivity can include activity from both natural and man-made radionuclides, if any are present. Naturally occurring minerals in the water can contribute to both alpha radiation (e.g., isotopes of uranium and radium-226 [ $^{226}\text{Ra}$ ]) and beta radiation (e.g., radium-228 [ $^{228}\text{Ra}$ ] and potassium-40 [ $^{40}\text{K}$ ]).

Gamma spectroscopy analysis is also performed on water samples; this can identify the presence of specific man-made radionuclides (e.g., americium-241 [ $^{241}\text{Am}$ ], cesium-137 [ $^{137}\text{Cs}$ ], cobalt-60 [ $^{60}\text{Co}$ ], and europium-152 and -154 [ $^{152}\text{Eu}$  and  $^{154}\text{Eu}$ ]), as well as natural radionuclides (e.g., actinium-228 [ $^{228}\text{Ac}$ ], lead-212 [ $^{212}\text{Pb}$ ],  $^{40}\text{K}$ , uranium-235 [ $^{235}\text{U}$ ], and thorium-234 [ $^{234}\text{Th}$ ]). Analyses for plutonium-238 [ $^{238}\text{Pu}$ ], plutonium-239+240 [ $^{239+240}\text{Pu}$ ], carbon-14 [ $^{14}\text{C}$ ], strontium-89+90 [ $^{89+90}\text{Sr}$ ], technetium-99 [ $^{99}\text{Tc}$ ],  $^{241}\text{Am}$ , and uranium isotopes are performed on selected water samples to help characterize sampled locations. Radium analyses were discontinued in 2005 because previous analyses indicated that  $^{226}\text{Ra}$  and  $^{228}\text{Ra}$  are not major contributors to gross alpha or gross beta activity.

### 5.1.4 RREMP Water Sampling/Analysis Methods

Water sampling methods are based, in part, on the characteristics and configurations of the sample locations. For example, wells with dedicated pumps may be sampled from the associated plumbing (e.g., spigots) at the wellhead, while wells without pumps may be sampled via a wireline bailer or a portable pumping system. Five of the wells are constructed to allow for sampling different horizons. The sample depths for these five wells are as follows:

#### HTH #1

- 590 meters (m) (1,935 feet[ft]) below ground surface (bgs)
- 622 m (2,040 ft) bgs
- 649 m (2,130 ft) bgs
- 701 m (2,300 ft) bgs

#### UE-18R

- 518 m (1,700 ft) bgs
- 649 m (2,130 ft) bgs

#### PM-3

- 475 m (1,560 ft) bgs
- 608 m (1,994 ft) bgs

#### ER-19-1

- 826 m (2,710 ft) bgs
- 1,000 m (3,280 ft) bgs

#### Ash-B

- Piezometer #2 - 114 m (375 ft) bgs
- Piezometer #1 - 312 m (1,025 ft) bgs

Sampling frequencies and analyses for routine radiological water monitoring (Table 5-1) are based on location and type of sampling point as defined in the RREMP. As discussed above, tritium analyses were performed on all samples obtained during 2010. Other analyses were performed on specific samples based primarily on the RREMP schedule. Gray shading in Table 5-1 indicates the locations that were sampled during 2010; the data tables to follow give further details about sampling frequency and analytes.

All tritium analyses (with the exception of those for E Tunnel and UGTA characterization wells) were conducted after the samples were enriched. The enrichment process concentrates tritium in a sample to provide low minimum detectable concentrations (MDCs) (see Glossary, Appendix B). For samples with expected levels of tritium that are much higher than the laboratory’s standard detection capability (i.e., E Tunnel) or when the



program goal is not to monitor for low-level concentrations of tritium (i.e., UGTA wells), tritium enrichment is not performed. Sample-specific MDCs for laboratory analysis of enriched samples, reported in each results table, ranged from 14.7 to 40.2 picocuries per liter (pCi/L). The MDCs for standard (non-enriched) tritium analyses typically range from 200 to 400 pCi/L, except for samples with high activity. For comparison, the EPA maximum contaminant level (MCL) for tritium in drinking water is 20,000 pCi/L; the RREMP cites an informal “action level” (with no formal action required by regulation) of 10 percent of the drinking water standard, or 2,000 pCi/L.

Analytical methods routinely include quality control samples such as duplicates, blanks, and spikes. Chapter 18 discusses in more detail the quality assurance and control procedures used for monitoring.

### 5.1.5 Presentation of Water Sampling Data

The following sections present values of gross alpha, gross beta, and tritium for all water samples, whether above or below their MDCs of the associated measurement process. Concentrations for man-made gamma-emitting radionuclides ( $^{137}\text{Cs}$ ,  $^{238}\text{Pu}$ ,  $^{239+240}\text{Pu}$ ,  $^{14}\text{C}$ ,  $^{89+90}\text{Sr}$ , and  $^{99}\text{Tc}$ ) are discussed if the analyses were performed and values were above their sample-specific MDCs.

The “±” values presented in the data tables are the laboratory’s stated 2–standard deviation “uncertainty” for each particular analysis. This does not include the uncertainty associated with sample collection or the tritium enrichment process. A statistical analysis of water supply well samples analyzed between July 1999 and December 2008 was conducted to obtain an estimate of the tritium decision level ( $L_C$ ). The analysis suggests an  $L_C$  (see Glossary, Appendix B) for tritium of approximately 19.6 pCi/L, where  $L_C$  is a 99 percent prediction limit for any individual measurement based on background water supply well data. Alternately, a 95 percent prediction limit for all enriched tritium measurements (PLall), based on that background water supply well data, is approximately 27.2 pCi/L. This takes into account the total number of enriched tritium measurements made annually under the current implementation of the RREMP (95 during 2010). In comparison to the analysis uncertainty (i.e., the uncertainty associated with only the measurement process for an individual sample), the PLall incorporates all uncertainties in the sampling and analysis process over multiple years of water monitoring. If all monitoring locations produced data from the same distribution as the water supply wells, there would be a 5 percent chance of obtaining one or more values exceeding PLall anywhere during any 1 year.

Figures 5-4 through 5-10 were created to show trends over time in gross alpha and beta radioactivity and tritium levels among the RREMP sample locations that have been sampled routinely. In preparing these figures, the annual mean analyte concentration for each RREMP location was first computed for each year. These were averaged across locations within groups of locations (offsite wells, offsite springs, onsite water supply wells, and onsite monitoring wells), and the annual “means of means” were plotted and then connected. The vertical bars in the figures extend from the minimum to the maximum annual mean for any well or spring for each year in each group of locations.

### 5.1.6 Results from RREMP Offsite Wells and Springs

The 2010 data indicate that groundwater sampled at both the offsite NNSA/NSO and private/community wells (Figure 5-2) and at offsite springs (Figure 5-3) has not been impacted by past NNS nuclear testing operations. Tritium was detected only in the sample from the shallow depth of Well PM-3, where it was slightly higher (48.3 pCi/L) than its MDC (25.5 pCi/L) (Tables 5-2 and 5-3). This level is far lower than the EPA MCL; additional monitoring will be performed to determine whether this is a one-time anomaly or otherwise. Gross alpha and gross beta radioactivity were detected in most offsite well samples (Table 5-2) and in offsite spring samples during years when these analyses have been performed (Figure 5-4). These likely represent the presence of naturally occurring radionuclides. None of the offsite water wells and springs exceeded safe drinking water standards for gross alpha and beta radioactivity; all 2010 gross alpha results were below the EPA MCL of 15 pCi/L, and all gross beta results were below the EPA Level of Concern (LoC) of 50 pCi/L.

Samples from offsite wells in Oasis Valley (ER-OV-01, ER-OV-02, ER-OV-03C, ER-OV-03C2, and ER-OV-06A) and EW-4 Well were analyzed for gamma-emitting radionuclides,  $^{238}\text{Pu}$ , and  $^{239+240}\text{Pu}$ . No man-made radionuclides were detected.

Figures 5-4 through 5-6 show the trends over time in gross alpha and beta radioactivity and tritium levels among the offsite wells and springs being sampled routinely. The high values above the EPA MCL seen in Figure 5-4 have been in Well ER-OV-02; none of the gross alpha values exceeded the MCL in 2010. Gross alpha appears to decrease in three Oasis Valley wells (ER-OV-01, ER-OV-02, and ER-OV-03A) over time. Nearly all recent gross alpha levels are below the EPA drinking water MCL (Figure 5-4). All gross beta values in Figure 5-5 are below the EPA LoC for drinking water, and all tritium values in Figure 5-6 are far below the EPA MCL for drinking water.

**Table 5-2. Gross alpha, gross beta, and tritium in offsite wells in 2010**

Location	Date Sampled	Concentration ± Uncertainty <sup>(a)</sup> (pCi/L)		
		Gross Alpha	Gross Beta	Tritium
<b>Non-potable NNSA/NSO Wells</b>				
ER-OV-01	10/25	10.8 ± 3.3	5.8 ± 1.6	-0.7 ± 8.7
	10/25 FD <sup>(b)</sup>	NA <sup>(c)</sup>	NA	-2.3 ± 8.5
ER-OV-02	10/26	9.2 ± 3.0	7.0 ± 1.8	-5.5 ± 8.6
ER-OV-03A	10/26	NA	NA	-2.3 ± 8.3
ER-OV-03A3	10/26	NA	NA	0.0 ± 9.1
ER-OV-03C	10/26	3.6 ± 1.8	2.4 ± 1.2	0.0 ± 8.9
	10/26 FD	NA	NA	-6.4 ± 8.1
ER-OV-03C2	10/26	6.1 ± 2.3	1.8 ± 0.9	-3.4 ± 8.1
	10/26 FD	NA	NA	-3.8 ± 7.9
ER-OV-04A	10/26	NA	NA	1.7 ± 9.0
ER-OV-05	10/26	NA	NA	-4.1 ± 8.5
ER-OV-06A	10/25	4.0 ± 3.0	3.8 ± 2.3	-2.9 ± 8.6
	10/25 FD	NA	NA	-0.6 ± 8.5
PM-3 (1,560 ft) (1,994 ft)	5/18	NA	NA	48.3 ± 17.9
	6/8	NA	NA	27.1 ± 17.6
<b>Private/Community Drinking Water Wells</b>				
EW-4 Well	11/2	9.9 ± 2.8	12.6 ± 2.8	0.6 ± 11.4
Roger Bright Ranch	11/2	NA	NA	3.5 ± 12.7
School Well	11/2	NA	NA	-1.3 ± 11.1
Tolicha Peak	11/2	NA	NA	0.5 ± 11.2
U.S. Ecology	11/2	NA	NA	0.5 ± 11.1

For comparison, the EPA MCL for gross alpha is 15 pCi/L, the EPA LoC for gross beta is 50 pCi/L, and the EPA MCL for tritium is 20,000 pCi/L. Mean MDCs were 2.3, 1.9, and 19.5 pCi/L for gross alpha, gross beta, and tritium, respectively. Gray shaded results are considered detected; the result is greater than the sample-specific MDC.

(a) ± 2 standard deviations.

(b) FD = Field duplicate sample.

(c) NA = Analysis not performed on this sample.

**Table 5-3. Gross alpha, gross beta, and tritium in offsite springs in 2010**

Location	Date Sampled	Concentration ± Uncertainty <sup>(a)</sup> (pCi/L)		
		Gross Alpha	Gross Beta	Tritium
Peacock Ranch	11/2	NA <sup>(b)</sup>	NA	-2.2 ± 10.9
Revert Spring	11/2	NA	NA	-3.0 ± 10.4
Spicer Ranch	11/2	NA	NA	-3.1 ± 10.6

For comparison, the EPA MCL for gross alpha is 15 pCi/L, the EPA LoC for gross beta is 50 pCi/L, and the EPA MCL for tritium is 20,000 pCi/L. The mean MDC for tritium was 21.3 pCi/L.

(a) ± 2 standard deviations.

(b) NA = Analysis not performed on this sample.

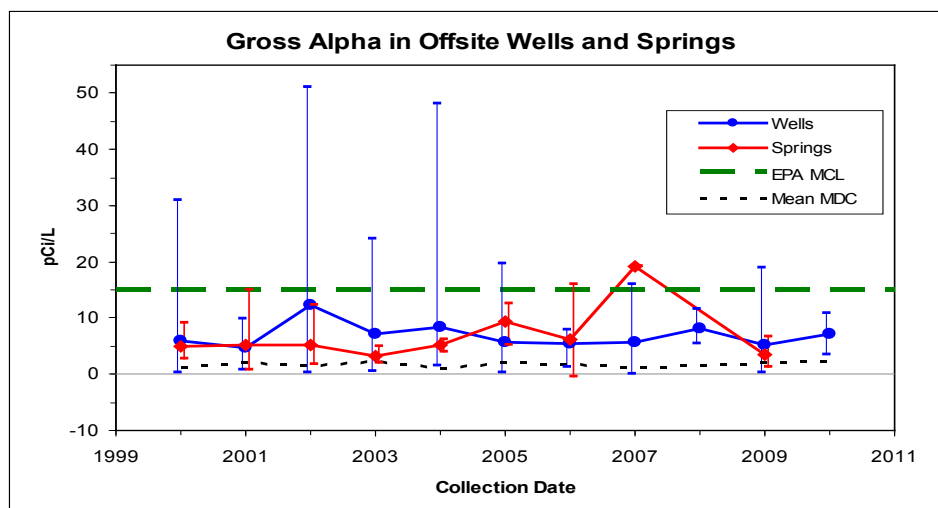


Figure 5-4. Gross alpha annual means for offsite wells and springs from 2000 through 2010

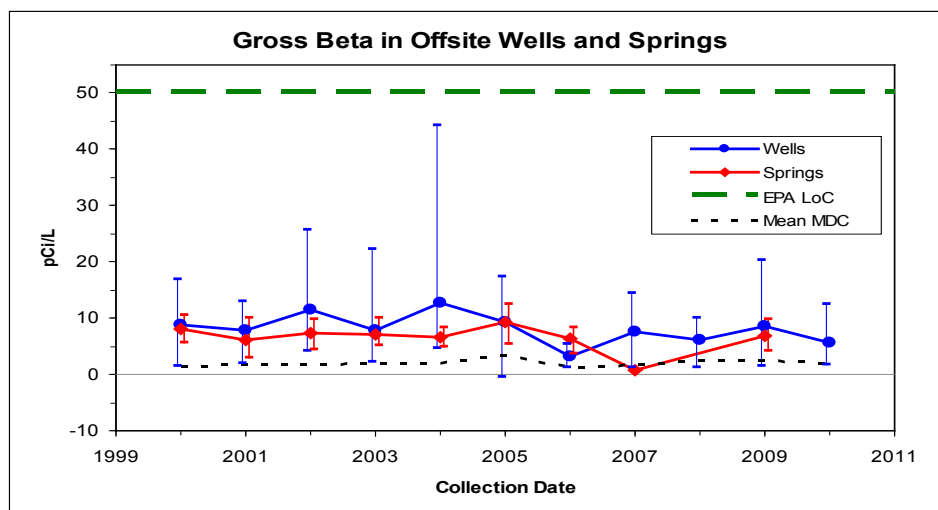


Figure 5-5. Gross beta annual means for offsite wells and springs from 2000 through 2010

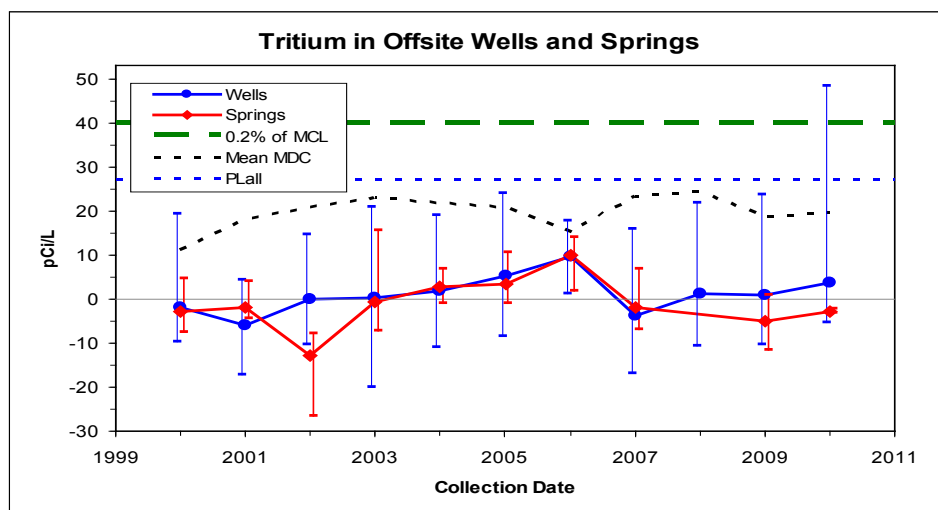


Figure 5-6. Tritium annual means for offsite wells and springs from 2000 through 2010

### 5.1.7 Results from RREMP NNSS Water Supply Wells

Results from the nine NNSS water wells sampled quarterly in 2010 (see Figure 5-2) continue to indicate that nuclear testing has not impacted the NNSS water supply network. No tritium measurements presented in Table 5-4 were above their MDCs. Gross alpha and gross beta radioactivity were found at concentrations slightly greater than their MDCs in most 2010 samples (Table 5-4). Two quarterly samples obtained from non-potable water supply wells (WW 5C and WW C-1) had gross alpha values slightly above the EPA MCL; otherwise no water supply samples had gross alpha measurements exceeding the EPA MCL or gross beta measurements exceeding the EPA LoC. The wells were also analyzed for gamma radionuclides and  $^{238}\text{Pu}$  and  $^{239+240}\text{Pu}$ . No man-made radionuclides were detected; therefore, the gross alpha and gross beta values greater than their MDCs likely represent the presence of naturally occurring radionuclides.

These nine water supply wells have been sampled routinely since 1999. None of the annual mean values shown in Figures 5-7 through 5-9 exceed the EPA MCLs (gross alpha, tritium) or EPA LoC (gross beta). A few early gross alpha quarterly values did exceed the MCL.

**Table 5-4. Gross alpha, gross beta, and tritium in NNSS water supply wells in 2010**

Location	Date Sampled	Concentration $\pm$ Uncertainty <sup>(a)</sup> (pCi/L)			
		Gross Alpha	Gross Beta	Tritium	
<b>Permitted Potable Wells</b>					
J-12 WW	1/19	1.8 $\pm$ 1.3	3.2 $\pm$ 1.3	-10.7 $\pm$ 19.4	
	5/11	1.9 $\pm$ 1.5	2.8 $\pm$ 1.6	-3.1 $\pm$ 15.4	
	7/14	0.7 $\pm$ 0.6	4.7 $\pm$ 1.3	-4.0 $\pm$ 16.6	
	10/19	0.8 $\pm$ 0.7	3.8 $\pm$ 1.5	-4.0 $\pm$ 16.0	
WW #4	1/19	6.7 $\pm$ 2.6	5.0 $\pm$ 1.6	0.8 $\pm$ 19.7	
	5/11	9.8 $\pm$ 3.0	4.4 $\pm$ 1.8	-7.8 $\pm$ 15.5	
	7/14	6.3 $\pm$ 1.5	6.0 $\pm$ 1.5	3.3 $\pm$ 16.5	
	7/14 FD <sup>(b)</sup>	NA <sup>(c)</sup>	NA	-8.2 $\pm$ 29.5	
WW #4A	10/19	6.7 $\pm$ 1.7	6.7 $\pm$ 1.7	-3.9 $\pm$ 16.1	
	1/19	7.5 $\pm$ 2.8	5.1 $\pm$ 1.5	-8.0 $\pm$ 19.4	
	5/11	12.0 $\pm$ 3.5	5.2 $\pm$ 1.8	-8.4 $\pm$ 15.7	
	7/14	4.8 $\pm$ 1.2	6.7 $\pm$ 1.5	3.1 $\pm$ 17.6	
	10/19	6.4 $\pm$ 1.6	7.7 $\pm$ 1.8	-12.9 $\pm$ 17.8	
WW 5B	10/19 FD	NA	NA	-2.3 $\pm$ 29.9	
	1/19	2.8 $\pm$ 1.7	8.5 2.0 1.1	-5.0 $\pm$ 19.5	
	1/19 FD	NA	NA	-3.7 $\pm$ 32.8	
	5/11	4.5 $\pm$ 2.1	9.3 $\pm$ 2.4	-15.9 $\pm$ 15.9	
	7/14	2.6 $\pm$ 1.0	12.1 $\pm$ 2.4	1.7 $\pm$ 17.0	
WW 8	10/19	2.4 $\pm$ 0.7	11.7 $\pm$ 2.1	1.4 $\pm$ 18.3	
	1/19	1.0 $\pm$ 1.1	2.7 $\pm$ 1.2	-14.0 $\pm$ 19.5	
	5/11	1.6 $\pm$ 1.4	5.0 $\pm$ 1.6	3.9 $\pm$ 15.6	
	5/11 FD	NA	NA	-3.8 $\pm$ 26.5	
	7/14	0.4 $\pm$ 0.5	3.5 $\pm$ 1.1	0.9 $\pm$ 16.7	
Non-potable and Inactive Wells	10/19	0.1 $\pm$ 0.5	1.6 $\pm$ 1.2	-2.6 $\pm$ 17.7	
	Army #1 WW	3/24	2.8 $\pm$ 1.6	5.2 $\pm$ 1.5	-10.3 $\pm$ 21.4
	UE-16D WW	5/11	4.2 $\pm$ 2.0	6.5 $\pm$ 2.0	1.2 $\pm$ 15.5
		7/14	2.2 $\pm$ 0.9	5.9 $\pm$ 1.5	0.0 $\pm$ 15.9
10/19		2.7 $\pm$ 1.0	5.7 $\pm$ 1.5	-5.5 $\pm$ 16.2	
UE-16D WW	1/19	5.8 $\pm$ 2.5	6.2 $\pm$ 1.7	-15.5 $\pm$ 18.4	
	5/11	5.0 $\pm$ 2.2	5.8 $\pm$ 1.9	0.1 $\pm$ 15.3	
	7/14	5.0 $\pm$ 1.4	6.8 $\pm$ 1.7	3.6 $\pm$ 16.3	
	10/19	5.1 $\pm$ 1.5	8.7 $\pm$ 1.9	-3.3 $\pm$ 18.2	

Table 5-4. Gross alpha, gross beta, and tritium in NNSS water supply wells in 2010 (continued)

Location	Date Sampled	Concentration ± Uncertainty <sup>(a)</sup> (pCi/L)		
		Gross Alpha	Gross Beta	Tritium
<b>Non-potable and Inactive Wells (continued)</b>				
WW 5C	1/19	19.0 ± 5.2	1.2 ± 1.0	-17.1 ± 19.2
	5/11	5.7 ± 2.3	5.0 ± 1.8	-2.2 ± 15.5
	7/14	4.0 ± 1.1	7.4 ± 1.8	-2.0 ± 17.3
	10/19	6.8 ± 1.4	7.4 ± 1.5	-4.4 ± 16.2
WW C-1	1/19	11.6 ± 4.5	13.6 ± 3.4	0.9 ± 16.6
	5/11	10.4 ± 3.4	15.1 ± 3.2	-8.8 ± 14.6
	7/14	7.8 ± 1.9	13.2 ± 2.8	-10.4 ± 17.0
	10/19	24.4 ± 4.7	39.1 ± 6.6	4.1 ± 16.4

For comparison, the EPA MCL for gross alpha is 15 pCi/L, the EPA LoC for gross beta is 50 pCi/L, and the EPA MCL for tritium is 20,000 pCi/L. Mean MDCs were 1.6, 1.9, and 28.8 pCi/L for gross alpha, gross beta, and tritium, respectively.

Gray shaded results are considered detected; the result is greater than the sample-specific MDC.

Yellow shaded results exceed the EPA MCL for gross alpha.

(a) ± 2 standard deviations. (b) FD = Field duplicate sample. (c) NA = Analysis not performed on this sample.

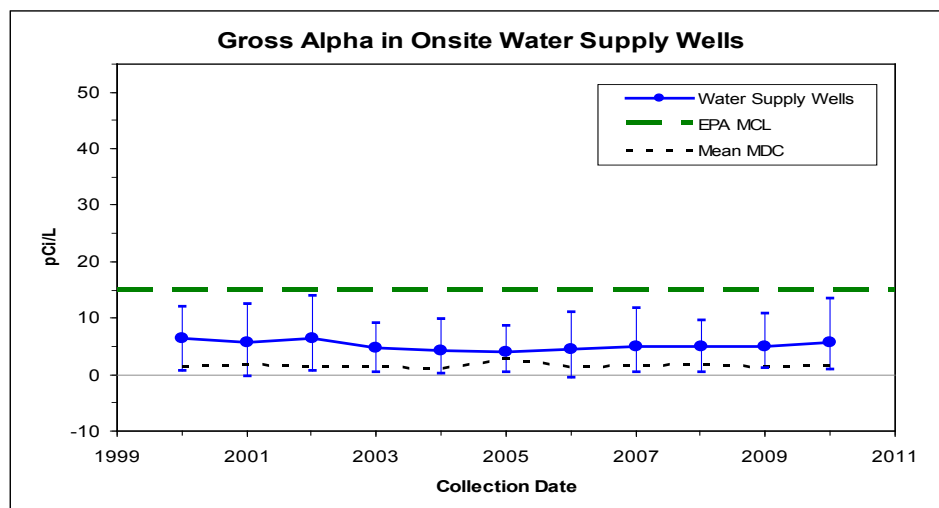


Figure 5-7. Gross alpha annual means for NNSS water supply wells from 2000 through 2010

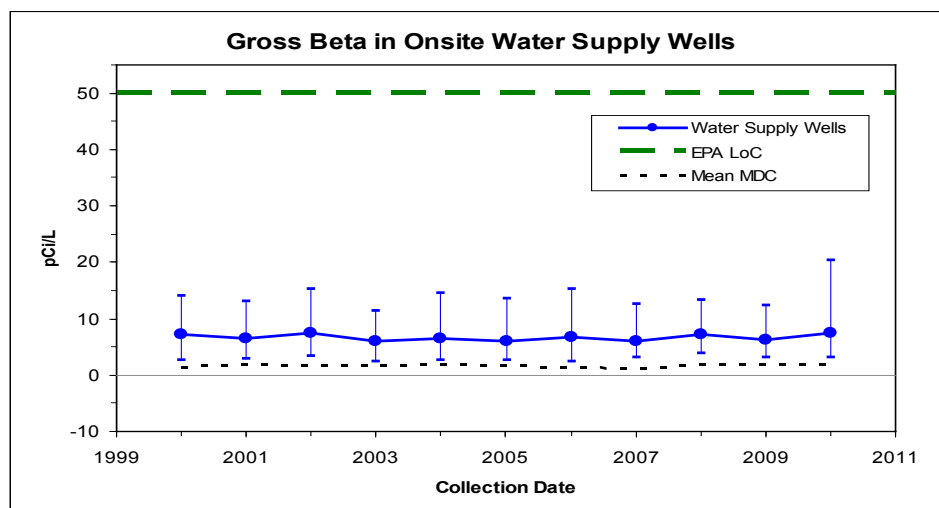


Figure 5-8. Gross beta annual means for NNSS water supply wells from 2000 through 2010

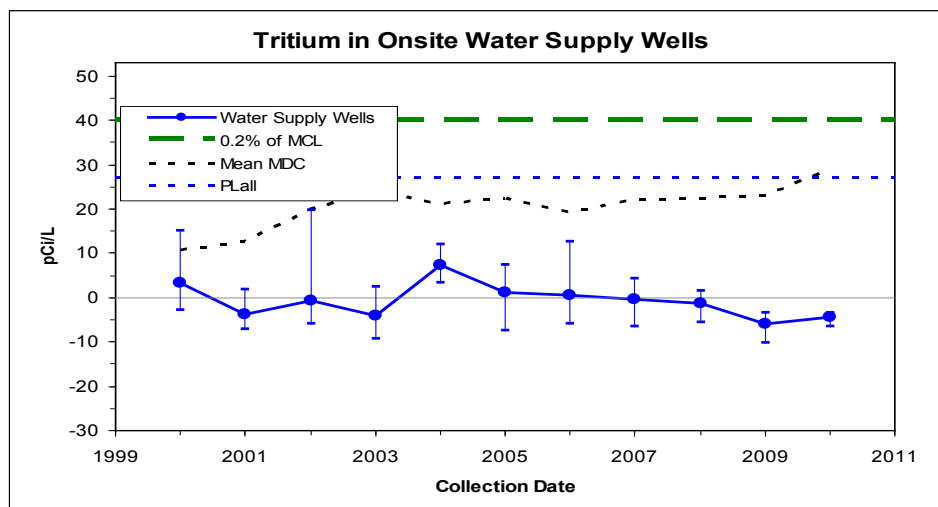


Figure 5-9. Tritium annual means for NNSS water supply wells from 2000 through 2010

### 5.1.8 Results from RREMP NNSS Monitoring Wells

Detectable concentrations of gross alpha and gross beta were present in water collected from NNSS onsite monitoring wells in 2010 (see Table 5-5). Gross alpha in Well U-19BH exceeded the EPA drinking water MCL in 2010. The gross alpha and gross beta radioactivity in most of these wells is likely from natural sources. No man-made gamma-emitting radionuclides were detected at concentrations above their respective MDCs in any of the NNSS monitoring wells in 2010.

Table 5-5. Gross alpha, gross beta, and tritium in NNSS monitoring wells in 2010

Location	Date Sampled	Concentration ± Uncertainty <sup>(a)</sup> (pCi/L)		
		Gross Alpha	Gross Beta	Tritium
ER-19-1 (2,710 ft)	5/4	NA <sup>(b)</sup>	NA	7.4 ± 16.1
	5/4 FD <sup>(c)</sup>	NA	NA	6.1 ± 17.4
	(3,280 ft) 5/4	NA	NA	-0.5 ± 17.3
ER-20-1	9/29	NA	NA	-12.2 ± 15.8
ER-20-2 #1	5/11	NA	NA	-3.8 ± 16.2
HTH #1 (1,935 ft)	4/13	1.0 ± 0.8	1.6 ± 1.1	-2.4 ± 8.4
	(2,040 ft) 4/13	1.0 ± 0.6	0.7 ± 0.9	14.0 ± 18.2
	(2,130 ft) 4/13	0.9 ± 0.7	2.1 ± 1.1	5.7 ± 16.2
	(2,300 ft) 4/13	1.7 ± 0.8	1.6 ± 1.0	1.6 ± 15.7
PM-1	5/19	NA	NA	140.0 ± 25.6
	5/19 FD	NA	NA	118.0 ± 24.2
SM-23-1	11/15	3.8 ± 1.1	9.5 ± 1.9	3.7 ± 14.3
	11/15 FD	4.0 ± 1.1	9.3 ± 1.9	10.4 ± 14.8
TW D	2/10	4.4 ± 2.4	6.0 ± 1.9	-31.1 ± 20.3
U-19BH	5/5	32.7 ± 8.4	37.4 ± 7.3	25.5 ± 18.3
	5/5 FD	NA	NA	34.8 ± 17.2
UE-1Q	2/9	5.9 ± 2.7	5.9 ± 2.1	-20.8 ± 20.0
UE5 PW-1 <sup>(d)</sup>	3/10	NA	NA	-10.1 ± 23.5
	3/10 FD	NA	NA	-3.0 ± 23.1
	8/10	NA	NA	-4.6 ± 17.0
	8/10 FD	NA	NA	-3.9 ± 16.5
UE5 PW-2 <sup>(d)</sup>	3/10	NA	NA	-19.1 ± 23.5
	3/10 FD	NA	NA	-31.2 ± 21.1
	8/10	NA	NA	1.6 ± 17.7
	8/10 FD	NA	NA	-1.5 ± 16.4

**Table 5-5. Gross alpha, gross beta, and tritium in NNSS monitoring wells in 2010 (continued)**

Location	Date Sampled	Concentration ± Uncertainty <sup>(a)</sup> (pCi/L)		
		Gross Alpha	Gross Beta	Tritium
UE5 PW-3 <sup>(d)</sup>	3/31	NA	NA	-19.6 ± 21.6
	3/31/FD	NA	NA	-25.5 ± 18.0
	8/10	NA	NA	1.9 ± 17.7
	8/10 FD	NA	NA	2.3 ± 17.7
UE-7NS	2/23	0.0 ± 0.6	6.1 ± 1.4	41.4 ± 25.2
WW A	2/8	1.5 ± 1.4	3.5 ± 1.5	315.0 ± 56.7
	2/8 FD	3.5 ± 2.1	6.2 ± 2.1	342.0 ± 60.6

For comparison, the EPA MCL for gross alpha is 15 pCi/L, the EPA LoC for gross beta is 50 pCi/L, and the EPA MCL for tritium is 20,000 pCi/L. Mean MDCs were 1.5, 2.0, and 30.5 pCi/L for gross alpha, gross beta, and tritium, respectively.

Gray shaded results are considered detected; the result is greater than the sample-specific MDC.

Yellow shaded results exceed the EPA MCL for gross alpha.

(a) ± 2 standard deviations. (b) NA = Analysis not performed on this sample. (c) FD = Field duplicate sample.

(d) Compliance well for mixed low level waste disposal cells at Area 5 RWMS (see Section 10.1.7).

In 2010, tritium was detected in four RREMP monitoring wells (PM-1, U-19BH, UE-7NS, and WW A) (Table 5-5). These wells are known to have detectable concentrations of tritium, as reported in previous annual NNSS environmental reports. Each of the four wells is located within 1 kilometer (km) (0.6 miles [mi]) of a historical underground nuclear test, as discussed below. Tritium concentrations in samples from these four wells have been decreasing in recent years (Figure 5-10). Since 1999, for example, estimated annual rates of decrease are 6.7 percent, 5.4 percent, 12.8 percent, and 6.5 percent for PM-1, U-19BH, UE-7NS, and WW A (p-values are 0.003, 0.065, 0.001, and 0.000), respectively. Three of these decreasing trends are statistically significant; for U-19BH the values are the lowest of the four wells, including some recent nondetects.

**PM-1** – This well is located in the Central Pahute Mesa CAU. It is constructed with unslotted casing from the surface to 2,300 m (7,546 ft) bgs and is an open hole from 2,300 to 2,356 m (7,546 to 7,730 ft) bgs. Results from depth profile sampling below the static water level in 2001 show a decreasing tritium concentration with depth, indicating that tritium is entering the borehole near the static water level at approximately 643 m (2,109 ft) bgs. Potential sources include the underground nuclear tests FARM (U-20ab), GREELEY (U-20g), and KASSERI (U-20z). The FARM test is closest to PM-1 but is believed to be downgradient. GREELEY and KASSERI tests are both upgradient from PM-1 at distances of 2,429 m (7,969 ft) and 1,196 m (3,924 ft), respectively.

**U-19BH** – This well is located in the Central Pahute Mesa CAU. It is an unexpended emplacement borehole. There were several nuclear detonations conducted near U-19BH, but the source of the tritium in the borehole is unclear. Previous investigations suggest that the water in the well originates from a perched aquifer, but identifying the likely source of tritium is difficult due to a lack of data regarding the perched system (Brikowski et al., 1993). The results from a tracer test conducted in the well indicate that there is minimal flow across the borehole (Brikowski et al., 1993). The lack of measurable flow in the well suggests that the chemistry of the water sampled from the borehole may not be representative of the aquifer.

**UE-7NS** – This well is located in the Yucca Flat CAU and was drilled 137 m (449 ft) from the BOURBON underground nuclear test (U-7n), which was conducted in 1967. This well was routinely sampled between 1978 and 1987, with the resumption of sampling in 1991. Tritium levels in this well have been decreasing in recent years (Figure 5-10). UE-7NS is the second known location on the NNSS where the regionally important lower carbonate aquifer (LCA) has been impacted by radionuclides from nuclear testing (Smith et al., 1999). The first location where the LCA has been impacted by radionuclides from nuclear testing is Well UE-2CE, located less than 200 m (656 ft) from the NASH test conducted in Yucca Flat in 1967. Well UE-2CE is not configured for routine sampling, however.

**WW A** – This well is completed in alluvium in the Yucca Flat CAU. It is located within 1 km (0.6 mi) of 14 underground nuclear tests, most of which appear to be up-gradient of the well. The well has had measurable tritium since the late 1980s. The marked increase between 1985 and 1999 suggests inflow of tritium to this well from the HAYMAKER underground nuclear test (U-3aus) conducted in 1962, 524 m (1,720 ft) north of WW A. This well, which supplied non-potable water for construction, was shut down in the early 1990s.

Tritium was not detected in samples from the other RREMP onsite monitoring wells during 2010 (Table 5-5). Tritium histories for these other wells are shown in Figure 5-11.

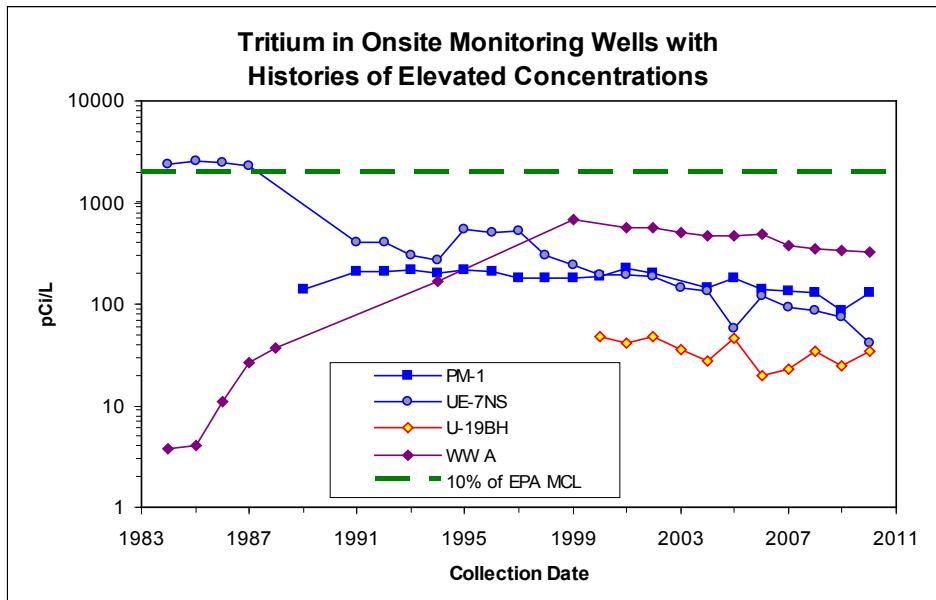


Figure 5-10. Tritium annual means for NNS monitoring wells with histories of elevated concentrations

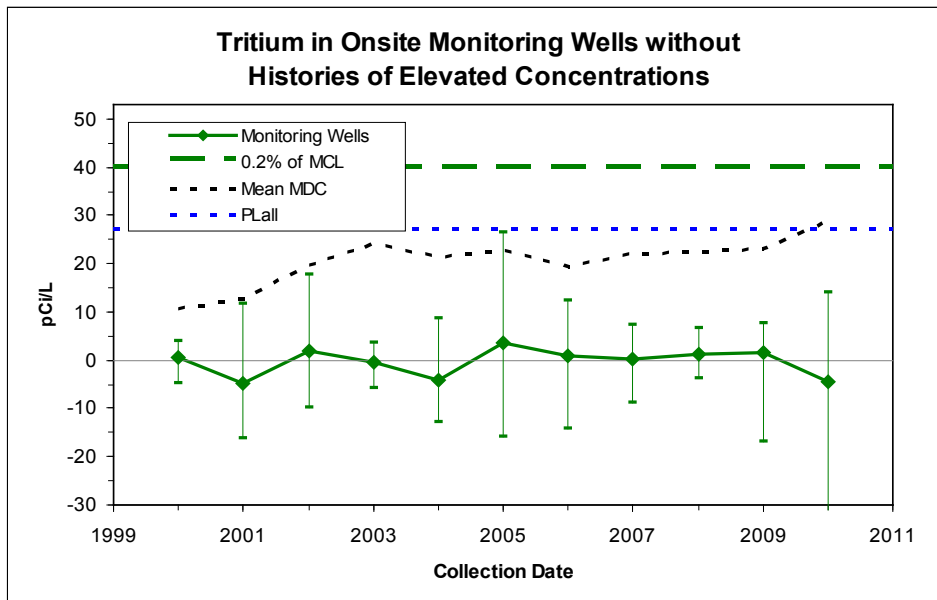


Figure 5-11. Tritium annual means for NNS monitoring wells without histories of elevated concentrations



### 5.1.9 Results from E-Tunnel Waste Water Disposal System (ETDS) Monitoring

NNSA/NSO manages and operates the ETDS in Area 12 under a water pollution control permit (NEV 96021) issued by the Nevada Division of Environmental Protection (NDEP) Bureau of Federal Facilities. The permit governs the management of radionuclide-contaminated wastewater that drains from the E Tunnel portal into a series of holding ponds (the E Tunnel Ponds). The permit requires Well ER-12-1 groundwater to be monitored once every 24 months and E Tunnel discharge waters to be monitored once every 12 months for tritium, gross alpha, and gross beta as well as for numerous nonradiological parameters (see Section 5.2.4, Table 5-11).

E Tunnel discharge water was sampled on October 5, 2010. Tritium, gross alpha, and gross beta levels for all samples were below the limits allowed under permit (Table 5-6). Well ER-12-1 was last sampled in April 2009, and is slated for sampling again in 2011.

**Table 5-6. Gross alpha, gross beta, and tritium in E Tunnel Disposal System samples in 2010**

Location	Date Sampled	Concentration $\pm$ Uncertainty <sup>(a)</sup> (pCi/L)		
		Gross Alpha	Gross Beta	Tritium
E Tunnel	10/5	8.0 $\pm$ 1.6	37.7 $\pm$ 6.1	505,000 $\pm$ 77,100

The permissible limits are 35.1, 101.0, and 1,000,000 pCi/L for gross alpha, gross beta, and tritium, respectively. Sample MDCs were 1.0, 1.2, and 1,240 pCi/L for gross alpha, gross beta, and tritium, respectively.

Gray shaded results are considered detected; the result is greater than the sample-specific MDC.

(a)  $\pm$  2 standard deviations.

Source: NSTec (2011b)

### 5.1.10 Results from UGTA Sub-Project Well Sampling

In 2010, the UGTA Sub-Project pumped and collected groundwater samples from seven characterization wells on Pahute Mesa and immediately south of Pahute Mesa (Table 5-7). Five of the wells are located on the Nevada Test and Training Range (NTTR) within 3.2 kilometers (2 miles) of the NNSS boundary (see Chapter 12, Figure 12-4). Preliminary samples were collected from the four new Phase II wells during and immediately after drilling. They will be sampled again in 2011 after further well development and hydraulic testing activities. A multi-agency team consisting of personnel from LANL and LLNL collected the groundwater samples and analyzed them for tritium and other radionuclides. The resulting tritium concentrations are shown in Table 5-7.

Tritium concentrations at Well ER-20-7 represent a contaminant plume from nearby underground nuclear test(s), which was first defined at Well Cluster ER-20-5 (DOE/NV, 1997b). In 2009, the offsite monitoring well, ER-EC-11, had a tritium level of 13,000 pCi/L, still below the EPA MCL for drinking water of 20,000 pCi/L; this was the first time that elevated tritium levels had been found off the NNSS. It is considered that those tritium results indicate that this well is likely near the leading edge of the contaminant plume. In 2010, a deeper zone of Well ER-EC-11 was sampled, and no tritium was detected. This was not unexpected, as the aquifer sampled is isolated from the overlying contaminated aquifer by a confining unit, which does not readily conduct water. Tritium concentrations in the other characterization wells sampled in 2010 were reported as nondetects by the UGTA Sub-Project. UGTA groundwater data are maintained by Navarro-Intera, LLC, in the UGTA Sub-Project geochemical database. See Chapter 12 of this document for more information regarding the UGTA Sub-Project.

**Table 5-7. Tritium results from UGTA groundwater characterization well samples in 2010**

UGTA Well	Sample Depth (ft bgs)	Date Sampled	Concentration $\pm$ Uncertainty <sup>(a)</sup> (pCi/L)	
			Tritium	
ER-20-4, Area 20	1,870	9/7	-30	$\pm$ 210
	1,870	9/7 FD <sup>(b)</sup>	20	$\pm$ 210
	3,000	9/7	100	$\pm$ 200
ER-20-7, Area 20	Composite	9/24	19,100,000	$\pm$ 2,900,000
	Composite	9/24 FD	18,900,000	$\pm$ 2,900,000
ER-EC-8, NTTR	Composite	9/27	-40	$\pm$ 200
	Composite	9/27 FD	-120	$\pm$ 200

**Table 5-7. Tritium results from UGTA groundwater characterization well samples in 2010 (continued)**

UGTA Well	Sample Depth (ft bgs)	Date Sampled	Concentration $\pm$ Uncertainty <sup>(a)</sup> (pCi/L)	
			Tritium	
ER-EC-11, NTTR	3,750	5/2	20	$\pm$ 180
	3,750	5/2 FD	-10	$\pm$ 180
	3,300	5/2	90	$\pm$ 190
ER-EC-12, NTTR	2,730	7/15	-90	$\pm$ 210
	2,730	7/15 FD	140	$\pm$ 230
	3,880	7/15	40	$\pm$ 220
ER-EC-13, NTTR	2,150	10/22	340	$\pm$ 170
	2,150	10/22 FD	170	$\pm$ 160
	2,500	10/22	130	$\pm$ 150
ER-EC-15, NTTR	2,380	11/24	20	$\pm$ 190
	2,380	11/24 FD	-80	$\pm$ 190
	3,110	11/25	-130	$\pm$ 190

Gray shaded results are considered detected by the UGTA Sub-Project; mean MDC = 290 pCi/L

(a)  $\pm$  2 standard deviations.

(b) FD = Field duplicate sample.

### 5.1.11 Environmental Impact

The radiological impact to water resources from current and past activities on the NNSS is groundwater contamination from man-made radionuclides within the UGTA Sub-Project CAUs (Figure 5-1) and the migration of these radionuclides downgradient from the CAUs. In 2009, sampling of the new UGTA Sub-Project Well ER-EC-11, 716.3 m (2,350 ft) west of the NNSS boundary (Chapter 12, Figure 12-2), confirmed the presence of tritium at elevated levels around 66 percent of the EPA drinking water MCL. This was the first time that radionuclides from NNSS underground tests (UGTs) had been detected in groundwater beyond NNSS boundaries. Those sampling results were consistent with UGTA's Pahute Mesa transport model, which predicts migration of tritium off the NNSS within 50 years of the first nuclear detonation (1965) from the Central and Western Pahute Mesa CAUs (Chapter 12; Figure 12-3). Tritium was not found in a deeper horizon in ER-EC-11 in the 2010 sampling. Well sampling results to date have not detected the presence of man-made radionuclides downgradient of Pahute Mesa in any of the other nearby UGTA wells on the NTTR (ER-EC-1, -2A, -4, -5, -6, -7, and -8; see Chapter 12, Figure 12-3). Samples from offsite RREMP monitoring wells in Oasis Valley, further downgradient of Pahute Mesa, also contain no detectable man-made radionuclides. The groundwater sample collected in May 2010 under the RREMP from PM-3 at a depth of 475.5 m (1,560 ft) was found to contain a low concentration of tritium (48.3 pCi/L) (Table 5-2). PM-3 is 3,261 m (10,700 ft) west of the NNSS border. It is 7.4 km (4.6 mi) northwest and 57 m (188 ft) upgradient from Well ER-EC-11. This concentration level is far lower than the EPA MCL of 20,000 pCi/L and the RREMP action level of 2,000 pCi/L. RREMP monitoring of PM-3 will continue in 2011, and the UGTA Sub-Project will collect and test additional samples to confirm the presence of tritium in the well. Sampling results will be considered in future data collection decisions and groundwater model evaluations.

On the NNSS, groundwater monitoring results indicate that the migration of radionuclides from UGTs is not significant in distance. UGTA Well ER-20-7, completed in 2009, intercepted a contaminant plume of tritium believed to originate from two UGTs, TYBO and BENHAM, which are about 945 m (3,100 ft) and 1,310 m (4,300 ft) from ER-20-7, respectively. Similarly, groundwater from the four RREMP monitoring wells on the NNSS with detectable tritium levels (PM-1, U-19BH, UE-7NS, and WW A) are each within about 1,000 m (3,300 ft) of a UGT. Since 1999, their tritium concentrations have all been less than 3 percent of the EPA MCL for drinking water (20,000 pCi/L) and are low and/or statistically significantly decreasing, as discussed in Section 5.1.8.

The NDEP-approved method of containing tritium-contaminated waters in lined sumps and in the E Tunnel ponds exposes NNSS wildlife to tritium in their drinking water or aquatic habitat. The potential dose to NNSS biota from the E Tunnel ponds has been assessed; the results demonstrated that the doses to biota were much less than the limits set to protect plant and animal populations (BN, 2004a; NSTec, 2008).

## 5.2 Nonradiological Drinking Water and Wastewater Monitoring

The quality of drinking water and wastewater on the NNSS is regulated by federal and state laws. The design, construction, operation, and maintenance of many of the drinking water and wastewater systems are regulated under state permits. NSTec is tasked with ensuring that such systems meet the applicable water quality standards and permit requirements (see Section 2.2). The NNSS nonradiological water monitoring goals are shown below. NSTec Environmental Programs (EP) personnel meet these goals by conducting field water sampling and analyses, performing assessments, and maintaining documentation. This section describes the results of 2010 activities. Information about radiological monitoring of drinking water on and off the NNSS is presented in Sections 5.1.6 and 5.1.7.

<b><i>Nonradiological Water Monitoring Goals</i></b>	<b><i>Compliance Measures/Actions</i></b>
<p>Ensure that the operation of NNSS public water systems (PWSs) and private water systems (see Glossary, Appendix B) provides high-quality drinking water to workers and visitors of the NNSS.</p> <p>Determine if NNSS PWSs are operated in accordance with the requirements in Nevada Administrative Code NAC 445A, "Water Controls," under permits issued by the State.</p> <p>Determine if the operation of commercial septic systems to process domestic wastewater on the NNSS meets operational standards in accordance with the requirements NAC 445A under permits issued by the State.</p> <p>Determine if the operation of industrial wastewater systems on the NNSS meets operational standards of federal and state regulations as prescribed under the GNEV93001 state permit.</p>	<p>Number of PWS samples containing coliform bacteria</p> <p>Inorganic chemicals, volatile organic chemicals, disinfection by-products, and Secondary Standards contaminants in PWS samples</p> <p>5-day biological oxygen demand (BOD<sub>5</sub>), total suspended solids (TSS), pH, and 29 organic and inorganic contaminants in sewage lagoon water</p> <p>Inspection of sewage lagoon systems</p> <p>Flow rate, pH, temperature, specific conductance, and 14 contaminants (mostly metals) in E Tunnel effluent water</p>

### 5.2.1 Drinking Water Monitoring

Six permitted wells supply the potable water needs of NNSS operations. These are grouped into three PWSs that were operated by NSTec in 2010 (Figure 5-12). The largest PWS (Areas 23 and 6) serves the main work areas of the NNSS. The PWSs are designed, operated, and maintained in accordance with the requirements in NAC 445A under permits issued by the NDEP Bureau of Safe Drinking Water (BSDW). PWS permits are renewed annually. The three PWSs must meet water quality standards for National Primary and Secondary Drinking Water Standards. They are sampled according to a 9-year monitoring cycle, which identifies the specific classes of contaminants to monitor for each drinking water source and the frequency of their monitoring.

For work locations at the NNSS that are not part of a PWS, NNSA/NSO hauls potable water in two water tanker trucks. The trucks are permitted by the BSDW to haul water to a PWS, and the water they carry is subject to water quality standards for coliform bacteria. Normal use of these trucks, however, involves hauling to private water systems (see Glossary, Appendix B) and to hand-washing stations at construction sites, activities not subject to permitting. NNSA/NSO renews the permits for these trucks annually, however, in case of emergency.

#### 5.2.1.1 PWS and Water-Hauling Truck Monitoring

Table 5-8 lists the water quality parameters monitored in 2010, sample frequencies, and sample locations. At all building locations, the sampling point for coliform bacteria is one of the sinks within one of the building's bathrooms. Samples for the chemical contaminants were collected at the four points of entry to the PWSs. Although not required by regulation or permit, the private water systems were monitored quarterly for coliform bacteria to ensure safe drinking water.

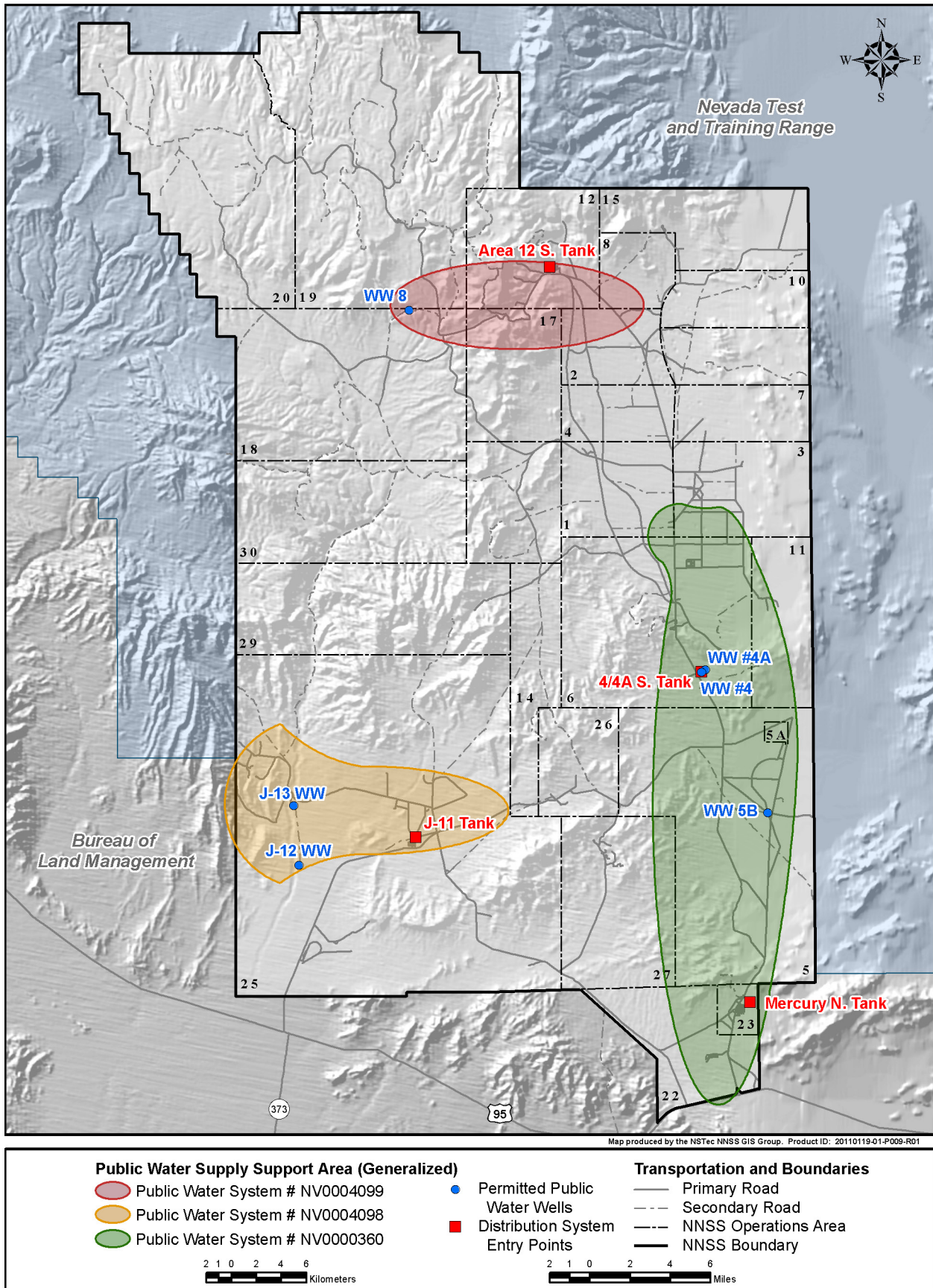


Figure 5-1. Water supply wells and drinking water systems on the NNSS

**Table 5-8. 2010 monitoring parameters and sampling design for NNSS PWSs and permitted water-hauling trucks**

2010 Monitoring Requirements			
PWS	Contaminant	Samples/Frequency	Monitoring Locations
Area 23 and 6	Coliform Bacteria	36 samples/ 3 buildings per month	Buildings 5-7, U1H restroom, 6-609, 6-900, 22-1, 23-180, 23-701, 23-777, and 23-1103
	Inorganic Chemicals: Nitrate	2 samples (1 per entry point)/ annually	Entry points: Mercury N. Tank and 4/4A S. Tank
	Secondary Standards: 15 parameters (Table 5-9)	2 samples (1 per entry point)/ every 3 years	
	19 Volatile Organic Chemicals: (Table 5-9)	1 sample/every 3 years (from alternating entry points)	Mercury N. Tank
	Volatile Organic Chemical: Xylenes	2 samples (1 per entry point)/ annually	Entry points: Mercury N. Tank and 4/4A S. Tank
Area 12	Coliform Bacteria	4 samples/1 per quarter	Building 12-30
	Inorganic Chemicals: Nitrate	1 sample/ every 3 years	Entry point Area 12 S. Tank
Area 25	Coliform Bacteria	4 samples/1 per quarter	Building 25-4320 or 25-4221
	Inorganic Chemicals: Nitrate	1 sample/every 3 years	Entry point J-11 Tank
	Secondary Standards: 15 parameters (Table 5-9)		
<b>Water-Hauling Truck</b>			
Truck 84846 and Truck 84847	Coliform Bacteria	12 samples/ (1 per month for each truck)	From water tank on each truck after filling at Area 6 potable water fill stand

All water samples were collected in accordance with accepted practices, and the analyses were performed by state-approved laboratories. The laboratories used approved analytical methods listed in NAC 445A and Title 40 Code of Federal Regulations (CFR) Part 141, "National Primary Drinking Water Standards."

In 2010, monitoring results indicated that the PWSs complied with National Primary Drinking Water Quality Standards and Secondary Standards (Table 5-9). Also, all water samples from the water-hauling trucks were negative for coliform bacteria in 2010.

**Table 5-9. Water quality analysis results for NNSS PWSs**

Contaminant	Maximum Contaminant Level (mg/L)	2010 Results (mg/L)		
		Area 23 and 6 PWS	Area 12 PWS	Area 25 PWS
<b>Coliform Bacteria</b>	Coliforms present in 1 sample/month	Absent in all samples	Absent in all samples	Absent in all samples
<b>Inorganic Chemicals</b>				
Nitrate	10 (as nitrogen)	3.03 and 3.74	1.10	1.71
<b>Secondary Standards</b>				
Aluminum	0.2	0.012 and ND <sup>(b)</sup>	NA <sup>(a)</sup>	0.027
Chloride	400	18.8 and 11.3	NA	7.05
Copper	1.3	ND and ND	NA	0.00088
Foaming Agents	0.5	ND and ND	NA	ND
Iron	0.6	ND and ND	NA	0.22
Magnesium	150	4.3 and 7.7	NA	1.8
Manganese	0.1	0.00026 and 0.00066	NA	0.0087
Silver	0.1	ND and ND	NA	ND
Sulfate	500	47.3 and 37.9	NA	21.2
Total Dissolved Solids	1,000	330 and 400	NA	240
Zinc	5	ND and ND	NA	ND

Table 5-9. Water quality analysis results for NNSS PWSs (continued)

Contaminant	Maximum Contaminant Level (mg/L)	2010 Results (mg/L)		
		Area 23 and 6 PWS	Area 12 PWS	Area 25 PWS
<b>Secondary Standards (continued)</b>				
Zinc	5	ND and ND	NA	ND
Fluoride	2	0.781 and 0.621	NA	1.74
Color	15 units	ND and ND	NA	7.5
Odor	3	1.0 and 1.0	NA	1.0
pH	6.5 to 8.5	8.02 and 7.93	NA	7.89
<b>Volatile Organic Chemicals</b>				
Vinyl chloride	0.002	< 0.0002	NA	NA
Benzene	0.005	< 0.0001	NA	NA
Carbon tetrachloride	0.005	< 0.0001	NA	NA
1, 2-Dichloroethane	0.005	< 0.0002	NA	NA
Trichloroethylene	0.005	< 0.00011	NA	NA
para-Dichlorobenzene	0.075	< 0.0002	NA	NA
1, 1-Dichloroethylene	0.007	< 0.0001	NA	NA
1, 1, 1-Trichloroethane	0.2	< 0.0002	NA	NA
cis-1, 2-Dichloroethylene	0.07	< 0.00025	NA	NA
1, 2-Dichloropropane	0.005	< 0.0002	NA	NA
Ethylbenzene	0.7	0.00273	NA	NA
Monochlorobenzene	0.1	< 0.0001	NA	NA
o-Dichlorobenzene	0.6	< 0.0001	NA	NA
Styrene	0.1	< 0.0001	NA	NA
Tetrachloroethylene	0.005	< 0.0002	NA	NA
Toluene	1	< 0.0001	NA	NA
trans-1, 2-Dichloroethylene	0.1	< 0.00025	NA	NA
Xylenes (total)	10	0.00023 and <0.0002	NA	NA

(a) NA = Not applicable

(b) ND = Not detected

### 5.2.1.2 State Inspections

Periodically, NDEP conducts a sanitary survey of the permitted NNSS PWSs. It consists of an inspection of the wells, tanks, and other visible portions of each PWS to ensure that they are maintained in a sanitary configuration. As non-community water systems, the minimum survey frequency is once every 5 years. NDEP did not perform a sanitary survey of the PWSs in 2010. The last survey was conducted in November 2008, and there were no significant findings.

NDEP inspects the two water-hauling trucks annually at the time of permit renewal to make sure they still meet the requirements of NAC 445A. Inspections were performed in June 2010, and permits were renewed.

### 5.2.1.3 New Water Supply Well Construction

In 2010, a new water supply well, Well J-14, was designed and drilled. It is located in Area 25, approximately 8,400 feet north-northeast of Well J-11 and the J-11 Tank (see Figure 5-12). Well J-14 will become a part of the Area 25 PWS and is expected to relieve water pressure on the PWS's existing long water transmission line, thereby reducing leaks and system maintenance and repair costs. A new water pipeline from Well J-14 was also designed in 2010 and will be connected to the Area 25 PWS in 2011. Construction, development, testing, and completion of the well were in accordance with industry standards and satisfied the requirements of applicable portions of NACs 534 and 445A (see Section 2.3.1).



## 5.2.2 Domestic Wastewater Monitoring

A total of 23 permitted septic systems for domestic wastewater are being used on the NNSS (Figure 5-13). These septic systems are permitted to handle 5,000 gallons of wastewater per day. Of the 23 permitted systems, 7 systems are under the direct control of the NSTec Solid Waste Department; the remaining 16 systems fall under the supervision and management of the building's facility manager. The permitted septic systems are inspected periodically for sediment loading and are pumped as required. A state-permitted septic pumping contractor is used. The State conducts onsite inspections of pumper trucks and pumping contractor operations. EP personnel perform management assessments of the permitted systems and services to determine and document adherence to permit conditions. The assessments are performed according to existing directives and procedures.

In 2010, there were no compliance actions relating to domestic wastewater on the NNSS.

A septic tank pumping contractor permit (NY-17-03318), four septic tank pump truck permits (NY-17-03313, NY-17-03315, NY-17-03317, NY-17-06838), and a septic tanker permit (NY-17-06839) were approved by the State and renewed in July 2010.

## 5.2.3 Industrial Wastewater Monitoring

Industrial discharges on the NNSS are limited to two operating sewage lagoon systems: Area 6 Yucca Lake and Area 23 Mercury (these lagoon systems also receive domestic wastewater) (Figure 5-13). The Area 6 Yucca Lake system consists of two primary lagoons and two secondary lagoons. All lagoons in this system are lined with compacted native soils that meet the State of Nevada requirements for transmissivity ( $10^{-7}$  centimeters per second). The Area 23 Mercury system consists of one primary lagoon, a secondary lagoon, and an infiltration basin. The primary and secondary lagoons have a geosynthetic clay liner and a high-density polyethylene liner. The lining of the ponds allows Area 23 lagoons to operate as a fully contained, evaporative, non-discharging system.

### 5.2.3.1 Quarterly and Annual Influent Monitoring

Both sewage systems are monitored quarterly for influent quality. Composite samples from each system are collected over a period of 8 hours and in accordance with accepted practices. The analyses are performed by State-approved laboratories. The laboratories used approved analytical methods listed in NAC 445A and 40 CFR 141. The composite samples are analyzed for three parameters: 5-day biological oxygen demand (BOD<sub>5</sub>, see Glossary, Appendix B), total suspended solids (TSS), and pH. In 2010, all results for BOD<sub>5</sub>, TSS, and pH for sewage system influent waters were within the limits established under Water Pollution Control General Permit GNEV93001 (Table 5-10). Quarterly monitoring reports of these results were submitted to NDEP in April, July, and October 2010 and in January 2011.

**Table 5-10. Water quality analysis results for NNSS sewage lagoon influent waters in 2010**

Parameter	Units	Minimum and Maximum Values from Quarterly Samples	
		Area 6 Yucca Lake	Area 23 Mercury
BOD <sub>5</sub> (Permit Limit)	mg/L	136–233 (No Limit)	183–361 (No Limit)
BOD <sub>5</sub> Mean Daily Load <sup>(a)</sup> (Permit Limit)	kg/d	0.24–1.63 (8.66)	14.82–29.82 (115.4)
TSS (Permit Limit)	mg/L	145–290 (No Limit)	160–350 (No Limit)
pH (Permit Limit)	S.U. <sup>(b)</sup>	8.20–8.70 (6.0–9.0)	8.00–8.50 (6.0–9.0)

(a) BOD<sub>5</sub> Mean Daily Load in kilograms per day (kg/d) = (mg/L BOD x liters per day (L/d) average flow x 3.785)/10<sup>6</sup>

(b) Standard units of pH

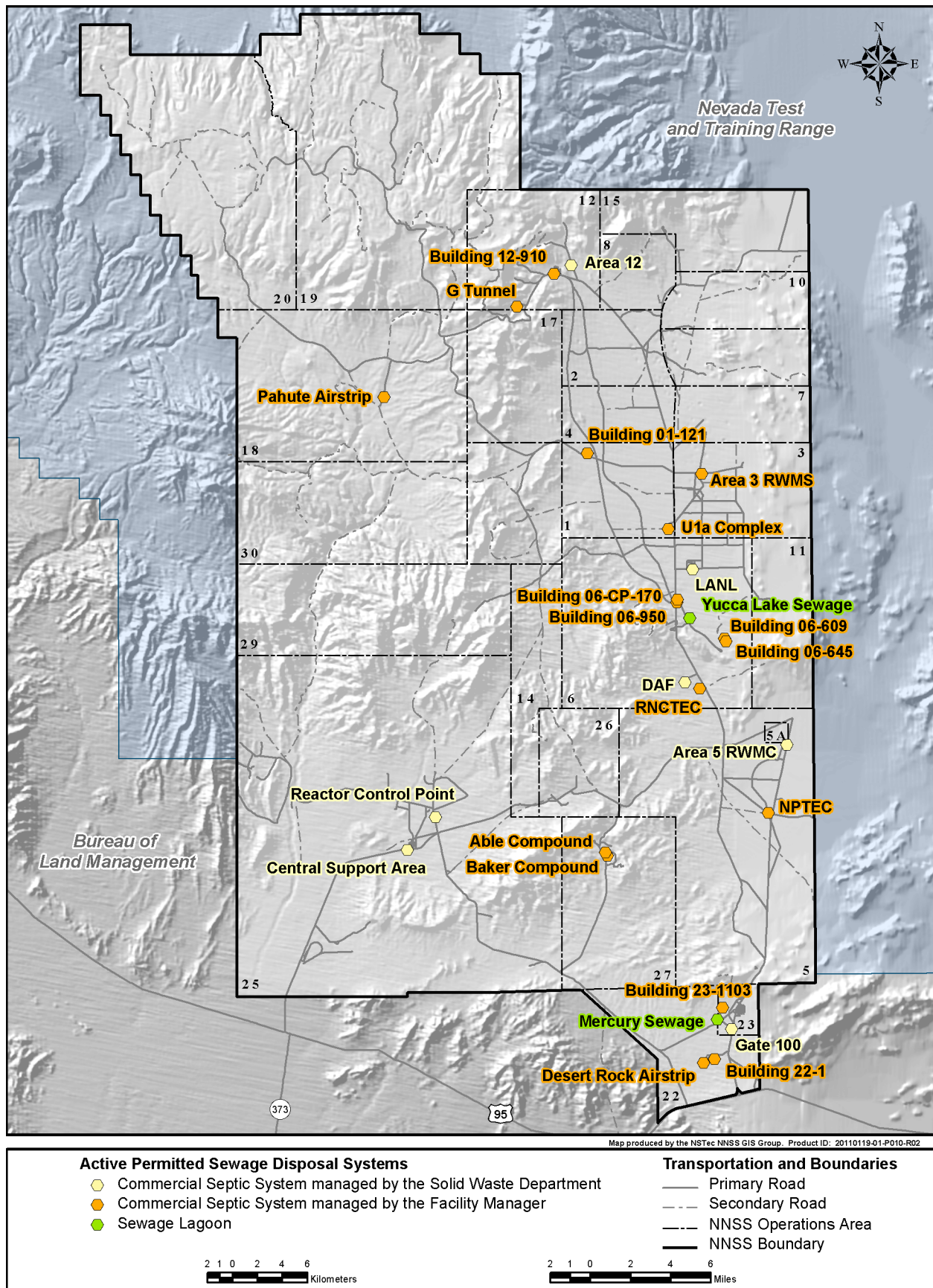


Figure 5-2. Active permitted sewage disposal systems on the NNSS



Toxicity monitoring of influent waters of the lagoons was not conducted in 2010. The permit requires that the lagoons be sampled and analyzed for the 29 contaminants shown in Table 4-10 of the *Nevada Test Site Environmental Report 2008* (NSTec, 2009) only in the event of specific or accidental discharges of potential contaminants. There were no such discharges that warranted sampling in 2010.

### 5.2.3.2 Sewage System Inspections

The sewage system operators inspect active systems weekly and inactive lagoon systems quarterly. NDEP inspects both active and inactive NNSS lagoon systems annually. Onsite operators inspect for abnormal conditions, weeds, algae blooms, pond color, abnormal odors, dike erosion, burrowing animals, discharge from ponds or lagoons, depth of staff gauge, crest level, excess insect population, maintenance/repairs needed, and general conditions. NSTec conducted weekly and quarterly inspections throughout the year, and NDEP conducted its annual inspection in June 2010. The inspection covered field maintenance programs, lagoons, sites, and access roads functional to operations. There were no notable findings from the onsite and NDEP inspections.

### 5.2.4 ETDS Monitoring

NNSA/NSO manages and operates the ETDS in Area 12 under a separate water pollution control permit (NEV 96021) issued by the NDEP Bureau of Federal Facilities (BFF). The permit governs the management of radionuclide-contaminated wastewater that drains from the E Tunnel portal into a series of holding ponds. The permit requires ETDS discharge waters to be monitored every 12 months for radiological parameters (see Section 5.1.9, Table 5-6) and for the nonradiological parameters listed in Table 5-11. It also requires Well ER-12-1 to be sampled for the same parameters but at a frequency of once every 24 months. The ETDS is also monitored monthly for flow rate, pH, temperature, and specific conductance (SC) of the discharge water and the total volume and structural integrity of the holding ponds. Monitoring data are reported to the NDEP BFF in annual and quarterly reports.

In 2010, all nonradiological parameters in the annual ETDS sample were within the threshold limits specified by the permit (Table 5-11). All 2010 monthly measurements and observations demonstrated compliance with permit limits and specifications, with the exception of SC measurements at the ETDS discharge point. SC measures were 379.0, 369.7, 385.7, 395.7, 371.5, 391.7, 380.2, 389.0, 388.2, and 393.3 microsiemens per centimeter ( $\mu\text{S}/\text{cm}$ ) in February, March, April, May, June, August, September, October, November, and December, respectively—all below the lower permit limit of 400  $\mu\text{S}/\text{cm}$ . NDEP determined, after evaluating NNSA/NSO and NSTec's study of this parameter, that these measurements should continue to be collected. NDEP suspended the permit requirement for follow-on monitoring, and will re-evaluate the permit limits for SC when the permit is renewed in 2013. Well ER-12-1 was not sampled in 2010 since it was last sampled in April 2009.

**Table 5-11. Nonradiological results for ETDS discharge samples**

Parameter	Threshold (mg/L)	Measured Value (mg/L)
Cadmium	0.045	< 0.001
Chloride	360	9.43
Chromium	0.09	< 0.003
Copper	1.2	0.00152 <sup>(a)</sup>
Fluoride	3.6	0.25
Iron	5.0	2.42
Lead	0.014	0.00164 <sup>(a)</sup>
Magnesium	135	1.28
Manganese	0.25	0.027
Mercury	0.0018	< 0.0002
Nitrate nitrogen	9	1.27
Selenium	0.045	< 0.01
Sulfate	450	16.9
Zinc	4.5	0.0308
pH (S.U.) <sup>(b)</sup>	6.0–9.0	7.21
SC ( $\mu\text{S}/\text{cm}$ )	400–500	389

(a) Estimated quantity based on the minimum detection limit

Source: NSTec (2011b)

(b) S.U. = standard unit(s) (for measuring pH)

### 5.2.5 *Environmental Impact*

The results of all drinking water and wastewater monitoring in 2010 were within permit limits. In the past, some drinking water standards in NNSS water supply wells or PWSs have been exceeded (e.g., arsenic in Army #1 WW and WW 5C, lead in the Area 12 PWS, elevated total dissolved solids and hardness in WW C-1). However, all were determined to have been due to natural causes or the condition of the water distribution systems themselves; they have not been the result of the release of contaminants into the groundwater from site operations. Nonradiological contamination of groundwater from NNSS operations is expected to be co-located with the radiological contamination that has occurred from historical underground nuclear testing within the UGTA Sub-Project CAUs. It is expected to be minor, however, in comparison to the radiological contamination. For nuclear tests above the water table, potential nonradiological contaminants are not likely to reach groundwater because of their negligible advective and dispersive transport rates through the thick vadose zone. Water samples from UGTA Sub-Project wells, which include highly contaminated wells, have not had elevated levels of nonradiological man-made contaminants.

Well drilling, waste burial, chemical storage, and wastewater management are the only current NNSS activities that have the potential to contaminate groundwater with nonradiological contaminants. This potential is very low, however, due to engineered and operational deterrents and natural environmental factors. Current drilling operations include the containment of drilling muds and well effluents in sumps (see Chapter 14). Well effluents are monitored for nonradiological contaminants (predominantly lead) to ensure that lined sumps are used when necessary. The Area 3 and Area 5 Radioactive Waste Management Sites and the solid waste landfills are designed and monitored to ensure that contaminants do not reach groundwater (see Chapter 10). In addition, the potential for mobilization of contaminants from all these sources to groundwater is negligible due to the arid climate, the extensive depth to groundwater (thickness of the vadose zone), and the proven behavior of liquid and vapor fluxes in the vadose zone (primarily upward liquid movement towards the ground surface).

The Environmental Restoration program, through the Soils Project and Industrial Sites Project, conducts cleanup and closures of historical surface and shallow subsurface contamination sites, some of which have nonradiological contaminants like metals, petroleum hydrocarbons, hazardous organic and inorganic chemicals, and unexploded ordnance (see Chapter 10). The potential for mobilization of these contaminants to groundwater is negligible due to the same regional climatic, soil, and hydrogeologic factors mentioned above.

No past or present NNSA/NSO operations are known to have contaminated natural springs or ephemeral surface waters on the NNSS.

## 6.0 Direct Radiation Monitoring

U.S. Department of Energy (DOE) Orders DOE O 5400.5, “Radiation Protection of the Public and the Environment,” and DOE O 435.1, “Radioactive Waste Management,” have requirements to protect the public and environment from exposure to radiation (see Section 2.3). Radionuclides present in the Nevada National Security Site (NNSS) environment could potentially be deposited in humans and animals through inhalation and ingestion. Chapter 5 and Chapter 8 present the results of monitoring radionuclides in air and water, respectively, on the NNSS; those results are used to estimate potential internal radiation dose to the public via inhalation and ingestion. Energy absorbed from radioactive materials outside of the body results in an external dose. External dose comes from direct ionizing radiation on the NNSS from all sources, including natural radioactivity from cosmic and terrestrial sources as well as man-made radioactive sources. During 2010, external dose was assessed under the Direct Radiation Monitoring Program of National Security Technologies, LLC (NSTec), Ecological and Environmental Monitoring. This chapter presents the data obtained through this program.

Direct radiation monitoring is conducted to assess the external radiation environment, detect changes in that environment, and measure gamma radiation levels near potential exposure sites. DOE O 450.1A, “Environmental Protection Program,” states that environmental monitoring should be conducted to detect, characterize, and respond to releases from DOE activities, assess impacts, and estimate dispersal patterns in the environment. In addition, DOE O 5400.5 states that “it is also an objective that potential exposures to members of the public be as low as is reasonably achievable (ALARA).”

### ***Direct Radiation Monitoring Program Goals***

Assess the proportion of external dose that comes from background radiation versus NNSS operations.

Measure external radiation in order to assess the potential external dose to a member of the public from all U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office (NNSA/NSO) operations at the NNSS and determine if the total dose (internal and external) complies with the 100 millirem per year (mrem/yr) (1 millisievert [mSv]/yr) dose limit of DOE O 5400.5 (see Chapter 9 for estimates of public dose).

Measure external radiation in order to assess the potential external dose to a member of the public from operations at the Area 3 and Area 5 Radioactive Waste Management Sites (RWMSs) and determine if the total dose complies with the 25 mrem/yr (0.25 mSv/yr) dose limit to members of the public specified in DOE Manual DOE M 435.1-1, “Radioactive Waste Management Manual” (see Chapter 9 for estimates of public dose).

Monitor operational activities involving radioactive material, radiation-generating devices, or accidental releases of radioactive material to ensure exposure to members of the public are kept ALARA as stated in DOE O 5400.5.

Determine if the absorbed radiation dose (in a unit of measure called a rad [see Glossary, Appendix B]) from external radiation exposure to NNSS terrestrial plants and aquatic animals is less than 1 rad per day (1 rad/d) (0.01 gray/d), and if the absorbed radiation dose to NNSS terrestrial animals is less than 0.1 rad/d (1 milligray/d) (limits prescribed by DOE O 5400.5 and DOE Standard DOE-STD-1153-2002, “A Graded Approach for Evaluating Radiation Doses to Aquatic and Terrestrial Biota”) (see Section 9.2 for biota dose assessments).

Determine the patterns of exposure rates through time at various soil contamination areas to fulfill the requirements of DOE O 450.1A to characterize releases in the environment.

An offsite monitoring program has been established by NNSA/NSO to monitor direct radiation within communities adjacent to the NNSS. The Desert Research Institute (DRI) conducts this monitoring as part of its Community Environmental Monitoring Program (CEMP). DRI’s 2010 direct radiation monitoring results are presented in Sections 7.1.2 and 7.1.3; see also Figure 6-2 of this chapter.

## 6.1 Measurement of Direct Radiation

Direct radiation is exposure to electromagnetic (gamma and X-ray) radiation. Electromagnetic radiation can travel long distances through air and penetrate living tissue causing ionization within the body tissues. By contrast, alpha and beta particles do not travel far in air (a few centimeters for alpha and about 10 meters (m) (33 feet [ft]) for beta particles). Alpha particles deposit only negligible energy to living tissue as they rarely penetrate the outer dead layer of skin. Beta particles are generally absorbed in the layers of skin immediately below the outer layer.

Direct radiation exposure is usually reported in the unit milliroentgen (mR), which is a measure of exposure in terms of numbers of ionizations in air. The dose in human tissue resulting from an exposure from the most common radionuclides can be approximated by equating a 1 mR exposure with a 1 mrem (0.01 mSv) dose.

## 6.2 Thermoluminescent Dosimetry Surveillance Network Design

Monitoring is performed on the NNSS because some NNSS areas have elevated radiation levels resulting from historical weapons testing, current and past radioactive waste management activities, and/or current operations involving radioactive material or radiation-generating devices. A surveillance network of thermoluminescent dosimeter (TLD) sampling locations has been established on the NNSS. The objectives and design of the network are described in detail in the *Routine Radiological Environmental Monitoring Plan* (RREMP) (Bechtel Nevada, 2003a).

TLDs measure ionizing radiation exposure from all sources. The TLD used is the Panasonic UD-814AS, which has three calcium sulfate elements, housed in an air-tight, water-tight, ultraviolet-light-protected case. Measurements from the three calcium sulfate elements are averaged to assess penetrating gamma radiation.

A pair of TLDs is placed at  $1.0 \pm 0.3$  m (28 to 51 inches [in.]) above the ground at each monitoring location; these are exchanged for analysis quarterly. Analysis of TLDs is performed using automated TLD readers calibrated and maintained by the NSTec Radiological Control Department. Reference TLDs are exposed to 100 mR from a cesium-137 radiation source under tightly controlled conditions. These are read along with TLDs collected from the network to calibrate their responses.

There were 109 active environmental TLD locations on the NNSS (Figure 6-1) during 2010. They include the following numbers and types of locations:

- Background (B) – 10 locations where radiation effects from NNSS operations are negligible.
- Environmental 1 (E1) – 41 locations where there is no measurable radioactivity from past operations but that are of interest due to the presence of the public in the area and/or the potential for increased radiation exposure from a current operation.
- Environmental 2 (E2) – 35 locations where there is measurable added radioactivity from past operations; these locations are of interest to monitor direct radiation trends in the area. Some locations fitting this description are grouped with the waste operations category below.
- Waste Operations (WO) – 17 locations in and around the Area 3 and Area 5 RWMSs.
- Control (C) – 5 locations in Building 652 and 1 location in Building 650 in Mercury. Control TLDs are kept in stable environments and are used as a quality check on the TLDs and the analysis process.

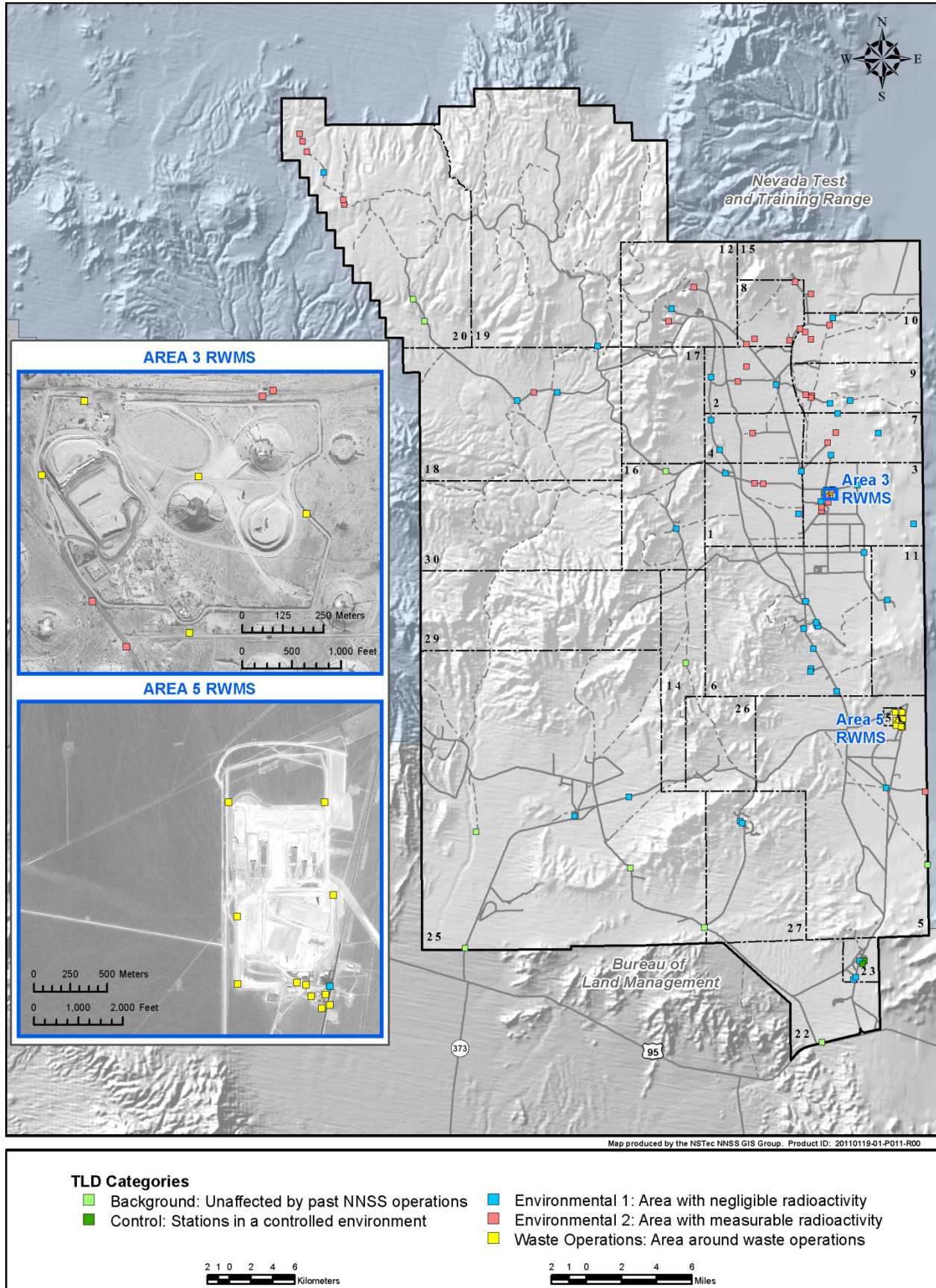


Figure 6-1. Location of TLDs on the NNSS



### 6.2.1 Data Quality

Quality assurance (QA) procedures for TLD monitoring of ambient radiation involve comparing the data from paired TLDs at each location to estimate measurement precision, comparing current and past measurements at each location, and reviewing data from the TLDs in control locations. Five of the six control locations are shielded; the sixth is unshielded, located in Mercury in Building 650. These locations allow one to detect and estimate any systematic variation that might be introduced by the measurement process itself.

At least one TLD of each pair provided data for 434 of the 436 possible quarterly measurements (109 locations for 4 quarters = 436 possible measurements); both TLDs provided data for 433 of these. Agreement between results provided by the paired TLDs was very good, with an average relative percent difference between measurements of 2.9 percent during 2010. The quarter-to-quarter coefficient of variation (CV, identical to the relative standard deviation) ranged from 1.9 to 10.9 percent (median = 4.8 percent) over all locations excluding Gate 100 Truck Parking 1 (see the discussion in Section 6.3.1) but including control locations. This median quarter-to-quarter CV is greater than observed in recent years, but is lower than that observed in 2002 and 2003. For comparison, CV values for control locations have ranged from 1.2 to 10.0 percent in recent years; CVs at control locations tend to be higher than those at environmental locations because the exposure rates are much lower due to shielding.

At a programmatic level, QA and quality control (QC) protocols, including Data Quality Objectives, have been developed and are maintained as essential elements of direct radiation monitoring, as directed by the RREMP. The QA/QC requirements established for the monitoring program include the use of sample packages to thoroughly document each sampling event, rigorous management of databases, and completion of essential training. The Radiological Control Department maintains certification through the U.S. Department of Energy Laboratory Accreditation Program for dosimetry.

### 6.2.2 Data Reporting

Direct radiation is recorded as exposure per unit time in milliroentgens per day (mR/d), calculated by dividing the measured exposure per quarter for each TLD by the number of days the TLD was exposed at its measurement location. These are multiplied by 365 to obtain annualized values. The estimated annual exposure is the average of the quarterly annualized values; it is used to determine compliance with federal annual dose limits.

## 6.3 Results

Estimated annual exposures for all TLD locations are summarized in Table 6-1. Summary statistics for the five location types are given in Table 6-2. During 2010, the average of the estimated annual exposures among the 10 background locations was 116 mR and ranged from 64 to 160 mR (Table 6-2). A 95 percent prediction interval (PI) for annual exposures, based on the 2010 estimated mean annual exposures at the background locations, is 40.6 to 191.9 mR (the “95% PI from B” shown in Figures 6-2, 6-3, and 6-4). This interval predicts mean annual background exposure at locations where radiation effects from NNSS operations are negligible.

For comparison, the CEMP’s estimated annual exposure in Las Vegas, Nevada (at 622 m [2,040 ft] elevation), was 87 mR during 2010 (see Table 7-3). Estimated exposures at CEMP locations ranged from 70 mR at St. George, Utah (792 m [2,600 ft] elevation), to 146 mR at Twin Springs, Nevada (1541 m [5,055 ft] elevation). There is an increasing relationship between exposure and elevation. On the NNSS, background locations with lowest and highest exposures are at elevations 1,087 m (3,568 ft) (for the station named “Area 5, 3.3 Mi SE of Aggregate Pit”) and 1,737 m (5,700 ft) (for the station named “Area 20, Stake A-112”), respectively. Exposure estimates at all locations on the NNSS include the contribution from natural sources. It is important to note that the DOE dose limits to the public are for dose over and above what the public may receive from natural sources.

Table 6-1. Annual direct radiation exposure rates measured at TLD locations on the NNSS in 2010

NNSS Area	Station	Location Type <sup>(b)</sup>	Number of Quarters	Estimated Annual Exposure (mR) <sup>(a)</sup>		
				Mean <sup>(c)</sup>	Minimum <sup>(c)</sup>	Maximum <sup>(c)</sup>
5	3.3 Mi SE of Aggregate Pit	B	4	64	61	67
14	Mid-Valley	B	4	143	135	155
16	Stake P-3	B	4	116	111	125
20	Stake A-112	B	4	160	150	176
20	Stake A-118	B	4	150	142	161
22	Army #1 Water Well	B	4	84	79	90
25	Gate 25-4-P	B	4	131	126	139
25	Guard Station 510	B	4	126	120	129
25	Jackass Flats & A-27 Roads	B	4	82	79	88
25	Skull Mtn Pass	B	4	107	104	114
23	Building 650 Dosimetry	C	4	59	57	62
23	Lead Cabinet, 1	C	4	26	25	27
23	Lead Cabinet, 2	C	4	26	25	27
23	Lead Cabinet, 3	C	4	25	25	26
23	Lead Cabinet, 4	C	4	26	25	27
23	Lead Cabinet, 5	C	4	25	24	26
1	BJY	E1	4	116	111	123
1	Sandbag Storage Hut	E1	4	113	108	118
1	Stake C-2	E1	4	119	115	125
2	Stake M-140	E1	4	132	125	139
2	Stake TH-58	E1	4	92	90	97
3	LANL Trailers	E1	4	121	118	124
3	Stake OB-20	E1	4	87	84	91
3	Well ER 3-1	E1	4	127	121	136
4	Stake TH-41	E1	4	111	107	116
4	Stake TH-48	E1	4	118	110	128
5	Water Well 5B	E1	4	113	109	119
6	CP-6	E1	4	69	66	73
6	DAF East	E1	4	96	93	101
6	DAF North	E1	4	101	97	108
6	DAF South	E1	4	135	127	142
6	DAF West	E1	4	85	82	89
6	Decon Facility NW	E1	4	130	124	140
6	Decon Facility SE	E1	4	133	127	145
6	Stake OB-11.5	E1	4	131	126	140
6	Yucca Compliance	E1	4	91	88	97
6	Yucca Oil Storage	E1	4	98	95	107
7	Reitmann Seep	E1	4	126	121	134
7	Stake H-8	E1	4	128	124	135
9	Papoose Lake Road	E1	4	87	83	90
9	U-9CW South	E1	4	104	98	112
9	V & G Road Junction	E1	4	113	108	118
10	Gate 700 South	E1	4	129	124	136
11	Stake A-21	E1	4	132	124	143
12	Upper N Pond	E1	4	126	118	138
16	3545 Substation	E1	4	140	130	150

Table 6-1. Annual direct radiation exposure rates measured at TLD locations on the NNSS in 2010 (continued)

NNSS Area	Station	Location Type <sup>(b)</sup>	Number of Quarters	Estimated Annual Exposure (mR) <sup>(a)</sup>		
				Mean <sup>(c)</sup>	Minimum <sup>(c)</sup>	Maximum <sup>(c)</sup>
18	Stake A-83	E1	4	143	135	151
18	Stake F-11	E1	4	141	132	153
19	Stake P-41	E1	4	157	146	173
20	Stake J-41	E1	4	133	126	142
23	Gate 100 Truck Parking 1	E1	4	91	73	132
23	Gate 100 Truck Parking 2	E1	4	64	62	66
23	Mercury Fitness Track	E1	4	58	56	63
25	HENRE	E1	4	123	118	131
25	NRDS Warehouse	E1	4	124	118	134
27	Cafeteria	E1	4	114	112	116
27	JASPER-1	E1	4	114	112	119
1	Bunker 1-300	E2	4	120	114	126
1	T1	E2	4	261	249	270
2	Stake L-9	E2	4	167	156	179
2	Stake N-8	E2	4	473	444	510
3	Stake A-6.5	E2	4	140	135	146
3	T3	E2	4	345	331	374
3	T3 West	E2	4	332	323	354
3	T3A	E2	4	376	358	403
3	T3B	E2	4	480	453	520
3	U-3co North	E2	4	183	174	194
3	U-3co South	E2	4	145	140	154
4	Stake A-9	E2	4	579	554	610
5	Frenchman Lake	E2	4	322	308	344
7	Bunker 7-300	E2	4	224	216	242
7	T7	E2	4	117	111	125
8	Baneberry 1	E2	4	353	329	384
8	Road 8-02	E2	4	121	116	130
8	Stake K-25	E2	3	102	98	107
8	Stake M-152	E2	4	160	150	172
9	B9A	E2	4	130	121	138
9	Bunker 9-300	E2	4	120	116	132
9	T9B	E2	4	486	455	532
10	Circle & L Roads	E2	4	118	114	125
10	Sedan East Visitor Box	E2	4	131	126	139
10	Sedan West	E2	4	226	216	245
10	T10	E2	4	248	236	264
12	T-Tunnel #2 Pond	E2	4	236	200	262
12	Upper Haines Lake	E2	4	107	99	116
15	EPA Farm	E2	4	111	105	119
18	Johnnie Boy North	E2	4	141	132	154
20	Palanquin	E2	4	215	197	235
20	Schooner-1	E2	4	639	594	697
20	Schooner-2	E2	4	246	232	261
20	Schooner-3	E2	4	140	136	149
20	Stake J-31	E2	4	162	152	175



**Table 6-1. Annual direct radiation exposure rates measured at TLD locations on the NNSS in 2010 (continued)**

NNSS Area	Station	Location Type <sup>(b)</sup>	Number of Quarters	Estimated Annual Exposure (mR) <sup>(a)</sup>		
				Mean <sup>(c)</sup>	Minimum <sup>(c)</sup>	Maximum <sup>(c)</sup>
3	A3 RWMS Center	WO	4	140	134	148
3	A3 RWMS East	WO	4	135	131	143
3	A3 RWMS North	WO	3	124	119	132
3	A3 RWMS South	WO	4	327	314	351
3	A3 RWMS West	WO	4	127	120	135
5	A5 RWMS East Gate	WO	4	101	96	105
5	A5 RWMS Expansion NE	WO	4	140	136	148
5	A5 RWMS Expansion NW	WO	4	145	137	153
5	A5 RWMS NE Corner	WO	4	125	120	132
5	A5 RWMS NW Corner	WO	4	123	118	131
5	A5 RWMS South Gate	WO	4	107	102	110
5	A5 RWMS SW Corner	WO	4	124	118	133
5	Building 5-31	WO	4	104	100	112
5	WEF East	WO	4	122	116	129
5	WEF North	WO	4	116	113	121
5	WEF South	WO	4	125	120	129
5	WEF West	WO	4	119	114	126

(a) To obtain daily exposure rates, divide exposure measures by 365.

(b) Location types:

B: Background locations

C: Control locations

E1: Environmental locations with exposure rates near background but monitored for potential for increased exposure rates due to NNSS operations

E2: Environmental locations with measurable radioactivity from past operations, excluding those designated WO

WO: Locations in or near waste operations

(c) Mean, minimum, and maximum values from quarterly estimates. In general, each quarterly estimate is the average of two TLD readings per location.

**Table 6-2. Summary statistics for 2010 mean annual direct radiation exposure by TLD location type**

Location Type	Number of Locations	Estimated Annual Exposure (mR)		
		Mean <sup>(a)</sup>	Minimum <sup>(a)</sup>	Maximum <sup>(a)</sup>
Background (B)	10	116	64	160
Control (C)	6	31	25	59
Environmental 1 (E1)	41	114	58	157
Environmental 2 (E2)	35	242	102	639
Waste Operations (WO)	17	135	101	327

(a) Mean, minimum, and maximum values from estimated annual exposures.

### 6.3.1 Potential Exposure to the Public along the NNSS Boundary

Most of the NNSS is not accessible to the public, as only the southern portion of the NNSS borders public land. Therefore, the only place the public has unlimited access is along the southern end of the NNSS.

Gate 100 is the primary entrance point to the NNSS. The outer parking areas are accessible to the public. Trucks hauling radioactive materials, primarily low-level waste (LLW) destined for disposal in the RWMSs, often park outside Gate 100 while waiting to enter the NNSS. Two TLD locations were established in October 2003 to monitor this truck parking area. The TLDs at the north end of the parking area (Gate 100 Truck Parking 2) had an

estimated annual exposure of 64 mR, with quarterly estimates varying between 62 and 66 mR. These values are similar to the lower end of the range of background exposures observed at the NNSS.

The TLD location on the west side of the parking area (Gate 100 Truck Parking 1) has had elevated exposure levels at various times in its history, as documented in previous annual environmental reports. Its average value for 2010 was 91 mR, with quarterly estimates of 80, 132, 80, and 73, respectively. These values are all within the range of background variation; however, the second quarter value is somewhat higher, likely due to exposure to waste shipments.

While the public has access only to the southern portions of the NNSS borders, others may have access to other boundaries of the NNSS. The great majority of the NNSS is bounded by the Nevada Test and Training Range (NTTR). Military or other personnel on the NTTR who are not classified as radiation workers would also be subject to the 100 mrem/yr public dose limit. Nuclear tests on the NTTR (Double Tracks and Project 57) consisted of experiments where weapons were conventionally exploded without going critical (safety experiments). These areas, therefore, have primarily alpha-emitting radionuclides that do not contribute significantly to external dose. Historical nuclear testing activities also occurred on the Tonopah Test Range (TTR) (Clean Slate 1, 2, and 3) located in the northwest portion of the NTTR. Radiation exposure rates are measured on and around the TTR, and the results are reported by Sandia National Laboratories (SNL) in the TTR annual environmental report (SNL, 2011).

A radiological boundary extends beyond the NNSS in the Frenchman Lake region of Area 5 along the southeast boundary of the NNSS. This region was a location of atmospheric weapons testing in the 1950s, and it is inaccessible to the public. A TLD location was established there in July 2003 to characterize direct radiation levels from this legacy soil contaminated area and to assess the external dose to personnel not classified as radiation workers who may visit the area. The estimated annual exposure to a hypothetical person at the Frenchman Lake TLD location during 2010 was 322 mR. This has been consistently declining over time, down from 411 mR in 2004. The resulting above-background dose during 2010 would be approximately 162 to 262 mrem, depending on which background value is subtracted. This would exceed the 100 mrem dose limit to a person residing year-round at this location, but there are no living quarters or full-time workers in this vicinity.

Based on these results, the potential external dose to a member of the public due to past or present operations at the NNSS does not exceed 100 (mrem/yr) (1 mSv/yr) and exposures are kept ALARA, as required by DOE O 5400.5.

### **6.3.2 Exposures from NNSS Operational Activities**

During 2010 there were 41 TLDs in locations where there is negligible radioactivity from past operations but where monitoring is of interest due to either the presence of personnel or the public in the area and/or due to the potential for receiving radiation exposure from current operations (E1 locations). The mean estimated annual exposure at these locations was 114 mR, approximately the same as the mean estimated annual exposure at background locations (see Table 6-2). Overall, annual exposures were not different between B and E1 locations (Figure 6-2) based upon the estimated annual exposures at all E1 locations being within the background-based 95 percent PI. E1 locations were also comparable with the off-NNSS exposures reported by the CEMP stations, as shown in Figure 6-2.

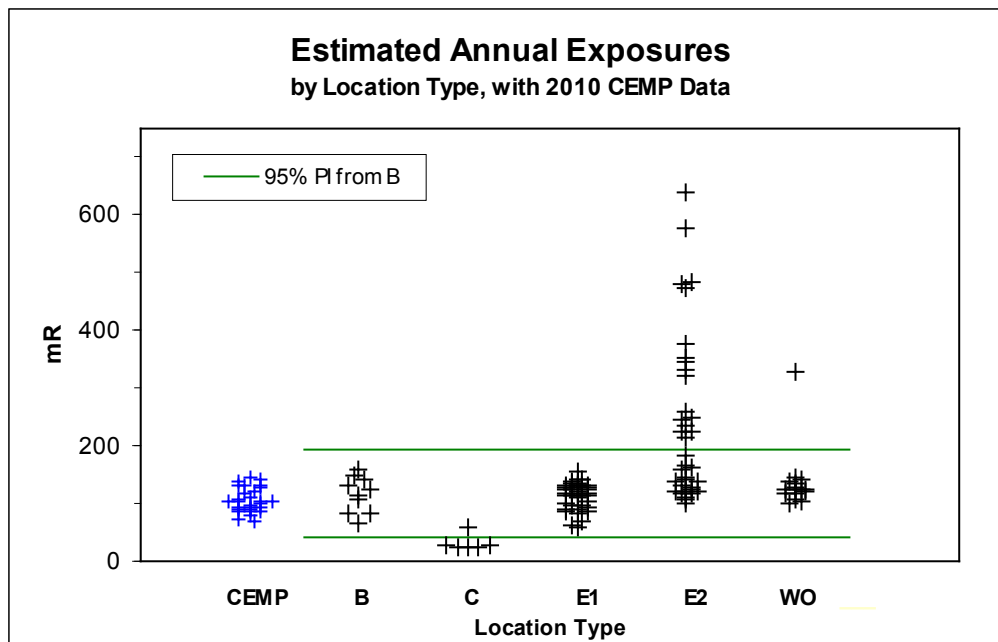


Figure 6-2. 2010 annual exposure rates on the NNSS, by location type, and off the NNSS (CEMP stations)

### 6.3.3 Exposures from RWMSs

DOE M 435.1-1 states that LLW disposal facilities shall be operated, maintained, and closed so that a reasonable expectation exists that annual dose to members of the public shall not exceed 25 mrem from all exposure pathways combined. Given that the RWMSs are located well within the NNSS boundaries that control entry, no member of the public could access these areas for significant periods of time. However, TLDs are placed at the RWMSs to show the potential dose from external radiation to a hypothetical person residing year-round at each RWMS (see Section 9.1.2 of this report for a summary of the potential dose to the public from the RWMSs from all exposure pathways).

The Area 3 RWMS is located in Yucca Flat. Between 1952 and 1972, 60 nuclear weapons tests were conducted within 400 m (1,312 ft) of the Area 3 RWMS boundary. Fourteen of these tests were atmospheric tests that left radionuclide-contaminated surface soil and, therefore, elevated radiation exposures across the area. Waste pits in the Area 3 RWMS are subsidence craters from seven subsurface tests, which are filled with LLW and then covered with clean soil. As a result, exposures inside the Area 3 RWMS are low when compared with average exposures at the fence line or in Area 3 outside the fence line.

Annual exposures during 2010 in and around the Area 3 RWMS are shown in Figure 6-3. The exposures measured inside the Area 3 RWMS and three of four measurements at the boundary were within the range of background exposures. The estimated exposure above the range of NNSS background levels at one location on the RWMS boundary is associated with historical aboveground nuclear weapon test locations. Under these conditions, current Area 3 RWMS operations would have contributed negligible external exposure to a hypothetical person residing at the Area 3 RWMS boundary during 2010.

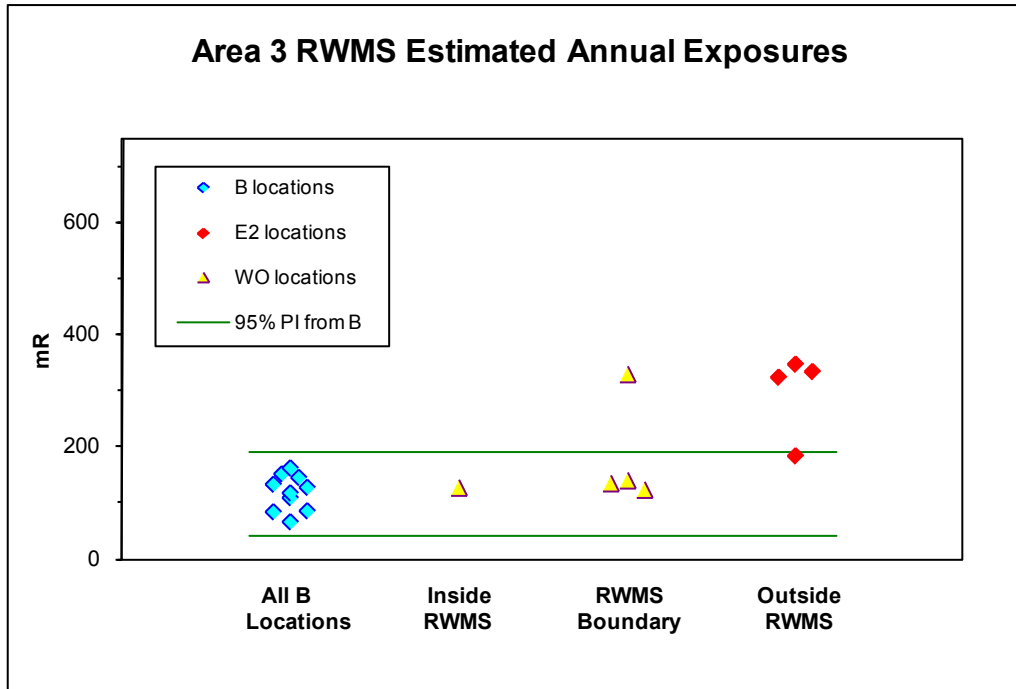


Figure 6-3. 2010 annual exposure rates in and around Area 3 RWMS and at background locations

The Area 5 RWMS is located in the northern portion of Frenchman Flat. Between 1951 and 1971, 25 nuclear weapons tests were conducted within 6.3 kilometers (km) (3.9 miles [mi]) of the Area 5 RWMS. Fifteen of these were atmospheric tests, and, of the remaining ten, nine released radioactivity to the surface, which contributes to exposures in the area. No nuclear weapons testing occurred within the boundaries of the Area 5 RWMS. During 2010, estimated annual exposures at Area 5 RWMS TLD locations were within the range of exposures measured at NNSS background locations (Figure 6-4). The one exposure rate outside the RWMS in Area 5 that was higher than background levels was within 0.5 km (0.3 mi) of six atmospheric tests in Frenchman Lake Playa.

Based on these results, the potential external dose to a member of the public from operations at the Area 3 and Area 5 RWMSs does not exceed the 25 mrem/yr (0.25 mSv/yr) dose limit to members of the public, specified in DOE M 435.1-1. See Section 9.1.2 of this report for a summary of the potential dose to the public from the RWMSs from all exposure pathways.

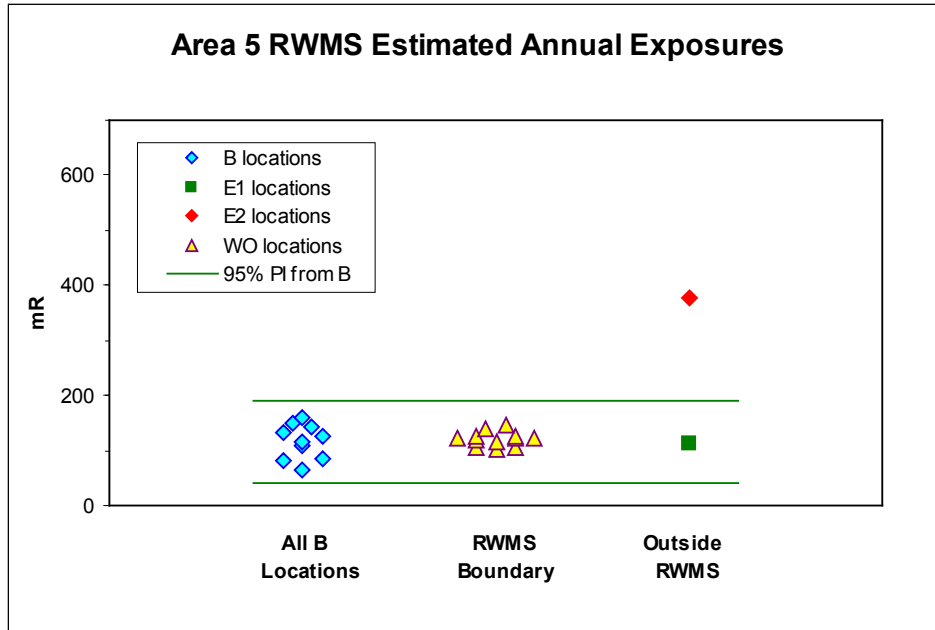


Figure 6-4. 2010 annual exposure rates around Area 5 RWMS and at background locations

### 6.3.4 Exposures to NNSS Plants and Animals

The highest exposure rate at any TLD location during 2010 was 697 mR/yr (1.91 mR/d) at the Schooner-1 location during the second quarter (Table 6-1). Given such a large area source, there is very little difference between the exposure measured at a height of 1 m (3.3 ft) and that measured at an elevation near the ground (e.g., 3 centimeters [1.2 in.]) where small plants and animals reside. The daily exposure rate at the Schooner-1 location at a height of 1 m or near the surface would be less than 2 percent of the most stringent total dose rate to biota, which is the 0.1 rad/d (approximately 100 mR/d) limit to terrestrial animals stated in DOE-STD-1153-2002. Hence, doses to plants and animals from external radiation exposure at NNSS monitoring locations are low compared with the dose limit. Dose to biota from both internal and external radionuclides is presented in Chapter 9.

### 6.3.5 Exposure Patterns in the Environment over Time

DOE O 450.1A states that environmental monitoring should be conducted in order to characterize releases from DOE activities. Continued monitoring of exposures at locations of past releases on the NNSS helps to accomplish this. Small quarter-to-quarter changes are normally seen in exposure rates from all locations. During 2010, the CVs for measurements between quarters averaged 5 percent.

Long-term trends are displayed in Figure 6-5 by location type for locations that have been monitored for at least 10 years. As expected, the C and B locations show virtually no net change through time due to the protected locations and lack of added man-made radionuclides. Among all locations with at least 10-year data histories, the exposure rates at E1 locations decreased at an average rate of 0.43 percent per year, the rates at E2 locations decreased 1.85 percent per year on average, and the rates at WO locations decreased 0.75 percent per year on average. Exposure rates decreased 3.59 percent per year on average at those locations with significant added man-made radiation, which are the E2 and WO locations with 2010 exposure rates higher than the background-based PI. These average rates of decay are very similar to those of 2009 and 2008. The observed decreases are due to a combination of natural radioactive decay and the dispersal and shielding of radionuclides in the environment.

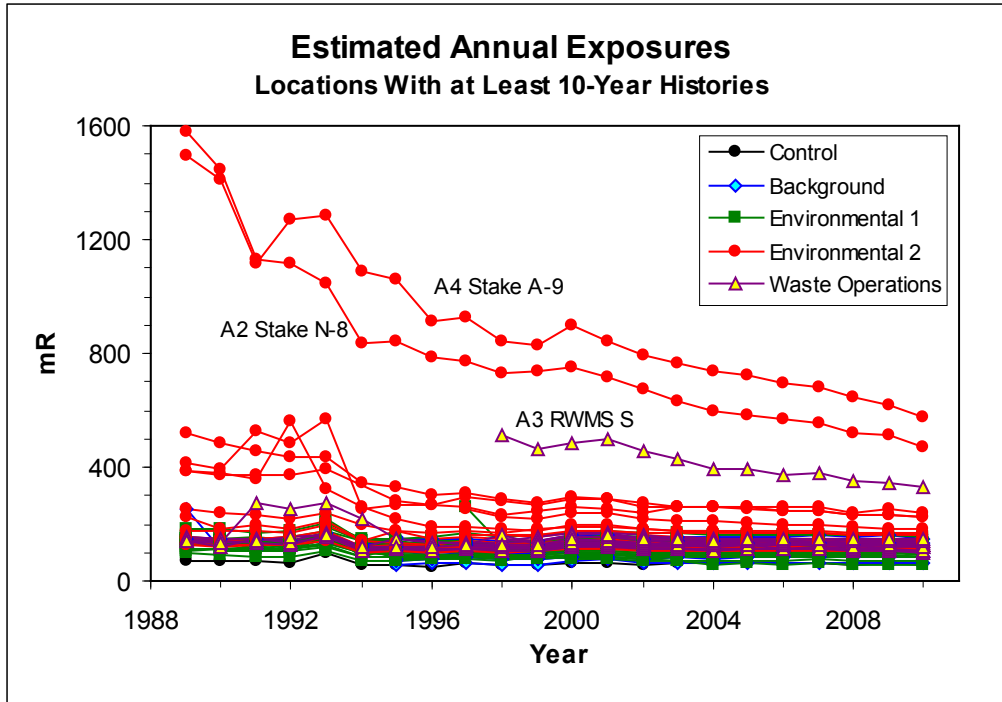


Figure 6-5. Trends in direct radiation exposure measured at TLD locations

The Schooner-1 location, which has the highest exposure of any current NNSS location, is not included in Figure 6-5 because it was established in 2003 and does not yet have a 10-year history. The two highest exposures shown in Figure 6-5, Stake A-9 in Area 4 and Stake N-8 in Area 2, are decreasing by 4.0 and 4.7 percent per year, respectively; these correspond to half-lives of about 17 and 14 years. The location with the next highest exposure shown in Figure 6-5 is the WO location RWMS South in Area 3, which is decreasing by 3.7 percent per year.

## 6.4 Environmental Impact

Direct radiation exposure to the public from NNSS operations in 2010 was negligible. Radionuclides historically released to the environment on the NNSS have resulted in localized elevated exposures. These areas of elevated exposure are not open to the public, nor do personnel work in these areas full-time. Overall exposures at the RWMSs appear to be generally lower inside and at the boundary compared with those outside the RWMSs. This is likely due to the presence of radionuclides released from historical testing distributed throughout the area around the RWMSs compared with the clean soil used inside the RWMSs to cap waste pits. The external dose to plants and animals at the location with the highest measured exposure was a small fraction of the dose limit to biota; hence, no detrimental effects to biota from external radiation exposure are expected at the NNSS.

## 7.0 Community Environmental Monitoring Program

Community oversight for the Nevada National Security Site (NNSS) is provided through the Community Environmental Monitoring Program (CEMP), whose mission is to monitor and communicate environmental data that are relevant to the safety and well-being of participating communities and their surrounding areas. Previously, the CEMP network functioned as a first line of offsite detection of potential radiation releases from underground nuclear tests at the NNSS, and it can be outfitted to fulfill this role again should underground testing resume. It currently exists as a non-regulatory public informational and outreach program, although quarterly reporting of monitoring data is furnished to the Nevada Division of Environmental Protection and the U.S. Environmental Protection Agency (EPA) Region IX as a supplemental requirement to NNSS onsite monitoring. The CEMP is sponsored by the U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office (NNSA/NSO), and is administered and operated by the Desert Research Institute (DRI) of the Nevada System of Higher Education.

Monitored and collected data include, but are not necessarily limited to, background and airborne radiation data, meteorological data, and tritium concentrations in community and ranch drinking water. Network air monitoring stations, located in Nevada, Utah, and California, are managed by local citizens, many of them high school science teachers, whose routine tasks are to ensure equipment is operating normally and to collect air filters and route them to the DRI for analysis. These Community Environmental Monitors (CEMs) are also available to discuss the monitoring results with the public and to speak to community and school groups. DRI's responsibilities include maintaining the physical monitoring network through monthly visitations by environmental radiation monitoring specialists, who also participate in training and interfacing with CEMs and interacting with other local community members and organizations to provide information related to the monitoring data. DRI also provides public access to the monitoring data through maintenance of a project website at <http://www.cemp.dri.edu/>. A detailed informational background narrative about the CEMP can be found at <http://www.cemp.dri.edu/cemp/moreinfo.html> along with more detailed descriptions of the various types of sensors found at the stations and on outreach activities conducted by the CEMP.

<i>CEMP Goals</i>	<i>Analytes Monitored</i>												
Monitor offsite environmental conditions and communicate environmental data relevant to past and continuing activities at the NNSS Engage the public hands-on in monitoring environmental conditions in their communities relative to activities at the NNSS Communicate environmental monitoring data to the public in a transparent and accessible manner Provide an educated, trusted, local resource for public inquiries and concerns regarding past and present activities at the NNSS	<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top;"><u>In Air:</u></td> <td style="width: 50%; vertical-align: top;"><u>In Water:</u></td> </tr> <tr> <td>Gross alpha radioactivity</td> <td>Tritium (<sup>3</sup>H)</td> </tr> <tr> <td colspan="2">Gross beta radioactivity</td> </tr> <tr> <td colspan="2">Gamma-emitting radionuclides</td> </tr> <tr> <td colspan="2">Ambient gamma radiation</td> </tr> <tr> <td colspan="2">Meteorological parameters</td> </tr> </table>	<u>In Air:</u>	<u>In Water:</u>	Gross alpha radioactivity	Tritium ( <sup>3</sup> H)	Gross beta radioactivity		Gamma-emitting radionuclides		Ambient gamma radiation		Meteorological parameters	
<u>In Air:</u>	<u>In Water:</u>												
Gross alpha radioactivity	Tritium ( <sup>3</sup> H)												
Gross beta radioactivity													
Gamma-emitting radionuclides													
Ambient gamma radiation													
Meteorological parameters													

### 7.1 Offsite Air Monitoring

During 2010, 29 CEMP stations managed by DRI composed the Air Surveillance Network (ASN) (Figure 7-1). The ASN stations include various types of equipment as described below. The Mesquite, Nevada, CEMP station is shown in Figure 7-2.

**CEMP Low-Volume Air Sampling Network** – During 2010, the CEMP ASN included continuously operating low-volume particulate air samplers located at 27 of the 29 CEMP station locations. No low-volume air samplers were located at Medlin's Ranch or Warm Springs Summit, Nevada, during 2010. Duplicate air samples were collected from up to three ASN stations each week. The duplicate samplers are operated at randomly selected stations for 3 months (one calendar quarter) before being moved to a new location.



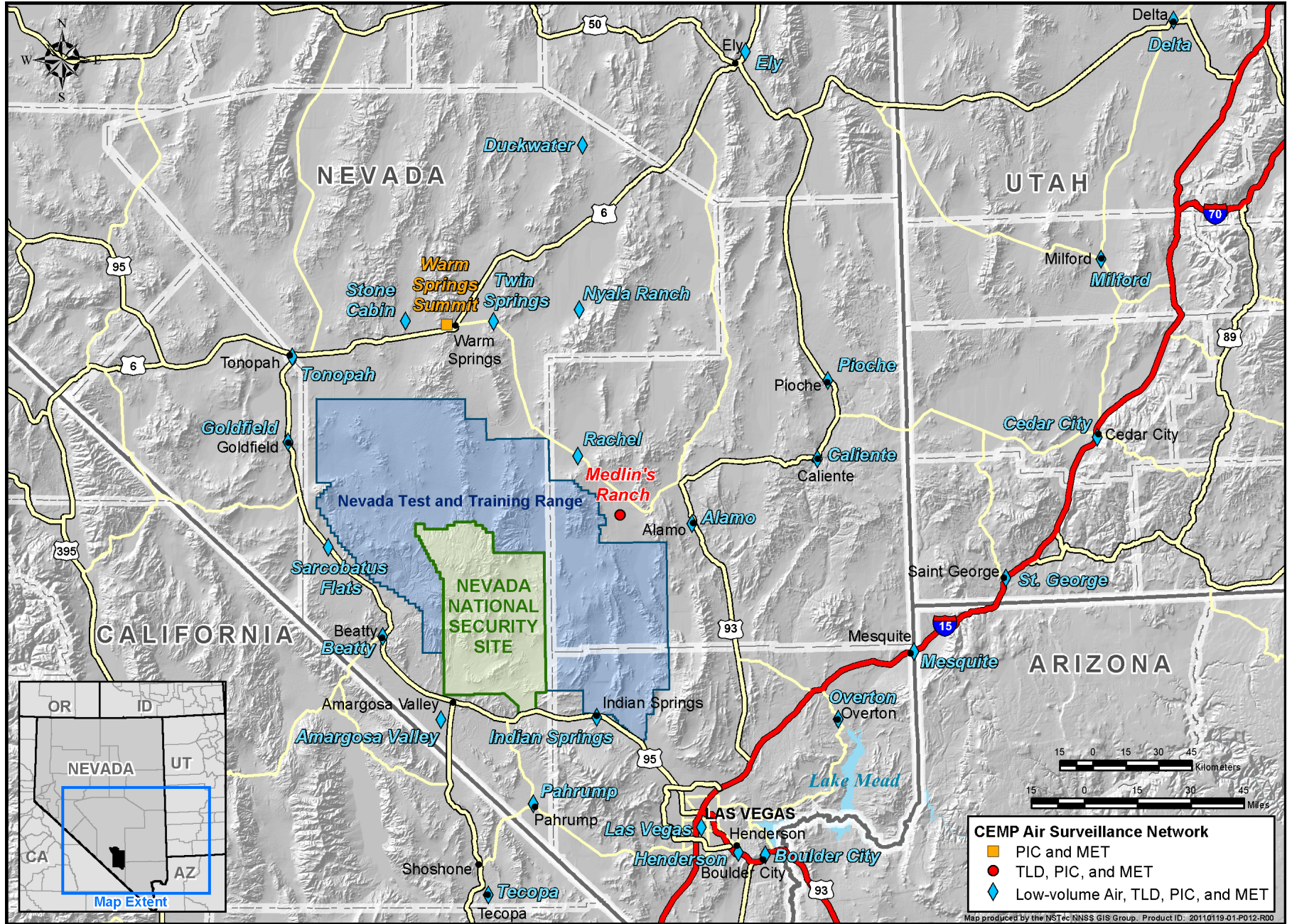


Figure 7-1. 2010 CEMP Air Surveillance Network

Map produced by the NSTec/NNSS GIS Group. Product ID: 20110119-01-P012-R00





**Figure 7-2. CEMP Station at Mesquite, Nevada**

Glass-fiber filters from the low-volume particulate samplers are collected by the CEMs and mailed to DRI, where they are prepared and forwarded to an independent laboratory to be analyzed for gross alpha and gross beta activity. Samples are held for a minimum of 7 days after collection to allow for the decay of naturally occurring radon progeny. Upon completion of the gross alpha/beta analyses, the filters are returned to DRI to be composited on a quarterly basis for gamma spectroscopy analysis.

**CEMP Thermoluminescent Dosimetry Network** – Thermoluminescent dosimetry is used to measure both individual and population external exposure to ambient radiation from natural and artificial sources. In 2010, this network consisted of fixed environmental thermoluminescent dosimeters (TLDs) at 28 of the 29 CEMP stations (see Figure 7-1). A TLD is not currently deployed at Warm Springs Summit due to limited access during the winter months. The TLD used is a Panasonic UD-814AS. Within the TLD, a slightly shielded lithium borate element is used to check low-energy radiation levels while three calcium sulfate elements are used to measure penetrating gamma radiation. For quality assurance (QA) purposes, duplicate TLDs are deployed at three randomly selected environmental stations. An average daily exposure rate was calculated for each quarterly exposure period. The average of the quarterly values was multiplied by 365.25 days to obtain the total annual exposure for each station.

**CEMP Pressurized Ion Chamber (PIC) Network** – The PIC detector measures gamma radiation exposure rates and, because of its sensitivity, may detect low-level exposures that go undetected by other monitoring methods. PICs are in place at all 29 stations in the CEMP network (see Figure 7-1). The primary function of the PIC network is to detect changes in ambient gamma radiation due to human activities. In the absence of such activities, ambient gamma radiation rates vary naturally among locations, reflecting differences in altitude (cosmic radiation), radioactivity in the soil (terrestrial radiation), and slight variations at a single location due to weather patterns. Because a full suite of meteorological data is recorded at each CEMP station, variations in PIC readings caused by weather events such as precipitation or changes in barometric pressure are more readily identified. Variations can be easily viewed by selecting a station location on the Graph link from the CEMP home page, <http://www.cemp.dri.edu/>, then selecting the desired variables.

**CEMP Meteorological (MET) Network** – Because changing weather conditions can have an effect on measurable levels of background radiation, meteorological instrumentation is in place at each of the 29 CEMP stations. The MET network includes sensors that measure air temperature, humidity, wind speed and direction, solar radiation, barometric pressure, precipitation, and soil temperature and moisture data. All of these data can be observed real-time at the onsite station display, and archived data are available by accessing the CEMP home page at <http://www.cemp.dri.edu/>.

### 7.1.1 Air Particulate Sampling Results

During 2010, CEMP air samples were collected on a bi-weekly basis. This sampling frequency, which began in the last quarter of 2008, results in the possible collection of 26 samples per year for each station. Samples of airborne particulates from CEMP ASN stations were collected by drawing air through a 5-centimeter (2-inch) diameter glass-fiber filter at a constant flow rate of 49.5 liters (1.75 cubic feet [ft<sup>3</sup>]) per minute at standard temperature and pressure. The actual flow rate and total volume were measured with an in-line air-flow calibrator.

The filter is mounted in a holder that faces downward at a height of approximately 1.5 meters (m) (5 feet [ft]) above the ground. The total volume of air collected ranged from approximately 1,030 to 1,290 cubic meters (m<sup>3</sup>) (36,000 to 45,000 ft<sup>3</sup>), depending on the elevation of the station and changes in air temperature and/or pressure.

#### 7.1.1.1 Gross Alpha and Gross Beta

Analyses of gross alpha and beta in airborne particulate samples are used to screen for long-lived radionuclides in the air. The mean annual gross alpha activity across all sample locations was  $1.22 \pm 0.24 \times 10^{-15}$  microcuries per milliliter ( $\mu\text{Ci}/\text{mL}$ ) ( $4.51 \pm 0.89 \times 10^{-5}$  becquerels [ $\text{Bq}/\text{m}^3$ ]) (Table 7-1). Gross alpha was detectable in most of the 2010 air samples, and, overall, gross alpha levels of activity were similar to results from previous years. Figure 7-3 shows the long-term maximum, mean, and minimum alpha trend for the CEMP stations as a whole.

**Table 7-1. Gross alpha results for the CEMP offsite ASN in 2010**

Sampling Location	Number of Samples	Concentration ( $\times 10^{-15} \mu\text{Ci}/\text{mL}$ [ $3.7 \times 10^{-5} \text{Bq}/\text{m}^3$ ])			
		Mean	Standard Deviation	Minimum	Maximum
Alamo	26	1.57	1.14	0.47	4.67
Amargosa Valley	26	1.20	0.60	0.44	2.88
Beatty	26	1.24	0.52	0.38	2.29
Boulder City	26	1.45	0.69	0.69	3.25
Caliente	25	1.78	0.77	0.67	3.81
Cedar City	26	0.84	0.33	0.30	1.92
Delta	26	1.05	0.67	0.46	3.35
Duckwater	26	1.13	0.66	0.45	3.07
Ely	24	0.89	0.44	0.31	2.20
Garden Valley	26	1.07	0.55	0.30	2.95
Goldfield	26	1.08	0.50	0.31	2.44
Henderson	26	1.26	0.66	0.27	3.17
Indian Springs	26	1.20	0.55	0.52	2.58
Las Vegas	26	1.11	0.49	0.45	2.54
Mesquite	26	1.45	0.81	0.58	3.91
Milford	26	1.23	0.68	0.36	3.07
Nyala Ranch	25	1.17	1.14	0.50	5.87
Overton	26	1.11	0.62	0.47	3.12
Pahrump	26	1.25	0.72	0.49	3.44
Pioche	26	1.00	0.47	0.34	2.08
Rachel	26	1.18	0.91	0.31	4.25
Sarcobatus Flats	26	1.88	1.40	0.77	5.22
Stone Cabin Ranch	26	1.04	0.42	0.53	2.10
St. George	26	1.12	0.50	0.62	2.65
Tecopa	26	1.33	1.19	0.67	6.91
Tonopah	26	1.03	0.46	0.46	2.53
Twin Springs	26	1.25	1.08	0.43	4.50
<b>Network Mean = <math>1.22 \pm 0.24 \times 10^{-15} \mu\text{Ci}/\text{mL}</math></b>					
<b>Mean Minimum Detectable Concentration (MDC; see Glossary, Appendix B) = <math>0.43 \times 10^{-15} \mu\text{Ci}/\text{mL}</math></b>					
<b>Standard Error of Mean MDC = <math>0.04 \times 10^{-15} \mu\text{Ci}/\text{mL}</math></b>					

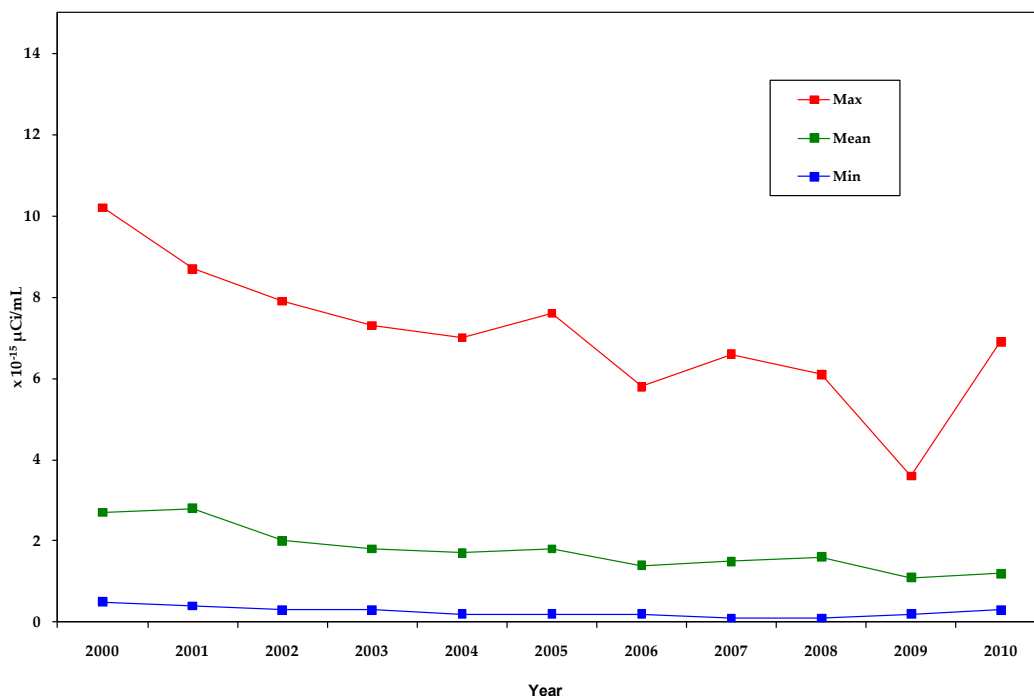


Figure 7-3. Historical trend for gross alpha analysis for all CEMP stations

The mean annual gross beta activity across all sample locations (Table 7-2) was  $1.76 \pm 0.18 \times 10^{-14} \mu\text{Ci/mL}$  ( $6.51 \pm 0.67 \times 10^{-4} \text{Bq/m}^3$ ). Gross beta activity was detected in most air samples and was similar to previous years' levels. Figure 7-4 shows the long-term maximum, mean, and minimum beta trend for the CEMP stations as a whole.

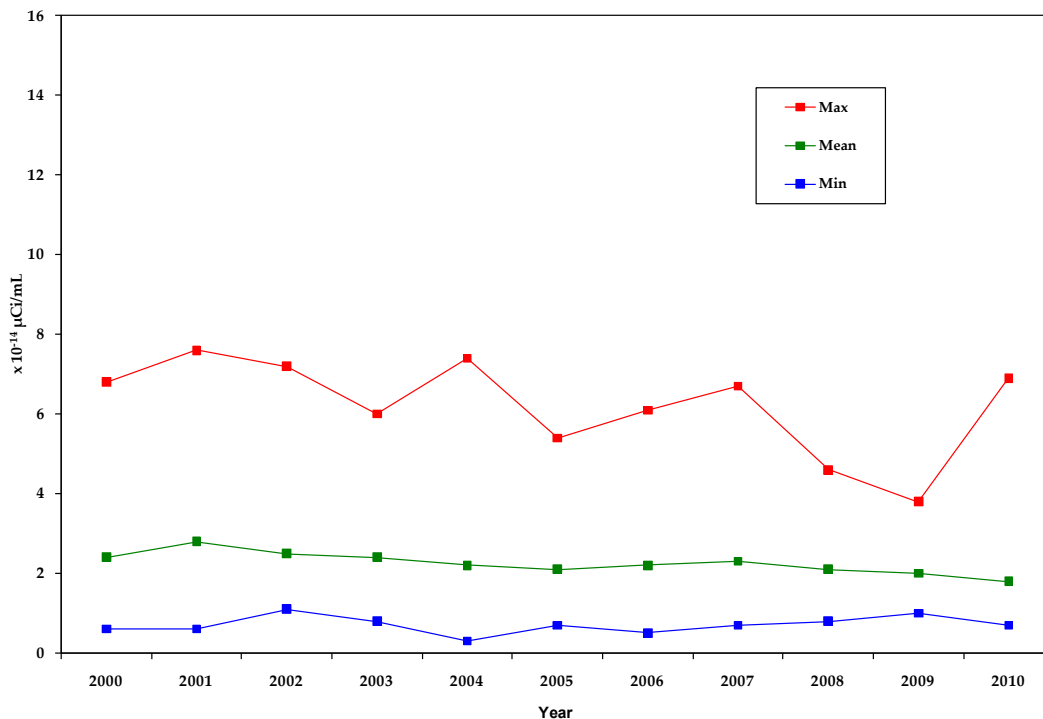
Table 7-2. Gross beta results for the CEMP offsite ASN in 2010

Sampling Location	Number of Samples	Concentration ( $\times 10^{-14} \mu\text{Ci/mL}$ [ $3.7 \times 10^{-4} \text{Bq/m}^3$ ])			
		Mean	Standard Deviation	Minimum	Maximum
Alamo	26	1.67	0.41	1.02	2.63
Amargosa Valley	26	1.77	0.44	0.95	2.54
Beatty	26	1.65	0.35	0.90	2.33
Boulder City	26	2.15	0.57	1.04	3.38
Caliente	25	1.88	0.44	1.25	3.07
Cedar City	26	1.51	0.39	0.92	2.16
Delta	26	1.75	0.61	0.99	3.62
Duckwater	26	1.70	0.57	0.83	3.43
Ely	24	1.50	0.37	0.86	2.15
Garden Valley	26	1.73	0.44	1.03	2.70
Goldfield	26	1.63	0.43	0.81	2.50
Henderson	26	1.86	0.46	1.01	2.89
Indian Springs	26	1.75	0.41	1.00	2.40
Las Vegas	26	1.75	0.46	0.75	2.55
Mesquite	26	2.04	0.62	1.33	4.26
Milford	26	1.95	0.65	1.17	3.57
Nyala Ranch	25	1.81	1.12	1.09	6.86
Overton	26	1.94	0.57	1.14	3.34

**Table 7-2. Gross beta results for the CEMP offsite ASN in 2010 (continued)**

Sampling Location	Number of Samples	Concentration ( $\times 10^{-14} \mu\text{Ci/mL}$ [ $3.7 \times 10^{-4} \text{Bq/m}^3$ ])			
		Mean	Standard Deviation	Minimum	Maximum
Pahrump	26	1.74	0.41	0.97	2.46
Pioche	26	1.41	0.40	0.74	2.19
Rachel	26	1.78	0.64	0.89	4.33
Sarcobatus Flats	26	1.86	0.51	0.98	3.06
Stone Cabin	26	1.50	0.30	1.02	2.19
St. George	26	1.94	0.69	1.13	4.47
Tecopa	26	1.90	0.51	0.92	2.99
Tonopah	26	1.54	0.39	0.93	2.35
Twin Springs	26	1.85	0.85	0.99	4.98

**Network Mean =  $1.76 \pm 0.18 \times 10^{-14} \mu\text{Ci/mL}$**   
**Mean MDC =  $0.06 \times 10^{-14} \mu\text{Ci/mL}$       Standard Error of Mean MDC =  $0.01 \times 10^{-14} \mu\text{Ci/mL}$**



**Figure 7-4. Historical trend for gross beta analysis for all CEMP stations**

The mean gross alpha results show a generally decreasing trend for the past 10 years from 2000 to 2010. Likewise, the gross beta results show a similar trend for the same time period. Although the downward trend in the mean data since 2001 for gross beta is not as pronounced, even arguably level, the maximum values do suggest a downward trend is likely. These trends are also reflected by most of the stations on an individual basis. The decreasing trends since 2001 can most likely be explained as an overall gradual decrease in severity of persistent drought conditions throughout the southwest and Great Basin states. Drought in these regions has existed to varying degrees since 1996. Variations in drought conditions could be directly responsible for increases and decreases in suspended air particles collected by the air sampling network. The slight decrease in mean values since 2001 may indicate a minor change in the severity of drought conditions, but overall remain greater than pre-drought values prior to 1996 (not shown).

### 7.1.1.2 Gamma Spectroscopy

Gamma spectroscopy analysis was performed on all samples from the low-volume air sampling network. The filters were composited by station on a quarterly basis after gross alpha/beta analysis. As in previous years, all samples were gamma-spectrum negligible with respect to man-made radionuclides (i.e., gamma-emitting radionuclides were not detected). In most of the samples, naturally occurring beryllium-7 ( $^7\text{Be}$ ) was detectable. This radionuclide is produced by cosmic ray interaction with nitrogen in the atmosphere. The mean annual activity for  $^7\text{Be}$  for the sampling network was  $1.00 \pm 0.66 \times 10^{-13} \mu\text{Ci/mL}$ .

### 7.1.2 TLD Results

TLDs measure ionizing radiation from all sources, including natural radioactivity from cosmic or terrestrial sources and from man-made radioactive sources. The TLDs are mounted in a plexiglass holder approximately 1 m (3.3 ft) above the ground and are exchanged quarterly. TLD results are not presented for the Warm Springs Summit, Nevada, station at this time because its access is limited in the winter months. This does not allow for a proper quarterly change of the TLD as required. The total annual exposure for 2010 ranged from 70 milliroentgens (mR) (0.70 millisieverts [mSv]) at St. George, Utah, to 146 mR (1.46 mSv) at Twin Springs, Nevada, with a mean annual exposure of 106 mR (1.06 mSv) for all operating locations. Results are summarized in Table 7-3 and are consistent with previous years' data. Figure 7-5 shows the long-term trend for the CEMP stations as a whole.

**Table 7-3. TLD monitoring results for the CEMP offsite ASN in 2010**

Sampling Location	Number of Quarters	Estimated Annual Exposure (mR) <sup>(a)</sup>		
		Mean <sup>(b)</sup>	Minimum <sup>(b)</sup>	Maximum <sup>(b)</sup>
Alamo	4	106	96	120
Amargosa Valley	4	94	87	100
Beatty	4	129	112	140
Boulder City	4	94	86	101
Caliente	4	104	100	108
Cedar City	4	81	76	84
Delta	4	86	84	88
Duckwater	4	103	97	109
Ely	4	91	82	96
Garden Valley	4	139	127	148
Goldfield	4	110	104	120
Henderson	4	102	97	110
Indian Springs	4	90	83	97
Las Vegas	4	87	80	94
Medlin's Ranch	4	132	120	144
Mesquite	4	95	86	106
Milford	4	130	124	136
Nyala Ranch	4	100	93	108
Overton	4	87	78	96
Pahrump	4	73	70	76
Pioche	4	102	96	108
Rachel	4	118	100	124
Sarcobatus Flats	4	140	128	149
Stone Cabin Ranch	4	131	116	145
St. George	4	70	68	76
Tecopa	4	97	90	104
Tonopah	4	122	112	127
Twin Springs	4	146	138	153

(a) To obtain daily exposure rates, divide annual exposure rates by 365

(b) Mean, minimum, and maximum values are from quarterly estimates

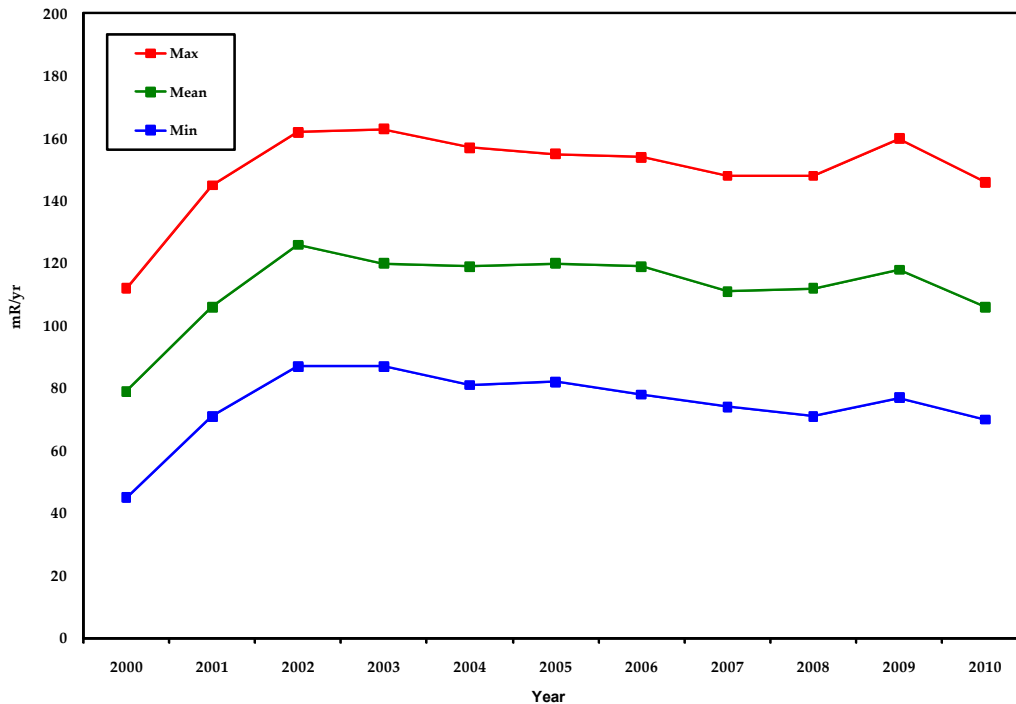


Figure 7-5. Historical trend for TLD analysis for all CEMP stations

With the exception of an increase in values from 2000 to 2002, the TLD data show a generally decreasing trend for the past 8 years from 2002 to 2010. The 2010 results are slightly lower than 2009, but continue to be consistent with previous data. The TLD trends generally mirror those for gross alpha and beta analyses. This again may be consistent with minor changes in drought conditions observed in the regions around the monitoring network as described in Section 7.1.1.1.

### 7.1.3 PIC Results

The PIC data presented in this section are based on daily averages of gamma exposure rates from each station. Table 7-4 contains the maximum, minimum, and standard deviation of daily averages (in microrentgens per hour [ $\mu\text{R/hr}$ ]) for the periods during 2010 when telemetry data were available. It also shows the average gamma exposure rate for each station during the year (in  $\mu\text{R/hr}$ ) as well as the total annual exposure (in milliroentgens per year [ $\text{mR/yr}$ ]). The exposure rate ranged from 72.71  $\text{mR/yr}$  (0.73  $\text{mSv/yr}$ ) in Pahrump, Nevada, to 174.32  $\text{mR/yr}$  (1.74  $\text{mSv/yr}$ ) in Warm Springs Summit, Nevada. Background levels of environmental gamma exposure rates in the United States (from combined effects of terrestrial and cosmic sources) vary between 49 and 247  $\text{mR/yr}$  (BEIR III, 1980). Averages for selected regions of the United States were compiled by the EPA and are shown in Table 7-5. The annual exposure levels observed at the CEMP stations in 2010 are well within these United States background levels, and are consistent with previous years' exposure rates.

Table 7-4. PIC monitoring results for the CEMP offsite ASN in 2010

Sampling Location	Daily Average Gamma Exposure Rate ( $\mu\text{R/hr}$ )				Annual Exposure (mR/yr)
	Mean	Standard Deviation	Minimum	Maximum	
Alamo	13.70	0.25	12.9	14.5	120.01
Amargosa Valley	12.05	0.45	10.9	13.2	105.56
Beatty	17.05	0.24	16.3	17.8	149.36
Boulder City	15.30	0.15	14.8	15.8	134.03
Caliente	15.95	0.26	15.1	16.8	139.72
Cedar City	11.45	0.25	10.3	12.6	100.30
Delta	12.15	0.23	10.9	13.4	106.43
Duckwater	14.75	0.43	13.4	16.10	129.21
Ely	12.30	0.32	11.2	13.4	107.75
Garden Valley	17.50	0.75	15.1	19.9	153.30
Goldfield	15.15	0.36	13.8	16.5	132.71
Henderson	13.80	0.16	13.2	14.4	120.89
Indian Springs	11.25	0.22	10.7	11.8	98.55
Las Vegas	11.05	0.34	10.2	11.9	96.80
Medlin's Ranch	16.90	0.30	16.0	17.8	148.04
Mesquite	12.05	0.19	11.3	12.8	105.56
Milford	17.50	0.53	15.3	19.7	153.30
Nyala Ranch	13.65	0.43	12.5	14.8	119.57
Overton	11.15	0.88	9.6	12.7	97.67
Pahrump	8.30	0.16	7.8	8.8	72.71
Pioche	14.20	0.61	12.3	16.1	124.39
Rachel	15.05	0.31	13.9	16.2	131.84
Sarcobatus Flats	16.90	0.68	15.6	18.2	148.04
Stone Cabin Ranch	16.50	0.60	14.7	18.3	148.04
St. George	10.55	0.25	9.4	11.7	92.42
Tecopa	14.75	0.28	13.8	15.7	129.21
Tonopah	16.10	0.30	15.1	17.1	141.04
Twin Springs	19.40	0.53	17.5	21.3	169.94
Warm Springs Summit	19.90	0.53	18.0	21.8	174.32

Table 7-5. Average natural background radiation for selected U.S. cities (excluding radon)

City	Radiation (mR/yr)
Denver, CO	164.6
Fort Worth, TX	68.7
Las Vegas, NV	69.5
Los Angeles, CA	73.6
New Orleans, LA	63.7
Portland, OR	86.7
Richmond, VA	64.1
Rochester, NY	88.1
St. Louis, MO	87.9
Tampa, FL	63.7
Wheeling, WV	111.9

Source: <http://www.wrcc.dri.edu/cemp/Radiation.html>. "Radiation in Perspective," August 1990 (Access Date: 3/22/2010)



### 7.1.4 Environmental Impact

Results of analyses conducted on data obtained from the CEMP network of low-volume particulate air samplers, TLDs, and PICs showed no measurable evidence at CEMP station locations of offsite impacts from radionuclides originating on the NNSS. Activity observed in gross alpha and beta analyses of low-volume air sampler filters was consistent with previous years' results and is within the range of activity found in other communities of the United States that are not adjacent to man-made radiation sources. Also, no man-made gamma-emitting radionuclides were detected. Likewise, TLD and PIC results remained consistent with previous years' background levels and are well within average background levels observed in other parts of the United States (see Table 7-5).

Occasional elevated gamma readings (10–50 percent above normal average background) in 2010 were always associated with precipitation events and/or low barometric pressure. Low barometric pressure can result in the release of naturally occurring radon and its daughter products from the surrounding soil and rock substrates. Precipitation events can result in the “rainout” of globally distributed radionuclides occurring as airborne particulates in the upper atmosphere. Figure 7-6, generated from the CEMP website, illustrates an example of this phenomenon.

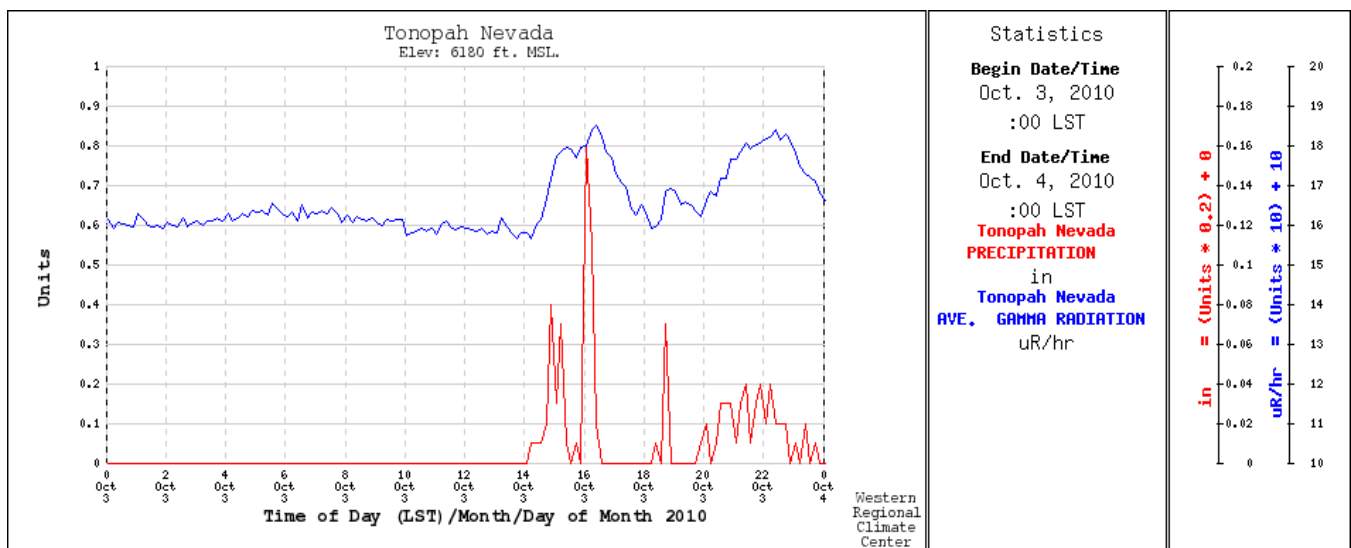


Figure 7-6. The effect of meteorological phenomena on background gamma readings

### 7.1.5 Air Monitoring in Response to Japan Nuclear Reactor Accident

On March 11, 2011, during the preparation of this 2010 environmental report, a large earthquake and resulting tsunami damaged the Fukushima Nuclear Power Plant in Japan. The damage caused the failure of cooling and safety systems, resulting in the atmospheric release of radiological materials from the reactor site. In response, on March 21, 2011, the CEMP installed additional air samplers at existing sampling stations in the network to determine if radiological materials could be detected from the accident. Air samplers equipped with glass fiber filters backed by charcoal cartridges were co-located at the Las Vegas and Henderson stations. This configuration allowed for the collection of air particulates as well as radioiodine not attached to dust particles. Samples were changed every 2 to 3 days and submitted for gamma spectroscopy analysis. In addition, the routine air filters from the CEMP sampling network for this time period were collected for gamma spectroscopy analysis. The results of these analyses can be accessed at [http://www.cemp.dri.edu/japan\\_response.html](http://www.cemp.dri.edu/japan_response.html) and will be reported in the 2011 NNSS environmental report.

## 7.2 *Offsite Surface and Groundwater Monitoring*

The CEMP monitors offsite groundwater wells, surface waters, and springs used for water supplies in areas surrounding the NNSS. Like the CEMP air monitoring program, CEMP water monitoring is a non-regulatory public informational and outreach program. It provides the public with data regarding the presence of man-made radionuclides that could be the result of past nuclear testing on the NNSS. Water samples are collected by DRI personnel and analyzed for tritium. Tritium is one of the most abundant radionuclides generated by an underground nuclear test and, because it is a constituent of the water molecule itself, it is also one of the most mobile. DRI provides public access to water monitoring data through CEMP's website at <http://www.cemp.dri.edu/>.

### 7.2.1 *Sample Locations and Methods*

During the period of June 22 to September 13, 2010, DRI sampled 4 springs, 21 wells, and 3 surface water bodies either directly or through municipal water supply systems. Sample locations were selected based upon input from the CEMs and local ranch owners participating in the CEMP project. All wells were sampled using downhole submersible pumps.

Samples from surface water bodies were obtained via discharge from a faucet or valve connected to the water supply system that pumps that body of water. Springs were sampled by hand along surface drainage that emanates from the spring orifice, or from the water supply system connected to the spring discharge. Each well was pumped a minimum of 5 to 15 minutes prior to sampling to purge water from the pump tubing and well annulus. This process ensured that the resultant sample was representative of local groundwater. Table 7-6 lists all of the sample points, their locations, the date they were sampled, and the sampling method. The locations of the sample points are shown in Figure 7-7.

### 7.2.2 *Procedures and Quality Assurance*

DRI used several methods to ensure that radiological results reported herein conform to current QA protocols (see Section 18.0 for a detailed description of the CEMP QA program). This was achieved through the use of standard operating procedures, field QA samples, and laboratory QA procedures. DRI's standard operating procedures use step-by-step instructions to describe the method and materials that are required to collect field water quality samples and protect the samples from tampering and environmental conditions that may alter their chemistry.

The second tier of QA used on this project consisted of field QA samples, specifically field blanks, duplicates, and spiked samples. The intent of field blanks was to provide direct measures of the contribution of radioactive material that was derived from the bottles, sampling equipment, and the environment to the activity of tritium measured within the samples. Duplicate samples were collected to establish a measure of the repeatability of the analysis. Spiked samples consisted of samples that had the appearance of being routine CEMP samples, yet actually consisted of water containing a known quantity of tritium. Twelve samples (30% of the sample load) were collected for the purposes of meeting field QA requirements. The third tier of QA used on this project was laboratory QA controls, which consisted of the utilization of published laboratory techniques for the analysis of tritium, method blanks, laboratory control samples, and laboratory duplicates. The laboratory QA samples provide a measure of the accuracy and the confidence of the reported results.

Samples collected in 2010 were analyzed using enriched gas proportional counting at the University of Miami. CEMP tritium samples taken prior to 2008 were analyzed using gas proportional counting or enriched liquid scintillation counting. The enriched gas proportional counting process significantly lowers the detection limit, improving confidence in the reported results, especially for those samples containing little or no tritium. The decision level ( $L_C$ ) (see Glossary, Appendix B) for enriched gas proportional counting was 0.86 picocuries per liter (pCi/L). The  $L_C$  is the sample activity required such that 95% of the laboratory's repeated measures of background are exceeded. The  $L_C$  is established solely based on the variability of multiple measures of samples used to establish laboratory background. If a sample exceeds this threshold, then it is considered to be distinguishable from background. The MDC (see Glossary, Appendix B) for tritium was approximately 1.35 pCi/L. The MDC is a more rigorous threshold that dictates the sample to be distinguishable from background at a confidence of 95%. The MDC considers both the variability associated with multiple measures of the background as well as the variability associated with multiple measures of the sample itself.

**Table 7-6. CEMP water monitoring locations sampled in 2010**

<b>Monitoring Location Description</b>	<b>Latitude</b>	<b>Longitude</b>	<b>Date Sampled</b>	<b>Sample Collection Method</b>
Adaven Springs	38°08.25"	-115°36.20"	8/03/2010	By hand from stream discharging from spring orifice.
Alamo city water supply system—source of water is municipal well field	37°21.84"	-115°10.20"	7/07/2010	By hand from municipal water well.
Amargosa Valley school well	36°34.16"	-116°27.66"	9/07/2010	By hand at wellhead at the school.
Beatty Water and Sewer municipal water distribution system	36°50.00"	-116°49.44"	7/06/2010	By hand at holding tank containing municipal well water at corner of Rhyolite and Bullfrog. Coordinates refer to location of well supplying water to the holding tank.
Boulder City municipal water distribution system	35°59.74"	-114°49.90"	7/02/2010	By hand from a drinking fountain inside Hemenway Park; water originates from Lake Mead.
Caliente municipal water supply well	37°37.01"	-114°30.44"	6/22/2010	By hand at well in municipal well field.
Cedar City municipal water supply well about 11 kilometers (km) (7 miles [mi]) west of town	37°39.84"	-113°13.03"	6/23/2010	By hand at wellhead.
Delta municipal well	39°21.85"	-112°34.46"	6/23/2010	By hand at wellhead.
Duckwater water supply well	38°55.41"	-115°41.99"	8/04/2010	By hand at faucet inside pump house.
Ely municipal water source	39°13.80"	-114°53.94"	8/04/2010	By hand from sump located in spring discharge area. Different sump from the one sampled in 2009. Springs are used as municipal water supply.
Goldfield municipal water supply well about 18 km (11 mi) north of town	37°52.41"	-117°14.96"	7/06/2010	By hand at wellhead.
Henderson municipal water distribution system	36°00.43"	-114°57.95"	7/02/2010	By hand from faucet inside building of College of Southern Nevada; water originates from Lake Mead.
Indian Springs municipal well	36°34.15"	-115°40.25"	9/07/2010	By hand at wellhead.
Las Vegas Valley Water District #103	36°13.94"	-115°15.13"	9/13/2010	By hand at wellhead.
Medlin's Ranch—spring 16 km (10 mi) west of ranch house	37°24.10"	-115°32.25"	8/04/2010	By hand at kitchen faucet; water originates from spring 16 km (10 mi) west of ranch.
Mesquite municipal water supply well 3 km (2 mi) southeast of town	36°46.40"	-114°03.26"	9/13/2010	By hand at wellhead.
Milford municipal well	38°22.88"	-112°59.78"	6/23/2010	By hand at wellhead.
Nyala Ranch water well	38°14.93"	-115°43.72"	8/03/2010	By hand from front yard hose faucet at house.
Overton water well located at Arrow Canyon approximately 32 km (20 mi) west of town	36°44.06"	-114°44.87"	9/13/2010	By hand at wellhead.

Table 7-6. CEMP water monitoring locations sampled in 2010 (continued)

Monitoring Location Description	Latitude	Longitude	Date Sampled	Sample Collection Method
Pahrump municipal water system	36°11.29"	-115°57.95"	9/07/2010	By hand at wellhead.
Pioche municipal well	37°57.48"	-114°24.84"	6/22/2010	By hand at wellhead. Sample collected from a new well in 2010.
Rachel—Little A’Le’Inn well	37°38.79"	-115°44.75"	7/07/2010	By hand from faucet inside Little A’Le’Inn Restaurant.
Sarcobatus Flats well	37°16.78"	-117°01.92"	7/06/2010	By hand at wellhead.
St. George municipal water distribution system	37°10.47"	-113°23.92"	6/24/2010	By hand at water treatment plant; water originates from Quail Creek Reservoir.
Stone Cabin Ranch	38°12.45"	-116°37.99"	8/04/2010	By hand from outside house faucet; water originates from spring.
Tecopa residential well	35°57.59"	-116°15.71"	9/07/2010	By hand at wellhead.
Tonopah public utilities well field located approximately 19 km (12 mi) from town	38°11.68"	-117°04.70"	7/06/2010	By hand at wellhead.
Twin Springs Ranch well	38°12.21"	-116°10.53"	8/04/2010	By hand at wellhead.



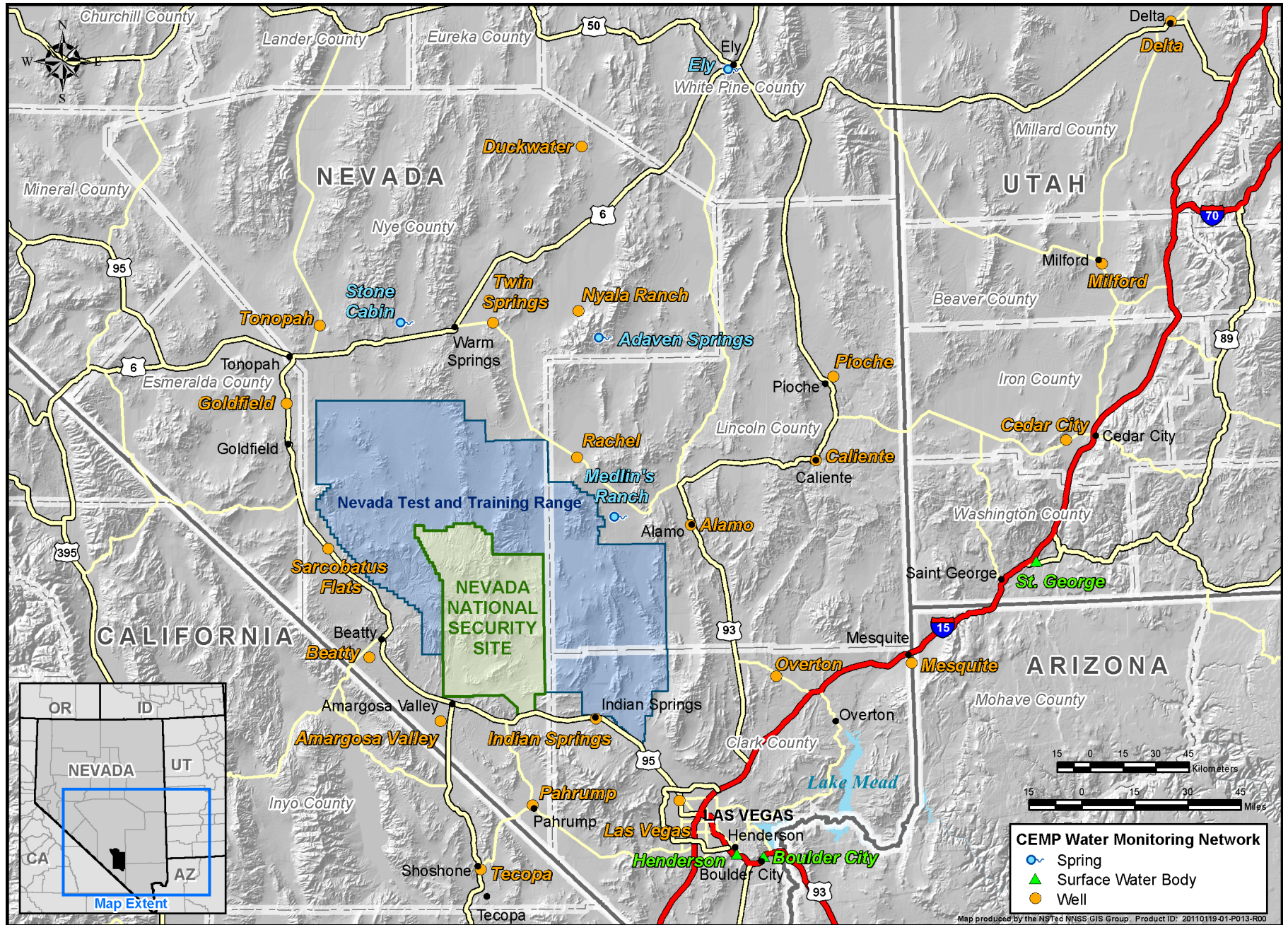


Figure 7-7. 2010 CEMP water monitoring locations

Map produced by the NSTed NNSS GIS Group. Product ID: 20110119-01-P013-R00

### 7.2.3 Results of Surface Water and Spring Discharge Monitoring

Measured tritium concentrations from the springs and surface waters sampled in 2010 ranged from below analytical detection to 23.5 pCi/L (Table 7-7). Almost all samples yielded results that were quantifiably above background (i.e.,  $\geq$  MDC), with the exception of Stone Cabin Ranch, which had tritium activities less than the  $L_C$  and was therefore indistinguishable from background. The greatest activities were detected in samples from Boulder City and Henderson, which originated from Lake Mead. Slightly elevated tritium activities in Lake Mead are documented in previous annual NNSS environmental reports (<http://www.nv.energy.gov/library/publications/aser.aspx>) and are due to a combination of the natural production of tritium in the upper atmosphere and the residual tritium persisting in the environment that originated from global atmospheric nuclear testing. All tritium results were well below the safe drinking water limit of 20,000 pCi/L.

All samples were analyzed for the presence of trends with respect to samples collected in previous years. The results are consistent with samples collected in 2008 and 2009 and analyzed using enriched gas-proportional counting, with the exception of Medlin's Ranch. Samples from Medlin's Ranch were slightly higher than previous years (5.1 pCi/L in fiscal year [FY] 2008 and 3.8 in FY 2009). No clear trend in tritium activity is apparent. The 2008 through 2010 results differ from that of previous years due to the use of an improved analytical method rather than any real change in the activity of the water being monitored. DRI also provides public access to the monitoring data through maintenance of their website at <http://www.cemp.dri.edu/>.

**Table 7-7. Tritium results for CEMP offsite surface water and spring discharges in 2010**

Monitoring Location	$^3\text{H} \pm \text{Uncertainty}^{(a)}$ (pCi/L)
Adaven Springs	13.8 $\pm$ 0.9
Ely municipal water source	2.7 $\pm$ 0.6
Medlin's Ranch	8.4 $\pm$ 0.6
Stone Cabin Ranch	0.6 $\pm$ 0.6
Boulder City municipal water distribution system	22.6 $\pm$ 1.5
Henderson municipal water distribution system	23.5 $\pm$ 1.5
St. George municipal water distribution system	8.5 $\pm$ 0.6

(a)  $\pm$  2 standard deviations

$L_C$  = 0.86 pCi/L; MDC = 1.35 pCi/L for all samples

### 7.2.4 Results of Groundwater Monitoring

The results for the 21 groundwater tritium analyses from the University of Miami Tritium Laboratory are presented in Table 7-8. The measured activities ranged from  $-0.3$  to 4.7 pCi/L. Most of the samples yielded results that were statistically indistinguishable from laboratory background ( $\leq L_C$ ). The sole exception was the samples obtained from Caliente ( $4.7 \pm 0.6$  pCi/L). The tritium activity for Caliente is similar to those detected in 2008 (5.4 pCi/L) and 2009 ( $4.7 \pm 0.6$  pCi/L) and is likely due to the presence of some combination of natural atmospheric production of tritium and tritium originating from atmospheric testing in waters that have recharged sometime over the last 50 years. All groundwater samples were well below the safe drinking water limit of 20,000 pCi/L.

**Table 7-8. Tritium results for CEMP offsite wells in 2010**

<b>Monitoring Location</b>	<b><math>^3\text{H} \pm \text{Uncertainty}^{(a)}</math> (pCi/L)</b>
Alamo City	-0.3 $\pm$ 0.6
Amargosa Valley	-0.3 $\pm$ 0.6
Beatty	0.4 $\pm$ 0.6
Caliente	4.7 $\pm$ 0.6
Cedar City	-0.2 $\pm$ 0.6
Delta	0.1 $\pm$ 0.6
Duckwater	0.2 $\pm$ 0.6
Goldfield	0.2 $\pm$ 0.6
Indian Springs	0.1 $\pm$ 0.6
Las Vegas	0.3 $\pm$ 0.6
Mesquite	0.2 $\pm$ 0.6
Milford	-0.3 $\pm$ 0.6
Nyala Ranch	0.0 $\pm$ 0.6
Overton	0.0 $\pm$ 0.6
Pahrump	0.1 $\pm$ 0.6
Pioche	-0.2 $\pm$ 0.6
Rachel	0.0 $\pm$ 0.6
Sarcobatus Flats	0.4 $\pm$ 0.6
Tecopa	0.6 $\pm$ 0.6
Tonopah	0.0 $\pm$ 0.6
Twin Springs Ranch	0.0 $\pm$ 0.6

(a)  $\pm$  2 standard deviations $L_C$  = 0.86 pCi/L; MDC = 1.35 pCi/L for all samples

### 7.2.5 Environmental Impact

The radiological impact to water resources from current and past activities on the NNSS is groundwater contamination from man-made radionuclides within the historical underground test areas on the NNSS and the migration of these radionuclides downgradient from the test areas (see Chapter 12.0).

As in previous years, the wells and water supply systems within the CEMP monitoring network showed no evidence of tritium contamination from past underground nuclear testing on the NNSS. However, in 2009, tritium was detected off site in the Underground Test Area Sub-Project characterization well, ER-EC-11, which is approximately 700 meters west of the NNSS on the Nevada Test and Training Range (NTTR) (see Section 12.3.2). This is the first offsite well in which radionuclides from underground nuclear testing activities at the NNSS have been detected. The nearest CEMP water monitoring locations that are downgradient of the NNSS nuclear testing areas are Amargosa Valley and Beatty, approximately 67 and 38 km, respectively, southwest of Well ER-EC-11.

Among the CEMP offsite water monitoring locations, detectable tritium activities were most often found in surface waters and in spring discharge emanating from small local groundwater systems located in recharge areas. Most of the groundwater samples analyzed were below the  $L_C$  for tritium (see Table 7-8). The greatest observed tritium activity, 4.7 pCi/L for Caliente, is upgradient of the NNSS and may be due to localized recharge.



## 8.0 Radiological Biota Monitoring

Historical atmospheric nuclear weapons testing, outfalls from underground nuclear tests, and radioactive waste disposal sites provide sources of potential radiation contamination and exposure to Nevada National Security Site (NNSS) plants and animals (biota). U.S. Department of Energy (DOE) Order DOE O 5400.5, “Radiation Protection of the Public and the Environment,” requires that all DOE sites monitor radioactivity in the environment to ensure that the public does not receive a radiological dose greater than 100 millirems per year (mrem/yr) from all pathways of exposure, including the ingestion of contaminated plants and animals. DOE also requires monitoring to determine if the radiological dose to aquatic and terrestrial biota on site exceeds DOE-established limits expressed in rad (for radiation absorbed dose, see Glossary, Appendix B) per day (rad/d).

Current NNSS land use discourages the harvest of plants or plant parts (e.g., pine nuts and wolf berries) for direct consumption by humans. However, it may be possible that some edible plant material is being taken and consumed. Though possible, this is likely very limited, which makes the ingestion of game animals the primary potential biotic pathway for radionuclide contamination from the NNSS to the public. Game animals on the NNSS may travel off the site and become available, through hunting, for consumption by the public. Game animals are therefore monitored under the *Routine Radiological Environmental Monitoring Plan* (RREMP) (Bechtel Nevada [BN], 2003a). In 2010, the National Security Technologies, LLC (NSTec), Ecological and Environmental Monitoring group conducted the monitoring.

Plants and game animals are sampled annually from contaminated NNSS sites to estimate hypothetical doses to persons consuming them, measure the potential for radionuclide transfer through the food chain, and determine if NNSS biota are exposed to radiation levels harmful to their own populations. Though not conducted during 2010, biota and soil samples are also taken from Radioactive Waste Management Sites (RWMSs) as a measure of the integrity of waste disposal cells. This chapter describes the biota monitoring program designed to meet public and environmental radiation protection regulations (see Section 2.3) and presents the field sampling and analyses results from 2010. Analysis results used to estimate the dose to humans consuming NNSS plants and animals and the dose to biota found in contaminated areas of the NNSS are presented in Chapter 9.

<b><i>Radiological Biota Monitoring Goals</i></b>	<b><i>Analytes Measured in Plant and Animal Tissues</i></b>
Collect and analyze biota samples for radionuclides to estimate the potential dose to humans who may consume plants or game animals from the NNSS (see Chapter 9 for the estimates of dose to humans).	Americium-241 ( <sup>241</sup> Am) Cesium-137 ( <sup>137</sup> Cs) Cobalt-60 ( <sup>60</sup> Co)
Collect and analyze biota samples for radionuclides to estimate the absorbed radiation dose to NNSS biota (see Chapter 9 for the estimates of dose to NNSS plants and animals).	Europium-152 ( <sup>152</sup> Eu) Europium-154 ( <sup>154</sup> Eu)
Collect and analyze soil samples at the Area 3 and Area 5 RWMSs to provide evidence that the burrowing activities of fossorial animals have or have not compromised the integrity of the soil covered waste disposal units.	Tritium ( <sup>3</sup> H) Plutonium-239+240 ( <sup>239+240</sup> Pu) Strontium-90 ( <sup>90</sup> Sr)

### 8.1 Species Selection

The goal for vegetation monitoring is to sample the plants most likely to have the highest contamination within the NNSS environment. They are generally found inside demarcated radiological areas near the “ground zero” locations of historical aboveground or near surface nuclear tests. The species selected for sampling represent the most dominant life forms (e.g., trees, shrubs, herbs, or grasses) at these sites. Woody vegetation (i.e., shrubs versus forbs or grasses) is sampled because it is reported to have deeper penetrating roots and higher concentrations of tritium (Hunter and Kinnison, 1998). Woody vegetation also is a major source of browse for



game animals that might potentially migrate off site. Grasses and forbs are also sampled when present because they are also a source of food for wildlife. During 2010, pine nuts were sampled as they can be potentially consumed by humans. Plant parts collected for analysis represent new growth over the past year.

The game animals monitored to assess the potential dose to the public had to meet three criteria: (1) have a relatively high probability of entering the human food chain; (2) have a home range that overlaps a contaminated site and, as a result, have the potential for relatively high radionuclide body burdens from exposure to contaminated soil, air, water, or plants at the contaminated site; and (3) be sufficiently abundant at a site to acquire an adequate tissue sample for laboratory analysis. These criteria limited the candidate game animals to those listed in Table 10-1. Mule deer, pronghorn antelope, and predatory game animals such as mountain lions are only collected as the opportunity arises if they are found dead on the NNSS (e.g., from accidentally being hit by a vehicle). Tissues from species analogous to big game, such as feral horses, may be collected opportunistically as well. If game animals are not sufficiently abundant at a particular site, or at a particular time, non-game small mammals may be used as an analog. During 2010, a mountain lion research project was begun on the NNSS. Blood was collected from captured mountain lions before they were released with a radio-collar for study. This allowed for an analysis of tritium concentration in the blood.

The goal of sampling animals for the purpose of determining potential dose to biota is to select species that are most exposed and most sensitive to effects from radiation. In general, mammals and birds are more sensitive to radiation than fish, amphibians, or invertebrates (DOE Standard DOE-STD-1153-2002, “A Graded Approach for Evaluating Radiation Doses to Aquatic and Terrestrial Biota). Because of this, and because no native fish or amphibians are found on the NNSS, the species in Table 8-1 are also used to assess potential dose to animals.

The sampling strategy used to assess the integrity of radioactive waste containment includes sampling plants, animals, and soil excavated by ants or small mammals on top of waste covers. Plants are generally selected by size with preference for larger shrubs under the assumption that they have deeper roots and therefore would be more likely to have penetrated waste. Small mammals need to meet three criteria: (1) be fossorial (i.e., burrow and live predominantly underground), (2) have a home range small enough to ensure they reside a majority of time on the waste disposal site, and (3) be sufficiently abundant at a site to acquire an adequate tissue sample for laboratory analysis. These criteria limited the animals to those listed in Table 8-1. Soils excavated by ants or small mammals are also selected for sampling on the basis of size, with preference for larger ant mounds and animal burrow sites under the assumption that these burrows were deeper and had a higher potential for penetrating waste.

**Table 8-1. NNSS animals monitored for radionuclides**

Small Mammals	Large Mammals	Birds
<b>Game Animals Monitored for Dose Assessments</b>		
Cottontail rabbit ( <i>Sylvilagus audubonii</i> )	Mule deer ( <i>Odocoileus hemionus</i> )	Mourning dove ( <i>Zenaida macroura</i> )
Jackrabbit ( <i>Lepus californicus</i> )	Pronghorn antelope ( <i>Antilocapra americana</i> )	Chukar ( <i>Alectoris chukar</i> )
	Mountain lion ( <i>Puma concolor</i> )	Gambel’s quail ( <i>Callipepla gambelii</i> )
<b>Animals Monitored for Integrity of Radioactive Waste Containment or as Game Animal Analogs</b>		
Kangaroo rats ( <i>Dipodomys</i> spp.)		
Mice ( <i>Peromyscus</i> spp.)		
Antelope ground squirrel ( <i>Ammospermophilus leucurus</i> )		
Desert woodrat ( <i>Neotoma lepida</i> )		

## 8.2 Site Selection

The monitoring design focuses on sampling sites that have the highest concentrations of radionuclides in other media (e.g., soil and surface water) and have relatively high densities of candidate animals. The RREMP identifies five contaminated sites and their associated control sites at which biota are sampled once every 5 years. They are E Tunnel Ponds, Palanquin Crater, Sedan Crater, T2, and Plutonium Valley (Figure 8-1), and each is associated with one type of a legacy contamination area (see bulleted list below). The control site selected for

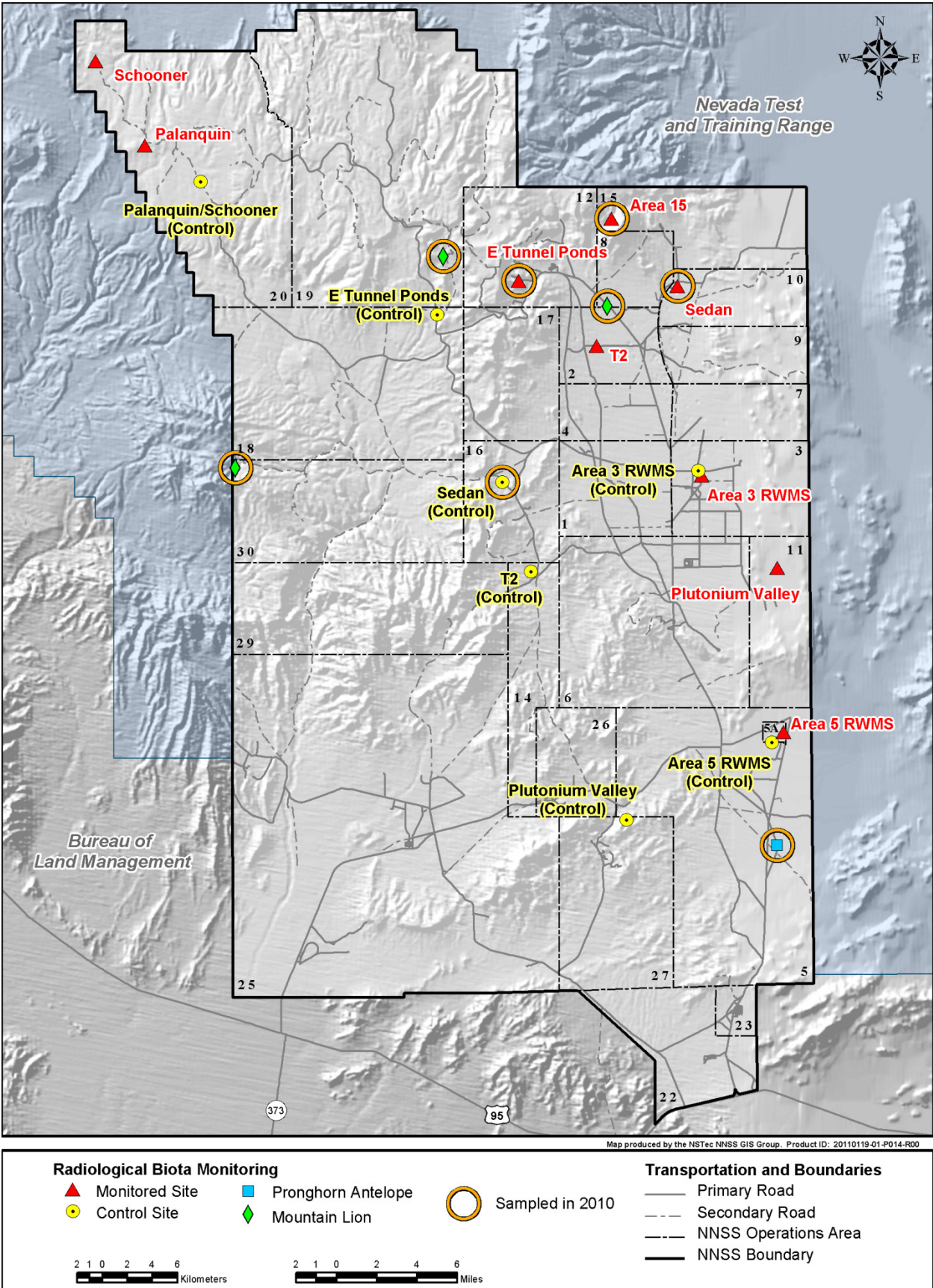


Figure 8-1. Radiological biota monitoring sites on the NNS

each contaminated site has similar biological and physical features. Control sites are sampled to document the radionuclide levels representative of background.

- **Runoff areas or containment ponds associated with underground or tunnel test areas.** Contaminated water draining from test areas can form surface water sources that are important given the limited availability of surface water on the NNSS. Therefore, they have a high potential for transferring radionuclides to plants and wildlife seeking surface water. The associated monitoring site is E Tunnel Ponds below Rainier Mesa. Pine nuts were sampled from this location in 2010.
- **Plowshare sites in alluvial fill at lower elevations with high surface contamination.** Subsurface nuclear detonations at these sites have distributed contaminants over a wide area, usually in the lowest precipitation areas of the NNSS. The associated monitoring site is Sedan Crater in Yucca Flat. It was sampled in 2010.
- **Plowshare sites in bedrock or rocky fill at higher elevations with high surface contamination.** Subsurface nuclear detonations at these sites distributed contaminants over a wide area, usually in the highest precipitation areas of the NNSS. Through 2007, the associated monitoring site was Palanquin Crater. It was last sampled in 2003. Schooner Crater was added as a biota sampling site and was last sampled in 2008.
- **Atmospheric test areas.** These sites have highly disturbed soils due to the removal of topsoil during historical cleanup efforts and due to the sterilization of soils from heat and radiation during testing. The same areas were often used for multiple nuclear tests. The associated monitoring site is T2 in Yucca Flat. It was last sampled in 2006.
- **Aboveground safety experiment sites.** These areas are typified by current radioactive soil contamination, primarily in the form of plutonium and uranium. The associated monitoring site is Plutonium Valley in Area 11. It was last sampled in 2009.

Soil sampling is also conducted periodically at radioactive waste disposal locations on the NNSS to assess whether fossorial small mammals are being exposed to buried wastes and, therefore, whether the integrity of waste containment is compromised. Two radioactive waste disposal facilities are sampled:

- **Area 3 RWMS.** Waste disposal cells within the Area 3 RWMS are subsidence craters resulting from underground nuclear testing. Two closed cells containing bulk low-level radioactive waste are craters U-3ax and U-3bl, which were combined to form the U-3ax/bl disposal unit (Corrective Action Unit 110). U-3ax/bl is covered with a vegetated, native alluvium closure cover that is at least 2.4 meters (m) (8 feet [ft]) thick. It was last sampled in 2009.
- **Area 5 RWMS.** Waste disposal has occurred at the Area 5 RWMS since the early 1960s. There are 11 closed disposal cells containing bulk low-level radioactive waste. The cells are unlined pits and trenches that range in depth from 4.6 to 15 m (15 to 48 ft). The unvegetated soil cover caps for the pits and trenches are approximately 2.4 m (8 ft) thick. Three pits and one trench were last sampled in 2009.

### 8.3 2010 Biota Sampling and Analysis

In 2010, the Sedan site and its control were sampled for plants and animals (Figure 8-1). The Sedan test was conducted July 6, 1962, in the northern portion of Area 10. This cratering experiment displaced 12 million tons of earth and formed a 390 m (1,280 ft) diameter by 97 m (320 ft) deep depression in the desert floor. The purpose of the test was to determine if nuclear devices could be used as cratering or earth-moving mechanisms.

Contaminants resulting from this test were primarily tritium,  $^{90}\text{Sr}$ ,  $^{137}\text{Cs}$ ,  $^{239+240}\text{Pu}$ , and  $^{241}\text{Am}$ . A control area for Sedan is located about 20 kilometers (km) (12.6 miles [mi]) southwest of the sample site near a spring in Area 16. Any of the candidate game species is likely to be present at the Sedan Control site.

In 2010, the E Tunnel Ponds site and a location in Area 15 north of the Baneberry test were sampled for pine nuts (Figure 8-1). The E Tunnel Ponds site is located just southeast of Rainier Mesa in Area 12 in the northern part of the NNSS at an elevation of 1,828 m (6,000 ft). Radionuclide-contaminated water and soils occur at this site. The ponds were constructed to collect and hold contaminated water (mainly from tritium) that drains out of E Tunnel where nuclear testing was conducted. The water is perched groundwater that has percolated through fractures in the tunnel system.

The Area 15 sampling location is in the eastern portion of Area 15, at an elevation of 1,760 m (5,774 ft). The location is also 6.4 km (3.9 mi) north of the Baneberry nuclear test, which was conducted on December 18, 1970. This test lost containment when fission products vented through a fissure that opened up near ground zero. The plume moved primarily to the north and northeast of the test.

In 2010, no soil sampling was conducted at the Area 3 or Area 5 RWMSs. Soils from ant mounds and small mammal burrows on the Area 3 U-3ax/bl soil cover cap and from the Area 5 soil cover caps of Pits 1, 2, and 5 and Trench 6 were sampled in 2009 (NSTec, 2010c). The 2009 soil samples did not suggest that burrowing animals had come into contact with buried waste.

### 8.3.1 Plants

On July 21, 2010, 8 plant samples were collected from the Sedan site and 12 were collected from the Sedan Control site. Sampled species represent the dominant vegetation at each site (Table 8-2). Plants were sampled over an area of about 0.013 square kilometers (km<sup>2</sup>) (0.005 square miles [mi<sup>2</sup>]) on the south end of the Sedan Radioactive Material Area. Plants were collected over a smaller area (0.005 km<sup>2</sup> [0.002 mi<sup>2</sup>]) at the Sedan Control site due to higher plant densities there. All samples consisted of about 150 to 500 grams (g) (5.3 to 17.6 ounces [oz]) of fresh-weight plant material and were composites of material from many plants of the same species found generally within 5 m (16 ft) of each other.

On September 13, 2010, pine nuts were collected from five pinyon trees at the E Tunnel Ponds site and from four trees at the Area 15 site. All sampled material was composited in order to make one sample for each location having 150 to 500 g (5.3 and 17.6 oz) of fresh-weight pine nuts.

Plant leaves and stems from the Sedan and Sedan Control sites were hand-plucked and stored in airtight plastic bags. Pine cones containing pine nuts were hand plucked and placed into a large paper bag for each site. Rubber gloves were used by samplers and changed between each composite sample. Samples were labeled and stored in an ice chest. Within 4 hours of collection, the samples were delivered to the laboratory. Pine nuts were removed from their shells by hand and placed in airtight plastic bags. Water was separated from plant samples by distillation. Water and dried plant tissues were submitted to a commercial laboratory for analysis of radionuclides. Water from plants was analyzed for tritium, and dried plant tissue was analyzed for gamma-emitting radionuclides, <sup>90</sup>Sr, uranium, plutonium, and <sup>241</sup>Am.

**Table 8-2. Plant species sampled in 2010**

Common Name	Scientific Name	Name Code	Sedan	Sedan Control	E Tunnel Ponds	Area 15
Indian ricegrass	<i>Achnatherum hymenoides</i>	ACHY	X			
Desert needlegrass	<i>Achnatherum speciosum</i>	ACSP	X			
Basin big sagebrush	<i>Artemisia tridentata</i>	ARTR		X		
Four-wing saltbush	<i>Atriplex canescens</i>	ATCA		X		
Glaucus willowherb	<i>Epilobium glaberrimum</i>	EPGL		X		
Rubber rabbitbrush	<i>Ericameria nauseosus</i>	ERNA	X	X		
Baltic rush	<i>Juncus balticus</i>	JUBA		X		
Singleleaf pinyon (pine nuts)	<i>Pinus monophylla</i>	PIMO			X	X
Desert bitterbrush	<i>Purshia glandulosa</i>	PUGL		X		
Small wirelettuce	<i>Stephanomeria exigua</i>	STEX	X			

As expected, more man-made radionuclides were detected in higher concentrations in samples from Sedan and E Tunnel Ponds compared with the Sedan Control and Area 15 sites (Table 8-3). Tritium was the only radionuclide detected in 100 percent of the samples. However, it is believed that the tritium in samples from the Sedan Control and Area 15 sites are due to cross contamination with the Sedan and E Tunnel Ponds samples during storage prior to distillation. All of the plant samples had been stored in a freezer for 5 days in sealed plastic bags adjacent to one another. An assessment of the sample storage and handling procedures was performed, and

procedures will be revised in 2011 to ensure that field specimens from contaminated sites and their control sites are stored separately or are processed immediately. Other radionuclides were detected only in the plant samples from Sedan (Table 8-3).

**Table 8-3. Concentrations of man-made radionuclides in plants sampled in 2010**

Plant Sample	Radionuclide Concentrations ± Uncertainty <sup>(a)</sup>				
	<sup>3</sup> H (pCi/L) <sup>(b)</sup>	<sup>90</sup> Sr (pCi/g) <sup>(c)</sup>	<sup>137</sup> Cs (pCi/g)	<sup>239+240</sup> Pu (pCi/g)	<sup>241</sup> Am(pCi/g)
<b>Sedan</b>					
ACHY #1	210,000 ± 21,400	0.560 ± 0.132	0.415 ± 0.190	0.015 ± 0.016	-0.002 ± 0.005
ACHY #2	274,000 ± 27,900	0.851 ± 0.189	0.712 ± 0.293	0.010 ± 0.013	0.002 ± 0.004
ACSP #1	101,000 ± 10,300	0.757 ± 0.174	0.491 ± 0.187	0.015 ± 0.013	0.001 ± 0.007
ACSP #2	189,000 ± 19,200	0.883 ± 0.197	0.591 ± 0.167	0.007 ± 0.010	0.008 ± 0.010
ERNA #1	1,270,000 ± 129,000	0.234 ± 0.062	0.256 ± 0.100	0.015 ± 0.013	0.006 ± 0.009
ERNA #2	16,500,000 ± 1,670,000	0.608 ± 0.138	0.717 ± 0.248	0.002 ± 0.007	0.009 ± 0.009
STEX #1	115,000 ± 11,700	1.190 ± 0.256	0.401 ± 0.190	0.015 ± 0.011	0.013 ± 0.011
STEX #2	164,000 ± 16,700	0.740 ± 0.168	0.333 ± 0.228	0.023 ± 0.015	0.002 ± 0.008
<b>Average MDC<sup>(d)</sup>:</b>	<b>1,442</b>	<b>0.042</b>	<b>0.172</b>	<b>0.017</b>	<b>0.011</b>
<b>Sedan Control</b>					
ARTR #1	587 ± 208	0.077 ± 0.058	0.000 ± 0.053	-0.002 ± 0.005	0.004 ± 0.005
ARTR #2	834 ± 226	0.001 ± 0.034	0.081 ± 0.083	-0.002 ± 0.005	0.000 ± 0.003
ATCA #1	852 ± 223	0.031 ± 0.052	0.042 ± 0.068	0.002 ± 0.004	-0.002 ± 0.004
ATCA #2	689 ± 212	0.008 ± 0.014	0.020 ± 0.056	-0.001 ± 0.004	0.000 ± 0.004
EPGL #1	552 ± 198	0.046 ± 0.064	0.072 ± 0.139	-0.002 ± 0.005	-0.002 ± 0.005
EPGL #2	1,580 ± 283	0.038 ± 0.051	-0.037 ± 0.096	0.002 ± 0.004	-0.003 ± 0.004
ERNA #1	727 ± 217	-0.034 ± 0.041	0.045 ± 0.080	0.001 ± 0.005	-0.001 ± 0.004
ERNA #2	661 ± 207	0.019 ± 0.048	0.072 ± 0.068	0.000 ± 0.004	0.001 ± 0.005
JUBA #1	3,950 ± 502	0.005 ± 0.045	-0.017 ± 0.088	0.004 ± 0.006	0.003 ± 0.005
JUBA #2	521 ± 198	0.046 ± 0.067	0.087 ± 0.144	0.000 ± 0.005	0.000 ± 0.006
PUGL #1	729 ± 213	0.057 ± 0.052	-0.013 ± 0.048	0.002 ± 0.005	-0.004 ± 0.005
PUGL #2	438 ± 191	-0.001 ± 0.046	0.032 ± 0.049	0.001 ± 0.004	-0.003 ± 0.005
<b>Average MDC:</b>	<b>296</b>	<b>0.083</b>	<b>0.133</b>	<b>0.011</b>	<b>0.012</b>
<b>E Tunnel Ponds</b>					
PIMO	307,000 ± 31,300	0.010 ± 0.036	0.021 ± 0.028	0.007 ± 0.007	0.000 ± 0.006
<b>Average MDC:</b>	<b>335</b>	<b>0.066</b>	<b>0.050</b>	<b>0.008</b>	<b>0.016</b>
<b>Area 15</b>					
PIMO	3,850 ± 526	0.054 ± 0.047	-0.001 ± 0.036	0.002 ± 0.0056	0.002 ± 0.007
<b>Average MDC:</b>	<b>618</b>	<b>0.075</b>	<b>0.058</b>	<b>0.012</b>	<b>0.018</b>

Shaded results are considered detected (results greater than the sample-specific minimum detectable concentration [MDC; see Glossary, Appendix B] of the measurement process)

<sup>(a)</sup> ± 2 standard deviations

<sup>(b)</sup> picocuries per liter water from sample

<sup>(c)</sup> picocuries per gram dry weight of sample

<sup>(d)</sup> the average sample-specific MDC

### 8.3.2 Animals

State and federal permits were secured to trap specific small mammals and birds in 2010 and to sample road-killed large mammals. Permission was obtained to acquire subsamples of blood from radio-collared mountain lions. Small mammals and birds were trapped at the Sedan and Sedan Control locations from July 21, 2010, through September 15, 2010. Two jackrabbits, one cottontail rabbit, and a mourning dove were trapped, muscle tissues from a mountain lion accidentally hit by a vehicle in Area 8 and from a pronghorn antelope found dead in Area 5 were collected, and blood samples from two radio-collared mountain lions were obtained (Table 8-4).

In the laboratory, whole bodies of the small animals trapped were homogenized. Past results have shown that radionuclide concentrations are generally higher in the skin, bone, and viscera compared with muscle. Though

muscle is usually the only portion consumed by humans, whole animals were homogenized to give a more conservative (higher) estimate of potential dose to someone consuming the animals (see Section 9.1.1.2). Water was distilled from the samples and submitted to a laboratory for tritium analysis, and the tissue samples were submitted for analysis of gamma-emitting radionuclides,  $^{90}\text{Sr}$ , plutonium, and  $^{241}\text{Am}$ .

**Table 8-4. Animal samples collected in 2010**

Location	Sample Name	Sample Description
<b>Sedan</b>		
	Jackrabbit #1	One jackrabbit whole body
	Jackrabbit #2	One jackrabbit whole body
<b>Sedan Control</b>		
	Cottontail rabbit	One cottontail rabbit whole body
	Mourning dove	Composite of three mourning doves (whole body)
<b>Opportunistic Sampling</b>		
Area 5	Pronghorn antelope	Muscle tissue from an adult female pronghorn antelope that died of unknown causes August 10, 2010
Area 8	Mountain lion	Muscle tissue from a female (~2 year old) hit by a vehicle February 15, 2010
Area 30	Mountain lion	Blood sample taken from a female (~2–3 years old) captured and released December 13, 2010
Area 12	Mountain lion	Blood sample taken from a female (~5–6 years old) captured and released December 24, 2010

Man-made radionuclides were detected in all animal samples collected at Sedan (Table 8-5). The only other man-made radionuclide detections were low levels of tritium in each of the mountain lions (Table 8-5). Activity levels were dominated by tritium in samples from Sedan but were similar to measurements in the past (NSTec, 2006a). No man-made radionuclides were detected in Sedan Control samples or in the pronghorn antelope from Area 5.

**Table 8-5. Concentrations of man-made radionuclides detected in animals sampled in 2010**

	Radionuclide Concentrations ± Uncertainty <sup>(a)</sup>				
	$^3\text{H}$ (pCi/L) <sup>(b)</sup>	$^{90}\text{Sr}$ (pCi/g) <sup>(c)</sup>	$^{137}\text{Cs}$ (pCi/g)	$^{239+240}\text{Pu}$ (pCi/g)	$^{241}\text{Am}$ (pCi/g)
<b>Sedan</b>					
Jackrabbit #1	153,000 ± 15,600	1.320 ± 0.293	0.893 ± 0.173	0.053 ± 0.021	0.006 ± 0.009
Jackrabbit #2	288,000 ± 29,300	1.830 ± 0.392	1.660 ± 0.208	0.056 ± 0.018	0.015 ± 0.013
<b>Average MDC<sup>(d)</sup>:</b>	<b>560</b>	<b>0.068</b>	<b>0.074</b>	<b>0.014</b>	<b>0.011</b>
<b>Sedan Control</b>					
Cottontail rabbit	-7 ± 183	0.023 ± 0.030	0.031 ± 0.038	0.053 ± 0.021	0.006 ± 0.009
Mourning dove	157 ± 199	0.000 ± 0.030	0.035 ± 0.059	0.056 ± 0.018	0.015 ± 0.013
<b>Average MDC:</b>	<b>331</b>	<b>0.055</b>	<b>0.086</b>	<b>0.014</b>	<b>0.011</b>
<b>Opportunistic Sampling</b>					
Pronghorn antelope (Area 5)	40 ± 199	0.036 ± 0.043	0.013 ± 0.065	0.004 ± 0.008	-0.002 ± 0.007
Mountain lion (Area 8)	1,370 ± 295	NM <sup>(d)</sup>	0.049 ± 0.076	0.004 ± 0.007	0.005 ± 0.005
Mountain lion (Area 30)	502 ± 244	NM	NM	NM	NM
Mountain lion (Area 12)	2,576 ± 627	NM	NM	NM	NM
<b>Average MDC:</b>	<b>451</b>	<b>0.072</b>	<b>0.116</b>	<b>0.012</b>	<b>0.012</b>

Shaded results are considered detected (results greater than the sample-specific MDC of the measurement process)

<sup>(a)</sup> ± 2 standard deviations

<sup>(b)</sup> picocuries per liter water from sample

<sup>(c)</sup> picocuries per gram dry weight of sample

<sup>(d)</sup> the average sample-specific MDC

## **8.4 Data Assessment**

Biota sampling results confirm that man-made radionuclide concentrations are generally higher at monitored locations (Sedan and E Tunnel Ponds) compared with control or other locations distant from operational activities. Though certain radionuclides are elevated, the levels detected pose negligible risk to humans and biota. The potential dose to a person consuming these animals or pine nuts is well below dose limits to members of the public (see Section 9.1.1.3). Also, radionuclide concentrations were below levels considered harmful to the health of the plants or animals; the dose resulting from observed concentrations were less than 1 percent of dose limits set to protect populations of plants and animals (see Section 9.2).



## 9.0 Radiological Dose Assessment

The U.S. Department of Energy (DOE) requires DOE facilities to estimate the radiological dose to the general public and to plants and animals in the environment caused by past or present facility operations. These requirements are specified in DOE Orders DOE O 450.1A, “Environmental Protection Program;” DOE O 435.1, “Radioactive Waste Management;” and DOE O 5400.5, “Radiation Protection of the Public and the Environment” (see Section 2.3). To estimate these radiological doses, mathematical models are used along with data gathered annually on the Nevada National Security Site (NNSS) by National Security Technologies, LLC (NSTec), and existing data from past inventories of the radionuclide content of NNSS surface soils. The 2010 data used are presented in Sections 4.0 through 8.0 of this report and include the results for onsite compliance monitoring of air, water, direct radiation, and biota, and the offsite monitoring results of air, direct radiation, and water reported by the Community Environmental Monitoring Program (CEMP). The specific goals for the dose assessment component of radiological monitoring are shown below along with the compliance measures that are calculated in order to accomplish these assessment goals.

<i>Radiological Dose Assessment Goals</i>	<i>Compliance Measures</i>
<p>Determine if the maximum radiation dose to a member of the general public from airborne radionuclide emissions at the NNSS complies with the Clean Air Act, National Emission Standards for Hazardous Air Pollutants (NESHAP) limit of 10 millirems per year (mrem/yr) (0.1 millisieverts per year [mSv/yr]).</p> <p>Determine if radiation levels from the Radioactive Waste Management Sites (RWMSs) comply with the 25 mrem/yr (0.25 mSv/yr) dose limit to members of the public as specified in DOE Manual DOE M 435.1-1, “Radioactive Waste Management Manual.”</p> <p>Determine if the total radiation dose to a member of the general public from all possible pathways (direct exposure, inhalation, ingestion of water and food) as a result of NNSS operations comply with the limit of 100 mrem/yr (1 mSv/yr) established by DOE O 5400.5.</p> <p>Determine if the radiation dose (in a unit of measure called a rad [see Glossary, Appendix B]) to NNSS biota complies with the following limits set by DOE O 5400.5 and DOE Standard DOE-STD-1153-2002, “A Graded Approach for Evaluating Radiation Doses to Aquatic and Terrestrial Biota”:</p> <ul style="list-style-type: none"> <li>&lt; 1 rad per day (rad/d) for terrestrial plants and aquatic animals</li> <li>&lt; 0.1 rad/d for terrestrial animals</li> </ul>	<p>Annual average concentrations of radionuclides at six NNSS critical-receptor air sampling locations compared to the Concentration Levels for Environmental Compliance, Table 2, Appendix E, Title 40 Code of Federal Regulations Part 61 (NESHAP)</p> <p>Committed effective dose equivalent (CEDE) for an offsite resident from all pathways, in mrem/yr (or mSv/yr)</p> <p>Absorbed dose to onsite plants and animals, in rad/d</p>

### 9.1 Dose to the Public

Several steps are taken to compute radiological dose to the public from all pathways. This section briefly describes these steps, identifies how field monitoring data are used with other NNSS data sources (e.g., radionuclide inventory data) to provide input to the dose estimates, and presents the results of each step.

#### 9.1.1 Dose from Possible Exposure Pathways

As prescribed in the *Routine Radiological Environmental Monitoring Plan* (Bechtel Nevada [BN], 2003a), NSTec routinely samples air, groundwater, and biota to document the amount of radioactivity in these media and to provide data that can be used to assess the radiation dose received by the general public from several pathways.

The potential pathways by which a member of the general public residing off site might receive a radiation dose resulting from past or present NNSS operations include the following:

- Inhalation of, ingestion of, or direct external exposure to airborne radionuclide emissions transported off site by wind
- Ingestion of wild game animals that drink from surface waters and eat vegetation containing NNSS-related radioactivity
- Ingestion of plants containing NNSS-related radioactivity
- Drinking contaminated water from underground aquifers containing radionuclides that have migrated from the sites of past underground nuclear tests or waste management sites
- Exposure to direct radiation along the borders of the NNSS

The subsections below address all of the potential pathways and their contribution to public dose estimated for 2010.

#### **9.1.1.1 Dose from NNSS Air Emissions**

Six air particulate and tritium ( $^3\text{H}$ ) sampling stations located near the boundaries and the center of the NNSS are approved by the U.S. Environmental Protection Agency (EPA) Region IX as critical receptor samplers to demonstrate compliance with the NESHAP public dose limit of 10 mrem/yr from air emissions. Analysis of air particulate and  $^3\text{H}$  data obtained at these six stations was performed in 2010 (see Sections 4.1.4.1 through 4.1.4.6 and 4.1.5). The annual average concentration of an airborne radionuclide must be less than its NESHAP Concentration Level for Environmental Compliance (abbreviated as compliance level [CL]) (see Table 4-1 of Section 4.1.1). The CL for each radionuclide represents the annual average concentration of that radionuclide in air that would result in an effective dose equivalent of 10 mrem/yr. If multiple radionuclides are detected at a station, then compliance with NESHAP is demonstrated when the sum of the fractions (determined by dividing each radionuclide's concentration by its CL and then adding the fractions together) is less than 1.0.

The following man-made radionuclides were detected at all six critical receptor samplers: americium-241 ( $^{241}\text{Am}$ ), plutonium-238 ( $^{238}\text{Pu}$ ), and plutonium-239+240 ( $^{239+240}\text{Pu}$ );  $^3\text{H}$  was detected at two (see Sections 4.1.4.1 through 4.1.4.6). All concentrations of these radionuclides were well below their CLs. The concentration of each man-made radionuclide measured at each critical receptor sampler was divided by its respective CL to obtain a "fraction of CL." These fractions were then summed for each location and all were less than 1.0 (see Table 4-12, Section 4.1.5). As in previous years, the 2010 data from the six critical receptor samplers show that the NESHAP dose limit to the public of 10 mrem/yr was not exceeded.

The Schooner critical receptor station in the far northwest corner of the NNSS had the highest sum of the fractions for critical receptor locations, 0.169 (Table 4-12). Scaling this 0.169 sum of fractions to the 10 mrem/yr limit gives an estimated effective dose equivalent of 1.69 mrem/yr from air emissions for a hypothetical individual living year-round at this station. Air concentrations drop relatively quickly with distance from contaminated locations. The Gate 20-2P sampler, which is 5.0 kilometers (km) (3.1 miles [mi]) south-southeast of the Schooner sampler, had a sum of fractions of only 0.002. A more realistic estimate of dose to the maximally exposed individual (MEI) off site would be to use the 0.004 sum of fractions from the Gate 510 sampler (Table 4-12), which is closest to the nearest public receptor (about 3.5 km [2.2 mi]). The estimated effective dose equivalent from air emissions for a hypothetical individual living year-round at the Gate 510 sampler would be 0.04 mrem/yr. More detailed information regarding the estimation of the airborne dose to the public in 2010 from all activities conducted by the U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office (NNSA/NSO) on the NNSS and its Nevada support facilities are reported in NSTec (2011a).

#### **9.1.1.2 Dose from Ingestion of Wild Game from the NNSS**

Two game species, mule deer and mourning doves, have been shown to travel off the NNSS and be available to hunters (Giles and Cooper, 1985; NSTec, 2009). Because of this, game animals on the NNSS are sampled annually near known radiological contaminated areas to give conservative (worst-case) estimates of the level of

radionuclides that hunters may consume if these animals are harvested off of the NNSS. In 2010, animals sampled from contaminated locations, or sampled animals potentially visiting contaminated locations, consisted of two jackrabbits from near the Sedan Crater in Area 10, one pronghorn antelope from Area 5, and three mountain lions, one each from Areas 8, 12, and 30. Samples from each of these animals were analyzed for radionuclide content (Section 8.3.2, Table 8-5).

The potential dose to an individual from consuming these game animals was calculated using the following assumptions:

- An individual consumes 20 jackrabbits over the year (the possession limit set for this species by the Nevada Division of Wildlife), each having 513 grams (g) of meat.
- An individual consumes all meat from one large game animal during the year.
- Each consumed animal contains the average concentration of each radionuclide detected in the samples from that species from the sample location. It was also assumed that  $^3\text{H}$  concentrations in blood samples taken from mountain lions were equal to that in muscle tissue.
- The moisture content of meat consumed is 71 percent.

The CEDE was calculated using dose conversion factors (EPA, 1988) multiplied by the total activity estimated to be consumed for each of the detected radionuclides. The resultant potential doses are shown in Table 9-1. Because no man-made radionuclides were detected in the pronghorn antelope sample (see Section 8.3.2, Table 8-5), dose from the sample was not calculated and is not included in the table. The highest estimated CEDE was 1.65 mrem (0.0165 mSv) from consuming jackrabbits from Sedan, which is only 1.65 percent of the annual dose limit for members of the public. If someone were to consume just one jackrabbit from Sedan, the potential dose would be about 0.08 mrem (0.0008 mSv).

Radionuclides contributing the most dose were  $^{239+240}\text{Pu}$  and  $^{90}\text{Sr}$ .  $^3\text{H}$  was present at much higher concentrations than other nuclides; however,  $^3\text{H}$  gives relatively little dose because it only emits low energy beta particles and has a short biological half-life.

To put these potential doses in perspective, the dose from naturally occurring cosmic radiation received during a 2-hour airplane flight at 39,000 feet is about 1 mrem (0.01 mSv). This is about the same as the CEDE from consuming 13 jackrabbits from Sedan.

**Table 9-1. Hypothetical dose to a human consuming animals sampled from the NNSS in 2010**

Animal	Average Radionuclide Concentrations <sup>(a)</sup>	Dose Conversion Factor (mrem/pCi ingested) <sup>(b)</sup>	Committed Effective Dose Equivalent (CEDE) (mrem)	Sum of CEDE (mrem)
<b>Sedan</b>				
Jackrabbit <sup>(c)</sup>	$^3\text{H}$ 220,500 pCi/L <sup>(d)</sup>	0.00000064	0.10	1.65
	$^{90}\text{Sr}$ 1.575 pCi/g <sup>(e)</sup>	0.000142450	0.67	
	$^{137}\text{Cs}$ 1.277 pCi/g	0.000050000	0.19	
	$^{239+240}\text{Pu}$ 0.055 pCi/g	0.003537200	0.58	
	$^{241}\text{Am}$ 0.010 pCi/g	0.003640800	0.11	
<b>Areas 8, 12, and 30</b>				
Mountain lion <sup>(f)</sup>	$^3\text{H}$ 1,483 pCi/L	0.00000064	0.001	0.001

(a) Negative values were set to zero prior to averaging. Radionuclides not detected in a species at a location were not included in dose estimate.

(b) Dose conversion factors for human ingestion are from Federal Guidance Report No. 11 (EPA, 1988).

(c) Assumed meat from 20 rabbits was consumed, and the meat on each weighed 513 g.

(d) pCi/L is concentration in water from animal; water content = 71% by weight.

(e) pCi/g are dry weight.

(f) Assumed average whole body weight was 45 kg and all meat (18,144 g) was consumed.

**9.1.1.3 Dose from Ingestion of Plants from the NNSS**

Current NNSS land use discourages the harvest of plants or plant parts for direct consumption by humans. However, it may be possible that individuals with access collect edible plant material for consumption. One species in particular, pinyon trees, produce pine nuts, which are harvested and consumed across the western United States. Pinyon trees grow in multiple locations on the NNSS. During 2010, pine nuts were sampled from two locations that would potentially be contaminated in order to determine the dose to someone consuming them. Pine nuts were collected from pinyon trees in Area 15 and near the E Tunnel Ponds in Area 12. Samples from each of these animals were analyzed for radionuclide content (Section 8.3.1, Table 8-3).

The potential dose to an individual from consuming these pine nuts was calculated using the following assumptions:

- An individual consumes 1 pound (453.6 g) over the year.
- Consumed pine nuts contain the average concentration of each radionuclide detected in the samples from that sample location.
- The moisture content of consumed pine nuts is 34 percent, which is the average moisture content of samples collected during 2010.

The only man-made radionuclide detected in the pine nuts was <sup>3</sup>H. The estimated potential doses from consuming the pine nuts, using the EPA dose conversion factor for <sup>3</sup>H (EPA, 1988), are shown in Table 9-2. The highest estimated CEDE was 0.003 mrem (0.00003 mSv) for consuming pine nuts from near the E Tunnel Ponds in Area 12. To put this dose in perspective, 0.003 mrem is about the same as one would receive from wearing a luminous liquid crystal display watch for a year and also 9,000 times less than the dose to the average person in the United States from naturally occurring cosmic radiation.

**Table 9-3. Hypothetical dose to a human consuming pine nuts sampled from the NNSS in 2010**

Sample Location	Radionuclide Concentrations	Dose Conversion Factor <sup>(a)</sup> (mrem/pCi ingested <sup>(b)</sup> )	Committed Effective Dose Equivalent (CEDE) (mrem)
Area 15, North of Baneberry	<sup>3</sup> H 3,850 pCi/L <sup>(c)</sup>	0.000000064	0.00004
Area 12, E Tunnel Ponds	<sup>3</sup> H 307,000 pCi/L	0.000000064	0.00303

(a) Dose conversion factors for human ingestion are from Federal Guidance Report No. 11 (EPA, 1988).  
 (b) Assumed 453.6 g consumed during the year.  
 (c) pCi/L is concentration in water from the pine nuts; water content = 34 % by weight.

**9.1.1.4 Dose from Drinking Contaminated Groundwater**

The 2010 groundwater monitoring data indicate that groundwater from offsite private and community wells and offsite springs has not been impacted by past NNSS nuclear testing operations (see Sections 5.1.6 and 7.2.3). No man-made radionuclides have been detected in any wells accessible to the offsite public or in private wells or springs. Therefore, drinking contaminated groundwater is not a possible pathway of exposure to the public residing off site.

**9.1.1.5 Dose from Direct Radiation Exposure along NNSS Borders**

The direct exposure pathway from gamma radiation to the public is monitored annually (see Chapter 6). In 2010, the only place where the public had the potential to be exposed to direct radiation along the NNSS borders was at Gate 100, the primary entrance to the site on the southern NNSS border. Trucks hauling radioactive materials, primarily low-level waste (LLW) being shipped for disposal at the Area 3 and Area 5 RWMSs, park outside Gate 100 while waiting for entry approval. Only during these times is there a potential for exposure to the public on the NNSS. However, no member of the public resides or remains full-time at the Gate 100 truck parking area.

Therefore, dose from direct radiation is not included as a possible pathway of exposure to the public residing off site.

### **9.1.2 Dose from Waste Operations**

DOE M 435.1-1 states that low-level waste (LLW) disposal facilities shall be operated, maintained, and closed so that a reasonable expectation exists that annual dose to members of the public shall not exceed 25 mrem. This limit is for all exposure pathways combined. Given that the RWMSs are located well within the NNSS boundaries, no members of the public could access these areas for significant periods of time. However, for purposes of documenting potential impacts, the possible pathways for radionuclide movement from waste disposal facilities are monitored.

During 2010, external radiation from waste operations measured near the boundaries of the Area 3 and Area 5 RWMSs could not be distinguished from background levels at those locations (see Section 6.3.3). Area 3 and Area 5 RWMS operations would have contributed negligible external exposure to a hypothetical person residing near the boundaries of these sites and no dose to the offsite public.

The dose from the air pathway can be estimated from air monitoring results from stations near the RWMSs (see Chapter 4, Figure 4-1). Mean concentrations of radionuclides in air at the Area 3 and Area 5 environmental sampler locations were, at the most, 4 percent of their CLs ( $^{239+240}\text{Pu}$  at U-3ah/at S; see Chapter 4, Table 4-5). Scaling this to the 10 mrem dose that the CL represents would be < 1 mrem to a hypothetical person residing near the boundaries of the RWMS, and the dose would be much lower to the offsite public.

There is no exposure, and therefore no dose, to the public from groundwater beneath waste disposal sites on the NNSS. Groundwater monitoring indicates that no man-made radiological contamination has been detected in wells accessible to the offsite public or in private wells or springs (see Sections 5.1.6 and 7.2.3). Also, groundwater and vadose zone monitoring at the RWMSs, conducted to verify the performance of waste disposal facilities, have not detected the migration of radiological wastes into groundwater (see Section 10.1.7 and 10.1.8). Based on these results, potential doses to members of the public from LLW disposal facilities on the NNSS from all pathways are negligible.

### **9.1.3 Total Offsite Dose to the Public from all Pathways**

DOE O 5400.5 establishes a radiation dose limit to a member of the general public from all possible pathways as a result of DOE facility operations. This limit is 100 mrem/yr (1 mSv/yr) over and above background radiation and includes the air transport, ingestion, and direct exposure pathways. For 2010, the only plausible pathways of public exposure to man-made radionuclides from current or past NNSS activities included the air transport pathway and the ingestion of game animals and pine nuts. The doses from these pathways are combined below to present an estimate of the total 2010 dose to the maximally exposed individual (MEI) (see Glossary, Appendix B) residing off site.

In the recent past, the MEI from the air-pathway was considered a hypothetical person residing at the critical receptor station with the highest dose (Schooner). However, in an effort to give a more realistic estimate, the 0.04 mrem/yr (0.0004 mSv) dose estimate for the Gate 510 critical receptor station is used for the dose estimate for an offsite MEI (see Section 4.1.1.1). If the offsite MEI is assumed to eat 20 jackrabbits from Sedan and 453.6 g of pine nuts from near the E Tunnel Ponds in Area 12, this individual may receive an estimated additional 1.65 mrem/yr (0.0165 mSv/yr) dose (Tables 9-1 and 9-4). The total CEDE to this hypothetical MEI would be 1.69 mrem/yr (0.0169 mSv/yr) (Table 9-3). The total dose of 1.69 mrem/yr is 1.7 percent of the DOE limit of 100 mrem/yr and about 0.5 percent of the total dose the MEI receives from natural background radiation (360 mrem/yr) (Figure 9-1).

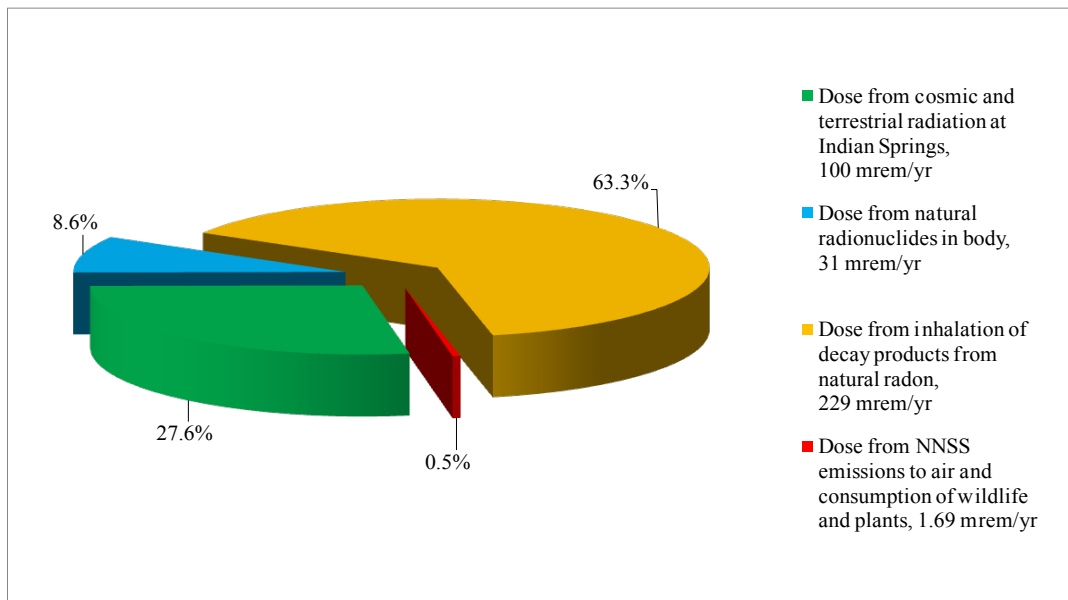
Natural background radiation consists of cosmic radiation, terrestrial radiation, radiation from radionuclides within the composition of the human body (primarily potassium-40), and radiation from the inhalation of naturally occurring radon and its progeny. The cosmic and terrestrial components of background radiation shown in Figure 9-1 were estimated from the annual mean radiation exposure rate measured with a pressurized ion

chamber (PIC) at Indian Springs by the Community Environmental Monitoring Program (98.55 milliroentgens per year [mR/yr], rounded to 100 mR/yr; see Chapter 7, Table 7-4). The radiation exposure in air, measured by the PIC in units of mR/yr, is approximately equivalent to the unit of mrem/yr for tissue. The portion of the background dose from the internally deposited, naturally occurring radionuclides and from the inhalation of radon and its daughters shown in Figure 9-1 were estimated at 31 mrem/yr and 229 mrem/yr, respectively, using the approximations by the National Council on Radiation Protection and Measurements (2006).

**Table 9-3. Estimated radiological dose to a hypothetical maximally exposed member of the general public from 2010 NNSS operations**

Pathway	Dose to MEI		Percent of DOE 100 mrem/yr Limit
	(mrem/yr)	(mSv/yr)	
Air <sup>(a)</sup>	0.04	0.0004	0.04
Water <sup>(b)</sup>	0	0	0
Wildlife <sup>(c)</sup>	1.65	0.0165	1.65
Direct <sup>(d)</sup>	0	0	0
All Pathways	1.69	0.0169	1.69

- (a) Based on annual average concentrations at the compliance station nearest the offsite public (Section 4.1.5, Table 4-12).
- (b) Based on all offsite groundwater sampling in 2010 (Section 8.5).
- (c) Assumes that the MEI consumes 20 jackrabbits from Sedan and 453.6 g of pine nuts from Area 12 (Tables 9-1 and 9-5).
- (d) Based on 2010 gamma radiation monitoring data at NNSS entrance (Section 6.3.1).



**Figure 9-1. Comparison of radiation dose to the MEI from the NNSS and natural background (percent of total)**

### 9.1.4 Collective Population Dose

The collective population dose to residents within 80 km (50 mi) of the NNSS emission sources was not estimated in 2010 because this assessment depends upon CAP88-PC estimations, which were not calculated. DOE approved the discontinuance of reporting collective population dose from NNSS operations after 2004 because it is so low for the NNSS. It has been below 0.6 person-rem/yr for the period from 1992, when it was first calculated and reported to DOE, through 2004 (Figure 9-2). The relatively large increase in collective population dose seen in 1994 in Figure 9-2 was due to two changes. The first was the inclusion of plutonium resuspension in air from soils across all areas of the NNSS instead of from soils from only a few areas of the NNSS in 1992 and 1993. The second was a large increase in the surrounding population in 1994, as Pahrump’s population increased by 7,000 and the population of Tonopah (4,200) was added to the calculation.

DOE recommended that NNSA/NSO should consider reporting collective population dose once again if ever it exceeds 1.0 person-rem/yr (DOE, 2004a). It will be recalculated when either the radionuclide emissions from NNS activities or the population within 80 km (50 mi) of the NNS increase significantly (e.g.,  $\geq 50$  percent), both of which are estimated annually (see Section 1.7).

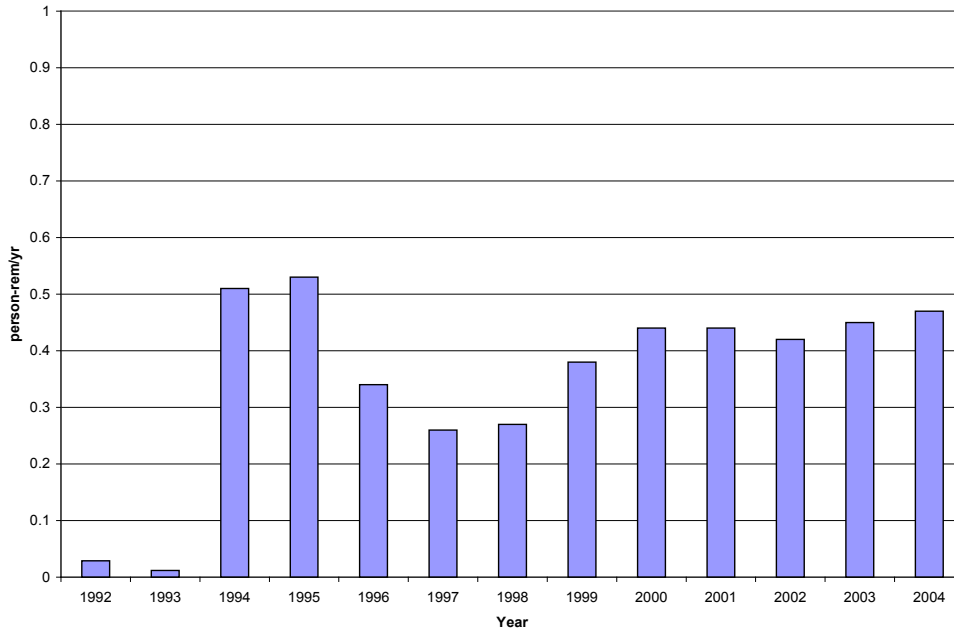


Figure 9-2. Collective population dose within 80 km (50 mi) of NNS emission sources from 1992 to 2004

### 9.1.5 Release of Property Containing Residual Radioactive Material

The release of property off the NNS that contains residual radioactive material is controlled. No vehicles, equipment, structures, or other materials can be released from the NNS unless the amount of radiological contamination on such items is less than the authorized limits. The default authorized limits are specified in the *Nevada Test Site Radiological Control Manual* (NNSA/NSO, 2009a) and are consistent with DOE O 5400.5. These limits are shown in Table 9-4. Items proposed for unrestricted release must be surveyed to document compliance with the authorized limits.

Government vehicles and equipment are routinely released or excessed when they are no longer needed by NNS projects or if they are required to be replaced. They are allowed to be released based on a combination of process knowledge and direct and indirect survey results that meet the release criteria of Table 9-4. With the exception of the locomotive discussed below, no items with residual radioactivity in excess of the limits specified in Table 9-4 were released from the NNS in 2010.

In 2010, a historical L 2 diesel-electric switch engine locomotive, which had resided near the Area 25 Engine Maintenance, Assembly, and Disassembly facility since the 1960s, was transported off the NNS to the Nevada State Railroad Museum in Boulder City, Nevada. Accessible areas of the locomotive were surveyed for residual radioactive material and decontaminated prior to the decision to donate the locomotive to the museum. Some inaccessible areas of the locomotive may have contained residual surface contamination, but disassembly to survey these areas would have required destroying some of the pieces and thereby destroying the locomotive's historical value. In accordance with DOE O 5400.5, NNSA/NSO requested an approval of alternate authorized release limits from DOE Headquarters specific for the locomotive. In doing so, NSTec estimated doses to the public using the DOE-approved dose modeling code RESRAD-BUILD Version 3.5 and conservative model parameters. NSTec's Radiological Engineering Calculation, REC-2010-001, "Public Dose Estimate from the EMAD 25 Ton Locomotive," concluded that the four exposure scenarios evaluated were all below the 25 mrem/yr



dose constraint of DOE O 5400.5. The likely use scenarios resulted in doses less than 1 mrem/yr, and the worst-case scenarios resulted in doses less than 4 mrem/yr. All scenarios met the radiological requirements for the unrestricted release of property with residual radioactivity to the public. DOE Headquarters approved the release, and the locomotive was transported to the museum in October.

**Table 9-4. Allowable total residual surface contamination for property released off NNSS**

Radionuclide	Residual Surface Contamination (dpm/100 cm <sup>2</sup> ) <sup>(a)</sup>		
	Removable	Average <sup>(b)</sup> (Fixed & Removable)	Maximum Allowable <sup>(c)</sup> (Fixed & Removable)
Transuranics, <sup>125</sup> I, <sup>129</sup> I, <sup>226</sup> Ra, <sup>227</sup> Ac, <sup>228</sup> Ra, <sup>228</sup> Th, <sup>230</sup> Th, <sup>231</sup> Pa	20	100	300
Th-natural, <sup>90</sup> Sr, <sup>126</sup> I, <sup>131</sup> I, <sup>133</sup> I, <sup>223</sup> Ra, <sup>224</sup> Ra, <sup>232</sup> U, <sup>232</sup> Th	200	1,000	3,000
U-natural, <sup>235</sup> U, <sup>238</sup> U, and associated decay products, alpha emitters (α)	1,000 α	5,000 α	15,000 α
Beta (β)-gamma (γ) emitters (radionuclides with decay modes other than alpha emission or spontaneous fission) except <sup>90</sup> Sr and others noted above	1,000 β+γ	5,000 β+γ	15,000 β+γ
<sup>3</sup> H and tritiated compounds	10,000	N/A	N/A

(a) Disintegrations per minute per 100 square centimeters

Source: NNSA/NSO (2009a)

(b) Averaged over an area of not more than 100 cm<sup>2</sup>

(c) Applicable to an area of not more than 100 cm<sup>2</sup>

In 2000, DOE placed a moratorium on the release of scrap metal from radiological areas for recycling. In the *FY 2011 NNSA/NSO Site Sustainability Plan* (SSP) (NSTec, 2010a), NNSA/NSO set goals to minimize the amount of construction and demolition materials disposed (see Section 3.3.1, Table 3-3). No such materials were diverted from disposal in 2010 through reuse or recycling based on concerns about compliance with the secretarial moratorium. In 2010, DOE Headquarters held a workshop and provided more specific guidance on what materials are or are not restricted from recycling. An assessment is scheduled to be conducted in 2011 that will identify NNSA/NSO materials that can be cleared for unrestricted reuse or recycling.

## 9.2 Dose to Aquatic and Terrestrial Biota

DOE O 450.1A requires DOE facilities to evaluate the potential impacts of radiation exposure to biota in the vicinity of DOE activities. To assist in such an evaluation, DOE’s Biota Dose Assessment Committee developed DOE-STD-1153-2002. This standard established the following radiological dose limits for plants and animals. Dose rates equal to or less than these are expected to have no direct, observable effect on plant or animal reproduction:

- 1 rad/d (0.01 grays per day [Gy/d]) for aquatic animals
- 1 rad/d (0.01 Gy/d) for terrestrial plants
- 0.1 rad/d (1 milligray per day) for terrestrial animals

DOE-STD-1153-2002 also provides concentration values for radionuclides in soil, water, and sediment that are to be used as a guide for determining if biota are potentially receiving radiation doses that exceed the limits. These concentrations are called the Biota Concentration Guide (BCG) values. They are defined as the minimum concentration of a radionuclide that would cause dose limits to be exceeded using very conservative uptake and exposure assumptions.

NSTec biologists use the graded approach described in DOE-STD-1153-2002. The approach is a three-step process consisting of a data assembly step, a general screening step, and an analysis step. The analysis step consists of site-specific screening, site-specific analysis, and site-specific biota dose assessment.

The following information is required by the graded approach:

- Identification of terrestrial and aquatic habitats on the NNSS that have radionuclides in soil, water, or sediment
- Identification of terrestrial and aquatic biota on the NNSS that occur in contaminated habitats and are at risk of exposure
- Measured or calculated radionuclide concentrations in soil, water, and sediment in contaminated habitats on the NNSS that can be compared to BCG values to determine the potential for exceeding biota dose limits
- Measured radionuclide concentrations in NNSS biota, soil, water, and sediment in contaminated habitats on the NNSS to estimate site-specific dose to biota

A comprehensive biota dose assessment for the NNSS using the graded approach was reported in the *Nevada Test Site Environmental Report 2003* (Bechtel Nevada, 2004a). This dose assessment demonstrated that the potential radiological dose to biota on the NNSS was not likely to exceed dose limits. Data from monitoring air, water, and biota across the NNSS do not suggest that NNSS surface contamination conditions have worsened; therefore, this biota dose evaluation conclusion remains the same for 2010.

### 9.2.1 2010 Site-Specific Biota Dose Assessment

The site-specific biota dose assessment phase of the graded approach centers on the actual collection and analysis of biota. To obtain a predicted internal dose to biota sampled in 2010, the RESRAD-BIOTA, Version 1.21, computer model (DOE, 2004b) was used. Maximum concentrations of man-made radionuclides detected in plant and animal tissue (see Section 8.3.1, Table 8-3, and Section 8.3.2, Table 8-5) were used as input to the model. External dose was based on the maximum exposure rate measured by a thermoluminescent dosimeter (TLD) near the biota sampling site. TLD sites used were the T10 location for Sedan Crater, the Upper Haines Lake location for the mountain lion and pine nuts sampled in Area 12, and the Stake K-25 location for the sampling location in Area 15 (see Chapter 6, Table 6-1).

The 2010 site-specific estimated dose rates to biota were all below the DOE limits for both plants and animals (Table 9-5). The highest was predicted for plants near the Sedan Crater in Area 10 followed by animals in the same location. External dose contributed more than 75 percent of the total dose for all locations except for plants at Sedan where internal radionuclides contributed 79 percent of the dose.

**Table 9-5. Site-specific dose assessment for terrestrial plants and animals sampled in 2010**

Location <sup>(a)</sup>	Estimated Radiological Dose (rad/d)					
	To Plants			To Animals <sup>(b)</sup>		
	Internal	External	Total	Internal	External	Total
Area 10 (near Sedan Crater)	0.00279	0.00072	0.00351	0.00021	0.00072	0.00093
Area 12 (near E Tunnel Ponds)	0.00003	0.00032	0.00035	NM <sup>(c)</sup>		
Area 15 (north of Baneberry)	0.0000004	0.00029	0.00029	NM		
<b>DOE Dose Limit:</b>	<b>1</b>			<b>0.1</b>		

(a) For more information, see Chapter 8.

(b) Used the maximum concentration measured of three mountain lions sampled during 2010.

(c) NM = not measured; no animals were sampled near E Tunnel Ponds in 2010.

### 9.2.2 Environmental Impact

Radionuclides in the environment from past or present NNSS activities result in a potential dose to the public or biota much lower than dose limits set to protect health and the environment. The estimated worst case dose to the MEI for 2010 was 1.7 percent of the dose limit set to protect human health. Dose to biota at the NNSS sites sampled in 2010 were less than 1 percent of dose limits set to protect plant and animal populations. Based on the low potential doses from NNSS radionuclides, impacts from those radionuclides are expected to be negligible.

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## 10.0 Waste Management

Several federal and state regulations govern the safe management, storage, and disposal of radioactive, hazardous, and solid wastes generated or received on the Nevada National Security Site (NNSS) (see Section 2.5). This chapter describes the waste management operations conducted under the Environmental Management Program of the U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office (NNSA/NSO) and summarizes the activities performed in 2010 to meet all environmental/public safety regulations. The goals of the program are shown below. The compliance measures and actions tracked and taken to meet the program goals are also listed.

<b>Waste Management Goals</b>	<b>Compliance Measures/Actions</b>
<p>Manage and safely dispose of low-level waste (LLW), mixed low-level waste (MLLW), and hazardous waste (HW) generated by NNSA/NSO, other U.S. Department of Energy (DOE), or selected U.S. Department of Defense (DoD) operations.</p> <p>Manage and safely dispose of solid/sanitary wastes generated by NNSA/NSO operations.</p> <p>Manage and safely store transuranic (TRU) and mixed TRU (MTRU) wastes and for eventual shipment to the Waste Isolation Pilot Plant (WIPP) in Carlsbad, New Mexico.</p> <p>Ensure that disposal systems meet performance objectives.</p> <p>Ensure that wastes received for storage and/or disposal meet waste acceptance criteria.</p> <p>Evaluate, design, construct, maintain, and monitor closure covers for radioactive waste disposal units at the Area 3 and Area 5 Radioactive Waste Management Sites (RWMSs).</p> <p>Manage radiation doses from the Area 3 and Area 5 RWMSs to the levels specified in DOE Manual DOE M 435.1-1, "Radioactive Waste Management Manual."</p> <p>Manage underground storage tanks (USTs) to prevent environmental contamination.</p>	<p>Maintain documents required for a Category II Non-reactor Nuclear Facility established for radioactive waste disposal operations</p> <p>Perform site characterizations for proposed new waste disposal systems</p> <p>Acceptance criteria for radioactive wastes received for disposal</p> <p>Volume of disposed LLW</p> <p>Volume of disposed MLLW</p> <p>Volume of stored HW and MLLW</p> <p>Weight of approved explosive ordnance wastes detonated</p> <p>Weight and volume of solid waste disposed</p> <p>Soil moisture in the vadose zone</p> <p>Tritium (<math>^3\text{H}</math>), pH, specific conductance, total organic carbon, and total organic halides in groundwater</p> <p>Direct radiation at thermoluminescent dosimeter (TLD) stations</p> <p>Tritium, gross alpha/beta, and gamma emitters at air monitoring stations</p>

### 10.1 Radioactive Waste Management

The NNSS Radioactive Waste Management facilities include the Area 3 RWMS and the Area 5 Radioactive Waste Management Complex (RWMC) (see Glossary, Appendix B). The Area 5 RWMC is composed of the Area 5 RWMS and the Waste Examination Facility. The Area 3 RWMS and the Area 5 RWMC operate as Category II Non-Reactor Nuclear Facilities. They are designed and operated to perform four functions:

- Dispose of LLW and MLLW from NNSA/NSO activities performed on the NNSS and performed off site in the state of Nevada.

- Dispose of DOE LLW and MLLW from around the DOE complex, primarily from the cleanup of sites associated with the manufacture of weapons components and materials, including former sites or projects operated by DOE or its predecessor agencies.
- Dispose of LLW and MLLW designated as classified material by DoD.
- Store and manage TRU wastes generated by ongoing NNSS projects in preparation for final disposal at WIPP.

All generators of waste streams must demonstrate eligibility to ship waste to the NNSS for disposal, submit profiles characterizing specific waste streams, meet the NNSS Radioactive Waste Acceptance Criteria, and receive programmatic approval from NNSA/NSO. To assess and predict the long-term performance of LLW disposal sites, NNSA/NSO conducts a Performance Assessment (PA) and a Composite Analysis (CA). A PA is a systematic analysis of the potential risks posed by a waste disposal site to the public and to the environment for LLW disposed after 1988. A CA is an assessment of the risks posed by all wastes disposed in a LLW disposal site and by all other sources of residual contamination that may interact with the disposal site.

### 10.1.1 Area 5 RWMS

The Area 5 RWMS is an approximately 740-acre NNSA/NSO owned radioactive waste disposal facility that includes 200 acres (ac) of historical and active disposal cells used for burial of both LLW and MLLW, and approximately 540 ac of land available for future radioactive disposal cells. Waste disposal at the Area 5 RWMS has occurred in a 37 ha (92 ac) portion of the site since the early 1960s. This “92-Acre Area” consists of 31 disposal cells (pits and trenches) and 13 Greater Confinement Disposal boreholes and was used for disposal of waste in drums, soft-sided containers, large cargo containers, and boxes. The 92-Acre Area is being filled and closed in 2011. Three new cells immediately north and west of the 92-Acre Area were constructed and began receiving wastes in 2010. They include two LLW cells (Cells 19 and 20) and a specialized MLLW cell (Cell 18), which can receive radioactive and mixed wastes contaminated with polychlorinated biphenyls (PCBs). LLW and MLLW disposal services are expected to continue at the Area 5 RWMS as long as the DOE complex requires the disposal of wastes from the weapons program and site cleanup activities.

On November 30, 2010, Pit 3 (P03), within the 92-Acre Area, was closed. It was operated under a Resource Conservation and Recovery Act (RCRA) Part B Permit (NEV HW0021) which authorized the disposal of MLLW through November 2010 or until a total of 20,000 cubic meters (m<sup>3</sup>) was received. In 2010, P03 received 1,266 tons of MLLW (Table 10-1). A total of 10,704.63 m<sup>3</sup> of MLLW were disposed in P03 over its lifetime. Quarterly reports were submitted to the State of Nevada in 2010 to document the weight of MLLW received each quarter at P03.

In 2010, the Area 5 RWMS received shipments containing a total of 69,905 m<sup>3</sup> (2,468,660 cubic feet [ft<sup>3</sup>]) of radioactive wastes for disposal (Table 10-1). The majority of disposed LLW and MLLW were received from offsite generators. Only 6,430 m<sup>3</sup> (227,075 ft<sup>3</sup>) of the LLW disposed in 2010 were generated on site. The volumes of waste shipments during fiscal year 2010 (October 1–September 30) are reported in an annual report (NNSA/NSO, 2011a).

**Table 10-1. Radioactive waste received and disposed at the Area 5 RWMS in 2010**

Waste Type	Disposal Cell(s)	Permitted Limit (m <sup>3</sup> )	2010 Quantities Received and Disposed	
			m <sup>3</sup> (ft <sup>3</sup> ) <sup>(a)</sup>	tons <sup>(b)</sup>
LLW	P10, P12–P17	NA <sup>(c)</sup>	58,443 (2,063,895)	NA
MLLW <sup>(d)</sup>	P03	20,000	1,951 (68,902)	1,266
MLLW	Cell 18	25,459	-- <sup>(e)</sup>	--
Asbestiform LLW	P06A	NA	9,511 (335,900)	2,364
Totals			69,905 (2,468,660)	3,630

(a) LLW disposal is regulated by DOE and totals reported are based on volume (m<sup>3</sup>).

(b) Fees paid to the State of Nevada for HW generated at NNSS and MLLW wastes received for disposal are based on weight (tons).

(c) Not applicable.

(d) MLLW contains a hazardous component that is regulated by the State of Nevada (see Section 10.2).

(e) Cell 18 (Area 5 Mixed Waste Disposal Unit [MWDU]) was opened in 2010 but did not receive MLLW until January 2011.

### 10.1.2 Area 3 RWMS

Disposal operations at the Area 3 RWMS began in the late 1960s. The Area 3 RWMS consists of seven subsidence craters configured into five disposal cells. Each subsidence crater was created by an underground weapons test. Until July 1, 2006, when the site was placed into inactive status, the site was used for disposal of bulk LLW, such as soils or debris, and waste in large cargo containers. The site consists of the following seven craters:

3 Disposal Cells (Inactive Status):

U-3ah/at  
U-3bh

2 Closed Cells:

U-3ax/bl (CAU 110)

2 Undeveloped Cells:

U-3az  
U-3bg

### 10.1.3 Waste Characterization

Waste Generator Services (WGS) characterizes LLW and MLLW generated by DOE primarily at the NNSS but also at selected offsite DOE locations. Characterization is performed using either knowledge of the generating process or sampling and analysis. Following the characterization of a waste stream, a Waste Profile is completed for approval by an appropriate disposal facility. The Waste Profile delineates the pedigree of the waste, including but not limited to, a description of the waste generating process, physical and chemical characteristics, radioactive isotopes and their quantities, and detailed packaging information. WGS then packs and ships approved waste streams in accordance with U.S. Department of Transportation requirements to the Area 5 RWMS or to an offsite treatment, storage, or disposal facility.

In 2010, LLW and MLLW were characterized by WGS for the following general waste stream categories:

- Lead Solids
- Sealed Sources
- Miscellaneous Debris
- Hazardous Soils
- Contaminated PCB Waste
- Compactable Trash
- Contaminated Soils
- Depleted Uranium
- Contaminated Asbestos Waste

### 10.1.4 Verification of Waste Acceptance Criteria

Waste verification is an inspection process that confirms the waste stream data supplied by WGS or by another waste generator before MLLW is accepted for disposal at NNSS. Verification uses Real-Time Radiography (RTR), visual inspection, and/or chemical screening on a designated percentage of MLLW. The objectives of waste verification include identifying prohibited waste forms, verifying that certain MLLW treatment objectives are met, confirming that waste containers do not contain free liquids, and ensuring that waste containers are at least 90 percent full, per RCRA and State of Nevada requirements.

Verification for onsite generated waste includes visual inspection, RTR, and chemical screening. Verification of offsite generated waste received at the NNSS includes only RTR because the waste packages are not opened at the NNSS. Offsite verification is also performed at a generator facility or a designated treatment, storage, or disposal facility and can include both physical and chemical verification.

In 2010, offsite visual verification was completed on 60 MLLW packages from 15 separate waste streams. Offsite chemical screening was completed on two of these waste streams. Onsite RTR was completed on 20 packages from two offsite waste streams, and onsite visual verification was completed on 5 packages from four onsite waste streams. No MLLW packages were rejected during 2010.

### 10.1.5 TRU Waste Operations

The TRU Pad/Transuranic Pad Cover Building (TPCB) at the Area 5 RWMC is a RCRA Part B interim status facility designed for the safe storage of TRU and MTRU waste generated by Lawrence Livermore National Laboratory (LLNL) and other small-quantity sites. The TPCB accepts TRU/MTRU waste from NNSS generators

including the Joint Actinide Shock Physics Experimental Research (JASPER) facility. The TPCB stores the waste until it is characterized for disposal at the WIPP in Carlsbad, New Mexico. In 2009, all legacy MTRU waste was characterized, visually inspected, repackaged, and shipped off site. In 2010, the TRU waste remaining in storage at the TPCB consisted of two experimental spheres from LLNL and 19 standard waste boxes from JASPER.

### 10.1.6 Maintenance of Key Documents

Table 10-2 lists the key documents that must be current and in place for RWMS disposal operations to occur. In 2010, all of these key documents were maintained and one was revised.

**Table 10-2. Key documents required for Area 3 RWMS and Area 5 RWMS disposal operations**

<p><b>Disposal Authorization Statement</b></p> <ul style="list-style-type: none"> <li>Disposal Authorization Statement for Area 5 RWMS, December 2000</li> <li>Disposal Authorization Statement for Area 3 RWMS, October 1999</li> </ul> <p><b>Performance Assessment</b></p> <ul style="list-style-type: none"> <li>Addendum 2 to Performance Assessment for Area 5 RWMS, Revision 2.1, September 2005</li> <li>Performance Assessment/Composite Analysis for Area 3 RWMS, Revision 2.1, October 2000</li> <li>2010 Annual Summary Report for Area 3 and 5 RWMSs at NNSS (Review of Performance Assessments and Composite Analyses), March 2011</li> </ul> <p><b>Composite Analysis</b></p> <ul style="list-style-type: none"> <li>Composite Analysis for Area 5 RWMS, September 2001</li> <li>Performance Assessment/Composite Analysis for Area 3 RWMS, Revision 2.1, October 2000</li> </ul> <p><b>NNSS Waste Acceptance Criteria</b></p> <ul style="list-style-type: none"> <li>NNSS Waste Acceptance Criteria, Revision 8-01, January 2011</li> </ul> <p><b>Integrated Closure and Monitoring Plan</b></p> <ul style="list-style-type: none"> <li>Closure Plan for the Area 3 RWMS at the NNSS, September 2007</li> <li>Closure Plan for the Area 5 RWMS at the NNSS, September 2008</li> </ul> <p><b>Auditable Safety Analysis</b></p> <ul style="list-style-type: none"> <li>Documented Safety Analysis (DSA) for the NNSS Area 3 and 5 Radioactive Waste Facilities, Revision 5, February 2010</li> <li>Safety Evaluation Report (SER) Addendum C, Revision 0 for the Visual Examination and Repackaging Building Addendum to the Area 5 RWMC DSA and Technical Safety Requirements (TSR) for the Area 5 RWMC TRU Waste Activities, September 2008</li> <li>Visual Examination and Repackaging Building Addendum to the Area 5 RWMC DSA, Revision 0, July 2008</li> <li>SER Addendum A, Revision 0 for the NNSS Area 3 and 5 Radioactive Waste Facility DSA, Revision 5, Change Notice 1, and TSR Revision 7, Change Notice 1, December 2010</li> <li>TSR for the Area 5 RWMC LLW Activities, Revision 5, October 2007</li> <li>TSR for the Area 5 RWMC TRU Waste Activities, Revision 10, February 2010</li> <li>TSR for the Area 3 and 5 RWMS LLW Activities, Revision 7, February 2010</li> <li>Authorization Agreement for Area 5 RWMC, January 2007</li> </ul>
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### 10.1.7 Groundwater Monitoring

P03 was operated in 2010 according to RCRA Interim Status standards for the disposal of mixed LLW. Title 40 Code of Federal Regulations (CFR) Part 265, “Groundwater Monitoring,” Subpart F (40 CFR 265.92) requires groundwater monitoring to verify the performance of P03 to protect groundwater from buried radioactive wastes. The RCRA Part B Permit for the new Cell 18 also requires groundwater monitoring. Wells UE5 PW-1, UE5 PW-2, and UE5 PW-3 are monitored for this purpose; these wells comprise 3 of the 19 onsite monitoring wells sampled periodically for radionuclide analyses of groundwater (see Section 5.1.8). Investigation levels (ILs) for five indicators of groundwater contamination (Table 10-3) were established by NNSA/NSO and the Nevada



Division of Environmental Protection (NDEP) for these three wells in 1998. None of the samples collected semi-annually in 2010 from the wells had contaminant levels above their ILs (Table 10-3). Static levels and general water chemistry parameters are also monitored. All sample analysis results are presented in NSTec (2011c). Table 5-5 of Section 5.1.8 presents the tritium results for UE5 PW-1, UE5 PW-2, and UE5 PW-3.

**Table 10-1. Results of groundwater monitoring of UE5 PW-1, UE5 PW-2, and UE5 PW-3 in 2010**

Parameter	Investigation Level (IL)	Sample Levels
pH	< 7.6 or > 9.2 S.U. <sup>(a)</sup>	8.13 to 8.39 S.U.
Specific conductance (SC)	0.440 mmhos/cm <sup>(b)</sup>	0.345 to 0.379 mmhos/cm
Total organic carbon (TOC)	1 mg/L <sup>(c)</sup>	<0.5 to 0.76 mg/L
Total organic halides (TOX)	50 µg/L <sup>(d)</sup>	< 5 to <5.9 µg/L
Tritium ( <sup>3</sup> H)	2,000 pCi/L <sup>(e)</sup>	-25.15 to 2.08 pCi/L

(a) S.U. = standard unit(s) (for measuring pH)

(b) mmhos/cm = millimhos per centimeter

Source: NSTec (2011c)

(c) mg/L = milligrams per liter

(d) µg/L = microgram(s) per liter

(e) pCi/L = picocuries per liter

### 10.1.8 Vadose Zone Monitoring of Closure Covers

Monitoring of the vadose zone (unsaturated zone above the water table) is conducted at the RWMC to demonstrate that (1) the PA assumptions at the RWMSs are valid regarding the hydrologic conceptual models used, including soil water contents, and upward and downward flux rates and (2) there is negligible infiltration of precipitation into zones of buried waste at the RWMSs. Vadose zone monitoring (VZM) offers many advantages over groundwater monitoring, including detecting potential problems long before groundwater resources would be impacted, allowing corrective actions to be made early, and being less expensive than groundwater monitoring.

The components of the VZM program include (1) the Drainage Lysimeter Facility northwest of U-3ax/bl, (2) the Area 5 Weighing Lysimeter Facility southwest of the Area 5 RWMS, (3) automated monitoring systems in the operational covers on Pits P03, P04, and P05; the floor of P05 underneath the waste; and the vegetated closure cover on U-3ax/bl, and (4) tritium monitoring via soil gas sampling at Well GCD-05 (one of the 13 GCD boreholes at the Area 5 RWMS). Descriptions of these components and the results of monitoring in 2010 can be found in NSTec (2011d). All VZM conducted in 2010 continued to demonstrate that there is negligible infiltration of precipitation into zones of buried waste at the RWMC and that the performance criteria of the waste disposal cells are being met to prevent contamination of groundwater and the environment.

### 10.1.9 Assessment of Radiological Dose to the Public

DOE M 435.1-1 states that LLW disposal facilities shall be operated, maintained, and closed so that a reasonable expectation exists that annual dose to members of the public shall not exceed 25 mrem/yr. This limit is for all exposure pathways combined and is for a 1,000-year compliance period after closure of the disposal units. Given that the RWMSs are located well within the NNSS boundaries, no members of the public can currently access these areas for significant periods of time to acquire a dose exceeding the 25 mrem/yr limit. To document compliance with DOE M 435.1-1, however, the possible pathways for radionuclide movement from waste disposal facilities are monitored.

#### 10.1.9.1 Dose from Air and Direct Radiation

Air samples operate continuously to collect air particulates and atmospheric moisture near each RWMS. These samples are analyzed for radionuclides, and results are used to assess potential dose. Details of the air sampling and a summary of the analysis results can be found in Chapter 4. The four air monitoring locations at the Area 3 RWMS are U-3bh N, U-3bh S, U-3ah/at N, and U-3ah/at S. The two air monitoring locations at the Area 5 RWMS are DoD and Sugar Bunker. The dose from the air pathway was estimated from air monitoring results from these six stations.

Mean concentrations of radionuclides in air at the Area 3 and Area 5 RWMS environmental sampler locations

were far below their established National Emission Standards for Air Pollutants (NESHAP) Concentration Levels for Environmental Compliance (CLs) (Table 10-4). The highest concentration of any radionuclide among the six RWMS air sampler locations was  $0.06072 \times 10^{-15}$   $\mu\text{Ci/mL}$  for  $^{239+240}\text{Pu}$  at the U-3ah/at S location, which is only 4 percent of the CL for  $^{239+240}\text{Pu}$  (Table 10-4). Scaling this to the 10 mrem dose that the CL represents would mean that a hypothetical person residing near the boundaries of the RWMS would receive a dose of  $< 1$  mrem/yr, and the dose would be much lower to the offsite public.

**Table 10-4. Concentrations of radionuclides in Area 3 and Area 5 RWMS air samples collected in 2010**

Radionuclide	Concentration ( $\times 10^{-15}$ microcuries/milliliter [ $\mu\text{Ci/mL}$ ])		
	NESHAP Concentration Level for Environmental Compliance (CL) <sup>(a)</sup>	Highest Concentration Among RWMS Samplers	RWMS Sampler with Highest Concentration
$^{241}\text{Am}$	1.9	0.01098	U-3ah/at S
$^{137}\text{Cs}$	19	0.0095	Sugar Bunker N
$^3\text{H}$	1,500,000	830	U-3ah/at S
$^{238}\text{Pu}$	2.1	0.00218	U-3ah/at S
$^{239}\text{Pu}$	2	0.06072 ( $^{239+240}\text{Pu}$ )	U-3ah/at S
$^{233}\text{U}$	7.1	0.2202 ( $^{233+234}\text{U}$ )	Sugar Bunker N <sup>(b)</sup>
$^{234}\text{U}$	7.7		
$^{235}\text{U}$	7.1	0.01829 ( $^{235+236}\text{U}$ )	Sugar Bunker N <sup>(b)</sup>
$^{236}\text{U}$	7.7		
$^{238}\text{U}$	8.3	0.2278	Sugar Bunker N <sup>(b)</sup>

Note: The CL values represent an annual average concentration that would result in a total effective dose equivalent (TEDE) of 10 mrem/yr, the federal dose limit to the public from all radioactive air emissions.

- (a) From Table 2, Appendix E of 40 CFR 61, "National Emission Standards for Hazardous Air Pollutants," 1999.  
 (b) Sugar Bunker N was the only RWMS air sampler location at which uranium isotopes were analyzed.

TLDs are used to measure ionizing radiation exposure in and around each RWMS. These TLDs have three calcium sulfate elements used to measure the total exposure rate from penetrating gamma radiation that includes background radiation. The penetrating gamma radiation makes up the deep dose, which is compared to the 25 mrem/yr limit when background exposure is subtracted. Details of the direct radiation monitoring can be found in Chapter 6. During 2010, the external radiation measured near the boundaries of the Area 3 and Area 5 RWMSs could not be distinguished from background levels (see Section 6.3.3). Area 3 and Area 5 RWMS operations would have contributed negligible external exposure to a hypothetical person residing near the boundaries of these sites and no dose to the offsite public.

### 10.1.9.2 Dose from Groundwater

Groundwater and vadose zone monitoring at the RWMSs is conducted to verify the performance of waste disposal facilities. Such monitoring has not detected the migration of radiological wastes into groundwater (see Sections 10.1.7 and 10.1.8). Also, the results of monitoring offsite public and private wells and springs (see Sections 5.1.6 and 7.2) indicate that man-made radionuclides have not been detected in any public or private water supplies. Based on these results, potential doses to members of the public from LLW disposal facilities on the NNSS from groundwater, and from all pathways combined, are negligible.

## 10.2 Hazardous Waste Management

Hazardous wastes regulated under RCRA are generated at the NNSS from a broad range of activities including onsite laboratories, site and vehicle maintenance, communications operations, and environmental restoration of historical contaminated sites (see Chapter 11). Up until the end of September 2010, the RCRA Part B Permit NEV HW0021 regulated the operation of three HW facilities on the NNSS: P03 at the Area 5 RWMS, the Hazardous Waste Storage Unit (HWSU) in Area 5, and the Explosive Ordnance Disposal Unit (EODU) in Area 11. Pit P03, which received MLLW, was closed November 30, 2010, and a new MLLW facility (the Area 5 MWDU or Cell 18) was completed in 2010 (see Section 10.1.4.1).

In October 2010, the Area 5 MWDU (Cell 18), the HWSU, and the EODU facilities were issued a RCRA Part B permit, NEV HW0101. Included in the RCRA Part B permit is authorization for the storage of MLLW at the Mixed Waste Storage Unit (MWSU) composed of the following four facilities at the Area 5 RWMC: the TRU Pad Cover Building and TRU Pad, the Sprung Instant Structure Building, the Visual Examination and Repackaging Building, and the Drum Holding Pad. The RCRA permit requires preparation of a U.S. Environmental Protection Agency Biennial Hazardous Waste Report of all HW volumes generated and disposed or stored at the NNSS. This report is prepared for odd-numbered years only. It was prepared for 2009 and submitted to the State of Nevada on February 24, 2010. An annual report to the State of Nevada that is due March 1 is also prepared annually for volumes of wastes received at the Area 5 MWSU, HWSU, EODU, and Cell 18 during the previous year. The 2010 annual report was completed February 22, 2011.

### 10.2.1 MLLW and MTRU Facilities

In 2010, P03 received a total of 1,266 tons of MLLW for disposal (Table 10-5) prior to its closure in November 2010. The MWSU started receiving MLLW for temporary storage in January 2011 and did not receive any MLLW in 2010.

### 10.2.2 HWSU and Waste Accumulation Areas

The HWSU is a pre-fabricated, rigid-steel-framed, roofed shelter that is permitted to store a maximum of 61,600 liters (16,280 gallons) of approved waste at a time. HW generated at NSTec environmental restoration sites off the NNSS (e.g., at the Tonopah Test Range [TTR]) or generated at the North Las Vegas Facility are direct-shipped to approved disposal facilities. HW generated on the NNSS is also direct-shipped if the sites generate bulk, non-packaged HW that is not accepted at the HWSU for storage. HW would also be direct-shipped in the unlikely case when the waste volume capacity of the HWSU is approaching its permitted limits. Satellite Accumulation Areas (SAAs) and 90-day Hazardous Waste Accumulation Areas (HWAAs) are used at the NNSS for the temporary storage of HW prior to direct shipment off site or to the HWSU.

In 2010, a total of 8.95 tons of HW and PCB wastes were received for storage at the HWSU (Table 10-5). Forty-one drums totaling 6.01 tons of PCB wastes were shipped off site in 2010. This offsite shipment included 4.3 tons that had been received at the HWSU in 2009. In 2010, 6.66 tons of PCB-contaminated soil and debris were direct-shipped from an NNSS corrective action site (see Section 13.1). Also, 6.51 tons of HW were direct-shipped from an NNSS HWAA (Table 10-5). No storage limits were exceeded. Quarterly 2010 reports of applicable waste quantities were submitted on time to NDEP.

### 10.2.3 EODU

Conventional explosive wastes are generated at the NNSS from NSTec explosive operations at construction and experiment sites, the NNSS firing range, the resident national laboratories, and other activities. The permit allows NNSA/NSO to treat explosive ordnance wastes at the EODU by open detonation of no more than 45.4 kilograms (100 pounds) of approved waste at a time, not to exceed one detonation event per hour. In 2010, no explosive ordnance were detonated at the EODU (Table 10-5).

**Table 10-5. Hazardous waste managed at the NNSS in 2010**

Permitted Unit	Total Waste Managed (tons)
P03	1,266.43
HWSU	7.33
HWSU – PCB Waste	1.62
SAAs and HWAAs	6.51 <sup>(a)</sup>
EODU	0

(a) Tons shipped directly off site from SAAs and/or HWAAs.

### 10.3 Underground Storage Tank (UST) Management

RCRA regulates the storage, transportation, treatment, and disposal of hazardous wastes to prevent contaminants from leaching into the environment from underground storage tanks (USTs). Nevada Administrative Code NAC 459.9921–459.999, “Storage Tanks,” enforces the federal regulations under RCRA pertaining to the maintenance and operation of fuel tanks (including underground fuel storage tanks) so as to prevent environmental contamination.

NNSA/NSO operates one deferred UST and three excluded USTs at the Device Assembly Facility (DAF) and one fully regulated UST at the Area 6 Helicopter pad, which is not in service. In 2010, NDEP inspected the deferred UST at the DAF and the fully regulated UST at the Area 6 Helicopter pad. No deficiencies were noted at either location. No USTs were upgraded or removed in 2010.

### 10.4 Solid and Sanitary Waste Management

#### 10.4.1 Landfills

The NNSSS has three landfills for solid waste disposal that were operated by NSTec Waste Management in 2010. The landfills are regulated and permitted by the State of Nevada (see Table 2-13 for list of permits). No liquids, hazardous waste, or radioactive waste are accepted in these landfills. They include:

- Area 6 Hydrocarbon Disposal Site – accepts hydrocarbon-contaminated wastes, such as soil and absorbents.
- Area 9 U10c Solid Waste Disposal Site – designated for industrial waste such as construction and demolition debris and asbestos waste under certain circumstances.
- Area 23 Solid Waste Disposal Site – accepts municipal-type wastes such as food waste and office waste. Regulated asbestos-containing material is also permitted in a special section. The permit allows disposal of no more than an average of 20 tons/day at this site.

These landfills are designed, constructed, operated, maintained, and monitored in adherence to the requirements of their state-issued permits. NDEP visually inspects the landfills and checks the records on an annual basis to ensure compliance with the permits.

The vadose zone is monitored at the Area 6 Hydrocarbon Disposal Site and the Area 9 U10c Solid Waste Disposal Site. VZM is performed once annually in lieu of groundwater monitoring to demonstrate that contaminants from the landfills are not leaching into the groundwater. VZM in 2010 indicated that there was no soil moisture migration and, therefore, no waste leachate migration to the water table.

The amount of waste disposed of in each solid waste landfill is shown in Table 10-6. An average of 2.74 tons/day was disposed at the Area 23 landfill, well within permit limits. State inspections of the three permitted landfills were conducted in 2010 and no out-of-compliance issues were noted.

**Table 10-6. Quantity of solid wastes disposed in NNSSS landfills in 2010**

Metric Tons (Tons) of Waste		
Area 6 Hydrocarbon Disposal Site	Area 9 U10c Solid Waste Disposal Site	Area 23 Solid Waste Disposal Site
61 (67)	2,462 (2,714)	497 (548)

#### 10.4.2 Sewage Lagoons

The NNSSS also has two state-permitted sewage lagoons that were operated by NSTec Waste Management in 2010. They are the Area 6 Yucca Lake and Area 23 Mercury lagoons. The operations and monitoring requirements for these sewage lagoons are specified by Nevada water pollution control regulations. Because of this, the discussion of their operations and compliance monitoring are presented in Section 5.2.3.

## 11.0 Environmental Restoration

The Environmental Restoration Project is charged with evaluating and implementing corrective actions on portions of the Nevada National Security Site (NNSS), the Nevada Test and Training Range (NTTR), and the Tonopah Test Range (TTR) that have been impacted by atmospheric and underground nuclear tests conducted from 1951 to 1992. The project is the responsibility of the U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office (NNSA/NSO) Environmental Management (EM) Program. Cleanup strategies and corrective actions are developed based on the nature and extent of contamination and the risks posed by that contamination. In all, the project is responsible for nearly 3,000 corrective action sites (CASs) in Nevada. The CASs may be contaminated with radioactive and/or nonradioactive wastes. For efficiency in managing the corrective actions, multiple CASs are grouped into corrective action units (CAUs) according to location, physical and geological characteristics, and/or contaminants.

In April 1996, the U.S. Department of Energy (DOE), the U.S. Department of Defense, and the State of Nevada entered into a Federal Facility Agreement and Consent Order (FFACO) to address the environmental restoration of CASs at the NNSS, parts of the TTR, parts of the NTTR, the Central Nevada Test Area, and the Project Shoal Area. Appendix VI of the FFACO, as amended (May 2011), describes the strategy that will be employed to plan, implement, and complete environmental corrective actions.

Environmental restoration activities follow a formal work process, which is described in the FFACO. The State of Nevada is a participant throughout the closure process, and the Nevada Site Specific Advisory Board (NSSAB) is kept informed of the progress made. The NSSAB is a formal volunteer group of interested citizens and representatives who provide informed recommendations to NNSA/NSO's EM Program. The NSSAB's comments are strongly considered throughout the corrective action process. A public participation working group of representatives from NNSA/NSO, the State of Nevada, and the NSSAB meets twice a year to discuss progress, upcoming environmental restoration activities, priority-setting activities established under the FFACO, and the level of public involvement required.

<i>Environmental Restoration Goals</i>	<i>Compliance Measures/Actions</i>
Characterize and remediate sites contaminated by NNSA/NSO nuclear testing activities. Remediate sites in accordance with FFACO-approved planning documents. Conduct post-closure monitoring of sites in accordance with FFACO site closure documents.	Volume of disposed low-level waste (LLW) Volume of stored nonradioactive hazardous waste (HW) Volume of disposed mixed low-level waste (MLLW) Site characterization, remediation, closure, and post-closure site monitoring Soil moisture (for vadose zone monitoring)

CASs are broadly organized into four categories based on the source of contamination: Industrial Sites, Soils Sites, Underground Test Area (UGTA) Sites, and Nevada Off-Sites. Nevada Off-Sites are CASs associated with underground nuclear testing at the Project Shoal Area and the Central Nevada Test Area, located in northern and central Nevada, respectively. These offsite CASs are managed by the DOE Office of Legacy Management. The other three categories of CASs are managed under the NNSA/NSO Industrial Sites Sub-Project, the Soils Sub-Project, and the UGTA Sub-Project, respectively. Figures 11-1 and 11-2 show the locations of the CASs managed by NNSA/NSO.

In 2010, Navarro-Intera, LLC, conducted site characterization activities at CASs, while the NNSS Management and Operating contractor, National Security Technologies, LLC, conducted site restoration, soil remediation, and some facility decontamination and decommissioning activities. This section summarizes Environmental Restoration Project activities conducted in 2010.



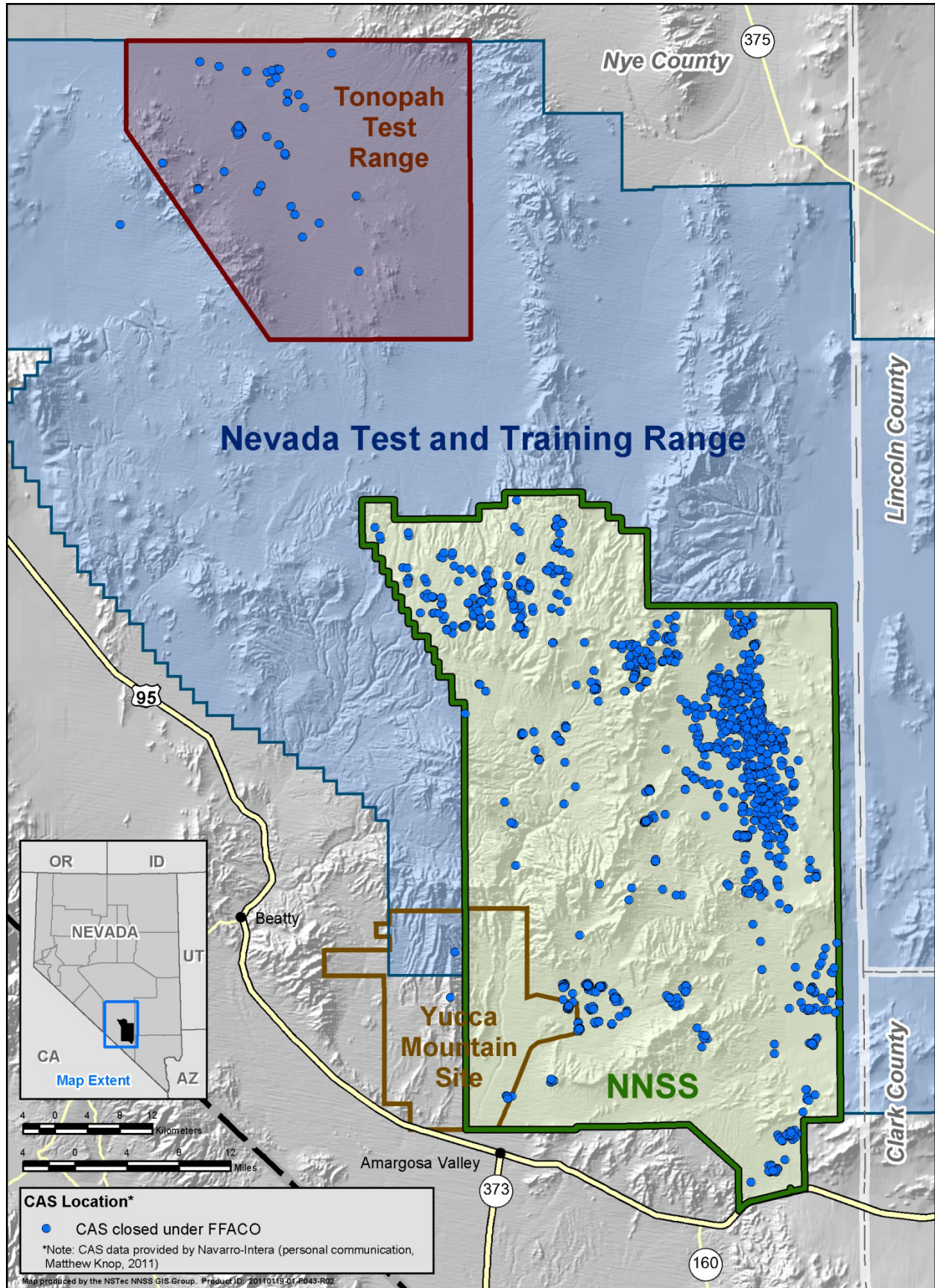


Figure 11-1. Location of CASS managed by NNSA/NSO that are closed



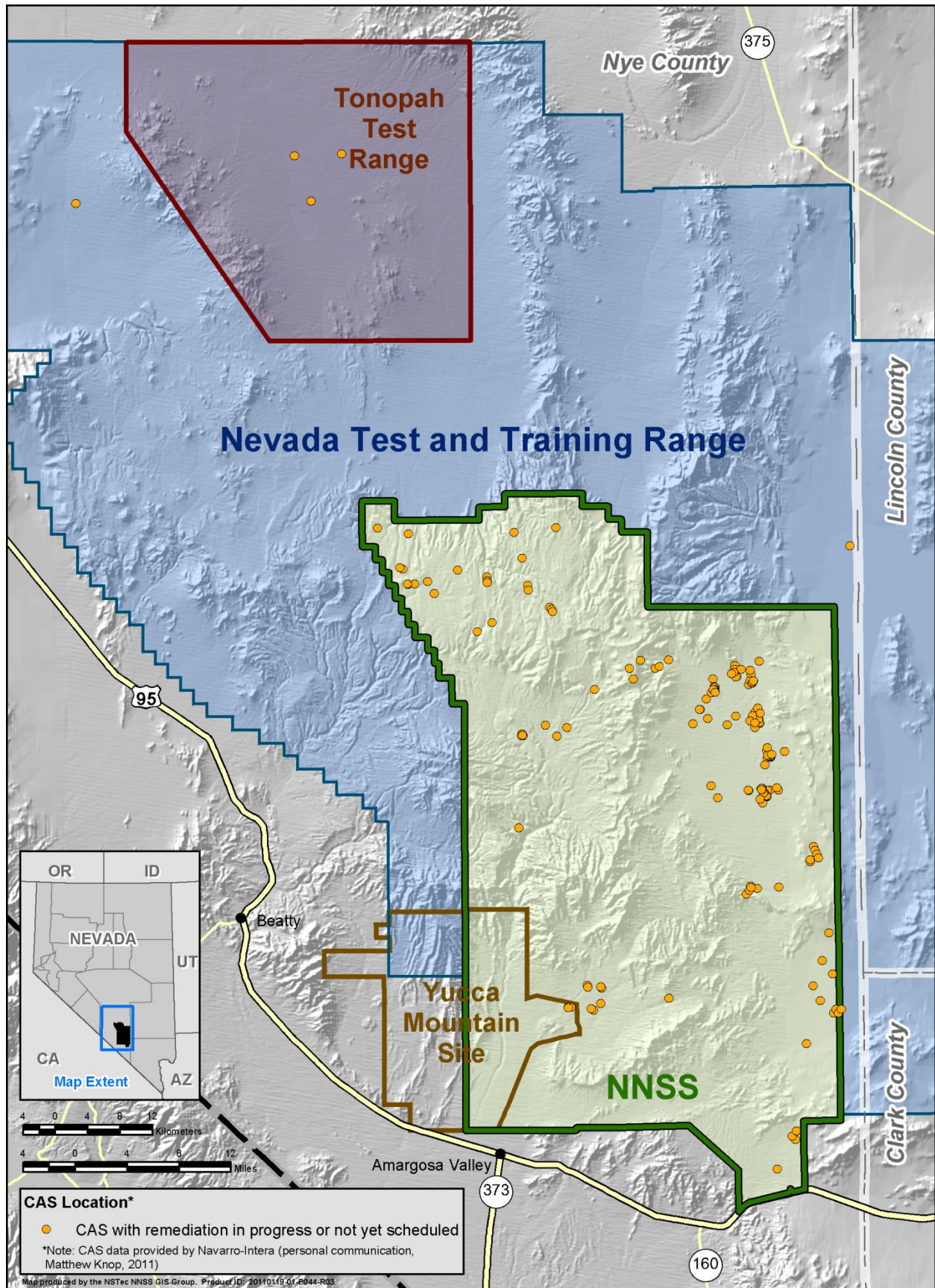


Figure 11-2. Location of CASs managed by NNSA/NSO that are not closed



## 11.1 Industrial Sites Sub-Project

Industrial Sites are facilities and land that may have become contaminated as a result of activities conducted in support of nuclear testing, and include disposal wells, inactive tanks, contaminated waste sites, inactive ponds, muck piles, spill sites, drains and sumps, and ordnance sites. In total, 1,852 Industrial Sites have been identified for which NNSA is responsible. All but 72 sites have been formally closed. Closure approaches may entail the removal and disposal of debris, complete excavation of the site, decontamination and decommissioning activities, closure in place (see footnote b of Table 11-1), no further action, and subsequent monitoring. Radioactive wastes generated at Industrial Sites are disposed at the Area 5 Radioactive Waste Management Site (see Section 10.1). Hazardous wastes generated at the CASs are either direct-shipped to approved disposal facilities or are temporarily stored at the NNSS prior to shipment off site (see Section 10.2). Beyond remediation, the ultimate goal of the Industrial Sites Sub-Project within Environmental Restoration is to ensure that any necessary long-term surveillance and maintenance programs are in place to protect the safety of the public and the environment. The Industrial Sites Sub-Project is scheduled to be completed in 2013, with the one exception of closing the Area 25 Engine Maintenance, Assembly, and Disassembly (EMAD) Facility, which will be closed in 2022. In 2010, 12 Industrial Sites CASs were closed (Table 11-1), and 60 CASs were investigated and/or remediated as progress towards closure (Table 11-2).

**Table 11-1. Industrial Sites closed in 2010**

CAU	CAU Description	Number of CASs	Corrective Actions	Wastes Generated
408	Bomblet Target Area (TTR)	1	Clean closure <sup>(a)</sup>	LLW, sanitary
560	Septic Systems	7	Closure in place <sup>(b)</sup> with use restrictions and clean closure	PCB <sup>(c)</sup> soils, sanitary
563	Septic Systems	4	Clean closure	Sanitary

(a) Clean closure is the removal of pollutants, hazardous wastes, and solid wastes at a CAS in accordance with corrective action plans.

(b) Closure in place is the stabilization or isolation of pollutants, hazardous wastes, and solid wastes, with or without partial treatment, removal activities, and/or post-closure monitoring, in accordance with corrective action plans.

(c) polychlorinated biphenyl

**Table 11-2. Other Industrial Sites where work was conducted in 2010**

CAU	CAU Description	Number of CASs	Activity	Wastes Generated
113	Area 25 RMAD <sup>(a)</sup> Facility	1	Demolition of Building 3110 and water tower	LLW, HW, MLLW
114	Area 25 EMAD Facility	1	Asbestos removal; tapping and draining of nonradiologically impacted piping	Sanitary, HW, recycled oil
116	Area 25 Test Cell C Facility	2	Removal of hazardous materials and asbestos from Building 3210; demolition of the nuclear furnace shield wall	LLW, MLLW
117	Area 26 Pluto Disassembly Facility	1	Demolition of Building 2201 and water tower	LLW, MLLW
484	Surface Debris, Waste Sites, and Burn Area (TTR) <sup>(b)</sup>	6	Excavation of four depleted uranium (DU) soil sites and remediation of DU items on the ground surface	LLW
539	Areas 25 and 26 Railroad Tracks	2	Investigation of radioactively contaminated soil along railroad tracks	None
544	Cellars, Mud Pits, and Oil Spills	20	Investigation of contaminated sites, sampling of soils at seven of the sites	Sanitary
547	Miscellaneous Contaminated Waste Sites	3	Investigation of internally radioactively contaminated piping	None
548	Areas 9, 10, 18, 19, 20 Housekeeping Sites	20	Collection of characterization samples to prepare for disposal of housekeeping debris/waste	None
561	Waste Disposal Areas	10	Investigation of contaminated waste sites	None
562	Waste Systems	13	Investigation of contaminated waste sites	None
566	EMAD Compound	1	Investigation of the compound surrounding the EMAD facility	None

(a) Reactor Maintenance, Assembly, and Disassembly

(b) Four locations that were closed in place in 2007 were clean closed in 2010

### 11.1.1 Post-Closure Monitoring and Inspections

Eight of nine historical waste management units on the NNSS identified for closure under the *Resource Conservation and Recovery Act* (RCRA) (see Section 2.5) have been closed (Table 11-3). The ninth site is scheduled to close in 2012. The RCRA Part B Permit for the NNSS prescribes quarterly or semi-annual post-closure monitoring for five of these sites. CAU 110, the Area 3 U-3ax/bl Subsidence Crater, also requires vadose zone monitoring (VZM) of the crater's engineered cover cap. The cover cap is designed to limit infiltration into the disposal unit and is monitored using time-domain reflectometry soil water content sensors buried at various depths within the waste cover to provide water content profile data. The data are used to demonstrate whether the cover is performing as expected. The cover cap was also revegetated with native vegetation and is periodically monitored for revegetation success. In 2010, VZM results for CAU 110 indicated that surface water is not migrating into buried wastes and that the cover is functioning as designed. One annual monitoring report for all RCRA closure sites was prepared and submitted to the Nevada Division of Environmental Protection (NDEP) in January 2011.

**Table 11-3. Historical RCRA closure sites and those inspected or monitored in 2010**

CAU	Remediation Site	Post-closure Requirements
90	Area 2 Bitcutter Containment	Semi-annual site inspection
91	Area 3 U-3fi Injection Well	Semi-annual site inspection
92	Area 6 Decon Pond	Quarterly site inspection
93	Area 6 Steam Cleaning Effluent Ponds	None
94	Area 23 Building 650 Leachfield	None
109	Area 2 U-2bu Subsidence Crater	None
110	Area 3 U-3ax/bl Subsidence Crater	Quarterly site inspection, VZM <sup>(a)</sup> of cover
112	Area 23 Hazardous Waste Trenches	Quarterly site inspection

(a) Vadose zone monitoring of the engineered cover cap

Post-closure inspections are also required for many of the closed remediation sites managed under the FFAO. In 2010, physical inspections were conducted at 54 closed CAUs managed under the FFAO. Several CAUs that do not require inspections were inspected as a best management practice to ensure that the signs are intact. A combined annual monitoring report for non-RCRA closure sites on the NNSS was prepared and submitted to NDEP in May 2011. A combined annual monitoring report for sites on the TTR was prepared and submitted to NDEP in March 2011.

## 11.2 Soils Sub-Project

Soil Sites are CASs where nuclear tests have resulted in extensive surface and/or shallow subsurface contamination. Environmental Restoration's Soils Sub-Project is responsible for characterizing, managing, and where necessary, cleaning up surface and shallow subsurface soils. The soils may contain contaminants including radioactive materials, oils, solvents, heavy metals, as well as contaminated instruments and test structures used during testing activities. Corrective actions range from removal of soil to closure in place with restricted access controls. There are 128 Soils Sub-Project CASs for which NNSA/NSO is responsible, all of which have undergone preliminary characterization. Two sites on the NNSS were closed in 2010 (Table 11-4). The TTR and NTTR sites require negotiation with the State of Nevada and the U.S. Department of Defense. The anticipated date for the Soils Sub-Project closure is 2022. Table 11-5 shows the Soil Sites at which some work was performed in 2010.

**Table 11-4. Soils Sites closed in 2010**

CAU	CAU Description	Number of CASs	Corrective Actions	Wastes Generated
371	Johnnie Boy Crater and Pin Stripe	2	Closed in place with use restrictions	LLW, Sanitary

**Table 11-5. Other Soils Sites where work was conducted in 2010**

CAU	CAU Description	Number of CASS	Activity	Wastes Generated
106	Areas 5 and 11 Frenchman Flat Atmospheric Sites	5	Investigate nature and extent of contamination	ND <sup>(a)</sup>
365	Baneberry Contamination Area	1	Investigate nature and extent of contamination	ND
366	Area 11 PlutoniumValley Dispersion Sites	6	Investigate nature and extent of contamination	ND
367	Area 10 Sedan, Ess, and Uncle Unit Craters	4	Investigate nature and extent of contamination	LLW, Sanitary
372	Area 20 Cabriolet/Palanquin Unit Craters	4	Investigate nature and extent of contamination	LLW, Sanitary
374	Area 20 Schooner Unit Crater	5	Investigate nature and extent of contamination	LLW, Sanitary
375	Area 30 Buggy Unit Craters	3	Investigate nature and extent of contamination	LLW, Sanitary

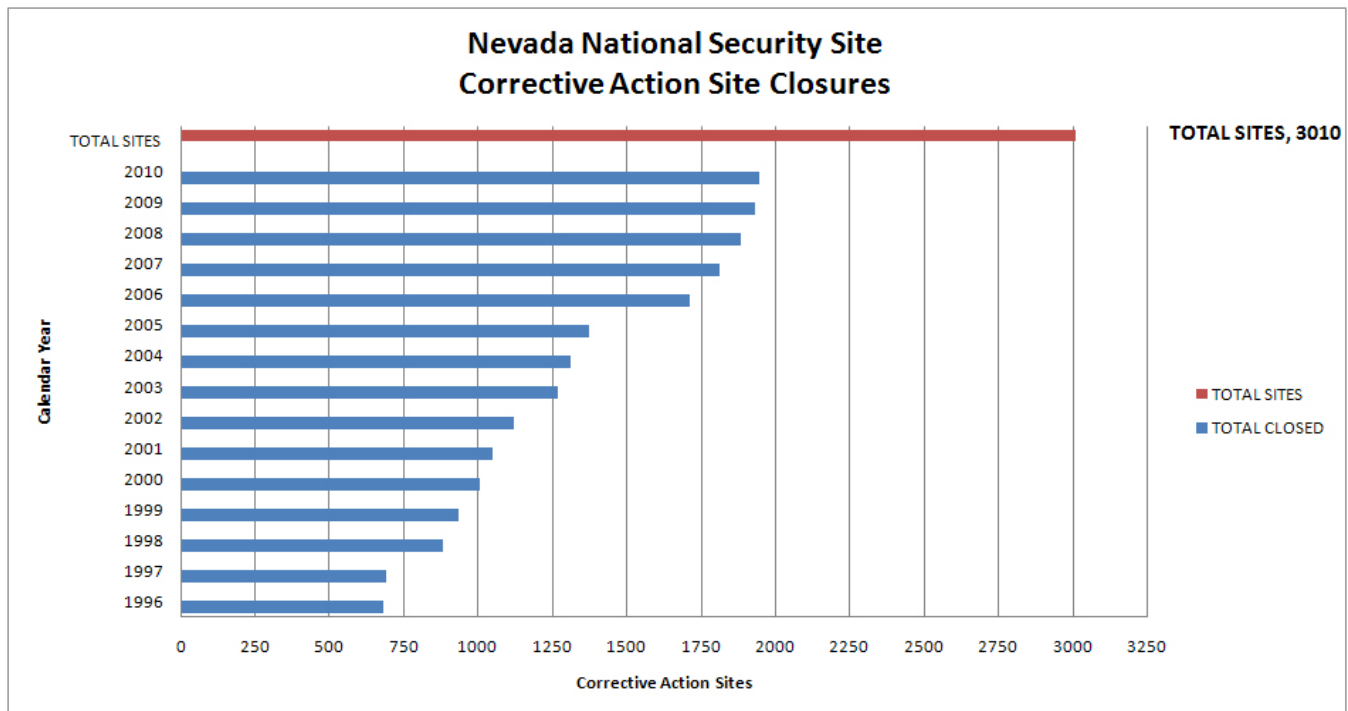
(a) Not yet determined

### 11.3 UGTA Sub-Project

There are 879 UGTA CASS that compose 5 CAUs, all located where underground nuclear tests have resulted or might result in local or regional impacts to groundwater resources. The CASS are sites of underground nuclear tests. The CAUs and the activities conducted by the UGTA Sub-Project in 2010 are discussed in Chapter 12.

### 11.4 Restoration Progress under FFACO

In 2010, 14 CASS were closed and all 2010 FFACO milestones were met. Figure 11-3 depicts the progress made since 1996 in the remediation of historically contaminated sites. The majority of the remaining CASS are UGTA CASS, for which closure in place with monitoring in perpetuity is the corrective action (see Chapter 12).



**Figure 11-3. Annual cumulative totals of NNSA/NSO CAS closures**

## 12.0 Groundwater Characterization and Contaminant Flow Modeling

From 1951 to 1992, more than 800 underground nuclear tests were conducted at the Nevada National Security Site (NNSS) (U.S. Department of Energy, Nevada Operations Office [DOE/NV], 2000). Most were conducted hundreds of feet above groundwater; however, over 200 were within or near the water table. The Underground Test Area (UGTA) Sub-Project has identified areas where groundwater contamination has occurred. These areas have been organized into five UGTA corrective action units (CAUs), which are directly related to the geographical and hydrologic areas of past NNSS underground testing (Figure 12-1). The UGTA Sub-Project gathers data to characterize the groundwater aquifers beneath the NNSS and adjacent lands for the purpose of developing analytical models for predicting groundwater movement and the transport of radiological contaminants from these CAUs.

UGTA CAUs are included in the Federal Facility Agreement and Consent Order (FFACO, as amended March 2010) (see Section 2.5.1), which addresses the environmental restoration of historical sites contaminated by U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office (NNSA/NSO) activities. Analytical models for each UGTA CAU are being developed that include a predicted contaminant boundary and a negotiated compliance boundary. A monitoring well network will be designed and installed for each CAU and used for monitoring (NNSA/NSO, 2006). Closure-in-place with institutional controls and monitoring is considered to be the only feasible corrective action because cost-effective groundwater technologies have not been developed to effectively remove or stabilize deep subsurface radiological contaminants. The UGTA Sub-Project is the largest component of NNSA/NSO's Environmental Restoration Project.

The numerous surface and subsurface investigations and computer modeling are performed by various participating organizations including National Security Technologies, LLC (NSTec); Los Alamos National Laboratory (LANL); Lawrence Livermore National Laboratory (LLNL); the U.S. Geological Survey (USGS); the Desert Research Institute (DRI); and Navarro-Intera, LLC (N-I).

<i>UGTA Sub-Project Goals</i>	<i>Properties/Analytes Sampled</i>
<p>Evaluate discharges from springs located downgradient of the NNSS.</p> <p>Drill deep wells to access groundwater.</p> <p>Sample groundwater to test for the presence of man-made radionuclides.</p> <p>Assess NNSS hydrology and subsurface geology to determine possible groundwater flow paths and direction.</p> <p>Develop a regional three-dimensional computer groundwater model to identify any immediate risks and to provide a basis for developing more detailed CAU-specific models.</p> <p>Develop CAU-specific models of groundwater flow and contaminant transport that geographically cover the six former NNSS underground nuclear testing areas.</p> <p>Develop "sub-CAU scale" models to investigate specific geographical areas and for sensitivity analysis to identify key uncertainties and data needs.</p> <p>Identify contaminant boundaries where the presence of contaminants exceed the Safe Drinking Water Act (SDWA) limits or are likely to exceed those limits at any time within a 1,000 year period.</p>	<p>Depth to groundwater, formation porosity and conductivity; groundwater flow rates at wells and springs</p> <p>&gt;60 water chemistry parameters for characterization of well samples</p> <p>&gt;35 man-made and natural radionuclides for characterization of groundwater samples (i.e., source-term analyses)</p> <p>Tritium and lead for characterization of well drilling discharge fluids</p> <p>8 metals, conductivity, pH, gross alpha, gross beta, and tritium for characterization of drilling sump fluids</p>

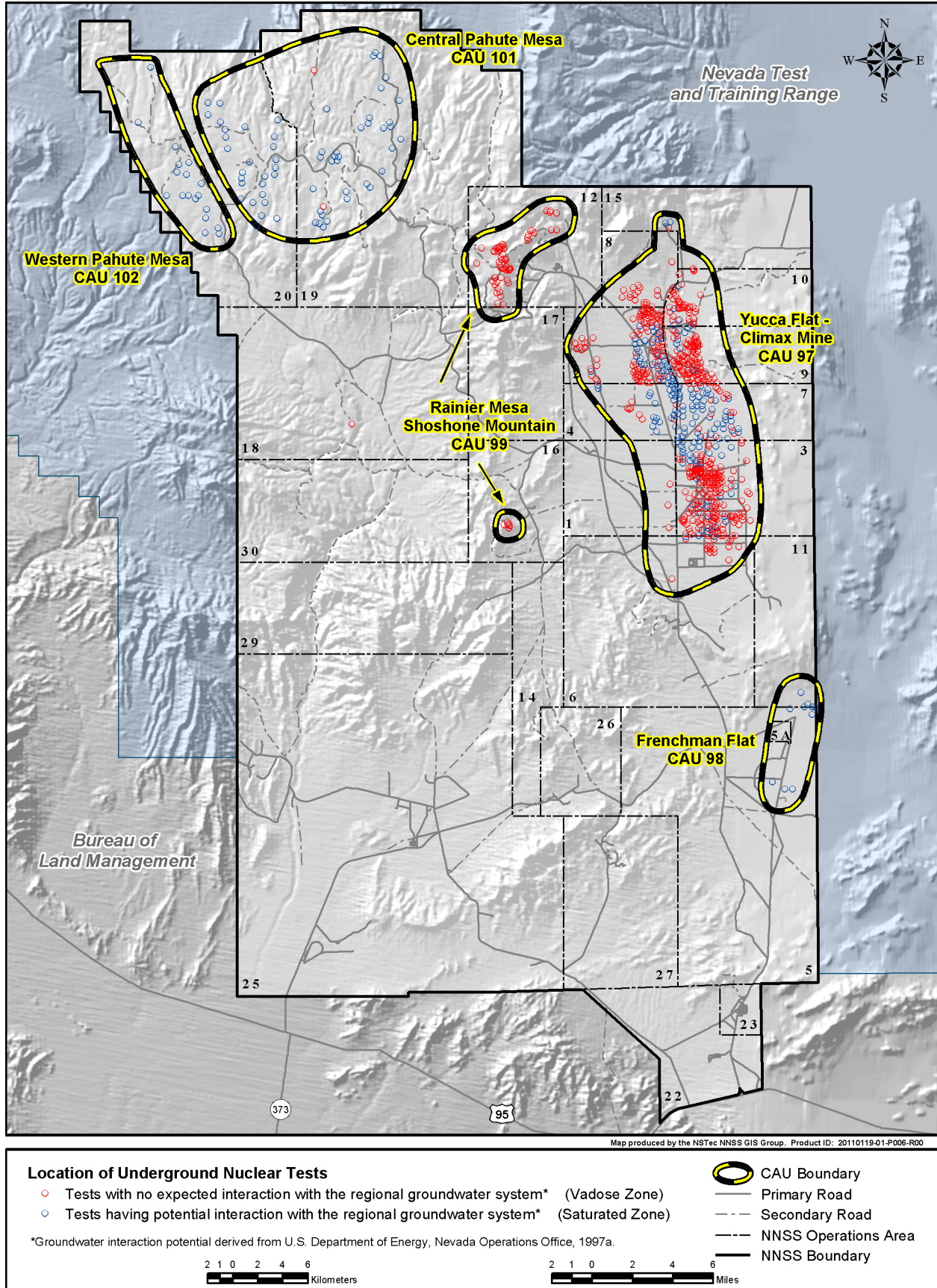


Figure 12-1. UGTA Sub-Project CAUs on the NNSS



## 12.1 UGTA Model Areas and UGTA Wells

The UGTA Sub-Project gathers information regarding the hydrology and geology of each CAU. Hydrogeologic studies use data from past testing, data obtained from drilling and testing newly constructed deep wells, and data from recompleting or rehabilitating existing wells. Data from these studies are used to produce hydrogeologic models for specific UGTA model areas that will be used to predict groundwater flow and contaminant transport. A regional three-dimensional computer groundwater model was developed (International Technology Corporation [IT], 1996; Belcher et al., 2004) to identify any immediate risk of radiological contaminants flowing off site and to provide a basis for developing more detailed models for each UGTA model area. The regional groundwater subbasins and general flow directions based on the regional model and CAU models developed to date are shown in Figure 12-2. Figure 12-3 shows the UGTA model areas, and Figure 12-4 shows the new and historical wells that are managed under the UGTA Sub-Project. UGTA wells that are not designated as source term characterization wells are made available for routine radiological monitoring (see Chapter 5).

## 12.2 Subsurface Investigations

The UGTA Sub-Project initiated a Phase II hydrogeologic investigation for the Pahute Mesa–Oasis Valley Model Area (Figure 12-3) in 2009. The investigation is part of the Corrective Action Investigation Plan (CAIP) for the Central and Western Pahute Mesa CAUs, 101 and 102, respectively (NNSA/NSO, 2009b). As part of this effort, 12 proposed well sites were identified, of which four were drilled in 2009 and four were drilled in 2010 (Figure 12-4). The final number of Pahute Mesa Phase II wells will be determined by NNSA/NSO. Proposed wells are selected to provide the maximum amount of hydrogeologic information to support refinement of the Phase I Pahute Mesa–Oasis Valley hydrostratigraphic framework model (Bechtel Nevada [BN], 2002) and to support subsequent Phase II groundwater flow and contaminant transport modeling. Of particular interest is the characterization of specific pathways (i.e., faults, fractured aquifers) along which radionuclides could migrate from individual underground nuclear tests away from the NNSS. Also of interest is determining the hydraulic properties of the volcanic aquifers in the model area and along potential flow paths downgradient. Some of the new wells drilled for this investigation may also be used as long-term monitoring wells. A Phase II well drilling and completion document (Stoller-Navarro Joint Venture [SNJV], 2009a) summarizes the scientific objectives, predicted geology and hydrology, expected drilling conditions, and well construction and completion designs for the Pahute Mesa Phase II wells. A description of the physiography, overall geology, structural setting, and hydrogeology of the Pahute Mesa area is found in Section A.2.5.3 of *Attachment A: Site Description*, which is included on the compact disc of this report. Attachment A also describes the geologic and hydrogeologic features mentioned below.

### 12.2.1 Well Drilling

In 2010, a second set of four Pahute Mesa Phase II wells were drilled and completed. They are Well ER-20-4 in Area 20 and Wells ER-EC-12, ER-EC-13, and ER-EC-15 on the Nevada Test and Training Range (NTTR) (Figure 12-4). Preliminary evaluations of the data show that these wells are providing quality information and fulfilling their intended scientific objectives. Revisions to the Phase II well drilling and completion document, based on data from the four wells drilled in 2009, were conveyed in an addendum to the document (Navarro Nevada Environmental Services [NNES], 2010a). Well construction data for the four wells will be published in individual well completion reports in 2011.

The primary purpose for Well ER-20-4 is to investigate the possibility of contaminant transport downgradient from underground nuclear tests in the Central Pahute Mesa CAU, possibly along the West Greeley fault (NNES, 2010a). This well is providing detailed hydrogeologic information in the Tertiary volcanic section, which reduces uncertainties within the southern Pahute Mesa area of the Pahute Mesa–Oasis Valley model. The aquifers of interest for this well are lava flows within the Calico Hills and Crater Flat Formations. No man-made radionuclides were detected in this well.

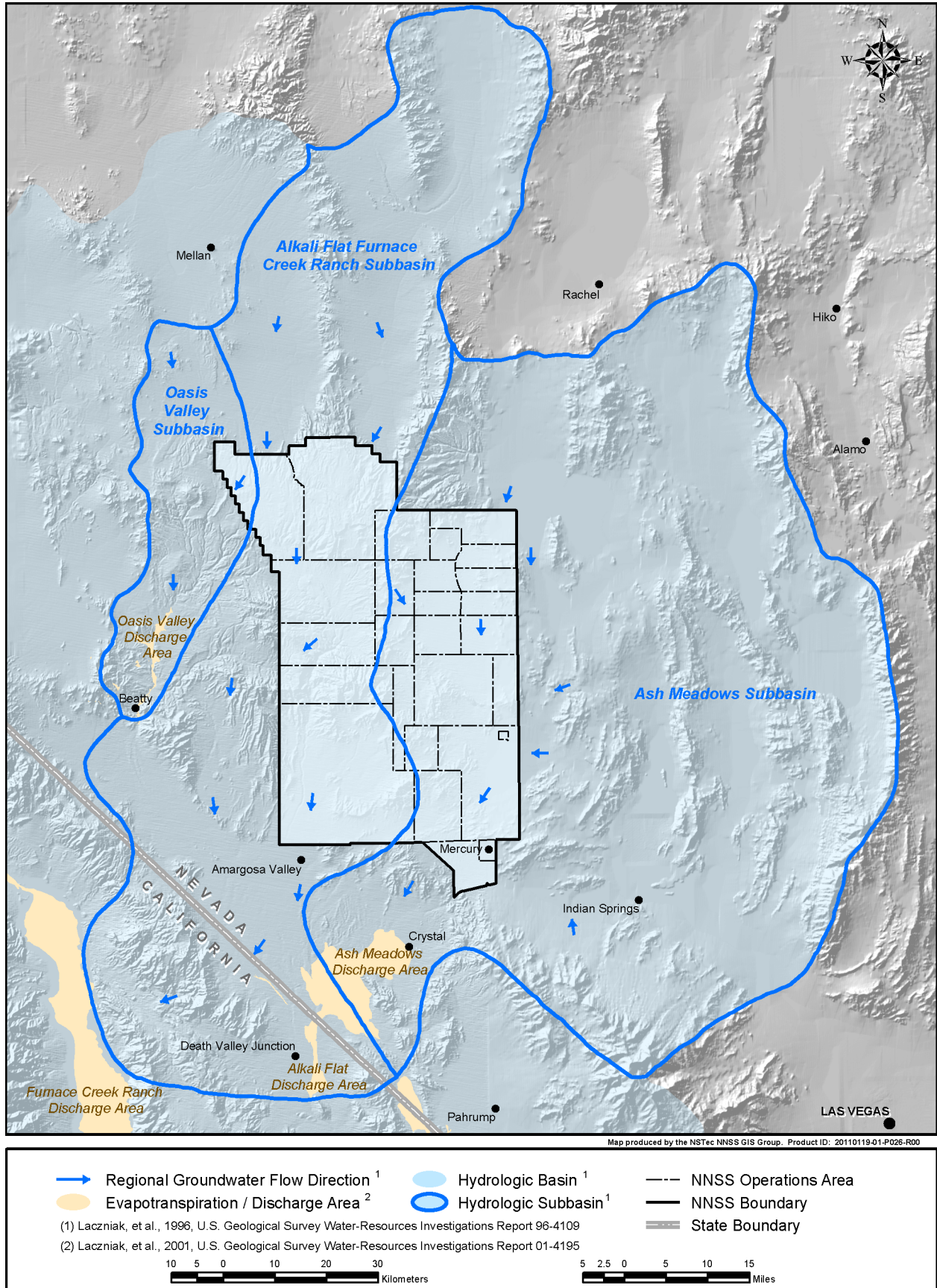


Figure 12-2. Groundwater subbasins of the NNSS and vicinity



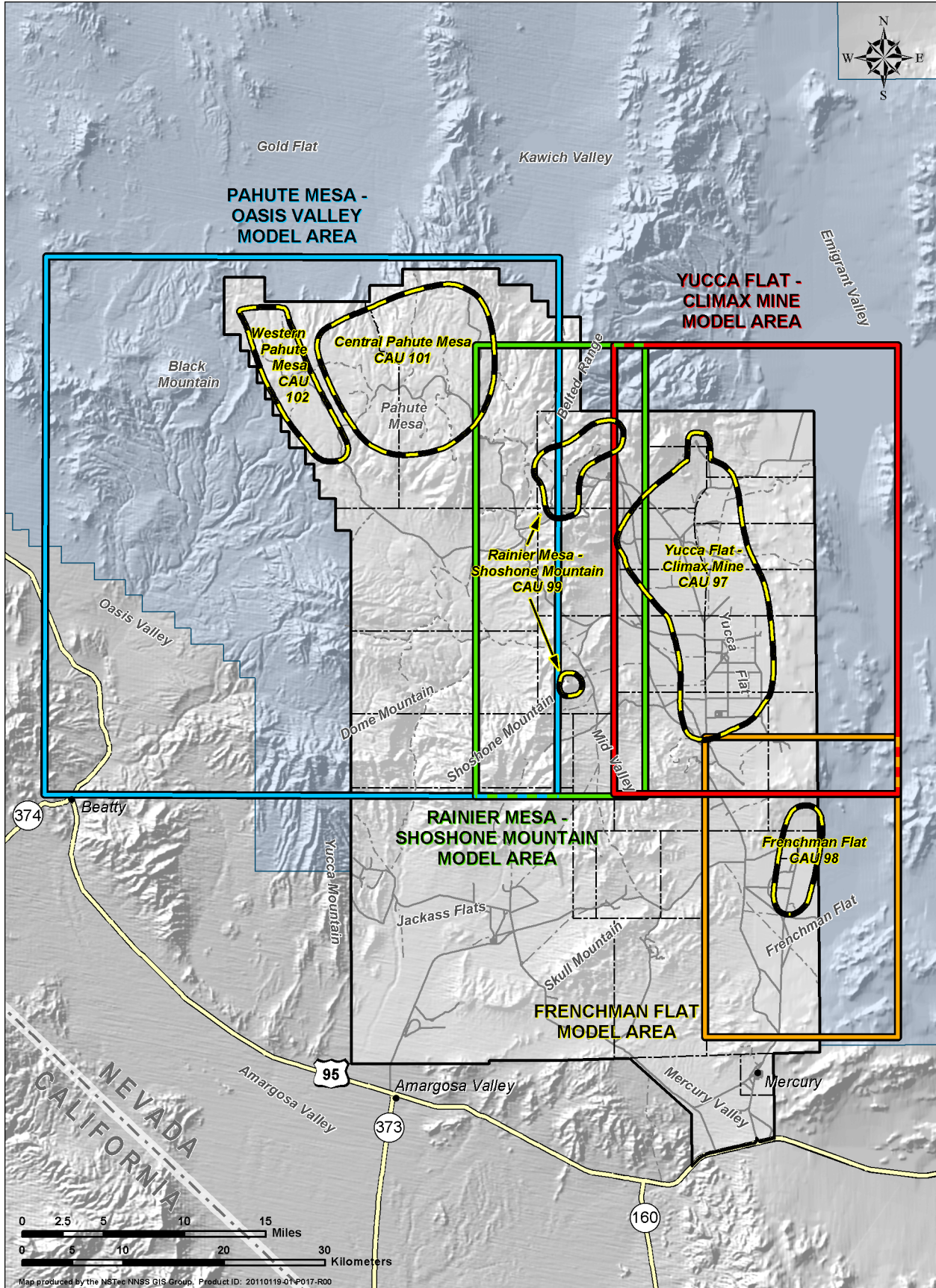


Figure 12-3. Location of UGTA model areas



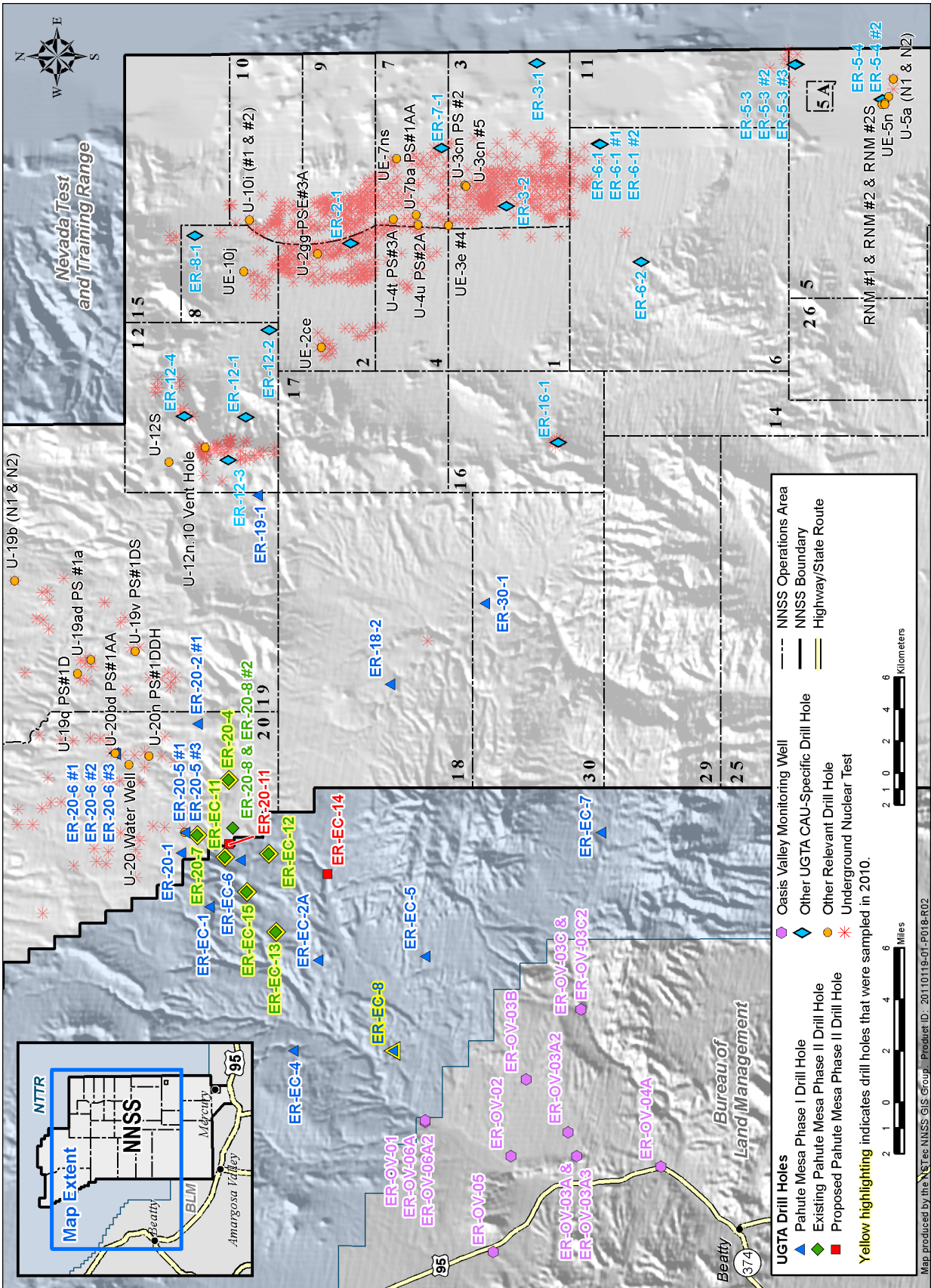


Figure 12-4. Existing and proposed UGTA Sub-Project managed drill wells

Wells ER-EC-12 and ER-EC-15 are providing detailed hydrogeologic information in the shallow- to intermediate-depth Tertiary volcanic section between the Silent Canyon caldera complex and the Timber Mountain caldera complex (TMCC) (see Section 1.0, Figure 1-2). These two wells are also expected to provide information regarding the nature and hydrologic effect of the Northern Timber Mountain moat structural zone and generally north-south trending faults. A contaminant plume was encountered at Wells ER-20-7, ER-EC-11, and ER-20-8, and the downgradient Wells ER-EC-12 and ER-EC-15 can be used to investigate the limits and rate of migration of the plume. The aquifers of interest for these two wells are the Benham aquifer, Tiva Canyon aquifer, and Topopah Spring aquifer. No manmade radionuclides were detected in either of these wells.

Well ER-EC-13 is providing detailed hydrogeologic information for the shallow- to intermediate-depth Tertiary volcanic section in the northern most area of the TMCC. This site is also providing stratigraphic, structural, and hydraulic information to better characterize the structure and hydrogeologic nature of the Timber Mountain caldera structural margin. The aquifers of interest for this well are embedded in lava flows within the Fortymile Canyon composite unit. No manmade radionuclides were detected in this well.

### **12.2.2 Groundwater Sampling**

In 2010, the UGTA Sub-Project pumped and collected groundwater samples from seven characterization wells on Pahute Mesa and immediately south of Pahute Mesa. They were Wells ER-20-4, -7, ER-EC-8, -11, -12, -13, and -15. Five of the wells are located on the NTTR within 3.2 kilometers (km) (2 miles [mi]) of the NNSS boundary (Figure 12-4). Preliminary samples were collected from the four new Phase II wells during and immediately after drilling. They will be sampled again in 2011 after further well development and hydraulic testing activities. Wells ER-20-7, ER-EC-8, and ER-EC-11 were purged using downhole electric submersible pumps prior to the collection of samples. A multi-agency team consisting of personnel from LANL and LLNL collected the groundwater samples and analyzed them for water chemistry parameters and radionuclides. Samples were analyzed by the laboratory Paragon Analytics, Inc. All groundwater data are maintained by N-I in the UGTA Sub-Project geochemical database. Tritium analysis results are shown in Table 5-7, Section 5.1.10, in Chapter 5, “Water Monitoring.”

The elevated tritium concentrations at Well ER-20-7 (see Table 5-7) represent a contaminant plume from nearby underground nuclear test(s). The plume was first defined at Well Cluster ER-20-5 (DOE/NV, 1997b). The tritium concentrations in the other characterization wells sampled in 2010 were below detection limits. See Section 12.3.2 for further discussion of wells within the Pahute Mesa–Oasis Valley Model Area.

### **12.2.3 Drilling Fluid and Well Sump Sampling**

Discharge fluids of UGTA characterization wells being drilled were routinely sampled for tritium and lead. Fluids having  $\geq 400,000$  picocuries per liter (pCi/L) of tritium ( $\geq 20$  times the Nevada Drinking Water Standards) were diverted to lined sumps in accordance with the Decision Criteria Limits specified in the *UGTA Fluid Management Plan* (Attachment I of U.S. Department of Energy, National Nuclear Security Administration Nevada Operations Office, 2002a). Discharge fluids having  $\geq 3$  milligrams per liter (mg/L) of lead (approaching the 5 mg/L Resource Conservation and Recovery Act [RCRA] concentration for hazardous waste) could result in the suspension of drilling operations. All sumps were routinely sampled for RCRA regulated metals as well as for gross alpha/beta and tritium. Test results for lead and metals were all negative. Tritium results are presented in Table 5-7 of Chapter 5.

### **12.2.4 Support Activities**

In 2010, land and ecological surveys were completed for the proposed access roads and drill pads for the new Wells ER-EC-12, ER-EC-13, and ER-EC-15. Construction of the access road and drill pads was completed in 2010. The drill pad sumps and access road for the fourth new well, ER-20-4, were constructed in 1994 as part of the early Phase I investigation.

NSTec personnel who support UGTA well drilling operations renewed their State of Nevada well drilling operations licenses in 2010.

## 12.3 Hydrogeologic Modeling and Supporting Studies

Construction of CAU-specific groundwater-flow and contaminant-transport models requires a hydrostratigraphic framework that depicts the character and extent of hydrostratigraphic units in three dimensions. Four hydrostratigraphic framework models, also referred to as hydrogeologic models, have been built (Figure 12-3):

- Frenchman Flat, CAU 98 (BN, 2005a)
- Pahute Mesa–Oasis Valley, CAUs 101 and 102 (BN, 2002)
- Rainier Mesa–Shoshone Mountain, CAU 99 (NSTec, 2007)
- Yucca Flat–Climax Mine, CAU 97 (BN, 2006)

In 2010, work was conducted for all four model areas.

### 12.3.1 Frenchman Flat Model Area

The Phase II investigation for the Frenchman Flat CAU and the Phase II Transport Model (NNES, 2010b) were both completed in 2009, and the model was submitted to the Nevada Division of Environmental Protection (NDEP) in 2010. Additionally, the total assemblage of models and documentation packages was submitted for formal external peer review. The peer review team consisted of six independent technical experts in geology, hydrogeology, groundwater modeling, and radiochemistry. The review team provided technical evaluation of the studies and assessed the readiness of the UGTA Sub-Project to proceed to monitoring activities for further model evaluation. The peer review team is of the opinion that, with some limitations, the modeling approaches, assumptions, and model results are consistent with the use of modeling studies for resolution of environmental and regulatory requirements. The team found that the modeling studies have accounted for uncertainty in models of flow and transport in Frenchman Flat, except for a few deficiencies described in the report (N-I, 2010a). The review team unanimously recommended to move forward to the preparation of a Corrective Action Decision Document and Corrective Action Plan, as prescribed under the FFACO environmental remediation process. After full review and consideration, NDEP accepted the Frenchman Flat flow and transport models. A Model Evaluation Plan (N-I, 2010b) was prepared, which describes a path forward and the evaluation of the flow and transport model forecasts for the Frenchman Flat CAU. The objectives and criteria for the Frenchman Flat CAU long-term monitoring well network were developed in 2010.

A surface magnetometer survey was conducted by the USGS in the fall of 2010 in northern Frenchman Flat. The purpose of this survey was to better define the extent of certain shallow volcanic aquifers, and to help site future model evaluation/monitoring wells. The results of this study will be published by the USGS in 2011.

### 12.3.2 Pahute Mesa–Oasis Valley Model Area

The Central and Western Pahute Mesa CAIP (NNSA/NSO, 2009b) outlines a campaign to drill nine wells from 2009 to 2011 to gather further data regarding the establishment of a long-term groundwater monitoring system. The UGTA Sub-Project selected 12 proposed locations for these new Phase II wells (Figure 12-4). This well drilling campaign began in May 2009 and continued in 2010 (see Section 7.2).

The Phase I Central and Western Pahute Mesa Transport Model (SNJV, 2009b) supports the 1997 regional groundwater flow and tritium transport report (DOE/NV, 1997c), which states that radioactively contaminated groundwater is predicted to travel off the northwestern boundary of the NNSS. The transport model predicts the migration of tritium and carbon-14 off the NNSS within 50 years of the first nuclear detonation (1966) from the Central and Western Pahute Mesa CAUs and that tritium contamination off site will be above the SDWA limit of 20,000 pCi/L (Figure 12-5). In April 2010, NNSA/NSO gave a second public presentation of the model predictions and the current state of knowledge of contaminant migration off the NNSS at the Beatty Community Center in Beatty, Nevada. Links to the regional transport model, to the Phase I Central and Western Pahute Mesa Transport Model, and to posters presented at the meeting can be found at the NNSA/NSO web page <http://www.nv.energy.gov/library/publications/Environmental/April2010GWOpenHousePosters.pdf>.



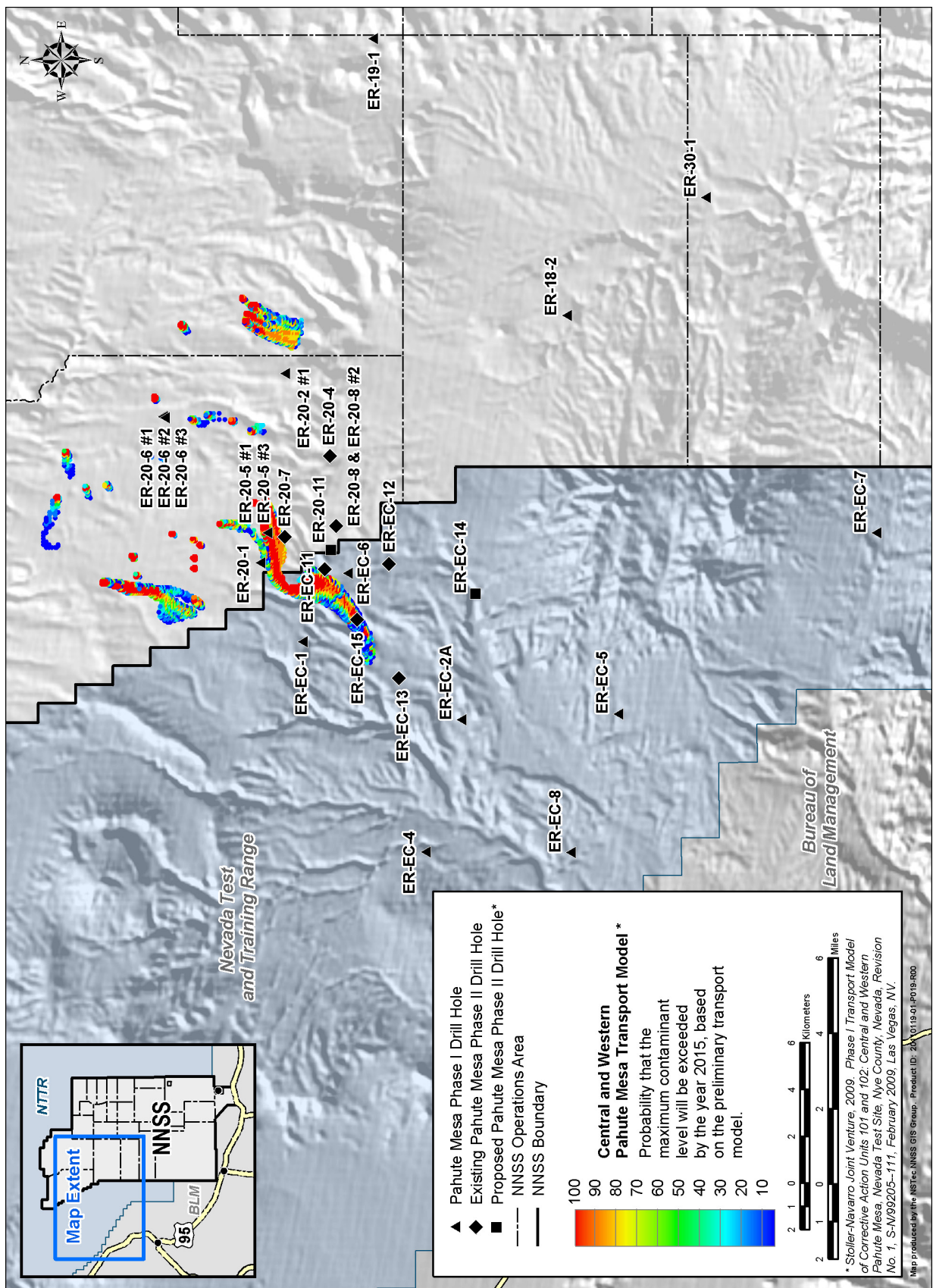


Figure 12-5. Results of Phase I Central and Western Pahute Mesa Transport Modeling

In 2010, further analysis of faults and fracture characteristics and of hydraulic properties of selected hydrostratigraphic units was conducted to support Phase II modeling, which had been recommended in 2009 by the Technical Working Group Pahute Mesa Phase II CAIP ad hoc subcommittee. The subcommittee includes the NNSA/NSO UGTA Sub-Project director, subject matter experts consisting of UGTA Sub-Project participants (NSTec, DRI, LLNL, LANL, N-I, and USGS), a representative from NDEP, and two representatives of the Nevada Site Specific Advisory Board, formerly known as the Community Advisory Board.

In 2009, groundwater sampling of the NTTR Well ER-EC-11 indicated the presence of tritium at 13,180 pCi/L (NSTec, 2010c). This is the first offsite well in which radionuclides from underground nuclear testing activities at the NNSS have been detected. Well ER-EC-11 is located approximately 716.3 meters (m) (2,350 feet [ft]) west of the NNSS boundary (Figure 12-4) and approximately 3.2 km (2 mi) from the nearest underground nuclear tests BENHAM and TYBO, which were conducted in 1968 and 1975, respectively. The 2009 sampling results are in accordance with the flow and transport model. In 2010, a deeper zone of Well ER-EC-11 was sampled, and no tritium was detected. This was not unexpected, as the aquifer sampled is isolated from the overlying contaminated aquifer by a confining unit, which does not readily conduct water.

In May 2010, Well PM-3, which is 3,261 m (10,700 ft) west of the NNSS border on NTTR, was found to have detectable levels of tritium (48.3 pCi/L) at the sample depth of 475.5 m (1,560 ft) during monitoring under the *Routine Radiological Environmental Monitoring Plan (RREMP)* (see Section 5.1.6, Table 5-2). Well PM-3 is 7,468 m (24,500 ft) northwest of ER-EC-11 and 57 m (188 ft) upgradient from Well ER-EC-11. The depth of the sample is within zeolitic nonwelded tuff, a tuff confining unit. Hydrogeologic data west of the NNSS are sparse, and thus groundwater flow predictions are uncertain. The UGTA Sub-Project will collect and test additional water samples from PM-3 to confirm the presence of tritium in the well. The UGTA sampling results as well as the RREMP results will be considered in future data collection decisions and groundwater model evaluations. Well sample analyses to date have not detected the presence of man-made radionuclides farther downgradient of Pahute Mesa in any of the 11 nearby UGTA wells on the NTTR (ER-EC-1, -2A, -4, -5, -6, -7, -8, -12, -13, -15, and ER-20-4; see Figure 12-4).

### ***12.3.3 Rainier Mesa–Shoshone Mountain Model Area***

The compilation, analysis, and documentation of all hydrologic and transport parameters to be used to build the flow and transport models for the Rainier Mesa–Shoshone Mountain CAU continued in 2010. LLNL began working on the source-term model for this CAU. LANL continued work on the sub-CAU-scale model constructed for the N-Tunnel area, and DRI continued work on the sub-CAU-scale model for the T-Tunnel area.

### ***12.3.4 Yucca Flat–Climax Mine Model Area***

UGTA Sub-Project participants continued in 2010 to develop flow and transport models for the Yucca Flat–Climax Mine CAU. LLNL participants continued to work on a source-term model.

### ***12.3.5 Other Activities and Studies***

Compiling, evaluating, and updating the various databases continued as an ongoing effort. The water chemistry and fracture databases were expanded and updated in 2010. Efforts to compile petrographic, mineralogical, and chemical data from outcrops, tunnels, and drill cuttings samples continued and will be included in updates of *A Petrographic, Geochemical, and Geophysical Database and Framework for the Southwestern Nevada Volcanic Field* (Warren et al., 2003).

### ***12.3.6 UGTA Sub-Project Publications***

All reports and publications that were completed in 2010 and published by June 2011 are listed in Table 12-1. Some of the published technical reports can be obtained from DOE's Office of Scientific and Technical Information (OSTI) at <http://www.osti.gov/bridge>, and the OSTI identification number (ID) for those reports is provided.

**Table 12-1. UGTA Sub-Project publications completed in 2010 and released prior to June 2011**

<b>Report</b>	<b>Reference</b>
The Hydrogeologic Character of the Lower Tuff Confining Unit and the Oak Spring Butte Confining Unit in the Tuff Pile Area (OSTI ID: 985874)	Drellack et al., 2010
Groundwater Flow Systems at the Nevada Test Site, Nevada: A Synthesis of Potentiometric Contours, Hydrostratigraphy, and Geologic Structures (OSTI ID: 972344)	Fenelon et al., 2010
Final External Peer Review Team Report Underground Testing Area Subproject for Frenchman Flat (OSTI ID: 989402)	N-I, 2010a
Model Evaluation Plan for Corrective Action Unit 98: Frenchman Flat, Nevada National Security Site, Nevada	N-I, 2010b
Phase II Documentation Overview of Corrective Action Unit 98: Frenchman Flat, Nevada Test Site, Nye County, Nevada (OSTI ID: 975097)	N-I, 2010c
Framework for a Risk-Informed Groundwater Compliance Strategy for Corrective Action Unit 98: Frenchman Flat, Nevada National Security Site, Nye County, Nevada	N-I, 2010d
Addendum to the Central and Western Pahute Mesa Phase II Hydrogeologic Investigation Wells Drilling and Completion Criteria	NNES, 2010a
Phase II Transport Model of Corrective Action Unit 98: Frenchman Flat, Nevada Test Site, Nye County, Nevada (OSTI ID: 972267)	NNES, 2010b
Yucca Flat Well Temperature Profile Study Data Report	NNES, 2010c
Phase II Testing Plan: Central and Western Pahute Mesa, Nevada Test Site, Nye County, Nevada	NNES, 2010d
Framework for a Risk-Based Groundwater Compliance Strategy for Corrective Action Unit 98: Frenchman Flat, Nevada Test Site, Nye County, Nevada	NNES, 2010e
Completion Report for Well ER-EC-11, Corrective Action Units 101 and 102: Central and Western Pahute Mesa (OSTI ID: 1003755)	NNSA/NSO, 2010a
Completion Report for Well ER-20-7, Corrective Action Units 101 and 102: Central and Western Pahute Mesa (OSTI ID: 977585)	NNSA/NSO, 2010b
Completion Report for Wells ER-20-8 and ER-20-8#2, Corrective Action Units 101 and 102: Central and Western Pahute Mesa (OSTI ID: 1012655)	NNSA/NSO, 2011b
Completion Report for Well ER-EC-12, Corrective Action Units 101 and 102: Central and Western Pahute Mesa (OSTI ID: 1013015)	NNSA/NSO, 2011c
Completion Report for Well ER-20-4, Corrective Action Units 101 and 102: Central and Western Pahute Mesa (OSTI ID: 1013014)	NNSA/NSO, 2011d
Completion Report for Well ER-EC-13, Corrective Action Units 101 and 102: Central and Western Pahute Mesa (OSTI ID: 1015229)	NNSA/NSO, 2011e
Completion Report for Well ER-EC-15, Corrective Action Units 101 and 102: Central and Western Pahute Mesa (OSTI ID: 1015230)	NNSA/NSO, 2011f



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## 13.0 Hazardous Materials Control and Management

Hazardous materials used or stored on the Nevada National Security Site (NNSS) are controlled and managed through the use of a Hazardous Substance Inventory database. All contractors and subcontractors of the U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office (NNSA/NSO) use this database if they use or store hazardous materials. They are required to comply with the operational and reporting requirements of the Toxic Substances Control Act (TSCA); the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA); the Emergency Planning and Community Right-to-Know Act (EPCRA); and the Nevada Chemical Catastrophe Act (see Section 2.6). Chemicals to be purchased are subject to a requisition compliance review process. Environmental Programs (EP) personnel with National Security Technologies, LLC (NSTec), reviewed hazardous substance purchases to ensure that toxic chemicals and products were not purchased when less hazardous substitutes were commercially available. Requirements and responsibilities for the use and management of hazardous/toxic chemicals are provided in company documents and are aimed at meeting the goals shown below. The reports and activities prepared or performed in 2010 to document compliance with hazardous materials regulations are presented below.

<b>Hazardous Materials Control and Management Goals</b>	<b>Compliance Activities/Reports</b>
<p>Minimize the adverse effects of improper use, storage, or management of hazardous/toxic chemicals.</p> <p>Ensure compliance with applicable federal and state environmental regulations related to hazardous materials.</p>	<p>Use of Hazardous Substance Inventory database</p> <p>Annual TSCA report</p> <p>FIFRA management assessments</p> <p>Annual Nevada Combined Agency (NCA) Report</p> <p>Annual EPCRA Toxic Release Inventory (TRI) Report, Form R</p> <p>Nevada Division of Environmental Protection (NDEP) Chemical Accident Prevention Program Annual Registration Form</p> <p>Use of electronic Hazardous Materials Notification System (known as HAZTRAK) for tracking the movements of such materials</p>

### 13.1 TSCA Program

There are no known pieces of polychlorinated biphenyl (PCB)-containing electrical equipment (transformers, capacitors, or regulators) at the NNSS. However, sometimes during demolition activities, old hydraulic systems or contaminated soils are found to contain PCB liquids. The TSCA program consists mainly of properly characterizing, storing, and disposing of various PCB wastes generated through remediation activities and maintenance of fluorescent lights. The remediation waste is generated by NSTec and Navarro-Intera, LLC, at corrective action sites (CASs) during environmental restoration activities (see Chapter 11) and during maintenance activities and building decontamination and decommissioning activities performed by NSTec. These activities can generate PCB-contaminated fluids and soil, along with bulk product waste containing PCBs.

Waste classified as bulk product waste that is generated on the NNSS by remediation and site operations can be disposed of on site in the Area 9 U10 Solid Waste Disposal Site with prior State of Nevada approval. PCB-containing light ballasts removed during normal maintenance can also go to this onsite landfill, but when remediation or upgrade activities generate several ballasts, these must be disposed of off site at an approved PCB disposal facility. Soil and other materials contaminated with PCBs must also be sent off site for disposal.

During 2010, three activities generated PCB regulated waste:

- Remediation, demolition, and renovation activities generated 41 drums (6.01 tons) of PCB light ballasts, which were sent off site for disposal in two separate shipments.
- Cleanup of Industrial Site Corrective Action Unit (CAU) 560, CAS 06-05-04, generated 439,682 kilograms (kg) (484.7 tons) of PCB-contaminated soil, which was shipped directly off site in 28 shipments.
- Cleanup of Building CP-160 and final cleanup of CAU 560, CAS 06-05-04, generated one container of 6,041 kg (6.6 tons) of debris and PCB-contaminated soil, which was shipped off site from the Area 5 Radioactive Waste Management Site.

On June 15, 2011, an annual report was generated for PCB management activities during 2010. There were no TSCA inspections by outside regulators performed at the NNSS in 2010.

### ***13.2 FIFRA Program***

EP personnel performed the following oversight functions to ensure FIFRA compliance: (1) screened all purchase requisitions for restricted-use pesticides; (2) reviewed operating procedures for handling, storing, and applying pesticide products; and (3) conducted facility inspections for unauthorized pesticide storage/use. On the NNSS, pesticides are applied under the direction of a State of Nevada certified applicator. This service was provided by Solid Waste Operations (SWO). SWO maintained appropriate Commercial Category (Industrial) certifications for applying restricted-use pesticides, although non-restricted-use pesticides are most commonly used. SWO did purchase and use restricted-use pesticides in 2010, and training was provided to affected personnel. Facility inspections were conducted and indicated that the storage and use of these pesticides were in compliance with federal/state requirements. Pesticide applications in NNSS food service facilities are also conducted by SWO. An NSTec inspection of chemical storage facilities was conducted, and the State of Nevada inspected the records for restricted-use pesticides. Operations were found to be in compliance in 2010.

### ***13.3 EPCRA Program***

EPCRA requires that federal, state, and local emergency planning authorities be provided information regarding the presence and storage of hazardous substances and their planned and unplanned environmental releases, including provisions and plans for responding to emergency situations involving hazardous materials. NNSA/NSO prepares and submits reports in compliance with EPCRA pursuant to Sections 302, 303, 304, 311, 312, and 313 of the Superfund Amendments and Reauthorization Act, Title III (see Section 2.5.1).

In response to the EPCRA requirements, all chemicals that are purchased are entered into a hazardous substance inventory database and assigned specific hazard classifications (e.g., corrosive liquid, flammable, diesel fuel). Annually, this database is updated to show the maximum amounts of chemicals that were present in each building at the NNSS, the North Las Vegas Facility (NLVF) (see Section A.1.4), and the Remote Sensing Laboratory–Nellis (RSL-Nellis) (see Section A.2.3). This information is then used to complete the NCA Report. The NCA Report provides information to the State of Nevada, community, and local emergency planning commissions on the maximum amount of any chemical, based on its hazard classification, present at any given time during the preceding year. The State Fire Marshall then issues permits to store hazardous chemicals on the NNSS, as well as at RSL-Nellis and NLVF. The 2010 chemical inventory for NNSS facilities was updated and submitted to the State of Nevada in the NCA Report on February 22, 2011. No accidental or unplanned release of an extremely hazardous substance occurred on the NNSS in 2010.

The hazardous substance inventory database is also used to complete the TRI Report, Form R. This report provides the U.S. Environmental Protection Agency (EPA) and the State Emergency Response Commission information on specific toxic chemicals that enter the environment above a given threshold. Toxic chemicals included in the TRI Report are typically released to the environment through air emissions, landfill disposal, application to the land, and recycling. Reuse of a material, however, does not constitute a release to the

environment. TRI toxic chemicals that are recovered during NNSS remediation activities or become “excess” to operational needs (e.g., lead bricks, lead shielding) are sent off site for recycling, reuse, or proper disposal. Mixed wastes generated at other DOE facilities and sent to the NNSS for disposal may contain TRI toxic chemicals that must be reported in the TRI Report. Lead and mercury, released as a result of NNSS activities, were determined to be reportable in 2010. Table 13-1 lists the 2010 sources of release, disposition, and release quantities for these two TRI toxic chemicals. On June 23, 2011, NNSA/NSO submitted to the EPA the TRI Report for calendar year 2010. No EPCRA inspections were performed by outside regulators at the NNSS in 2010.

**Table 13-1. EPCRA reported NNSS releases and transfers of toxic chemicals in 2010**

Toxic Chemical	Source	Disposition	Quantity (pounds)
Lead	Ammunition from Mercury Firing Range	Other disposal <sup>(a)</sup>	10,683
	Lead acid batteries	Offsite recycling	5,895.3 <sup>(b)</sup>
	Hazardous waste generated on site	Offsite disposal	7,454.55
	Mixed waste generated off site at DOE facilities	Onsite disposal	21,327
	Mixed waste generated on site <sup>(c)</sup>	Onsite disposal	69,000
	Ammunition from Mercury Firing Range	Airborne release	6.4
Mercury	Hazardous waste generated on site	Offsite recycling	0.03
	Mixed waste generated off site at DOE facilities	Onsite disposal	2,931.25

(a) Spent ammunition is left on the ground. When the firing range is closed, ammunition will be collected for recycling.

(b) Or 2.9 metric tons (mtons). This quantity represents large, non-automotive batteries from the NNSS that NSTec sent directly to a recycling facility and for which NSTec is responsible to report under EPCRA as lead releases. NSTec’s Pollution Prevention and Waste Minimization Program (see Section 3.3.2, Table 3.4), reported an additional 27.1 mtons of used automotive lead acid batteries from the NNSS, NLVF, and RSL-Nellis that were diverted from disposal. The automotive batteries were returned for recycling to the battery supplier who is responsible for proper battery management (i.e., recovery of sulfuric acid and recycling of lead) if the batteries are no longer usable.

(c) Onsite mixed waste resulting from one-time events (e.g., cleanup projects and building demolition, disposal of radioactive solid lead).

HAZTRAK is a tracking system that monitors hazardous materials while they are in transit. When a truck transporting hazardous material enters the NNSS, all information concerning the load is entered into the tracking system. Once the delivery is complete, the information provided at the time of entry is removed from the tracking system.

### ***13.4 Nevada Chemical Catastrophe Prevention Act***

If highly hazardous substances are stored in quantities that exceed threshold quantities established by NDEP, then NNSA/NSO submits a report notifying the State of Nevada. From June 2009 through May 2010, the Nonproliferation Test and Evaluation Complex in Area 5 stored one highly hazardous substance (oleum) in a quantity that required state notification. A Nevada Chemical Accident Prevention Program (CAPP) Report was prepared regarding NNSS operations from June 2009 through May 2010 and was submitted to NDEP on June 17, 2010. The CAPP Report for operations from June 2010 through May 2011 was submitted to NDEP on June 16, 2011. No highly hazardous substances were stored in quantities that exceeded reporting thresholds.

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## 14.0 Groundwater Protection

This chapter presents other programs and activities of the U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office (NNSA/NSO) that are related to the protection of groundwater that have not been discussed in previous chapters of this report (Chapter 5, Water Monitoring; Chapter 7, Section 7.2, Offsite Surface and Groundwater Monitoring; Chapter 10, Section 10.1.7, Groundwater Monitoring, and Section 10.1.8, Vadose Zone Monitoring of Closure Covers; and Chapter 12, Groundwater Characterization and Contaminant Flow Modeling).

It is the policy of NNSA/NSO to prevent pollutants, both from past and current Nevada National Security Site (NNSS) activities, from impacting the local groundwater. Groundwater-related activities under the current NNSA/NSO mission focus on preventing groundwater contamination, protecting the public and environment from past contamination, and protecting groundwater quality and availability for current and future NNSS missions. NNSA/NSO acknowledges that the greatest potential for environmental impact at the NNSS is the resumption of underground testing of nuclear devices and their components. If such testing were resumed in the future, the groundwater protection policy of NNSA/NSO would be to minimize, rather than eliminate, the impacts of testing.

The NNSA/NSO Hydrology Program Manager communicates and helps facilitate furtherance of the NNSA/NSO groundwater protection policy and goals. In conjunction with the *Groundwater Protection Program Plan for the National Nuclear Security Administration Nevada Site Office* (NNSA/NSO, 2008), the NNSA/NSO integrates site-wide groundwater-related activities across the multiple NNSA/NSO programs mentioned below and in previous chapters of this report.

### ***Groundwater Protection Program Goals***

Prevent the degradation of water quality due to NNSA/NSO activities that would be harmful to the public, the environment, or biota.

Conduct research and monitoring to prevent public exposure to drinking water contaminated by past nuclear testing activities.

Protect water availability for current and future NNSS activities.

### 14.1 Wellhead Protection

NNSA/NSO seeks to protect groundwater from the infiltration or introduction of contaminants at the wellhead through a variety of procedures and programs. Wellhead protection areas on the NNSS have been identified by the State of Nevada for NNSS water supply wells, and inventories and assessments of potential contaminant sources within these areas have been performed. Wellheads are routinely surveyed to identify potential new contaminant sources. Wellheads are protected from public access by locked well caps and by the prohibition of public access onto NNSS land enforced by site security. NNSA/NSO wells that are sampled are protected through adherence to proper groundwater sampling procedures developed by each NNSS contractor or tenant organization. These procedures must be identified and implemented as a condition of well access authorization under an NNSA/NSO permit called a Real Estate/Operations Permit. Also, the Borehole Management Program protects groundwater “at the wellhead” for boreholes that have been abandoned. These boreholes are plugged to prevent possible aquifer contamination.

#### 14.1.1 Borehole Management Program

More than 4,000 boreholes were drilled on and off the NNSS in support of nuclear testing. They include emplacement holes for nuclear devices, post-shot investigation boreholes, exploratory holes, instrument holes, potable water wells, construction water supply wells, monitoring wells, and other special purpose boreholes. In

2000, the Borehole Management Program identified 1,238 legacy boreholes as candidates for closure (plugging). Of these, 160 penetrated the groundwater and underground nuclear test cavities. Plugging may reduce the potential for boreholes to act as conduits for contaminants transported down the borehole from the surface or from contaminated aquifers to non-contaminated aquifers. They are plugged by National Security Technologies, LLC (NSTec), the Management and Operations contractor for the NNS and its support facilities, in accordance with Nevada Administrative Code NAC 534.420–534.427 requirements, to the extent possible.

In 2010, 50 boreholes were plugged (Table 14-1), 19 of which originally penetrated the groundwater and nuclear test cavities. As of the end of 2010, a total of 746 boreholes have been plugged, 130 of which penetrated groundwater and test cavities. Since 2000, some boreholes have been removed from the plugging candidate list as they were determined to be outside the scope of the Borehole Management Program (for example, already plugged or saved for other uses), and a number of partially plugged or previously unknown boreholes have been added to the list. There are 134 candidate boreholes remaining on the list, 30 of which penetrate groundwater and nuclear test cavities. The database of boreholes is maintained by NSTec. A fiscal year progress report is sent annually to the Nevada Division of Water Resources.

**Table 14-1. NNS boreholes plugged in 2010**

NNS Area	Borehole	Year Constructed	Hole Size (in.)	Original Depth (ft)	Surface Casing		Depth Plugged From to Surface (ft)
					Size (in.)	Depth (ft)	
2	U-2ar PS #1A	1977	9.875	1411	10.75	116	53
2	U-2t PS #1A	1966	15	119	10.75	117	23
3	U-3br PPS #1D	1968	9.875	771	13.375	710	60
3	U-3eh PPS #2D	1966	9.875	880	13.375	841	78
3	U-3hp PS #1D	1974	9.875	1587	13.375	86	51
3	U-3hu PS #2A	1975	6.25	1297	7.625	77	97
3	U-3hy PS #1D	1974	9.875	1526	13.375	86	62
3	U-3jl PS #1D	1974	9.875	1769	13.375	86	68
3	U-3jq PS #1D	1972	9.875	2151	20	120	105
3	U-3kt PS #1D	1977	10.625	1545	13.375	80	17
3	U-3Lh PS #1A	1982	9.875	1414	13.375	122	63
3	U-3Lk PS #1A	1989	9.875	1231	10.75	119	34
3	U-3mf PS #2A	1988	9.875	2523	10.75	119	10
4	U-4r PS #1A	1984	9.875	1474	13.375	119	12
6	A-06_Unknown_01	NA	NA	NA	13.375	NA	7
7	U-7ab PS #1D	1977	10.625	1754	13.375	117	70
7	U-7bv PS #1A	1985	9.875	1590	13.375	121	15
9	U-9bu PS #1A	1972	9.875	844	10.75	109	92
9	U-9w-24.5 PS#1A	1972	9.875	827	10.75	119	52
18	U-18a PS #2	1962	2.375	346	2.875	345	345
18	U-18a PS #3	1962	6	40	2.125	NA	11
18	U-18a PS #3s	1962	2.375	334	2.875	330	330
18	U-18a PS #3ss	1962	2.375	336	2.875	334	7
19	U-19ac PS #1A	1985	9.875	2545	10.75	90	1926
19	U-19aj PS #1D	1981	9.875	2585	10.75	122	1978
19	U-19ak PS #1A	1982	9.875	1558	13.375	125	24
19	U-19ak PS #2A	1982	9.875	1441	18	47	23
19	U-19an PS #1A	1987	9.875	2515	10.75	110	50
19	U-19ax PS #1A	1988	9.875	2474	16	122	17
19	U-19b PPS #2D	1966	9.875	1551	13.375	981	55
19	U-19b PS #1D	1966	9.875	3289	13.375	969	969
19	U-19c PS #1D	1968	9	2822	13.375	1087	197
19	U-19c PS #3D	1968	36	39	20	39	10
19	U-19c PS #4D	1968	36	39	20	39	22
19	U-19i PPS #1D	1967	12.25	1919	13.375	1889	70



Table 14-1. NNSS boreholes plugged in 2010 (continued)

NNSS Area	Borehole	Year Constructed	Hole Size (in.)	Original Depth (ft)	Surface Casing Size (in.)	Surface Casing Depth (ft)	Depth Plugged From to Surface (ft)
19	U-19L PS #1D	1968	9.875	2666	13.375	1140	1209
19	U-19t PS 1D	1978	9.875	2240	10.75	112	1978
19	U-19u PPS #2D	1969	30	168	20	166	166
19	U-19u PS #1D	1981	9.875	3696	20	503	69
20	U-20ad PS #1D	1979	9.875	2788	10.75	121	1567
20	U-20ai PS #1A	1986	9.875	2456	10.75	109	12
20	U-20ap PS #1A	1986	9.875	2479	10.75	103	1595
20	U-20as PS #1A	1986	9.875	2415	10.75	87	1636
20	U-20av PS #1A	1987	9.875	2484	10.75	110	400
20	U-20ay PS #1A	1988	9.875	2483	10.75	109	1958
20	U-20e PS #2D	1970	9.875	1988	10.75	157	601
20	UE-20ba #1	1987	12.25	330	13.375	15	315
20	UE-20ba #2	1987	12.25	330	13.375	15	318
20	UE-20e	1964	9.625	2440	13.375	694	1240
20	UE-20e #1	1968	6.125	6395	13.375	1500	62

## 14.2 Spill Prevention and Management

NSTec has established procedures for the prevention, control, cleanup, and reporting of spills of hazardous and toxic materials, or any other regulated material, into the environment. Spills include releases from underground tanks, aboveground tanks, containers, equipment, or vehicles. All users of the NNSS are instructed to prevent, control, and report spills. NSTec ensures that spills are reported to proper state and county regulatory agencies, if required, and are properly mitigated by removing and disposing the contaminated media. All federal and state regulations concerning spills under the Clean Water Act, the Resource Conservation and Recovery Act, Superfund Amendments and Reauthorization Act, and the Emergency Planning and Community Right-to-Know Act are followed. These activities help ensure that surface spills or subsurface releases of contaminants do not infiltrate groundwater or flow into surface waters. Reportable spills that occurred during 2010 are described in Section 2.10 of this document.

## 14.3 Water Level, Temperature, and Usage Monitoring by the USGS

The U.S. Geological Survey (USGS) Nevada Water Science Center collects, compiles, stores, and reports hydrologic data used in determining the local and regional hydrogeologic conditions in and around the NNSS. Hydrologic data are collected quarterly or semi-annually from wells on and off the NNSS. The USGS also maintains and develops the Death Valley Regional Groundwater Flow System Model (Belcher et al., 2004) and manages the NNSS well hydrologic and geologic information database.

By the end of 2010, the USGS monitored water levels in 200 wells. This included 102 wells on the NNSS and 98 wells off the NNSS. A map showing the location of monitored wells and all water-level data are posted on the USGS/U.S. Department of Energy (DOE) Cooperative Studies in Nevada web page at <http://nevada.usgs.gov/doe%5Fenv/>. The water-level data are also published online at <http://wdr.water.usgs.gov/>, Annual Water Data Reports, which includes data from October 2009 through September 2010.

Groundwater use from water-supply wells on the NNSS is collected using flow meters that are read monthly by the NNSS Management and Operating contractor and then reported to the USGS Nevada Water Science Center. The principal NNSS water supply wells monitored during 2010 included J-12 WW, UE-16d WW, WW #4, WW #4A, WW 5B, WW 5C, WW 8, and WW C-1 (see Chapter 5, Figure 5-2). The USGS compiles the annual water-use data and reports annual withdrawals in millions of gallons. Discharge data from these wells for 2010 have been compiled, processed, and entered onto the USGS/DOE Cooperative Studies in Nevada website at

[http://nevada.usgs.gov/doi\\_nv/wateruse/wu\\_map.htm](http://nevada.usgs.gov/doi_nv/wateruse/wu_map.htm). Discharge from these wells during 2010 was approximately 187.3 million gallons (Figure 15-1). Water-use data are also published online at <http://wdr.water.usgs.gov/>, Annual Data Reports, which includes data from October 2009 through September 2010.

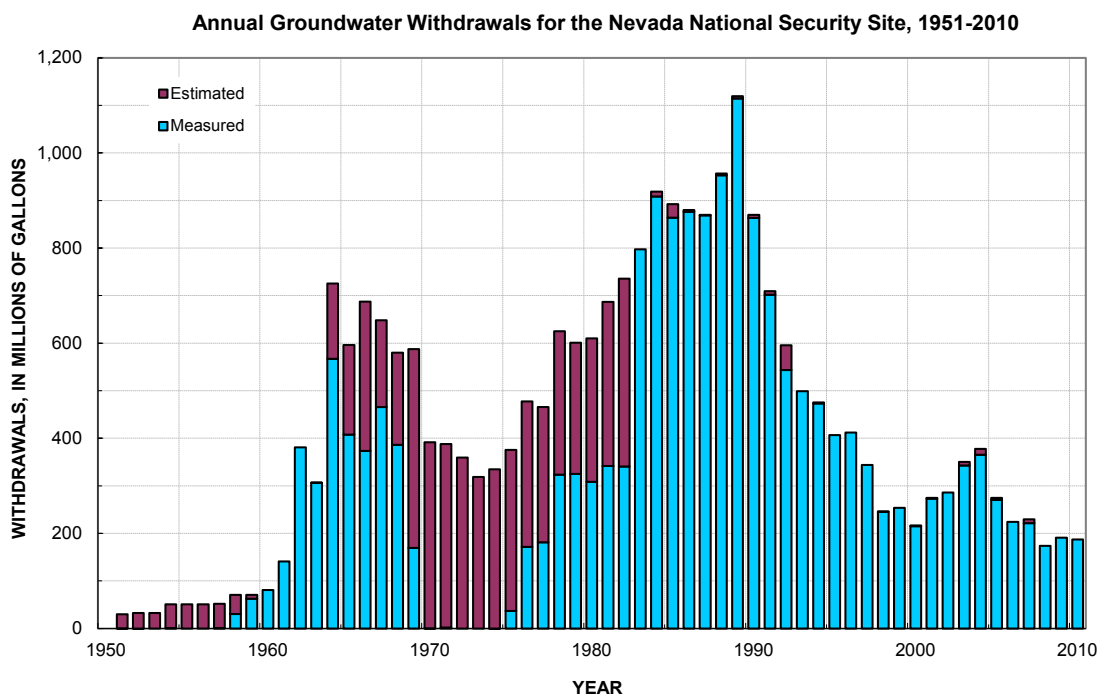


Figure 14-1. Annual withdrawals from the NNSS, 1951 to present

## 14.4 Groundwater Conservation

All water used by NNSA/NSO is groundwater. NNSA/NSO takes actions to conserve groundwater at the NNSS and its support facilities by addressing the water efficiency and water management goals presented in DOE's Strategic Sustainability Performance Plan (DOE, 2010a) and in the *FY 2011 NNSA/NSO Site Sustainability Plan* (NSTec, 2010a). These goals include reducing both potable and non-potable water use, installing metering systems for water, auditing water use, using water-efficient products, and increasing the use of recycled, reclaimed, and grey water where possible (see Section 3.3.1, Energy Management Program, Table 3-4). Below are listed all of the groundwater conservation accomplishments of fiscal year (FY) 2010:

- Groundwater production (potable and non-potable combined) was reduced by 17.3 percent from the FY 2007 baseline.
- The FY 2010 Environmental Management System performance target was met to keep water usage below FY 2009 levels; total (potable and non-potable) water usage was down 8.3 percent from FY 2009.
- A total of 22 water meters were installed at selected buildings at the North Las Vegas Facility (NLVF).
- Water projects totaling \$28 million were proposed for funding from the DOE's Office of Energy Efficiency and Renewable Energy. The proposed projects included installation of (1) solar water systems on high use facilities, (2) water meters in enduring buildings, (3) xeric landscaping at NLVF, (4) a new water well on NNSS (Well J-14), and (5) reuse of recovered water from evaporative cooling operations. No funding was received.
- Funding was received from the U.S. Department of Defense for construction of the new water supply well (Well J-14) located in Area 25 of the NNSS. The well was designed and drilled in 2010. A new pipeline connecting the well to the Area 25 Public Water System will reduce system leaks and maintenance costs. The well project is scheduled for completion in 2011.

- A cost estimate was developed for replacing all water system pipes at the NNSS in FY 2011.
- A project was developed to replace grass around Building C-1 at the NLVF; funding is dependent on whether NNSA/NSO will relocate from the NLVF in the near future.
- A new car wash was purchased and installed in Mercury to replace the car wash installed in 1962. The touchless system reclaims 85 percent of water used, which represents a 66 percent water savings per vehicle.
- NNSA/NSO developed a Performance Evaluation Plan and an Award Team Incentive for NSTec to reward exceptional individual and team performance in increasing water conservation.
- An outreach program was established to motivate employees to become more efficient in their use of water.

In 2010, the Energy Management Program completed the *FY 2010 NNSA/NSO Energy Executable Plan* (NSTec, 2010b) and the *FY 2011 NNSA/NSO Site Sustainability Plan* (NSTec, 2010a). They include the following proposed groundwater conservation actions:

- Continue to purchase and install WaterSense labeled products.
- Continue to purchase and install water meters at the NNSS and the NLVF. Any rebates received for energy-efficient upgrades will be used by the Energy Management Program to purchase meters.
- Conduct a management assessment of the water efficiency and management component of the Energy Management Program.
- Complete a water management plan, which will discuss administrative controls used to manage water at NNSA/NSO facilities.

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## 15.0 *Historic Preservation and Cultural Resources Management*

The historic landscape of the Nevada National Security Site (NNSS) contains archaeological sites, buildings, structures, and places of importance to American Indians and others. These are referred to as “cultural resources.” U.S. Department of Energy (DOE) Order DOE O 450.1A, “Environmental Protection Program,” requires that NNSS activities and programs comply with all applicable cultural resources regulations (see Section 2.8) and that such resources on the NNSS be monitored. The Cultural Resources Management (CRM) program at the NNSS has been established and is implemented by the Desert Research Institute (DRI) to meet this requirement. The CRM program is designed to meet the specific goals shown below.

<b><i>Cultural Resources Management Program Goals</i></b>
Ensure compliance with all regulations pertaining to cultural resources on the NNSS (see Section 2.8).
Inventory and manage cultural resources on the NNSS.
Provide information that can be used to evaluate the potential impacts of proposed projects and programs to cultural resources on the NNSS and mitigate adverse effects.
Curate archaeological collections in accordance with Title 36 Code of Federal Regulations (CFR) Part 79, “Curation of Federally-Owned and Administered Archeological Collections.”
Conduct American Indian consultations related to places and items of importance to the Consolidated Group of Tribes and Organizations.

In order to achieve the program goals and meet federal and state requirements, the CRM program is multifaceted and contains the following major components: (1) archival research, inventories, and historical evaluations; (2) curation of archaeological collections; and (3) the American Indian Program. The guidance for the CRM program work is provided in the *Cultural Resources Management Plan for the Nevada Test Site* (Drollinger and Beck, 2010). Historical preservation personnel and archaeologists of DRI who meet the qualification standards set by the Secretary of the Interior conduct the work, and the archaeological efforts are permitted under the Archaeological Resources Protection Act (ARPA).

A brief description of the CRM program components and their 2010 accomplishments is provided in this chapter. The methods used to conduct inventories and historical evaluations in support of NNSS operations were summarized in the *Nevada Test Site Environmental Report 2003* (Bechtel Nevada, 2004a). The reader is directed to the *Nevada National Security Site Environmental Report 2010 Attachment A: Site Description*. It is a separate file on the compact disc of this report and is also accessible on the U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office (NNSA/NSO) web page <http://www.nv.energy.gov/library/publications/aser.aspx>. Attachment A summarizes cultural resource inventories of the NNSS and describes prehistoric and historical artifacts found on the NNSS. It also contains a summary of the known human occupation and use of the NNSS from the Paleo-Indian Period, about 12,000 years ago, until the mining and ranching period of the 20<sup>th</sup> century, just before NNSS lands were withdrawn for federal use.

### 15.1 *Cultural Resources Inventories*

Cultural resources inventories are conducted at the NNSS to meet the requirements of the National Historic Preservation Act (NHPA) and the ARPA. The inventories are completed prior to proposed projects that may disturb or otherwise alter the environment. The following information is maintained in databases:

- Number of cultural resources inventories conducted
- Location of each inventory

- Number of acres surveyed at each project location
- Types of cultural resources identified at each project location
- Number of cultural resources determined eligible to the National Register of Historic Places (NRHP)
- Eligible properties avoided by project activities
- Cultural resources requiring mitigation to address an adverse effect
- Occurrences of damage to archaeological sites
- Final report on results

In 2010, DRI conducted archival research for 16 proposed NNSA/NSO projects that had the potential to impact cultural resources on the NNSS. The archival research findings led archeologists to conduct field inventories (i.e., surveys). In 2010, seven cultural resources inventories for proposed projects were completed through the report phase (Table 18-1). Seven prehistoric sites were identified: five are lithic artifact scatters and two are lithic artifact localities. None of the sites, however, were determined to be eligible to the NRHP. One locomotive associated with nuclear rocket testing activities was recorded and is eligible to the NRHP. Mitigation is only conducted when eligible properties will be affected by a proposed project; therefore, no mitigation measures were required in 2010. Also, there were no reported occurrences of damage to archaeological sites. A total of 164.29 hectares (ha) (405.72 acres [ac]) was examined during cultural resources inventories.

**Table 15-1. 2010 cultural resources inventories and historic evaluations for which final reports were completed**

Inventories and Evaluations	NNSA Area	Prehistoric/ Historical Sites Found	Cultural Resources Evaluated	Cultural Resources Determined NRHP Eligible	Area Surveyed	
					Hectares	Acres
Area 25 Solar Demonstration Project	25	6	6	0	114.7	283.3
UGTA <sup>(a)</sup> ER-20-9 Well Pad and Access Road	20	1	1	0	13.0	32.17
UGTA ER-EC-15 Well Pad and Access Road	NTTR <sup>(b)</sup>	0	0	0	23.9	59
Two New Pads Near the Pluto Facility	26	0	0	0	1.32	3.18
U12u Powerline	12	0	0	0	8.57	21.17
Explosive Ordnance Disposal Unit Firing Point	6	0	0	0	2.8	6.9
L 2 Locomotive Historical Evaluation	25	1	1	1	N/A	N/A
<b>Totals</b>		<b>8</b>	<b>8</b>	<b>1</b>	<b>164.29</b>	<b>405.72</b>

(a) Underground Test Area

(b) Nevada Test and Training Range

Also in 2010, ten cultural resources inventories and two historical evaluations were completed through the fieldwork phase (Table 15-2). Eighteen prehistoric sites were recorded: eight are lithic localities, eight are lithic artifact scatters, one is a rock cairn, and one is a knapping station. Four historic sites were recorded: three are historic localities and one is a historical camp. An additional two recorded sites consisted of both prehistoric and historic artifacts. Several historic features and can scatters were recorded within the Mine Mountain Mining District evaluation area. Draft reports for these inventories and evaluations were prepared and are in review.

**Table 15-2. 2010 cultural resources inventories and historic evaluations for which final reports and cultural resource evaluations to determine NRHP eligibility are pending**

Inventories and Evaluations	NNSS Area	Prehistoric/ Historical Sites Found	Area Surveyed	
			Hectares	Acres
Phase I Fiber Optic Line Mercury to Control Point 6	5, 6, 23	6	96	236
Phase II Fiber Optic Line Control Point 6 to Area 12 Substation	1–6, 12	2	98	242
Phase III Fiber Optic Line Mercury Highway to the JASPER Facility	5, 27	0	46	114
Phase IV Fiber Optic Line U12n Tunnel to U12g Tunnel Guard Shack	12	0	18	44
Phase V Fiber Optic Line Mercury Highway to Yucca Lake Dry Lake Bed	6	0	23	57
Source Physics Experiments (SPE)	8, 15	9	11.17	27.59
Pele Test	4	0	10.45	25.8
Palanquin Soil Samples	20	0	3.3	8.1
Pluto Compressor Building 26-2205 Historical Evaluation	26	1	10.33	25.5
Structural Response Buildings Historical Evaluation	1, 3, 12, 19	14 structures	1.43	3.53
Mine Mountain Mining District Recording	6, 16	1	27	68
Rail Lines	25, 26	8	4	10
<b>Totals</b>		32	348.68	861.52

## 15.2 Evaluations of Historic Structures

In 2010, a historical evaluation report for the U12n Tunnel Complex was revised and will be completed in 2011. From 1967 to 1992, 22 nuclear and 11 high explosives tests were conducted in the U12n Tunnel. The complex is composed of the portal and mesa areas, encompassing an area of approximately 240 ha (600 ac). Research continued in 2010 on the historical evaluation for the vertical shafts, U15a and U15e and the U16a Tunnel Complex. The U15a and U15e shaft complex was in operation from 1959 to 1967 for nuclear structural effects and cratering tests. Three nuclear tests were conducted in the shafts in 1962, 1965, and 1966. The U16a Tunnel Complex was in operation from 1962 to 2001 for nuclear weapons effects tests and high explosive tests. Six nuclear weapons effects tests and fifteen high explosives tests were conducted during this time frame. These evaluations are expected to be complete in 2011.

Also in 2010, archival research and fieldwork were completed for the historical evaluations of the L 2 Locomotive, the Structural Response Structures, and the Pluto Facility Compressor Building 26-2205. The L 2 Locomotive was stored outside on railroad tracks at the Engine Maintenance, Assembly, and Disassembly (E-MAD) facility in Area 25. The locomotive is a part of the Jackass and Western Railroad that played a valuable role in the space program of the United States from the 1950s to the early 1970s. It assisted in transporting nuclear rocket engines and reactors, before and after testing, between the various facilities at the Nuclear Rocket Development Station, served as a general purpose locomotive to move various pieces of rail equipment, and helped transport nuclear fuel assemblies at the E-MAD facility as part of the Spent Fuel Test-Climax program (1980–1983).

The Structural Response Structures were constructed for the Structural Response Safety Program, which was designed to gather ground motion and structural response data to ensure the safety of the offsite population and minimize damage to public and private structures from ground motion caused by underground nuclear testing. The structures were constructed between 1963 and 1966 and used into the late 1970s.

The Pluto Compressor Building was part of the Pluto complex in operation from 1958 to 1964 to develop and test nuclear reactors for ramjets to be used in long-range, low altitude missiles for the U.S. Department of Defense.



### **15.3 General Reconnaissance**

Seven field activities and two preliminary assessments were conducted in 2010. One of the field activities involved DRI personnel going through the E-MAD facility with Atomic Testing Museum (ATM) personnel to photograph and tag artifacts for inclusion into the ATM inventory. A second field activity was a visit to the Mine Mountain area to record and photograph the area surrounding the retort. The third field activity was to evaluate and photograph potential impacts from an off-road vehicle at Cane Spring. The fourth field activity involved the inventory of an area for a proposed NNSA/NSO project called the Source Physics Experiments. The fifth field activity was in Area 22 and involved evaluating an area for staging/storing trucks along the road into Camp Desert Rock. The sixth field activity involved a visit to Baneberry to photograph artifacts and the fissure surrounding the Baneberry crater. The seventh field activity was the continuation of the fiscal year site monitoring program involving visiting 15 eligible properties.

The preliminary assessments involved visiting multiple corrective action sites (CASs) that are part of two corrective action units (CAUs), CAU 561, Waste Disposal Areas, and CAU 367, Area 10 Sedan, Ess, and Uncle Unit Craters. DRI provided recommendations regarding the presence and protection of cultural resources at the CASs during CAS cleanup and closure.

### **15.4 Cultural Resources Reports**

Numerous reports were completed in 2010. They included seven inventory reports (Holz and Jones 2010; Jones 2010a; 2010b; 2010c; Jones and Arnold, 2010; Jones and Beck, 2010; and Jones and Drollinger, 2010) and five letter reports (Beck 2010a; 2010b; Drollinger, 2010; Jones, 2010d; 2010e). Specific site location information and reports containing such data are not available to the public. The data on NNSS archaeological activities also were provided to DOE Headquarters in the formal Archeology Questionnaire for transmittal to the Secretary of the Interior and, ultimately, to the U.S. Congress as part of the Secretary of the Interior's Annual Archeology Report to Congress.

### **15.5 Curation**

The NHPA requires that archaeological collections and associated records be maintained at professional standards; the specific requirements are delineated in 36 CFR 79. The NNSS Archaeological Collection currently contains over 400,000 artifacts and is curated in accordance with 36 CFR 79. Curation requirements for the NNSS Archaeological Collection include:

- Maintain a catalog of the items in the NNSS collection.
- Package the NNSS collection in materials that meet archival standards (e.g., acid-free boxes).
- Store the NNSS collection and records in a facility that is secure and has environmental controls.
- Establish and follow curation procedures for the NNSS collection and facility.
- Comply with the Native American Graves Protection and Repatriation Act (NAGPRA).

In the 1990s, the U.S. Department of Energy, Nevada Operations Office completed the required inventory and summary of NNSS cultural materials accessioned into the NNSS Archaeological Collection and distributed the inventory list and summary to the tribes affiliated with the NNSS and adjacent lands. Consultations followed, and all artifacts the tribes requested were repatriated to them. This process was completed in 2002; it will be repeated for new additions to the collection in the future. Known NNSS locations of American Indian human remains continued to be protected from NNSS activities in 2010.

All artifacts in the collection are stored in current archival-quality materials, and 30 years of archaeological survey reports, technical reports, and site records are linked to a Geographic Information System. Although the work schedule in the curation facility is variable, the state of the collection is monitored weekly to ensure that the materials remain in good condition.

In 2010, the NNSA/NSO artifact collections and documents for the cultural resources studies conducted on the NNSS were maintained and managed by DRI. The NNSA/NSO collection is now arranged on the shelving according to site provenience. All archival boxes containing artifacts, except for a few with specialized sizes or certain artifacts, have been replaced with plastic ones that meet or surpass archival standards (Drollinger, 2010).

The Hot Creek artifact collection and original field notes were returned to the Harry Reid Center for Environmental Studies, Division of Cultural Resources at the University of Nevada, Las Vegas. The collection and notes were on loan to DRI for research involving the Central Nevada Test Area (CNTA). The artifacts were collected from sites around the CNTA and on land belonging to other federal agencies.

## 15.6 American Indian Program

NNSA/NSO has had an active American Indian Program since the late 1980s. The function of the program is to conduct consultations between NNSA/NSO and NNSS-affiliated American Indian tribes. Consultation occurs through the Consolidated Group of Tribes and Organizations (CGTO). The CGTO is composed of 16 groups of Southern Paiute, Western Shoshone, and Owens Valley Paiute-Shoshone. The 16 groups are listed in previous NNSS environmental reports (e.g., National Security Technologies, LLC, 2008). A history of this program is contained in *American Indians and the Nevada Test Site, A Model of Research and Consultation* (Stoffle et al., 2001). The goals of the program are to:

- Provide a forum for the CGTO to interface directly with NNSA/NSO and discuss issues of importance.
- Provide the CGTO with opportunities to actively participate in decisions that involve places and locations that hold cultural significance to the tribes.
- Involve the CGTO in the curation and display of American Indian artifacts.
- Enable the CGTO and its constituency to practice and participate in religious and traditional activities within the boundaries of the NNSS.
- Provide an opportunity for subgroups of the CGTO to participate in the review and evaluation of program documents and provide guidance in the interim between regularly scheduled meetings,

In 2009, the CGTO, along with tribes from the Hanford Site and Los Alamos National Laboratory, participated in developing tribal text for the *Evaluation of Methods for the Disposal of Greater-Than-Class C Low-Level Waste* Environmental Impact Statement (EIS). Tribally approved text was forwarded to Environmental Management (EM) at DOE Headquarters for review in June 2010. In October 2010, EM completed their internal reviews, and minor formatting modifications were made for inclusion in the Draft EIS to be released in early 2011.

Beginning in February 2010, the CGTO's American Indian Writer's Subgroup (AIWS) began participating in the development of tribal text for the draft NNSS Site-Wide Environmental Impact Statement (SWEIS). AIWS reviewed draft chapters of the SWEIS as they were developed and completed the tribal text after three week-long meetings held in March, July, and August 2010. Final tribal text was submitted in September 2010 to NNSA/NSO for review.

On October 24–27, 2010, NNSA/NSO hosted its annual Tribal Update Meeting with the CTGO. The meeting was held as part of DOE's commitment to promoting government-to-government relations and working collaboratively with culturally affiliated tribes. NNSA/NSO provided an onsite tour and discussed program updates on current and future activities. The text developed by the AIWS on behalf of the CGTO for the NNSS SWEIS was reviewed by the CGTO. At the end of the meeting, the CGTO presented 29 recommendations to NNSA/NSO to further enhance the NNSA/NSO American Indian Program. One notable recommendation was the formal acceptance by the CGTO of the AIWS text developed for the NNSS SWEIS, followed by a recommendation to meet with the Assistant Secretary of EM during a regularly scheduled visit to discuss the progress of the NNSS American Indian Program. Other guidance recommendations included the continuance of annual Tribal Update Meetings, collaboration with NNSA/NSO to monitor artifact collections, publishing the NNSS American Indian History Project, and participating in co-management initiatives and cultural resource management activities.

In 2010, NNSA/NSO did not receive any requests from NNSS-affiliated tribes to access the NNSS for ceremonies or traditional use. However, interest in conducting a pine nut harvest on the NNSS in the future was discussed at the Tribal Update Meeting.

In the 1990s, NNSA/NSO initiated NAGPRA consultations with NNSS-affiliated tribes regarding the NNSS artifact collection. The final repatriation of cultural items from the collection to the tribes in 2002 marked the end of the NAGPRA consultations. NNSA/NSO continues to protect NNSS American Indian burial sites and their location information.

## 16.0 Ecological Monitoring

U.S. Department of Energy (DOE) Order DOE O 450.1A, “Environmental Protection Program,” requires ecological monitoring and biological compliance support for activities and programs conducted at DOE facilities. The National Security Technologies, LLC (NSTec), Ecological Monitoring and Compliance (EMAC) Program provides this support for the Nevada National Security Site (NNSS). The major sub-programs and tasks within EMAC include (1) the Desert Tortoise Compliance Program, (2) biological surveys at proposed construction sites, (3) monitoring important species and habitats, (4) the Habitat Restoration Program, (5) wildland fire hazard assessment, and (6) biological impact monitoring at the Nonproliferation Test and Evaluation Complex (NPTEC). Brief descriptions of these sub-programs and their 2010 accomplishments are provided in this chapter. Detailed information may be found in the most recent annual EMAC report (Hansen et al., 2011). EMAC annual reports are available at <http://www.nv.energy.gov/library/publications/emac.aspx>. The reader is also directed to *Attachment A: Site Description*, a separate file on the compact disc of this report, where the ecology of the NNSS is described.

### *Ecological Monitoring and Compliance Program Goals*

Ensure compliance with all state and federal regulations and stakeholder commitments pertaining to NNSS flora, fauna, wetlands, and sensitive vegetation and wildlife habitats (see Section 2.9).

Delineate NNSS ecosystems.

Provide ecological information that can be used to evaluate the potential impacts of proposed projects and programs on NNSS ecosystems and important plant and animal species.

### 16.1 Desert Tortoise Compliance Program

The desert tortoise is federally protected as a threatened species under the Endangered Species Act, and it inhabits the southern one-third of the NNSS (Figure 16-1). Activities conducted in desert tortoise habitat on the NNSS must comply with the terms and conditions of a Biological Opinion (Opinion) issued to the U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office (NNSA/NSO) by the U.S. Fish and Wildlife Service (FWS) (FWS, 2009). The Opinion is effectively a permit to conduct activities in desert tortoise habitat in a specific manner. It authorizes the incidental “take” (accidental killing, injury, harassment, etc.) of tortoises that may occur during the activities, which, without the Opinion, would be illegal and subject to civil or criminal penalties.

The Opinion states that proposed NNSS activities are not likely to jeopardize the continued existence of the Mojave population of the species and that no critical habitat would be destroyed or adversely modified. It sets compliance limits for the acres of tortoise habitat that can be disturbed, the numbers of accidentally injured and killed tortoises, and the number of captured, displaced, or relocated tortoises (Table 16-1). It also establishes mitigation requirements for habitat loss. The Desert Tortoise Compliance Program was developed to implement the Opinion’s terms and conditions, document compliance actions taken, and assist NNSA/NSO in FWS consultations.

In 2010, biologists conducted surveys for 20 projects that were within the distribution range of the desert tortoise. All of the proposed projects were covered under the Opinion, and no permit limits of the current Opinion were exceeded (Table 16-1). In 2010, 4.46 acres (ac) of desert tortoise habitat were disturbed under the Work for Others Program. Remuneration fees for the compensation of habitat disturbance were paid and deposited into a Desert Tortoise Public Lands Conservation Fund, as required by the Opinion. A cumulative total of 324.00 ac of desert tortoise habitat has been disturbed on the NNSS since issuance of the first Opinion after the species became protected. In 2010, 2 desert tortoises were accidentally killed by vehicles on paved roads, and 13 were moved out of harm’s way off of roads. At project sites, no desert tortoises were accidentally injured or killed, nor were any found, captured, or displaced from the project sites. In January 2011, NNSA/NSO submitted a report to the FWS Southern Nevada Field Office that summarizes tortoise compliance activities conducted on the NNSS from January 1 through December 31, 2010.

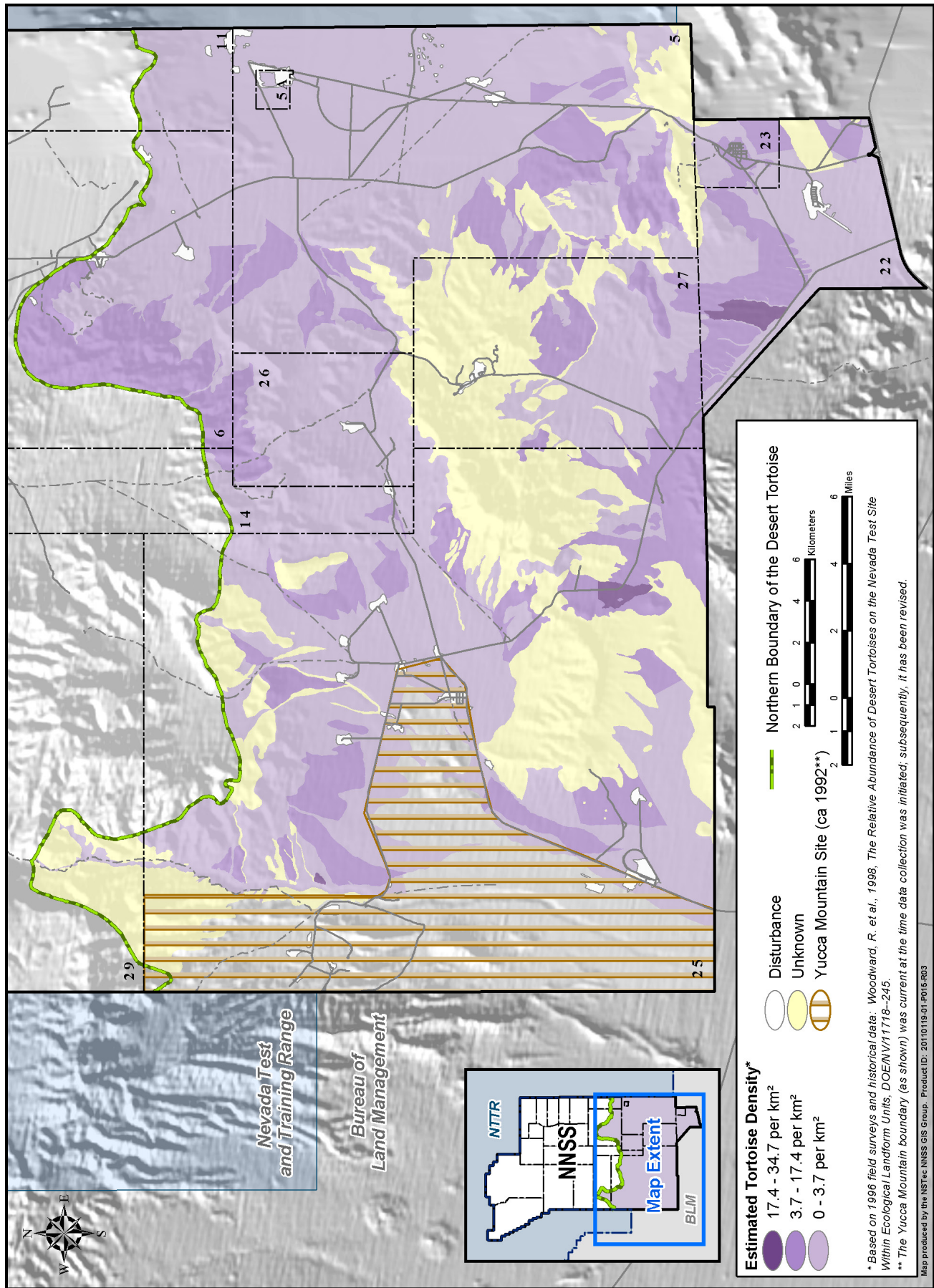


Figure 16-1. Desert tortoise distribution and abundance on the NNSS

**Table 16-1. Annual totals (2010), cumulative totals (2009–2010), and compliance limits for take of acres and tortoises**

Program/Activity	Acres Impacted			Tortoises Incidentally Taken					
				Killed or Injured			Other <sup>(a)</sup>		
	Annual Total	Cumulative Total	Permit Limit	Annual Total	Cumulative Total	Permit Limit	Annual Total	Cumulative Total	Permit Limit
Defense	0	5.61	500	0	0	1	0	0	10
Waste Management	0	0	100	0	0	1	0	0	2
Environmental Restoration	0	0	10	0	0	1	0	0	2
Nondefense Research and Development	0	0	1,500	0	0	2	0	0	35
Work for Others	4.46	6.93	500	0	0	1	0	0	10
Infrastructure Development	0	0	100	0	0	1	0	0	10
Vehicle Traffic on Roads	-	-	-	2	3	15 <sup>(b)</sup>	13	18	125
<b>Totals</b>	4.46	12.54	2,710	2	3	22	13	18	194

(a) The number of desert tortoises that a qualified biologist can take by capture, displacement, relocation, or disruption of behavior if desert tortoises are found in harm's way within a project area or on a heavily trafficked road.

(b) No more than 4 desert tortoises killed during any calendar year and 15 during the term of the Opinion (2009–2019).

## 16.2 Biological Surveys at Proposed Project Sites

Biological surveys are performed at proposed project sites where land disturbance will occur. The goal is to minimize the adverse effects of land disturbance on important plants and animals, their associated habitat, and important biological resources. Important species known to occur on the NNSS include 18 sensitive plants, 1 mollusk, 2 reptiles, over 250 birds, and 27 mammals. They are classified as important due to their sensitive, protected, and/or regulatory status with state or federal agencies (Tables 16-2 and 16-3), and they are evaluated for inclusion in long-term monitoring activities on the NNSS. Important biological resources include such things as cover sites, nest/burrow sites, roost sites, wetlands, or water sources that are vital to important species.

During 2010, biological surveys for 30 projects were conducted on or near the NNSS. They are identified in Figure 16-2 by their project survey numbers of 10-01 through 10-35. For some of the projects, multiple sites were surveyed. Biologists surveyed a total of 608.00 hectares (ha) (1,502.40 ac). A total of 20 projects were within the range of the desert tortoise. NSTec provided to project managers written summary reports of all survey findings and mitigation recommendations, which are summarized by project in Hansen et al. (2011).

## 16.3 Important Species and Habitat Monitoring

Over the last three decades, NNSA/NSO has taken an active role in collecting or supporting the collection of information on the status of important plants and animals (Tables 16-2 and 16-3) and their habitat on the NNSS. NNSA/NSO has produced numerous documents reporting the occurrence, distribution, and susceptibility to threats for predominately sensitive species on the NNSS (Wills and Ostler, 2001). In 1998, NNSA/NSO prepared a Resource Management Plan (U.S. Department of Energy, Nevada Operations Office, 1998). One of the natural resources goals stated in the plan is to protect and conserve sensitive plant and animal species found on the NNSS and to minimize cumulative impacts to those species as a result of NNSA/NSO activities.

Activities related to the important plants, animals, and habitats on the NNSS that occurred in 2010 are listed in Table 16-4. A description of the methods and a more detailed presentation of the results of these activities are reported in Hansen et al. (2011). A map of all the known sensitive plant populations on the NNSS is available at <http://www.nv.energy.gov/library/publications/Environmental/Figures/Fig11-3.pdf>.



**Table 16-2. Important plants known to occur on or adjacent to the NNSS**

<b>SENSITIVE PLANT SPECIES</b>		
<b>Flowering Plant Species</b>	<b>Common Name</b>	<b>Status<sup>(a)</sup></b>
<i>Astragalus beatleyae</i>	Beatley milkvetch	S, 5 years
<i>Astragalus funereus</i>	Black woolypod	S, 5 years
<i>Astragalus oophorus</i> var. <i>clokeyanus</i>	Clokey eggvetch	S, 5 years
<i>Eriogonum concinnum</i>	Darin buckwheat	S, 5 years
<i>Eriogonum heermannii</i> var. <i>clokeyi</i>	Clokey buckwheat	S, 5 years
<i>Ivesia arizonica</i> var. <i>saxosa</i>	Rock purpusia	S, 5 years
<i>Phacelia beatleyae</i>	Beatley scorpionflower	S, 10 years
<i>Arctomecon merriamii</i>	White bearpoppy	S, 10 years
<i>Camissonia megalantha</i>	Cane Spring suncup	S, 10 years
<i>Cymopterus riplei</i> var. <i>saniculoides</i>	Sanicle biscuitroot	S, 10 years
<i>Frasera pahutensis</i>	Pahute green gentian	S, 10 years
<i>Galium hilendiae</i> ssp. <i>kingstonense</i>	Kingston Mountains bedstraw	S, 10 years
<i>Hulsea vestita</i> ssp. <i>inyoensis</i>	Pumice alpinegold	S, 10 years
<i>Penstemon fruticiformis</i> var. <i>armagosae</i>	Death Valley beardtongue	S, 5 years
<i>Penstemon pahutensis</i>	Pahute Mesa beardtongue	S, 10 years
<i>Phacelia filiae</i>	Clarke phacelia	S, 10 years
<i>Phacelia mustelina</i>	Weasel phacelia	S, 10 years
<b>Moss Species</b>		
<i>Entosthodon planoconvexus</i>	Planoconvex entosthodon	S, 5 years
<b>PROTECTED/REGULATED PLANT SPECIES</b>		
<i>Cactaceae</i>	Cacti (18 species)	CY
<i>Agavaceae</i>	Yucca (3 species), Agave (1 species)	CY
<i>Juniperus osteosperma</i>	Juniper	CY
<i>Pinus monophylla</i>	Pinyon pine	CY

(a) Status Codes:

State of Nevada

S - Listed on the Nevada Natural Heritage Program (NNHP) Nevada Animal and Plant At-Risk Tracking List, March 2007

CY - Protected as a cactus, yucca, or Christmas tree (any evergreen tree or part thereof cut and removed from the place where grown without the foliage being removed) from unauthorized collection on public lands. Such plants are not protected from harm on private lands or on withdrawn public lands such as the NNSS. They are recommended for avoidance, however, at proposed land disturbance sites at which preactivity surveys are conducted.

Long-term Sensitive Plant Monitoring Status under EMAC

5 years - Monitor a minimum of once every 5 years

10 years - Monitor a minimum of once every 10 years



Table 16-3. Important animals known to occur on or adjacent to the NNSS

<b>Mollusk Species</b>	<b>Common Names</b>	<b>Status <sup>(a)</sup></b>
<i>Pyrgulopsis turbatrix</i>	Southeast Nevada pyrg	S, A
<b>Reptile Species</b>		
<i>Eumeces gilberti rubricaudatus</i>	Western red-tailed skink	S, E
<i>Gopherus agassizii</i>	Desert tortoise	LT, NPT, S, IA
<b>Bird Species <sup>(b)</sup></b>		
<i>Accipiter gentilis</i>	Northern goshawk	NPS, S, IA
<i>Alectoris chukar</i>	Chukar	G, IA
<i>Aquila chrysaetos</i>	Golden eagle	EA, NP, IA
<i>Buteo regalis</i>	Ferruginous hawk	NP, S, IA
<i>Callipepla gambelii</i>	Gambel's quail	G, IA
<i>Coccyzus americanus</i>	Western yellow-billed cuckoo	C, NPS, S, IA
<i>Falco peregrinus anatum</i>	Peregrine falcon	NPE, S, IA
<i>Haliaeetus leucocephalus leucocephalus</i>	Bald eagle	EA, NPE, S, IA
<i>Ixobrychus exilis hesperis</i>	Western least bittern	NP, S, IA
<i>Lanius ludovicianus</i>	Loggerhead shrike	NPS, IA
<i>Oreoscoptes montanus</i>	Sage thrasher	NPS, IA
<i>Phainopepla nitens</i>	Phainopepla	NP, S, IA
<i>Spizella breweri</i>	Brewer's sparrow	NPS
<i>Toxostoma lecontei</i>	LeConte's thrasher	NP, S, IA
<i>Toxostoma bendirei</i>	Bendire's thrasher	NP, S
<b>Mammal Species</b>		
<i>Antilocapra americana</i>	Pronghorn antelope	G, IA
<i>Antrozous pallidus</i>	Pallid bat	NP, M, A
<i>Cervus elaphus</i>	Rocky Mountain elk	G, IA
<i>Corynorhinus townsendii pallescens</i>	Townsend's big-eared bat	NPS, S, H, A
<i>Equus asinus</i>	Burro	HB, IA
<i>Equus caballus</i>	Horse	HB, A
<i>Euderma maculatum</i>	Spotted bat	NPT, S, M, A
<i>Lasionycteris noctivagans</i>	Silver-haired bat	M, A
<i>Lasiurus blossevillii</i>	Western red bat	NPS, S, H, A
<i>Lasiurus cinereus</i>	Hoary bat	M, A
<i>Lynx rufus</i>	Bobcat	F, IA
<i>Microdipodops megacephalus</i>	Dark kangaroo mouse	NP, A
<i>Microdipodops pallidus</i>	Pale kangaroo mouse	NP, S, A
<i>Myotis californicus</i>	California myotis	M, A
<i>Myotis ciliolabrum</i>	Small-footed myotis	M, A
<i>Myotis evotis</i>	Long-eared myotis	M, A
<i>Myotis thysanodes</i>	Fringed myotis	NP, S, H, A
<i>Myotis yumanensis</i>	Yuma myotis	M, A
<i>Ovis canadensis nelsoni</i>	Desert bighorn sheep	G, IA
<i>Odocoileus hemionus</i>	Mule deer	G, A
<i>Pipistrellus Hesperus</i>	Western pipistrelle	M, A
<i>Puma concolor</i>	Mountain lion	G, A
<i>Sylvilagus audubonii</i>	Audubon's cottontail	G, IA

**Table 16-3. Important animals known to occur on or adjacent to the NNSS (continued)**

<b>Mammal Species (continued)</b>	<b>Common Names</b>	<b>Status <sup>(a)</sup></b>
<i>Sylvilagus nuttallii</i>	Nuttall's cottontail	G, IA
<i>Tadarida brasiliensis</i>	Brazilian free-tailed bat	NP, A
<i>Urocyon cinereoargenteus</i>	Gray fox	F, IA
<i>Vulpes velox macrotis</i>	Kit fox	F, IA

(a) Status Codes:

U.S. Fish and Wildlife Service, Endangered Species Act

- LT - Listed Threatened
- C - Candidate for listing

U.S. Department of Interior

- EA - Protected under Bald and Golden Eagle Act
- HB - Protected under Wild Free Roaming Horses and Burros Act

State of Nevada

- F - Regulated as fur-bearer species
- G - Regulated as game species
- NPE - Species protected as endangered under Nevada Administrative Code (NAC) 503
- NPT - Species protected as threatened under NAC 503
- NPS - Species protected as sensitive under NAC 503
- NP - Species listed as protected under NAC 503
- S - Listed on NNHP's Nevada Animal and Plant At-Risk Tracking List, March 2007

Revised Nevada Bat Conservation Plan (Bradley et al., 2005) – Bat Species Risk Assessment Designations

- H - High: species imperiled or at high risk of imperilment and having the highest priority for funding, planning, and conservation actions
- M - Moderate: species that warrant closer evaluation, more research, and conservation actions and lacking meaningful information to adequately assess species' status

Long-term Sensitive Animal Monitoring Status under EMAC

- A - Active: currently included in long-term population monitoring activities
- E - Evaluate: species for which more information on distribution, abundance, and susceptibilities to threats on the NNSS must be gathered before deciding to include in long-term monitoring activities
- IA - Inactive: not currently included in long-term population monitoring activities

- (b) All wild bird species on the NNSS are protected by the Migratory Bird Treaty Act except for the following five species: Gambel's quail, chukar, English house sparrow, rock dove, and European starling. Also, the State of Nevada protects all wild birds that are protected by federal laws in addition to the species listed in this table.

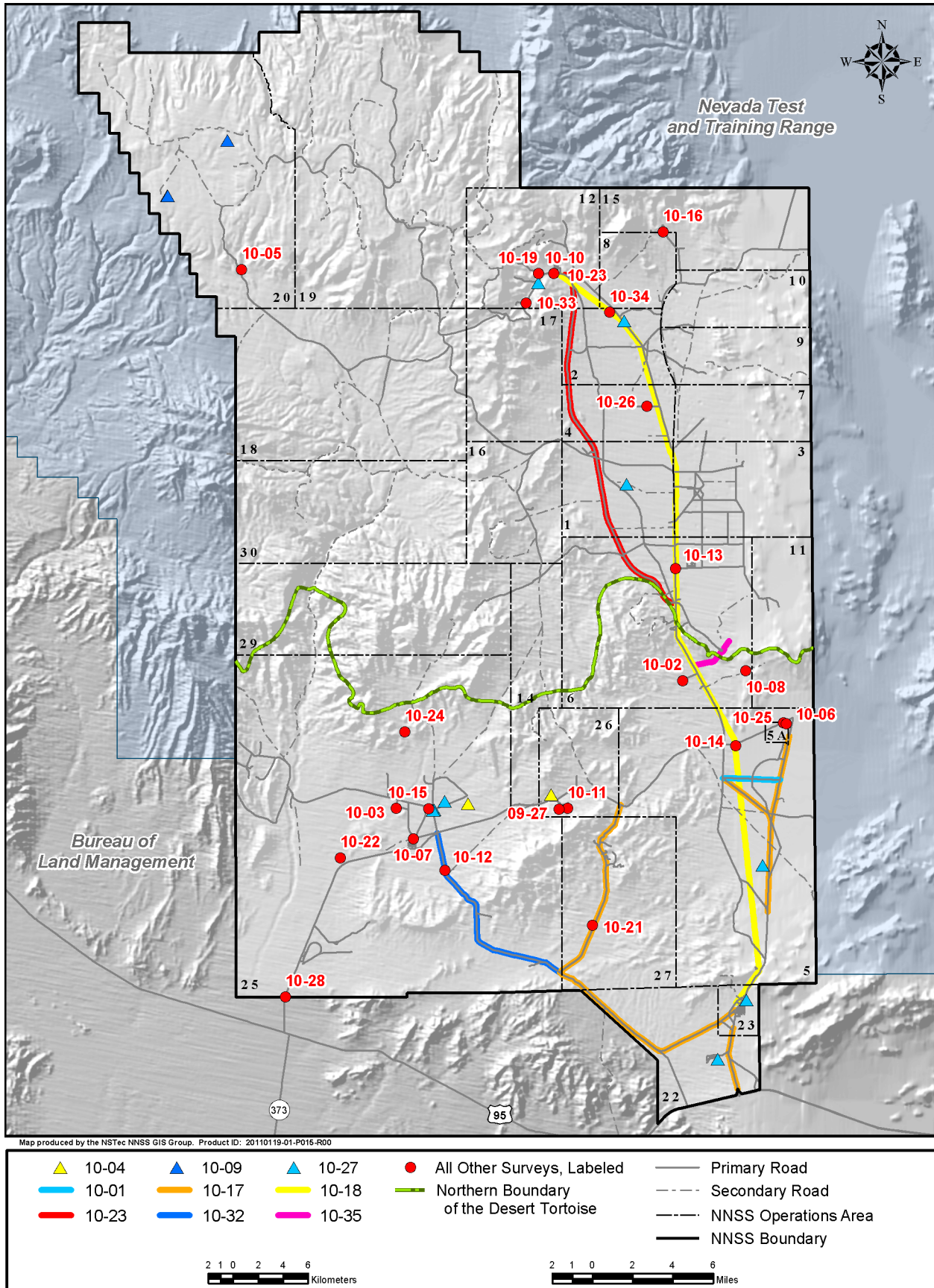


Figure 16-2. Location of biological surveys conducted on the NNSS in 2010

**Table 16-4. Activities conducted in 2010 for important species and habitats of the NNSS**

<p><b>Sensitive Plants</b></p> <ul style="list-style-type: none"> <li>• <i>Phacelia parishii</i> was removed from the list of sensitive plants (Table 16-2) based on field surveys that determined that previously reported locations of <i>P. parishii</i> on the NNSS were actually those of a near-identical species, <i>P. filiae</i>.</li> <li>• Field surveys were conducted to determine the distribution of <i>P. filiae</i>, and to locate new and known populations of <i>Cymopterus ripleyi</i> var. <i>saniculoides</i>, <i>Galium hilandiae</i> ssp. <i>Kingstonense</i>, and <i>Astragalus oophorus</i> var. <i>clokeyanus</i>.</li> <li>• Long-term monitoring plots were established for eight sensitive species, and their density at each plot was determined.</li> </ul>
<p><b>Migratory Birds</b></p> <ul style="list-style-type: none"> <li>• One raven nest with two chicks was found during a preactivity survey and was avoided until chicks fledged.</li> <li>• Fifteen known bird mortalities were documented (Figure 16-3). In 2010, two barn owls (<i>Tyto alba</i>), three red-tailed hawks (<i>Buteo jamaicensis</i>), and one raven (<i>Corvus corax</i>) were electrocuted by powerlines; one barn owl was killed by a vehicle; three cowbirds (<i>Molothrus ater</i>) were accidentally trapped under a netting used to cover an evaporation pond; and five northern flickers (<i>Colaptes auratus</i>) were accidentally trapped in an abandoned open metal box containing rainwater and oil. Sites of accidental entrapment were mitigated to avoid future bird deaths, and the FWS was informed of the mortalities and resultant mitigation.</li> </ul>
<p><b>Mountain Lions (<i>Puma concolor</i>)</b></p> <ul style="list-style-type: none"> <li>• A collaborative effort with Erin Boydston of the U.S. Geological Survey (USGS) continued to investigate mountain lion distribution and abundance on the NNSS using remote, motion-activated cameras. Cameras collected a total of 22 photographs/video clips from 8 of 23 camera sites.</li> <li>• A collaborative effort was initiated with Dr. David Mattson of the USGS to investigate the movements, habitat use, and food habits of mountain lions on and around the NNSS using radio-collared individuals. The goal is to capture and collar four mountain lions and track them for a year. Two female lions were captured and collared in December 2010.</li> </ul>
<p><b>Wild Horses (<i>Equus caballus</i>)</b></p> <ul style="list-style-type: none"> <li>• The annual horse census was conducted, and 35 individuals were counted, not including foals. Six foals were observed (Figure 16-4). The estimated size of the wild horse range on the NNSS was 235 square kilometers (km<sup>2</sup>) (90.7 square miles [mi<sup>2</sup>]). Camp 17 Pond and Gold Meadows Spring continue to be important summer water sources for horses.</li> </ul>
<p><b>Mule Deer (<i>Odocoileus hemionus</i>)</b></p> <ul style="list-style-type: none"> <li>• Mule deer surveys were conducted, and the average number of deer counted was 41 deer/night. Deer density ranged from 0.6–4.4 deer/km<sup>2</sup> (0.2–1.7 deer/mi<sup>2</sup>) between different segments of the survey route and averaged about 2.2 deer/km<sup>2</sup> (or 0.85 deer/mi<sup>2</sup>). Deer counts over the last 5 years have fluctuated greatly and show no distinctive trend.</li> </ul>
<p><b>Bats</b></p> <ul style="list-style-type: none"> <li>• U12u Tunnel was monitored for bats prior to the resumption of project activities in the tunnel. Acoustic monitoring of bat vocalizations and night video monitoring indicated that the tunnel was used by a few bat species as a night roost/foraging site. It was determined that resumed activity inside the tunnel would not significantly impact bat populations in the area.</li> <li>• Building 3210 in the Test Cell C Complex was surveyed and monitored for bats prior to the building's demolition. Visual inspection, acoustic monitoring, and night video monitoring indicated that the building was being used by sensitive bat species. A final inspection was conducted the day demolition began to ensure that bats were not present.</li> <li>• Bat vocalizations and concurrent climate data were collected from Camp 17 Pond.</li> <li>• Seven bats were found and documented at four NNSS buildings.</li> </ul>
<p><b>Western Red-tailed Skink (<i>Eumeces gilberti rubricaudatus</i>)</b></p> <ul style="list-style-type: none"> <li>• Surveys for the western red-tailed skink were conducted to determine its distribution and habitat use on the NNSS. Ten were captured at eight sites. NSTec biologists collaborated with Dr. Jonathan Richmond of the USGS, and provided him with skink tissue samples for genetic testing.</li> </ul>
<p><b>Natural and Man-made Water Sources</b></p> <ul style="list-style-type: none"> <li>• Ten natural NNSS wetlands were monitored to document water surface area, surface flow, observed disturbances, and wildlife use and mortality. No wetlands were damaged by NNSS activities. As in previous years, a sensitive species of springsnail (<i>Pyrgulopsis turbatrrix</i>) was present at Cane Spring, which is this species' only natural habitat on the NNSS.</li> <li>• Man-made water sources were monitored for wildlife use and mortality. They included 29 plastic-lined sumps and 1 radioactive containment pond. No wildlife mortality was observed at any water sources; their use by wildlife is presented in Hansen et al. (2011).</li> </ul>

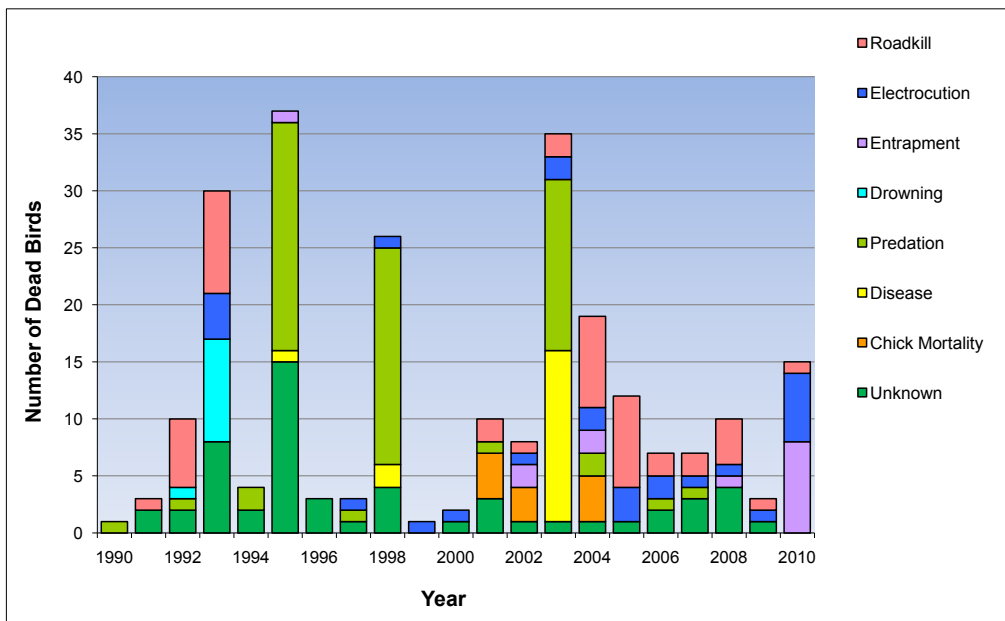


Figure 16-3. Number of bird deaths recorded on the NNSS by year and cause

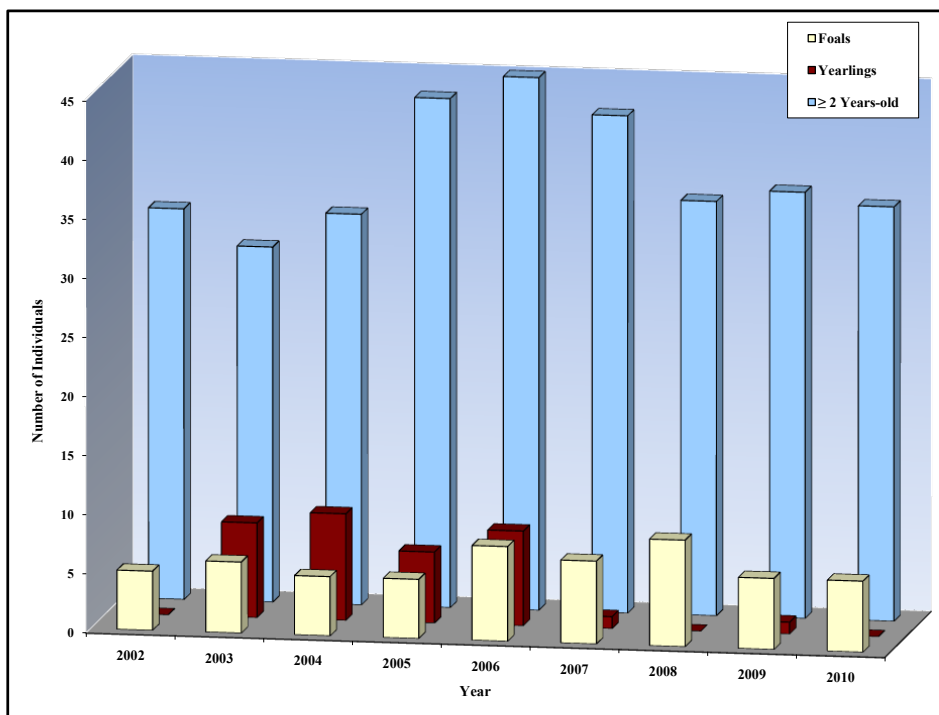


Figure 16-4. Trends in age structure of the NNSS horse population from 2002 to 2010

## 16.4 West Nile Virus Surveillance and Hantavirus Sampling

West Nile virus (WNV) surveillance on the NNSS continued in 2010 for the seventh consecutive year in cooperation with the Southern Nevada Health District. Nine sites were sampled for mosquitoes, and a total of seven mosquitoes representing three species were captured. All specimens were negative for WNV.

In 2010, biologists coordinated with NSTec's Industrial Hygiene and Solid Waste groups to trap rodents on the NNSS to assess the risk of worker exposure to hantavirus during rodent excreta cleanup operations. Rodents were live-trapped at facilities in Areas 1, 6, 12, and 23; humanely euthanized; and sent to the Museum of Southwestern Biology at the University of New Mexico for testing. Of 471 samples composed of 11 species of rodents, only four deer mice (*Peromyscus maniculatus*) tested positive for hantavirus (0.8 percent); three were from Area 12 and one was from Area 6. The combined results from all previous hantavirus sampling on the NNSS (EG&G Energy Measurements, 1994; Saethre, 1994; 1995) show that 2 percent (22 of 1,091) of rodents tested positive, all of which were deer mice. These results suggest that hantavirus is not very prevalent on the NNSS.

## **16.5 *Habitat Restoration Program***

The Habitat Restoration Program involves the revegetation of disturbances and the evaluation of previous revegetation efforts. Sites that have been revegetated are periodically sampled, and the information obtained is used to develop site-specific revegetation plans for future restoration efforts on the NNSS. Revegetation supports the intent of Executive Order EO 13112, "Invasive Species," to prevent the introduction and spread of non-native species and restore native species to disturbed sites. Revegetation also may qualify as mitigation for the loss of desert tortoise habitat under the current Opinion. NNSA/NSO projects for which revegetation has been pursued are lands disturbed in desert tortoise habitat, wildland fire sites, and abandoned industrial or nuclear test support sites characterized and remediated under the Environmental Restoration (ER) Program. The ER Program has also revegetated soil closure covers to protect against soil erosion and water percolation into buried waste. In 2010, two revegetated sites on the NNSS and two on the Tonopah Test Range (TTR) were monitored. The NNSS sites were the closure cover on the U-3ax/bl disposal unit, revegetated in 1998, and the Control Point waterline, revegetated in 2009. The TTR sites included Five Points Landfill (Corrective Action Unit [CAU] 400), revegetated in 1997, and Rollercoaster RADSAFE (CAU 407), revegetated in 2004. Monitoring results are reported in Hansen et al. (2011).

## **16.6 *Wildland Fire Hazard Assessment***

DOE O 450.1A requires protection of site resources from wildland and operational fires. An annual vegetation survey to determine wildland fire hazards is conducted on the NNSS each spring. Survey findings are submitted to the NNSS Fire Marshal and summarized in the annual EMAC report (Hansen et al., 2011). In April and May 2010, NSTec biologists visited 106 roadside sampling stations to assess a fuel index that can range from 0 to 10 (lowest to highest risk of wildfires). The mean combined fuels index for all 106 sampling stations was 4.86. In 2010, there were three wildland fires, which burned about 0.5 ha (1.0 ac). Two of the fires were caused by ordnance associated with training activities, while one was caused by a raven that was electrocuted on a power pole.

## **16.7 *Biological Monitoring of NPTEC***

Biological monitoring at NPTEC in Area 5 is performed when there is a risk of significant exposure to downwind plants and animals from planned test releases of hazardous materials. The Desert National Wildlife Refuge (DNWR) lies east of the NNSS border, approximately 5 kilometers (3 miles) from NPTEC. The National Wildlife Refuge System Administration Act forbids the disturbance or injury of native plants and wildlife on any National Wildlife Refuge System lands unless permitted by the Secretary of the Interior. Biological monitoring is conducted to verify that NPTEC tests do not disperse toxic chemicals that harm biota on DNWR. This is also a requirement of NPTEC's Programmatic Environmental Assessment (U.S. Department of Energy, Nevada Operations Office, 2002). Monitoring involves sampling established transects downwind and upwind of NPTEC and recording dead animals and vegetation damage. In 2010, no chemical testing that could pose significant exposures to biota was performed at NPTEC, and no baseline monitoring was conducted at control-treatment transects near NPTEC.



## 17.0 Quality Assurance Program

The National Security Technologies, LLC (NSTec), Quality Assurance Program (QAP) describes the system used by NSTec to ensure that quality is integrated into the environmental monitoring work performed for the U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office (NNSA/NSO). The NSTec QAP complies with Title 10 Code of Federal Regulations (CFR) Part 830, Subpart A, “Quality Assurance Requirements,” and with U.S. Department of Energy (DOE) Order DOE O 414.1C, “Quality Assurance.” The ten criteria of a quality program specified by these regulations are shown in the box below. The NSTec QAP requires a graded approach to quality for determining the level of rigor that effectively provides assurance of performance and conformance to requirements.

The Data Quality Objective (DQO) process developed by the U.S. Environmental Protection Agency (EPA) is generally used to provide the quality assurance (QA) structure for designing, implementing, and improving upon environmental monitoring efforts when environmental sampling and analysis are involved. Sampling and Analysis Plans are developed prior to performing an activity to ensure complete understanding of the data use objectives. Personnel are trained and qualified in accordance with company and task-specific requirements. Access to sampling locations is coordinated with organizations conducting work at or having authority over those locations in order to avoid conflicts in activities and to communicate hazards to better ensure successful execution of the work and protection of the safety and health of sampling personnel. Sample collection activities adhere to organization instructions and/or procedures that are designed to ensure that samples are representative and data are reliable and defensible. Sample shipments on site and to offsite laboratories are conducted in accordance with the U.S. Department of Transportation and International Air Transport Association regulations, as applicable. Quality control (QC) in the analytical laboratories is maintained through adherence to standard operating procedures that are based on methodologies developed by nationally recognized organizations such as the EPA, DOE, and ASTM International. Key quality-affecting procedural areas cover sample collection, preparation, instrument calibration, instrument performance checking, testing for precision and accuracy, and laboratory data review. NSTec data users perform reviews as required by the project-specific objectives before the data are used to support decision making.

### *Required Criteria of a Quality Program*

- Quality assurance program
- Personnel training and qualification
- Quality improvement process
- Documents and records
- Established work processes
- Established standards for design and verification
- Established procurement requirements
- Inspection and acceptance testing
- Management assessment
- Independent assessment

The key elements of the environmental monitoring process work flow are listed below. Each of these elements is designed to ensure the applicable QA requirements are implemented. A discussion of these elements follows.

- A **Sampling and Analysis Plan (SAP)** is developed using the EPA DQO process to ensure that clear goals and objectives are established for the environmental monitoring activity. The SAP is implemented in accordance with EPA, DOE, and other requirements addressing environmental, safety, and health concerns.
- **Environmental Sampling** is performed in accordance with the SAP and site work controls to ensure defensibility of the resulting data products and protection of the workers and the environment.
- **Laboratory Analyses** are performed to ensure that the resultant data meet DOE-, NSTec-, and regulation-defined requirements.
- **Data Review** is done to ensure that the SAP DQOs have been met, and thereby determine whether the data are suitable for their intended purpose.
- **Assessments** are employed to ensure that monitoring operations are conducted accordingly and that analytical data quality requirements are met in order to identify nonconforming items, investigate causal factors, implement corrective actions, and monitor for corrective action effectiveness.



## **17.1 Sampling and Analysis Plan**

Most environmental monitoring is specifically mandated to demonstrate compliance with a variety of requirements including federal and state regulations and DOE orders and standards. Developing the SAP using the DQO approach ensures those requirements are considered in the planning stage. The following statistical concepts and controls are vital in designing and evaluating the system design and implementation.

### **17.1.1 Precision**

Precision is the degree to which a set of observations or measurements of the same property, obtained under similar conditions, conform to themselves. Precision is a data quality indicator. Precision is usually expressed as standard deviation, variance, or range, in either absolute or relative terms (DOE, 2010b).

Practically, precision is determined by comparing the results obtained from performing analyses on split or duplicate samples taken at the same time from the same location or locations very close to one another, maintaining sampling and analytical conditions as nearly identical as possible.

### **17.1.2 Accuracy**

Accuracy refers to the degree of agreement between an observed value and an accepted reference value. Accuracy includes a combination of random error (precision) and systematic error (bias) components that are due to sampling and analytical operations. Accuracy is a data quality indicator (DOE, 2010b). Accuracy related to laboratory operations is monitored by performing measurements and evaluating results of control samples containing known quantities of the analytes of interest.

### **17.1.3 Representativeness**

Representativeness is the degree to which a measurement is truly representative of the sampled medium or population (i.e., the degree to which measured analytical concentrations represent the concentrations in the medium being sampled) (Stanley and Verner, 1985).

At each sampling point in the sampling and analysis process, subsamples of the medium of interest are obtained. The challenge is to ensure that each subsample maintains the character of the larger sampled population. From a field sample collection standpoint, representativeness is managed through sampling plan design and execution. Representativeness related to laboratory operations concerns the ability to appropriately subsample and characterize for analytes of interest. For example, in order to ensure representative characterization of a heterogeneous matrix (soil, sludge, solids, etc.), the sampling and/or analysis process should evaluate whether homogenization or segregation should be employed prior to sampling or analysis. Water samples are generally considered homogeneous unless observation suggests otherwise. Each air monitoring station's continuous operation at a fixed location results in representatively sampling the ambient atmosphere. Field sample duplicate analyses are additional controls allowing evaluation of representativeness and heterogeneity.

### **17.1.4 Comparability**

Comparability refers to “the confidence with which one data set can be compared to another” (Stanley and Verner, 1985). Comparability from an overall monitoring perspective is ensured by consistent execution of the sampling design concerning sample collection and handling, laboratory analyses, and data review. This is ensured through adherence to established procedures and standardized methodologies. Ongoing data evaluation compares data collected at the same locations from sampling events conducted over multiple years and produced by numerous laboratories to detect any anomalies that might occur.

## ***17.2 Environmental Sampling***

Environmental samples are collected in support of various environmental programs. Each program executes the field sampling activities in accordance with the SAP to ensure usability and defensibility of the resulting data. The key elements supporting the quality and defensibility of the sampling process and products include the following:

- Training and qualification
- Procedures and methods
- Field documentation
- Inspection and acceptance testing

### ***17.2.1 Training and Qualification***

The environmental programs ensure that personnel are properly trained and qualified prior to doing the work. In addition to procedure-specific and task-specific qualifications for performing work, training addresses environment, safety, and health aspects to ensure protection of the workers, the public, and the environment. Recurrent training is also conducted as appropriate to maintain proficiency.

### ***17.2.2 Procedures and Methods***

Sampling is conducted in accordance with established procedures to ensure consistent execution and continuous comparability of the environmental data. The analytical methods to be used are also consulted in order to ensure that, as methods are revised, sample collection is performed appropriately and that viable samples are obtained.

### ***17.2.3 Field Documentation***

Field documentation is generated for each sample collection activity. This may include chain of custody, sampling procedures, analytical methods, equipment and data logs, maps, Material Safety Data Sheets, and other materials needed to support the safe and successful execution and defense of the sampling effort. Chain of custody practices are employed from point of generation through disposal (cradle-to-grave); these are critical to the defensibility of the decisions made as a result of the sampling and analysis. Sampling data and documentation are stored and archived so that they are readily retrievable for use at a later date. In many cases the data are managed in electronic data management systems. Routine assessments or surveillances are performed to ensure that sampling activities are performed in accordance with applicable requirements. Deficiencies are noted, causal factors are determined, corrective actions are implemented, and follow-up assessments are performed to ensure effective resolution. This data management approach ensures the quality and defensibility of the decisions made using analytical environmental data.

### ***17.2.4 Inspection and Acceptance Testing***

Sample collection data are reviewed for appropriateness, accuracy, and fit with historical measurements. In the case of groundwater sampling, real-time field measurements are monitored during purging to determine when field parameters have stabilized, thereby indicating that the purge water is generally representative of the aquifer, at which time sampling may begin. After a sampling activity is complete, data are reviewed to ensure the samples were collected in accordance with the SAP. Samples are further inspected to ensure that their integrity has not been compromised, either physically (leaks, tears, breakage, custody seals) or administratively (labeled incorrectly) and that they are valid for supporting the intended analyses. If concerns are raised at any point during collection, the data user, in consideration of data usability, is consulted for direction on proceeding with or canceling the subsequent analyses.

## ***17.3 Laboratory Analyses***

Samples are transported to a laboratory for characterization. Several NSTec organizations maintain measurement capabilities that are generally considered “screening” operations, and may be used to support planning or

preliminary decision-making activities. However, unless specifically authorized by NNSA/NSO or the regulator, all data used for reporting purposes are generated by a DOE- and NSTec-qualified laboratory whose services have been obtained through subcontracts. Ensuring the quality of procured laboratory services is accomplished through focus on three specific areas: (1) procurement, (2) initial and continuing assessment, and (3) data evaluation.

### **17.3.1 Procurement**

Laboratory services are procured through the use of the DOE Integrated Contractor Purchasing Team (ICPT) Analytical Services Basic Ordering Agreement (BOA). The ICPT was put in place to pursue strategic sourcing opportunities that represent procurement-leveraged spending, which results in a lower total cost of ownership for DOE complex-wide site and facility contractors. Agreements placed by the ICPT have met all applicable requirements of the Competition in Contracting Act, the Federal Acquisition Regulation, the DOE Acquisition Regulations, prime contractor terms and conditions for subcontracting, and other relevant policies and procedures. As such, no further requirements apply pertaining to competition, further price analysis/justification, additional review of the terms and conditions, etc., which also saves time and effort.

The Analytical Services BOA was initially developed in 1998 by a team of contractor subject matter experts (both technical and procurement) from across the DOE complex, and BOAs were established with numerous laboratories beginning in 1999. The analytical services technical basis was initially contained in the BOA. It has been revised over the years and is currently codified in the DOE Quality Systems for Analytical Services (QSAS), Revision 2.6, November 2010 (DOE, 2010b). The QSAS is based on the National Environmental Laboratory Accreditation Conference Chapter 5, "Quality Systems," as implemented in 2005, based on International Organization for Standardization Standard 17025, "General Requirements for the Competence of Testing and Calibration Laboratories." Prior to a laboratory being issued a BOA, it must be assessed to be in compliance with the QSAS. Once a BOA is issued, the laboratory is routinely audited under the DOE Consolidated Audit Program (DOECAP).

Because of the rigor involved with the ICPT BOA process, rather than issuing a Request for Proposal to several laboratories and investing the time to evaluate the proposals received, NSTec awards subcontracts to laboratories that already hold a BOA. The NSTec subcontracts cite the BOA as the base requirement and address site-specific conditions.

The process for obtaining an ICPT BOA requires significant effort on the part of both the laboratory and DOE. Consequently, BOA-holding laboratories are primarily those providing a wide range of analytical services to DOE. NSTec obtains services not available from a BOA laboratory either through an NSTec subcontract laboratory's subcontracting of the work (i.e., lower-tier subcontractor) or by subcontracting directly with the laboratory. In either case, DOE and NSTec requirements for laboratory services are established with those laboratories as well for the specific services provided.

The subcontract places numerous requirements on the laboratory, including the following:

- Maintaining the following documents:
  - A Quality Assurance Plan and/or Manual describing the laboratory's policies and approach to the implementation of QA requirements
  - An Environment, Safety, and Health Plan
  - A Waste Management Plan
  - Procedures pertinent to subcontract scope
- The ability to generate data deliverables, both hard copy reports and electronic files
- Responding to all data quality questions in a timely manner
- Mandatory participation in proficiency testing programs
- Maintaining specific licenses, accreditations, and certifications
- Conducting internal audits of laboratory operations, as well as audits of vendors
- Allowing external audits by DOECAP and NSTec, and providing copies of other audits considered by NSTec to be comparable and applicable

### **17.3.2 Initial and Continuing Assessment**

An initial assessment is made during the request for proposal process above, including a pre-award audit. If an acceptable audit has not been performed within the past year, NSTec will consider performing an audit (or participating in a DOECAP audit) of those laboratories awarded the contract. NSTec will not initiate work with a laboratory without authorized approval of those NSTec personnel responsible for ensuring vendor acceptability.

A continuing assessment consists of the ongoing monitoring of a laboratory's performance against contract terms and conditions, of which the technical specifications are a part. Tasks supporting continuing assessment are as follows:

- Conducting regular audits or participating in evaluation of DOECAP audit products
- Monitoring for continued successful participation in proficiency testing programs such as:
  - National Institute of Standards and Technology Radiochemistry Intercomparison Program
  - Studies that support certification by the State of Nevada or appropriate regulatory authority for analyses performed in support of compliance monitoring
- Monitoring of the laboratory's adherence to the QA requirements

### **17.3.3 Data Evaluation**

Data products are continuously evaluated for compliance with contract terms and specifications. This primarily involves review of the data against the specified analytical method to determine the laboratory's ability to adhere to the QA/QC requirements, as well as an evaluation of the data against the DQOs. This activity is discussed in further detail in Section 17.4. Any discrepancies are documented and resolved with the laboratory, and continuous assessment tracks the recurrence and efficacy of corrective actions.

## **17.4 Data Review**

A systematic approach to thoroughly evaluating the data products generated from an environmental monitoring effort is essential for understanding and sustaining the quality of data collected under the program. This allows the programs to determine whether the DQOs established in the planning phase were achieved and whether the monitoring design performed as intended or requires review.

Because decisions are based on environmental data, and the effectiveness of operations is measured at least in part by environmental data, reliable, accurate, and defensible records are essential. Detailed records that must be kept include temporal, spatial, numerical, geotechnical, chemical, and radiological data, and all sampling, analytical, and data review procedures used. Failure to maintain these records in a secure but accessible form may result in exposure to legal challenges and the inability to respond to demands or requests from regulators and other interested organizations.

An electronic data management system is a key tool used by many programs for achieving standardization and integrity in managing environmental data. The primary objective is to store and manage in an easily and efficiently retrievable form unclassified environmental data that are directly or indirectly tied to monitoring events. This may include information on monitoring system construction (groundwater wells, ambient air monitoring), analytical, geotechnical, and field parameters at the Nevada National Security Site. Database integrity and security are enforced through the assignment of varying database access privileges commensurate with an employee's database responsibilities.

### **17.4.1 Data Verification**

Data verification is defined as a subcontract compliance and completeness review to ensure that all laboratory data and sample documentation are present and complete. Additional critical sampling and analysis process information is also reviewed at this stage, which may include, but is not limited to, sample preservation and temperature, defensible chain-of-custody documentation and integrity, and analytical hold-time compliance. Data verification also ensures that electronic data products correctly represent the sampling and/or analyses performed and includes evaluation of QC sample results.

## **17.4.2 Data Validation**

Data validation supplements verification and is a more thorough process of analytical data review to better determine if the data meet the analytical and project requirements. Data validation ensures that the reported results correctly represent the sampling and analyses performed, determines the validity of the reported results, and assigns data qualifiers (or “flags”), if required.

## **17.4.3 Data Quality Assessment (DQA)**

DQA is a scientific and statistical evaluation to determine if the data obtained from environmental operations are of the right type, quality, and quantity to support their intended use. The DQA includes reviewing data for accuracy, representativeness, and fit with historical measurements to ensure that the data will support their intended uses.

## **17.5 Assessments**

The overall effectiveness of the environmental program is determined through routine surveillance and assessments of work execution as well as review of the program requirements. Deficiencies are identified, causal factors are investigated, corrective actions are developed and implemented, and follow-on monitoring is performed to ensure effective resolution. The assessments discussed below are broken down into general programmatic and focused measurement data areas.

### **17.5.1 Programmatic**

Assessments and audits under this category include evaluations of the work planning, execution, and performance activities. Personnel independent of the work activity perform the assessments to evaluate compliance with established requirements and report on the identified deficiencies. Organizations responsible for the activity are required to develop and implement corrective actions, with the concurrence of the deficiency originator or recognized subject matter expert. NSTec maintains the companywide issues tracking system (called caWeb) to manage assessments, findings, and corrective actions.

### **17.5.2 Measurement Data**

This type of assessment includes routine evaluation of data generated from analyses of QC samples. QC sample data are used to monitor the analytical control on a given batch of samples and are indicators over time of potential biases in laboratory performance. Discussion of the 2010 results for field duplicates, laboratory control samples, blank analysis, and inter-laboratory comparison studies are provided, and summary tables are included below.

#### **17.5.2.1 Field Duplicates**

Samples obtained at approximately the same locations and times as initial samples are termed field duplicates and are used to evaluate the overall precision of the measurement process, including small-scale heterogeneity in the medium (air, soil, water, etc.) being sampled as well as analytical and sample preparation variation. The relative error ratio (RER) compares the absolute difference of initial and field duplicate measurements to a measure of the analytical uncertainty. The absolute relative percent difference (RPD) compares the absolute difference of initial and field duplicate measurements with the average of the two measurements; it is computed only from pairs for which both values are above their respective minimum detectable concentrations (MDCs). These are provided in Table 17-1.

The values in Table 17-1 fall in typical ranges. The highest average RPDs (85.3, 65.8, 58.4, and 44.6 percent) are found with plutonium-238 ( $^{238}\text{Pu}$ ), plutonium 239+240 ( $^{239+240}\text{Pu}$ ), uranium 235+236 ( $^{235+236}\text{U}$ ), and americium-241 ( $^{241}\text{Am}$ ), respectively. These are due mostly to one air sampler intercepting a particle with high Am or Pu while the other sampler in the pair had a typical background value. Also, measurements of these analytes tend to be in the lower end of their analytical ranges, with less than half of the data pairs meeting the

“both values above MDC” criterion. The average RER is similarly affected by particulates, with the high values being found with  $^{239+240}\text{Pu}$  and  $^{241}\text{Am}$ . The average RER is high for gross beta measurements in water; however, there were only two sets of values obtained during 2010 for this analyte.

**Table 17-1. Summary of field duplicate samples for compliance monitoring in 2010**

Analyte	Medium	Number of Duplicate Pairs <sup>(a)</sup>	Number of Pairs > MDC <sup>(b)</sup>	Average Absolute RPD <sup>(c)</sup> of Pairs > MDC	Average Absolute RER <sup>(d)</sup> of All Pairs
Gross Alpha	Air	103	10	21.3	0.70
Gross Beta	Air	103	102	9.1	0.84
Tritium	Air	52	11	10.0	0.73
$^{241}\text{Am}$	Air	24	7	44.6	1.01
$^7\text{Be}^{(e)}$	Air	24	24	5.6	0.66
$^{40}\text{K}^{(e)}$	Air	22	9	32.3	0.83
$^{238}\text{Pu}$	Air	22	1	85.3	0.67
$^{239+240}\text{Pu}$	Air	24	6	65.8	1.17
$^{233+234}\text{U}$	Air	12	12	13.3	0.77
$^{235+236}\text{U}$	Air	12	3	58.4	0.82
$^{238}\text{U}$	Air	12	12	14.2	0.83
$^{137}\text{Cs}$	Air	24	0	-	0.85
$^{235}\text{U}$ (gamma)	Air	24	0	-	0.69
Gross Alpha	Water	2	1	5.9	0.93
Gross Beta	Water	2	2	29.0	1.13
Tritium	Water	19	2	12.6	0.51
TLD	Ambient Radiation	433	NA	2.9	0.27

- (a) Represents the number of field duplicates reported for the purpose of monitoring precision. If an associated field sample was not processed, the field duplicate was not included in this table.
- (b) Represents the number of field duplicate–field sample result sets with both values above their minimum detectable concentrations (MDCs). The MDC does not apply to thermoluminescent dosimeter (TLD) measurements. If either the field sample or its duplicate was reported below the MDC, the RPD was not determined.
- (c) Reflects the average absolute RPD calculated as follows:

$$\text{Absolute RPD} = \frac{|D - S|}{(D + S)/2} \times 100$$

Where: S = Sample result  
D = Duplicate result

- (d) Relative error ratio (RER), determined by the following equation, is used to determine whether a sample result and the associated field duplicate result differ significantly when compared to their respective one sigma uncertainties. The RER is calculated for all sample and field duplicate pairs reported without regard to the MDC.

$$\text{Absolute RER} = \frac{|S - D|}{\sqrt{(\text{TPU}_S)^2 + (\text{TPU}_D)^2}}$$

Where: S = Sample result  
D = Duplicate result  
TPU<sub>S</sub> = one-sigma total propagated uncertainty of the field sample  
TPU<sub>D</sub> = one-sigma total propagated uncertainty of the field duplicate

- (e)  $^7\text{Be}$  and  $^{40}\text{K}$  are naturally occurring analytes included for quality assessment of the gamma spectroscopy analyses.

### **17.5.2.2 Laboratory Control Samples (LCSs)**

An LCS is prepared from a sample matrix verified to be free from the analytes of interest, and then spiked with verified known amounts of analytes or a material containing known and verified amounts of analytes. It is generally used to establish intra-laboratory or analyst-specific precision and bias or to assess the performance of all or a portion of the measurement system (DOE, 2010b).

The results are calculated as a percentage of the true value, and must fall within established control limits (or percentage range) to be considered acceptable. If the LCS recovery falls outside control limits, evaluation for potential sample data bias is necessary. The numbers of the 2010 LCSs analyzed and within control limits are summarized in Table 17-2.

### **17.5.2.3 Blank Analysis**

In general terms, a blank is a sample that has not been exposed to the analyzed sample stream, and is analyzed in order to monitor contamination that might be introduced during sampling, transport, storage, or analysis. The blank is subjected to the usual analytical and measurement process to establish a zero baseline or background value, and is sometimes used to adjust or correct routine analytical results (DOE, 2010b).

Laboratory method blank data are summarized in Table 17-3. A method blank is a sample of a matrix similar to the batch of associated samples that is free from the analytes of interest and is processed simultaneously with and under the same conditions as samples through all steps of the analytical procedures, and in which no target analytes or interferences are present at concentrations that impact the analytical results for sample analyses (DOE, 2010b).

### **17.5.2.4 Proficiency Testing Program Participation**

Laboratories are required to participate in Proficiency Testing Programs. Laboratory performance supports decisions on work distribution and may also be a basis for state certifications. Table 17-4 presents the 2010 results for the Mixed Analyte Performance Evaluation Program (MAPEP) (<http://www.inl.gov/resl/mapep/>) administered by the Radiological and Environmental Sciences Laboratory of the Idaho National Laboratory.

Table 17-5 shows the summary of inter-laboratory comparison sample results for the NSTec Radiological Health Dosimetry Group. This internal evaluation was based on National Voluntary Laboratory Accreditation Program (NVLAP) criteria. The Dosimetry Group participated in the Battelle Pacific Northwest National Laboratory performance evaluation study program during the course of the year.



Table 17-2. Summary of LCSs for 2010

	Analyte	Matrix	Number of LCS Results Reported	Number Within Control Limits	Control Limits (%)	
<b>Radiological Analyses</b>	Tritium	Air	24	24	70–130	
	<sup>60</sup> Co	Air	24	24	70–130	
	<sup>137</sup> Cs	Air	24	24	70–130	
	<sup>239+240</sup> Pu	Air	37	37	70–130	
	<sup>241</sup> Am	Air	62	62	70–130	
	Gross Alpha	Water	13	13	70–130	
	Gross Beta	Water	13	13	70–130	
	Tritium	Water	48	48	70–130	
	<sup>60</sup> Co	Water	9	9	70–130	
	<sup>90</sup> Sr	Water	3	3	70–130	
	<sup>137</sup> Cs	Water	9	9	70–130	
	<sup>239+240</sup> Pu	Water	13	13	70–130	
	<sup>241</sup> Am	Water	9	9	70–130	
	<sup>60</sup> Co	Soil	3	3	70–130	
	<sup>90</sup> Sr	Soil	3	3	70–130	
	<sup>137</sup> Cs	Soil	3	3	70–130	
	<sup>239+240</sup> Pu	Soil	3	3	70–130	
	<sup>241</sup> Am	Soil	6	6	70–130	
	<b>Nonradiological Analyses</b>	Metals	Water	151	143	80–120
		Volatiles	Water	206	203	70–130
Semi Volatiles		Water	62	61	Laboratory specific	
Miscellaneous		Water	229	228	80–120	
Metals		Soil	16	16	75–125	
Semi Volatiles		Soil	6	6	Laboratory specific	

Table 17-3. Summary of laboratory blank samples for 2010

	Analyte	Matrix	Number of Blank Results Reported	Number of Results < MDC
<b>Radiological Analyses</b>	Tritium	Air	34	34
	<sup>7</sup> Be	Air	24	24
	<sup>60</sup> Co	Air	12	12
	<sup>137</sup> Cs	Air	24	24
	<sup>238</sup> Pu	Air	25	24
	<sup>239+240</sup> Pu	Air	25	25
	<sup>241</sup> Am	Air	37	36
	Gross Alpha	Water	13	13
	Gross Beta	Water	13	13
	Tritium	Water	30	30
	<sup>60</sup> Co	Water	9	9
	<sup>90</sup> Sr	Water	2	2
	<sup>137</sup> Cs	Water	9	9
	<sup>238</sup> Pu	Water	9	9
	<sup>239+240</sup> Pu	Water	9	9
	<sup>241</sup> Am	Water	9	9
	<sup>60</sup> Co	Soil	3	3
	<sup>90</sup> Sr	Soil	3	3
	<sup>137</sup> Cs	Soil	3	3
	<sup>238</sup> Pu	Soil	3	3
	<sup>239+240</sup> Pu	Soil	3	3
	<sup>241</sup> Am	Soil	6	6

**Table 17-4. Summary of laboratory blank samples for 2010 (continued)**

	Analyte	Matrix	Number of Blank Results Reported	Number of Results < Reporting Limit
<b>Nonradiological Analyses</b>	Metals	Water	185	184
	Volatiles	Water	330	328
	Semi Volatiles	Water	95	95
	Miscellaneous	Water	227	223
	Metals	Soil	16	16
	Semi Volatiles	Soil	8	8

**Table 17-5. Summary of 2010 MAPEP reports**

	Analyte	Matrix	Number of Results Reported	Number within Control Limits <sup>(a)</sup>	
<b>Radiological Analyses</b>	Gross Alpha	Filter	4	4	
	Gross Beta	Filter	4	4	
	<sup>60</sup> Co	Filter	4	3	
	<sup>137</sup> Cs	Filter	4	3	
	<sup>238</sup> Pu	Filter	4	4	
	<sup>239+240</sup> Pu	Filter	4	3	
	<sup>241</sup> Am	Filter	4	3	
	Gross Alpha	Water	4	4	
	Gross Beta	Water	4	4	
	Tritium	Water	4	4	
	<sup>60</sup> Co	Water	4	4	
	<sup>90</sup> Sr	Water	4	4	
	<sup>137</sup> Cs	Water	4	4	
	<sup>238</sup> Pu	Water	4	2	
	<sup>239+240</sup> Pu	Water	4	4	
	<sup>241</sup> Am	Water	4	4	
	<sup>60</sup> Co	Vegetation	4	4	
	<sup>90</sup> Sr	Vegetation	4	4	
	<sup>137</sup> Cs	Vegetation	4	4	
	<sup>238</sup> Pu	Vegetation	4	4	
	<sup>239+240</sup> Pu	Vegetation	4	3	
	<sup>241</sup> Am	Vegetation	3	3	
	<sup>60</sup> Co	Soil	4	4	
	<sup>90</sup> Sr	Soil	4	3	
	<sup>137</sup> Cs	Soil	4	4	
	<sup>238</sup> Pu	Soil	4	3	
	<sup>239+240</sup> Pu	Soil	4	2	
	<sup>241</sup> Am	Soil	4	4	
	<b>Nonradiological Analyses</b>	Metals	Water	101	99
		Organics	Water	350	344
Metals		Soil	112	103	
Organics		Soil	187	186	

(a) Based upon MAPEP criteria

**Table 17-6. Summary of inter-laboratory comparison TLD samples for the subcontract dosimetry group in 2010**

Analysis	Matrix	Number of Results Reported <sup>(a)</sup>	Number within Control Limits <sup>(a)</sup>
TLD	Ambient Radiation	29	29

(a) Based upon NVLAP criteria; absolute value of the bias plus one standard deviation < 0.3

## ***18.0 Quality Assurance Program for the Community Environmental Monitoring Program***

The Community Environmental Monitoring Program (CEMP) Quality Assurance Program Plan (QAPP) was followed for the collection and analysis of radiological air and water data presented in Chapter 7 of this report. The CEMP QAPP ensures compliance with U.S. Department of Energy (DOE) Order DOE O 414.1C, "Quality Assurance," which implements a quality management system ensuring the generation and use of quality data. This QAPP addresses the following items previously defined in Section 17.0:

- Data Quality Objectives (DQOs)
- Sampling plan development appropriate to satisfy the DQOs
- Environmental health and safety
- Sampling plan execution
- Sample analyses
- Data review
- Continuous improvement

### ***18.1 Data Quality Objectives (DQOs)***

The DQO process is a strategic planning approach that is used to plan data collection activities. It provides a systematic process for defining the criteria that a data collection design should satisfy. These criteria include when and where samples should be collected, how many samples to collect, and the tolerable level of decision errors for the study. DQOs are unique to the specific data collection or monitoring activity, and are further explained in Appendices A through E of the *Routine Radiological Environmental Monitoring Plan* (Bechtel Nevada, 2003a).

### ***18.2 Measurement Quality Objectives (MQOs)***

The MQOs are basically equivalent to DQOs for analytical processes. The MQOs provide direction to the laboratory concerning performance objectives or requirements for specific method performance characteristics. Default MQOs are established in the subcontract with the laboratory, but may be altered in order to satisfy changes in the DQOs. The MQOs for the CEMP project are described in terms of precision, accuracy, representativeness, completeness, and comparability requirements. These terms are defined and discussed in Section 17.1 for onsite activities.

### ***18.3 Sampling Quality Assurance Program***

Quality Assurance (QA) in field operations for the CEMP includes sampling assessments, surveillances, and oversight of the following supporting elements:

- The sampling plan, DQOs, and field data sheets accompanying the sample package
- Database support for field and laboratory results, including systems for long-term storage and retrieval
- A training program to ensure that qualified personnel are available to perform required tasks

Sample packages include the following items:

- Station manager checklist confirming all observable information pertinent to sample collection
- An Air Surveillance Network Sample Data Form documenting air sampler parameters, collection dates and times, and total sample volumes collected
- Chain-of-custody forms

This managed approach to sampling ensures that the sampling is traceable and enhances the value of the final data available to the project manager. The sample package also ensures that the station manager Community Environmental Monitor (CEM) (see Section 7.1 for a description of CEMs) has followed proper procedures for sample collection. The CEMP Project Manager or QA Officer routinely performs assessments of the station managers and field monitors to ensure that standard operating procedures and sampling protocol are being followed properly.

Data obtained in the course of executing field operations are entered in the documentation accompanying the sample package during sample collection and in the CEMP database along with analytical results upon their receipt and evaluation.

Completed sample packages are kept as hard copy in file archives. Analytical reports are kept as hard copy in file archives as well as on read-only compact discs by calendar year. Analytical reports and databases are protected and maintained in accordance with the Desert Research Institute's Computer Protection Program.

## ***18.4 Laboratory QA Oversight***

The CEMP ensures that DOE O 414.1C requirements are met with respect to laboratory services through review of the vendor laboratory policies formalized in a Laboratory Quality Assurance Plan (LQAP). The CEMP is assured of obtaining quality data from laboratory services through a multifaceted approach involving specific procurement protocols, the conduct of quality assessments, and requirements for selected laboratories to have an acceptable QA Program. These elements are discussed below.

### ***18.4.1 Procurement***

Laboratory services are procured through subcontracts. The subcontract establishes the technical specifications required of the laboratory and provides the basis for determining compliance with those requirements and evaluating overall performance. The subcontract is awarded on a "best value" basis as determined by pre-award audits. The prospective vendor is required to provide a review package to the CEMP that includes the following items:

- All procedures pertinent to subcontract scope
- Environment, Safety, and Health Plan
- LQAP
- Example deliverables (hard copy and/or electronic)
- Proficiency testing (PT) results from the previous year from recognized PT programs
- Résumés
- Facility design/description
- Accreditations and certifications
- Licenses
- Audits performed by an acceptable DOE program covering comparable scope
- Past performance surveys
- Pricing

CEMP evaluates the review package in terms of technical capability. Vendor selection is based solely on these capabilities and not biased by pricing.

### ***18.4.2 Initial and Continuing Assessment***

An initial assessment of a laboratory is managed through the procurement process above, including a pre-award audit. Pre-award audits are conducted by the CEMP (usually by the CEMP QA Officer). The CEMP does not initiate work with a laboratory without approval of the CEMP Program Manager.

A continuing assessment of a selected laboratory involves ongoing monitoring of a laboratory's performance against the contract terms and conditions, of which technical specifications are a part. The following tasks support continuing assessment:

- Tracking schedule compliance
- Reviewing analytical data deliverables
- Monitoring the laboratory's adherence to the LQAP
- Conducting regular audits
- Monitoring for continued successful participation in approved PT programs

### **18.4.3 Laboratory QA Program**

The laboratory policies and approach to the implementation of DOE O 414.1C must be verified in an LQAP prepared by the laboratory. The elements of an LQAP required for the CEMP are similar to those required by National Security Technologies, LLC, for onsite monitoring, and are described in Section 17.3.

## **18.5 Data Review**

Essential components of process-based QA are data checks, verification, validation, and data quality assessment to evaluate data quality and usability.

**Data Checks** – Data checks are conducted to ensure accuracy and consistency of field data collection operations prior to and upon data entry into CEMP databases and data management systems.

**Data Verification** – Data verification is defined as a subcontract compliance and completeness review to ensure that all laboratory data and sample documentation are present and complete. Sample preservation, chain-of-custody, and other field sampling documentation shall be reviewed during the verification process. Data verification ensures that the reported results entered in CEMP databases correctly represent the sampling and/or analyses performed and includes evaluation of quality control (QC) sample results.

**Data Validation** – Data validation is the process of reviewing a body of analytical data to determine if it meets the data quality criteria defined in operating instructions. Data validation ensures that the reported results correctly represent the sampling and/or analyses performed, determines the validity of the reported results, and assigns data qualifiers (or “flags”), if required. The process of data validation consists of the following:

- Evaluating the quality of the data to ensure that all project requirements are met
- Determining the impact on data quality of those requirements if they are not met
- Verifying compliance with QA requirements
- Checking QC values against defined limits
- Applying qualifiers to analytical results in the CEMP databases for the purposes of defining the limitations in the use of the reviewed data

Operating instructions, procedures, applicable project-specific work plans, field sampling plans, QAPPs, analytical method references, and laboratory statements of work may all be used in the process of data validation. Documentation of data validation includes checklists, qualifier assignments, and summary forms.

**Data Quality Assessment (DQA)** – DQA is the scientific evaluation of data to determine if the data obtained from environmental data operations are of the right type, quality, and quantity to support their intended use. DQA review is a systematic review against pre-established criteria to verify that the data are valid for their intended use.

## **18.6 QA Program Assessments**

The overall effectiveness of the QA Program is determined through management and independent assessments as defined in the CEMP QAPP. These assessments evaluate the plan execution workflow (sampling plan

development and execution, chain-of-custody, sample receiving, shipping, subcontract laboratory analytical activities, and data review) as well as program requirements as it pertains to the organization.

## 18.7 2010 Sample QA Results

QA procedures were performed by the CEMP, including the laboratories responsible for sample analyses. These assessments ensure that sample collection procedures, analytical techniques, and data provided by the subcontracted laboratories comply with CEMP requirements. Data were provided by Testamerica Laboratories and the University of Nevada, Las Vegas, Radiation Services Laboratory (gross alpha/beta and gamma spectroscopy data); Mirion Technologies (thermoluminescent dosimeter [TLD] data); and the University of Miami Tritium Laboratory (tritium data). A brief discussion of the 2010 results for field duplicates, laboratory control samples, blank analyses, and inter-laboratory comparison studies is provided along with summary tables within this section. The 2010 CEMP radiological air and water monitoring data are presented in Section 7.0.

### 18.7.1 Field Duplicates (Precision)

A field duplicate is a sample collected, handled, and analyzed following the same procedures as the primary sample. The relative percent difference (RPD) between the field duplicate result and the corresponding field sample result is a measure of the variability in the process caused by the sampling uncertainty (matrix heterogeneity, collection variables, etc.) and measurement uncertainty (field and laboratory) used to arrive at a final result. The average absolute RPD, expressed as a percentage, was determined for the calendar year 2010 samples and is listed in Table 18-1. An RPD of zero indicates a perfect duplication of results of the duplicate pair, whereas an RPD greater than 100 percent generally indicates that a duplicate pair falls beyond QA requirements and is not considered valid for use in data interpretation. These samples are further evaluated to determine the reason for QA failure and if any corrective actions are required. Overall, the RPD values for all analyses indicate very good results, with only four alpha duplicates exceeding an RPD of 100 percent.

**Table 18-1. Summary of field duplicate samples for CEMP monitoring in 2010**

Analysis	Matrix	Number of Samples Reported <sup>(a)</sup>	Number of Samples Reported above MDC <sup>(b)</sup>	Average Absolute RPD of those above MDC (%) <sup>(c)</sup>
Gross Alpha	Air	72	72	65.4
Gross Beta	Air	72	72	36.6
Gamma – Beryllium-7	Air	10	10	22.7
Tritium	Water	4	1	0.4
TLDs	Ambient Radiation	12	12	3.2

- (a) Represents the number of field duplicates reported for the purpose of monitoring precision. If an associated field sample was not processed, the field duplicate was not included in this table.
- (b) Represents the number of field duplicate–field sample result sets reported above the minimum detectable concentration (MDC) (MDC is not applicable for TLDs). If either the field sample or its duplicate was reported below the detection limit, the precision was not determined.
- (c) Reflects the average absolute RPD calculated for those field duplicates reported above the MDC.

The absolute RPD calculation is as follows:

$$Absolute\ RPD = \frac{|FD - FS|}{(FD + FS) / 2} \times 100\%$$

Where: FD = Field duplicate result  
FS = Field sample result

### 18.7.2 Laboratory Control Samples (Accuracy)

Laboratory control samples (LCSs) (also known as matrix spikes) are performed by the subcontract laboratory to evaluate analytical accuracy, which is the degree of agreement of a measured value with the true or expected value. Samples of known concentration are analyzed using the same methods as employed for the project samples. The results are determined as the measured value divided by the true value, expressed as a percent. To be considered valid, the results must fall within established control limits (or percentage ranges) for further analyses to be performed. The LCS results obtained for 2010 are summarized in Table 18-2. The LCS results were satisfactory, with all samples falling within control parameters for the air sample matrix.

**Table 18-1. Summary of laboratory control samples (LCSs) for CEMP monitoring in 2010**

Analysis	Matrix	Number of LCS Results Reported	Number Within Control Limits <sup>(a)</sup>
Gross Alpha	Air	52	52
Gross Beta	Air	52	52
Gamma	Air	8	8
Tritium	Water	4	4

(a) Control limits are as follows: 80 to 115 percent for gross alpha, 81 to 115 percent for gross beta, 90 to 110 percent for gamma (<sup>137</sup>Cs, <sup>60</sup>Co, <sup>241</sup>Am), and 80 to 120 percent for tritium.

### 18.7.3 Blank Analysis

Laboratory blank sample analyses are essentially the opposite of LCSs discussed in Section 18.7.2. These samples do not contain any of the analyte of interest. Results of these analyses are expected to be “zero,” or, more accurately, below the MDC of a specific procedure. Blank analysis and control samples are used to evaluate overall laboratory procedures, including sample preparation and instrument performance. The laboratory blank sample results obtained for 2010 are summarized in Table 18-3. The laboratory blank results were satisfactory with less than 5 percent of the alpha and beta blank samples outside of control parameters for the air sample matrix.

**Table 18-2. Summary of laboratory blank samples for CEMP monitoring in 2010**

Analysis	Matrix	Number of Blank Results Reported	Number within Control Limits <sup>(a)</sup>
Gross Alpha	Air	52	51
Gross Beta	Air	52	46
Gamma	Air	8	8
Tritium	Water	5	5

(a) Control limit is less than the MDC.

### 18.7.4 Inter-laboratory Comparison Studies

Inter-laboratory comparison studies are conducted by the subcontracted laboratories to evaluate their performance relative to other laboratories providing the same service. These types of samples are commonly known as “blind” samples, in which the expected values are known only to the program conducting the study. The analyses are evaluated and, if found satisfactory, the laboratory is certified that its procedures produce reliable results. The inter-laboratory comparison sample results obtained for 2010 are summarized in Tables 18-4 and 18-5.

Table 18-4 shows the summary of inter-laboratory comparison sample results for the subcontract radiochemistry laboratories. The laboratories participated in either the QA Program administered by Environmental Research Associates (ERA) or the Mixed Analyte Performance Evaluation Program (MAPEP) for gross alpha, gross beta,



and gamma analyses. The subcontract tritium laboratory participated in the International Atomic Energy Agency (IAEA) tritium inter-laboratory comparison study. The subcontractors performed very well during the year by passing all of the parameters analyzed.

**Table 18-3. Summary of inter-laboratory comparison samples of the subcontract radiochemistry and tritium laboratories for CEMP monitoring in 2010**

Analysis	Matrix	Number of Results Reported	Number Within Control Limits <sup>(a)</sup>
<b>MAPEP, ERA, and IAEA Results</b>			
Gross Alpha	Air	4	4
Gross Beta	Air	4	4
Gamma	Air	2	2
Tritium	Water	6	6

(a) Control limits are determined by the individual inter-laboratory comparison study.

Table 18-5 shows the summary of the in-house performance evaluation results conducted by the subcontract dosimetry group. This internal evaluation was based on National Voluntary Laboratory Accreditation Program (NVLAP) criteria and was performed biannually. The dosimetry group performed very well during the year, passing 20 out of 20 TLDs analyzed.

**Table 18-4. Summary of inter-laboratory comparison TLD samples of the subcontract dosimetry group for CEMP monitoring in 2010**

Analysis	Matrix	Number of Results Reported	Number Within Control Limits <sup>(a)</sup>
TLDs	Ambient Radiation	20	20

(a) Based upon NVLAP criteria; absolute value of the bias plus one standard deviation < 0.3.

***Appendix A***  
***Las Vegas Area Support Facilities***

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## Appendix A: Las Vegas Area Support Facilities

The U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office (NNSA/NSO) manages two facilities in Clark County, Nevada, that support NNSA/NSO missions on and off the Nevada National Security Site (NNSS). They include the North Las Vegas Facility (NLVF) and the Remote Sensing Laboratory–Nellis (RSL–Nellis) (Figure A-1). This appendix describes all environmental monitoring and compliance activities conducted in 2010 at these support facilities.

### A.1 North Las Vegas Facility

The NLVF is a fenced complex composed of 31 buildings that house much of the NNSS project management, diagnostic development and testing, design, engineering, and procurement. The 32-hectare (80-acre) facility is located along Losee Road, a short distance west of Interstate 15 (Figure A-1). The facility is buffered on the north, south, and east by general industrial zoning. The western border separates the property from fully developed, single-family residential-zoned property. The NLVF is a controlled-access facility.

Environmental compliance and monitoring activities associated with this facility in 2010 included the maintenance of one wastewater permit, one National Pollutant Discharge Elimination System (NPDES) permit, one air quality operating permit, and one hazardous materials permit (Table A-1), and the monitoring of tritium in air and ambient gamma-emissions to comply with radiation protection regulations.

**Table A-1. Environmental permits for NLVF in 2010**

Permit Number	Description	Expiration Date	Reporting
<b>Wastewater Discharge</b>			
VEH-112	NLVF Wastewater Contribution Permit	December 31, 2013	Annually
NV0023507	NLVF NPDES Permit	November 2, 2011	Quarterly
<b>Air Quality</b>			
Source 657	Clark County Department of Air Quality and Environmental Management Minor Source Permit	November 1, 2015	Annually
<b>Hazardous Materials</b>			
8508	NLVF Hazardous Materials Permit	February 28, 2011	Annually

#### A.1.1 Compliance with Water Permits

NLVF wastewater permits in 2010 included a Class II Wastewater Contribution Permit from the City of North Las Vegas (CNLV) for sewer discharges, and an NPDES permit issued by the Nevada Division of Environmental Protection (NDEP) for dewatering operations to control rising groundwater levels at the facility.

Discharges of sewage and industrial wastewater from NLVF are required to meet permit limits set by the CNLV. These limits support the permit limits for the Publicly Owned Treatment Works (POTW) operated by the City of Las Vegas. Regulations for wastewater discharges are codified in the municipal codes for both cities.

##### A.1.1.1 Wastewater Contribution Permit VEH-112

This permit specifies concentration limits for contaminants in domestic and industrial wastewater discharges. Self-monitoring and reporting of the levels of nonradiological contaminants in the outfalls of sewage and industrial wastewater is conducted. In 2010, contaminant concentrations (in milligrams per liter [mg/L]) were below the established permit limits in all water samples taken from the two NLVF outfalls (Table A-2). In compliance with this permit, a report summarizing wastewater monitoring was generated for NLVF operations and was submitted on October 20, 2010, to the CNLV. The report is titled *Self-Monitoring Report for the National Nuclear Security Administration's North Las Vegas Facility: Permit VEH-112*.

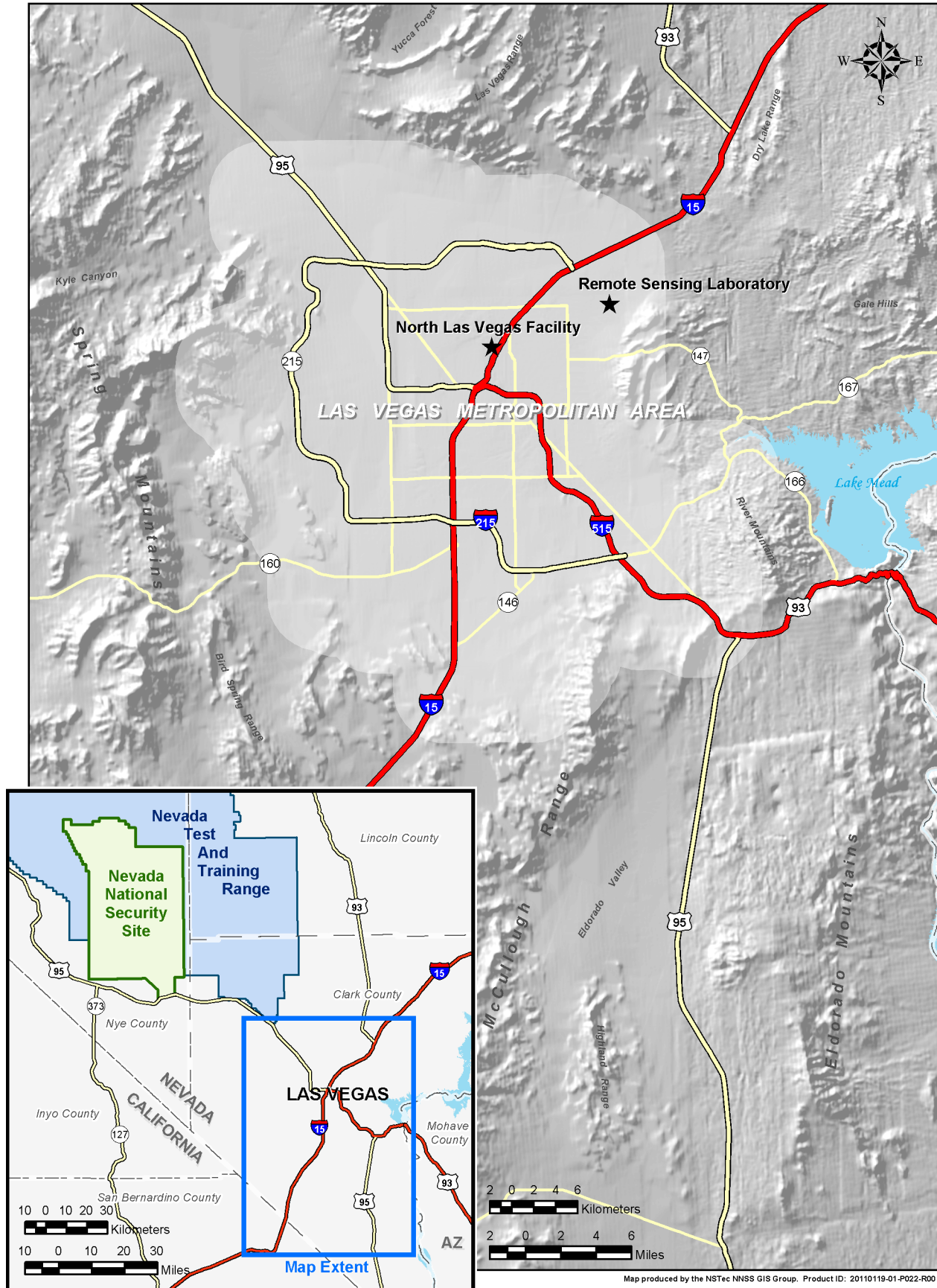


Figure A-1. Location of NNSS offsite facilities in Las Vegas and North Las Vegas



**Table A-2. Results of 2010 monitoring at NLVF for Wastewater Contribution Permit VEH-112**

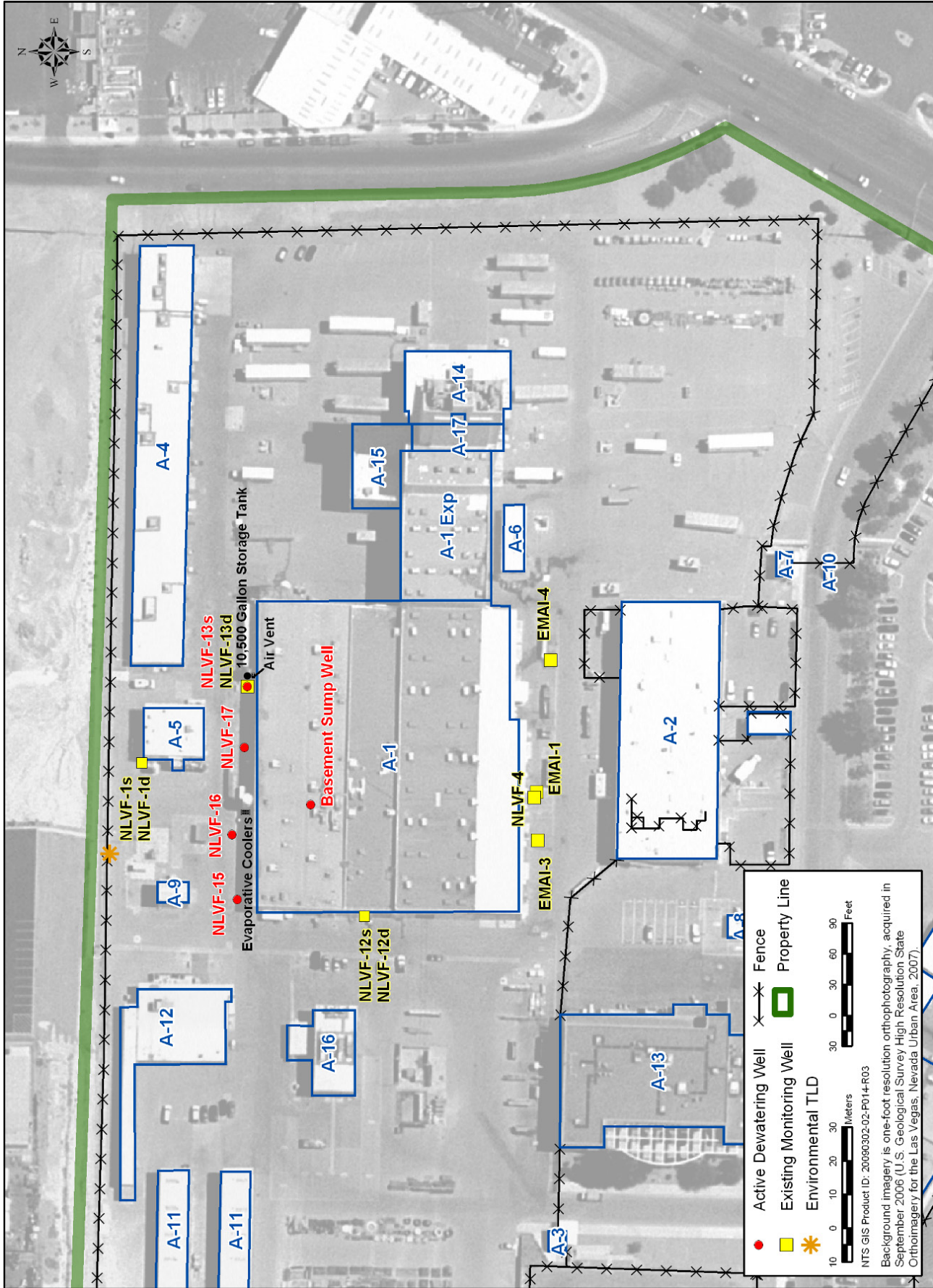
Contaminant	Permit Limit (mg/L)	Outfall A (mg/L)	Outfall B (mg/L)
Ammonia	61.0	48.5	22.5
Arsenic	2.3	0.00146 <sup>(a)</sup>	<0.003
Barium	13.1	0.140	0.195
Beryllium	0.02	<0.00025	0.0000621 <sup>(a)</sup>
Cadmium	0.15	0.000307 <sup>(a)</sup>	<0.0025
Chromium (hexavalent)	0.10	<0.02	0.06
Chromium (total)	5.60	<0.001	< 0.001
Copper	0.60	0.086	0.285
Cyanide (total)	19.9	<0.005	<0.005
Lead	0.20	<0.0015	<0.0015
Mercury	0.001	<0.000066	0.00013
Nickel	1.10	0.00301 <sup>(a)</sup>	0.00348 <sup>(a)</sup>
Oil and Grease (animal or vegetable)	250	<10.0	<10.0
Oil and Grease (mineral or petroleum)	100	<10.0	<10.0
Organophosphorus or carbamate compounds	1.0	0.168	0.168
pH (Standard Units)	5.0–11.0	8.22	7.93
Phenols	33.6	<0.05	<0.05
Phosphorus (total)	0.50	4.48	4.61
Selenium	2.70	<0.0025	< 0.0025
Silver	8.20	<0.00075	<0.00075
Zinc	13.1	0.176	0.264

(a) Estimated concentration, the concentration between the method detection limit and the method reporting limit.

#### ***A.1.1.2 National Pollution Discharge Elimination System Permit NV0023507***

An NPDES permit (NV0023507) covers the dewatering operation conducted at the NLVF (see Section A.1.2). Dewatering wells (NLVF-13s, -15, -16, -17) pump groundwater into a 39,747-liter (L) (10,500-gallon [gal]) storage tank (Figure A-2). The permit allows for the discharge of water from the storage tank to the groundwater of the state via percolation, when used for landscape irrigation and dust suppression, and into the Las Vegas Wash via direct discharge into the CNLV storm water drainage system. The permit defines the discharge source via percolation as “Outfall 001” and via the storm water drainage system as “Outfall 002.” Water produced from the dewatering wells may also be used for purposes that do not require a groundwater discharge permit or an NPDES permit (e.g., evaporative cooling). In accordance with the permit, chemistry analyses are performed quarterly, annually, and biennially for water samples collected from the storage tank (Table A-3). The total quantities of groundwater produced and discharged and the results of groundwater chemistry analyses are reported quarterly to NDEP’s Bureau of Water Pollution Control.

In 2010, the four dewatering wells produced a total of about 9,085 L (2,400 gal) per day that were directed into the storage tank (Figure A-2). The pumping rates varied from 2.6 liters per minute (lpm) (0.68 gallons per minute [gpm]) at Well NLVF-17 to 0.8 lpm (0.20 gpm) at Well NLVF-16. The average combined discharge from all four wells was about 280,120 L (74,000 gal) per month. Discharge rates did not exceed the NPDES permit limits (Table A-3). Quarterly and annual water samples from the holding tank had total petroleum hydrocarbons, total suspended solids, total dissolved solids, total inorganic nitrogen (as nitrogen [N]), pH, and tritium levels that were all below permit limits (Table A-3). Biennial water sampling for the presence of over 100 analytes (listed in Attachment A of the permit) was done in January 2009. Therefore, sampling for these analytes will not be done again until January 2011.



re A-2. Location of dewatering and monitoring wells around Building A-1

Table A-3. NPDES Permit NV0023507 monitoring requirements and 2010 sampling results

Parameter	Monitoring Requirements		Permit Discharge Limits Daily Maximum	Sample Results 1 <sup>st</sup> Quarter	Sample Results 2 <sup>nd</sup> Quarter	Sample Results 3 <sup>rd</sup> Quarter	Sample Results 4 <sup>th</sup> Quarter
	Sample Frequency	Sample Type					
Daily Maximum Flow (MGD) <sup>(a)</sup>	Continuous	Flow Meter	0.005184	0.002486	0.002238	0.002342	0.002401
Total Petroleum Hydrocarbons (mg/L)	Annually (4 <sup>th</sup> Qtr)	Discrete	1.0	NS <sup>(b)</sup>	NS	NS	ND <sup>(c)</sup>
Total Suspended Solids (mg/L)	Quarterly	Discrete	135	ND	ND	ND	ND
Total Dissolved Solids (mg/L)	Quarterly	Discrete	1900	975	985	995	963
Total Inorganic Nitrogen as N (mg/L)	Quarterly	Discrete	20.0	1.38	0.165	0.929	0.965
pH (Standard Units)	Quarterly	Discrete	6.5–9.0	7.81	7.70	8.22	7.64
Tritium (picocuries per liter [pCi/L])	Annually (4 <sup>th</sup> Qtr)	Discrete	MR <sup>(d)</sup>	NS	NS	NS	ND

(a) MGD = million gallons per day

(b) NS = not required to be sampled that quarter

(c) ND = not detected; values were less than the laboratory detection limits

(d) MR = monitor and report; no specified daily maximum or 30-day average limit, just the requirement that there shall be no discharge of substances that would cause a violation of state water quality standards

## ***A.1.2 Groundwater Control and Dewatering Operation***

During 2010, the groundwater control and dewatering project at the NLVF continued efforts to reduce the intrusion of groundwater below Building A-1. Since its inception in 2002, the project has transitioned from initial groundwater investigations and characterization phases to a long-term/permanent dewatering operational project. A review of the rising groundwater situation and past efforts to understand and remediate the problem is presented in previous reports (Bechtel Nevada [BN], 2003b; 2004b; 2005b; National Security Technologies, LLC [NSTec], 2006b; 2008).

Groundwater monitoring for this operation includes taking periodic water-level measurements at 24 accessible wells out of the 29 NLVF monitoring wells, taking continuous water-level measurements at the A-1 Basement Sump well, measuring the total volume of discharged groundwater, and conducting groundwater chemistry analyses in accordance with the NPDES permit (see Section A.1.1.2). Groundwater data are assessed quarterly or as new data become available. This information is used to help characterize the groundwater situation, validate the conceptual hydrologic model, and evaluate the dewatering operation. Water monitoring data are maintained in the NSTec Environmental Integrated Data Management System database.

In 2010, about 280,120 L (74,000 gal) per month were pumped from the dewatering wells. Groundwater also continued to be pumped from the A-1 Basement Sump well (Figure A-2), totaling about 1,305,210 L (344,800 gal) in 2010. When the A-1 Basement Sump well pump is active, the water level directly beneath Building A-1 is about 34.3 centimeters (cm) (13.5 inches [in.]) below the basement floor (as measured in a monitoring tube installed outside a nearby elevator shaft). When the pump is active, water within the A-1 Basement Sump well itself is about 244 cm (96 in.) below the basement floor. When the A-1 Basement Sump well pump is turned off for short periods of 3 to 6 days, the water in the elevator shaft-monitoring tube rises 33 cm (13 in.) to 18 cm (7 in.) below the basement floor, and water in the A-1 Basement Sump well itself rises to within 76 cm (30 in.) of the basement floor. These water level measurements reflect a drop of roughly 61 cm (24 in.) in the local water table beneath Building A-1 since full-scale dewatering operations began in 2006.

However, the general trend in the 29 NLVF monitoring wells shows rising water levels that are about 1.5 meters (5 feet) higher than levels obtained over the past 9 years. The dewatering efforts must counter this rising groundwater trend. The nearest monitoring wells, NLVF-1s, NLVF-12s, and NLVF-13d (Figure A-2), seem to be holding steady or decreasing, presumably reflecting drawdown of the local water table due to the dewatering operations at Building A-1.

### ***A.1.2.1 Discharge of Groundwater from Building A-1 Sump Well***

During 2001, the sump well was installed in the basement of Building A-1 and used in operations to remediate tritium contamination in the basement that occurred in 1995 (BN, 2000). The discharge water, which contains tritium, was disposed of at the NNSS. The sump well was turned off after the remedial operations were completed. However, beginning in early 2003, the sump well has been used to help control the encroaching water below Building A-1. The water contains some residual tritium, and it is segregated from the uncontaminated water from the dewatering operation through its own disposal process. The amount of tritium in the sump well water has decreased over the last couple of years from about 1,900 pCi/L to about 640 pCi/L (average of two analyses) in 2010 (or about 1/30<sup>th</sup> of the Safe Drinking Water Act limit of 20,000 pCi/L). The discharge is transported to the NNSS during the winter, but during the warm months, the discharge is evaporated with an exterior array of evaporative units located on the north side of Building A-1. In 2010, about 874,809 L (231,100 gal) were transported to the NNSS for disposal during the winter, and about 430,401 L (113,700 gal) were evaporated at the NLVF during the summer months. These measured quantities of water released through evaporation and the measured tritium concentrations in these waters were used to estimate total curies released to the atmosphere in 2010 at the NNSS (see Section 4.1.9, Table 4-13) and at the NLVF (see Section A.1.6.1).

## ***A.1.3 Compliance with Air Quality Permits***

Sources of air pollutants at the NLVF are regulated by the Source 657 Minor Source Permit issued by the Clark County Department of Air Quality and Environmental Management (DAQEM) for the emission of criteria

pollutants and hazardous air pollutants (HAPs). These pollutants include sulfur dioxide (SO<sub>2</sub>), nitrogen oxide (NO<sub>x</sub>), carbon monoxide (CO), particulate matter (PM), volatile organic compounds (VOCs), and any of the other defined HAPs. The regulated sources of emissions at the NLVF include an aluminum sander, an abrasive blaster, diesel generators, a fire pump, cooling towers, and boilers.

In 2010, two permit modifications were approved by the DAQEM. Modification (Mod.) 5 of the permit, issued in February 2010, was for the removal of an unused paint spray booth and two emergency generators. A second modification was approved in November 2010 for the addition of an emergency generator that will eventually replace one located at Building A-5. The DAQEM requires an annual emissions inventory of criteria air pollutants and HAPs. The 2010 emissions inventory was submitted to the DAQEM on March 15, 2011, which reported the estimated quantities shown in Table A-4.

**Table A-4. Tons of criteria air pollutant and HAPs emissions estimated for NLVF in 2010**

Criteria Pollutant (Tons/yr) <sup>(a)</sup>					
CO	NO <sub>x</sub>	PM10 <sup>(b)</sup>	SO <sub>2</sub>	VOC	HAPs (Tons/yr)
0.089	0.368	0.173	0.00003	0.021	0.093
<b>Total Emissions = 0.744</b>					

(a) 1 ton equals 0.91 metric tons

(b) Particulate matter equal to or less than 10 microns in diameter

The NLVF air permit requires that at least one visual emissions observation be performed each week for the boilers, generators, emergency fire pump, emergency generator, and the cooling towers. If emissions are observed, then U.S. Environmental Protection Agency Method 9 opacity readings are recorded by a certified visible emissions evaluator. If visible emissions appear to exceed the limit, corrective actions must be taken to minimize emission. In 2010, two NSTec employees from the NLVF were recertified by Carl Koontz Associates to conduct opacity readings. Readings were taken for generators, and their emissions were well below the Clean Air Act National Ambient Air Quality Standards (NAAQS) opacity limit of 20 percent.

On April 15, 2010, DAQEM issued a Letter of Noncompliance based on a deficiency noted during a March 1, 2010, county inspection. The deficiency was for not maintaining the maintenance and run logs for two diesel generators located at Building B-7. In response, corrections were made to operational procedures that included revamping the logbook formats, training personnel in recordkeeping procedures, and instituting quarterly internal compliance inspections. A Letter of Compliance was then issued by Clark County on October 18, 2010.

### ***A.1.4 Compliance with Hazardous Materials Regulations***

In 2010, the chemical inventory at the NLVF was updated and submitted to the State in the Nevada Combined Agency (NCA) Report on February 22, 2011. The inventory data were submitted in accordance with the requirements of the Hazardous Materials Permit 8015 (see Section 2.6, Emergency Planning and Community Right-to-Know Act, for a description of the content, purpose, and federal regulatory driver behind the NCA Report). No accidental or unplanned release of an extremely hazardous substance (EHS) occurred at the NLVF in 2010. Also, the quantities of toxic chemicals kept at the NLVF that are used annually did not exceed the specified reporting thresholds (see Section 2.6 concerning Toxic Chemical Release Inventory, Form R).

### ***A.1.5 Southern Nevada Health District Audit of Hazardous Waste***

Hazardous wastes (HWs) generated at the NLVF include such items as non-empty aerosol cans, lead debris, and oily rags. HWs are stored temporarily in satellite accumulation areas until they are direct-shipped to approved disposal facilities. The NLVF is a Conditionally Exempt Small Quantity Generator; therefore, no HW permit is required by the State of Nevada. However, once a year, the Southern Nevada Health District (SNHD) conducts an onsite audit to validate proper handling and storage. SNHD personnel conducted the annual audit on August 19, 2010, and found existing HW procedures acceptable.

## A.1.6 Compliance with Radiation Protection Regulations

### A.1.6.1 National Emission Standards for Hazardous Air Pollutants (NESHAP)

In compliance with NESHAP of the Clean Air Act, in 2010 NSTec assessed the radionuclide air emissions from the NLVF and the resultant radiological dose to the public surrounding the facility. NESHAP establishes a dose limit for the general public to be no greater than 10 millirems per year (mrem/yr) from all radioactive air emissions. Building A-1's basement was contaminated with tritium in 1995 when a container of tritium foils was opened, emitting about 1 curie of tritium (U.S. Department of Energy, Nevada Operations Office, 1996b). Complete cleanup of the tritium was unsuccessful due to the tritium being absorbed into the building materials. This has resulted in a continuous but decreasing release of tritium into the basement air space, which is ventilated to the outdoors. Since 1995, a dose assessment has been performed every year for this building.

In 2010, groundwater containing detectable levels of tritium was pumped from the sump well in the basement and allowed to evaporate from the array of evaporative units on the north side of the building beginning in May and extending into November. The tritium concentration levels in the groundwater and the volume of groundwater diverted to the evaporative units were known and were used to compute total annual tritium emissions from the evaporative units. Also, two air samples were collected from the basement (from April 5 to 12 and from September 1 to 8) in order to compute average tritium emissions from the basement. A calculated annual total of 6.45 millicuries (mCi) were released: 0.28 mCi from the evaporative units and 6.17 mCi in the basement air that was vented to the outside. Based on this emission rate, the 2010 calculated radiation dose to the nearest member of the general public from the NLVF was very low: 0.000032 mrem/yr (NSTec, 2011a). The nearest public place is located 100 meters (328 feet) northwest of Building A-1. This annual dose is 27 percent lower than the public dose estimated for the previous year of 2009 (NSTec, 2010c).

### A.1.6.2 DOE O 5400.5

U.S. Department of Energy (DOE) Order DOE O 5400.5, "Radiation Protection of the Public and the Environment," specifies that the radiological dose to a member of the public from radiation from all pathways must not exceed 100 mrem/yr as a result of DOE activities. This dose limit does not include the dose contribution from natural background radiation. The Atlas A-1 Source Range Laboratory and the Building C-3 High Intensity Source Building are two NLVF facilities that use radioactive sources or where radiation-producing operations are conducted that have the potential to expose the general population or non-project personnel to direct radiation. NSTec's Ecological and Environmental Monitoring (EEM) group conducts direct radiation monitoring at these locations. EEM uses thermoluminescent dosimeters (TLDs) to monitor external gamma radiation exposure near the boundaries of these facilities. The methods of TLD use and data analyses are described in Chapter 6 of this report.

In 2010, radiation exposure was measured at two locations along the perimeter fence and at one control location along the west fence of the C-1 Building. Annual exposure rates estimated from measurements at those NLVF locations are summarized in Table A-5. The radiation exposure in air measured by the TLDs is in the unit of milliroentgens per year (mR/yr), which is considered equivalent to the unit of mrem/yr for tissue. These exposures include contributions from background radiation and are similar to the TLD measurement of 87 mR/yr for total annual exposure reported by the Desert Research Institute from their Las Vegas air monitoring station (see Section 7.1.2, Table 7-3). The NLVF TLD results indicate that facility activities do not contribute a radiological dose to the surrounding public that can be distinguished from the dose due to background radiation.

**Table A-5. Results of 2010 direct radiation exposure monitoring at NLVF**

Location	Number of Samples	Gamma Exposure (mR/yr)			
		Mean	Median	Minimum	Maximum
Control	4	70	69	66	76
North Fence of Building A-1	4	64	63	60	69
North Fence of Building C-3	4	63	63	60	67

## A.2 Remote Sensing Laboratory–Nellis

RSL-Nellis is approximately 13.7 kilometers (km) (8.5 miles [mi]) northeast of the Las Vegas city center, and approximately 11.3 km (7 mi) northeast of the NLVF. It occupies six facilities on approximately 14 secured hectares (35 acres) at the Nellis Air Force Base. The six NNSA/NSO facilities were constructed on property owned by the U.S. Air Force (USAF). There is a Memorandum of Agreement between the USAF and the NNSA/NSO whereby the land belongs to the USAF but is under lease to the NNSA/NSO for 25 years (as of 1989) with an option for a 25-year extension. The facilities are owned by NNSA/NSO. RSL-Nellis provides emergency response resources for weapons-of-mass-destruction incidents. The laboratory also designs and conducts field tests of counter-terrorism/intelligence technologies, and has the capability to assess environmental and facility conditions using complex radiation measurements and multi-spectral imaging technologies.

Environmental compliance and monitoring activities at RSL-Nellis in 2010 included maintenance of a wastewater contribution permit, air quality permit, hazardous materials permit, and a waste management permit (Table A-6). Sealed radiation sources are used for calibration at RSL-Nellis, but the public has no access to any area that may have elevated gamma radiation emitted by the sources. Therefore, no environmental TLD monitoring is conducted. However, dosimetry monitoring is performed to ensure protection of personnel who work within the facility.

**Table A-6. Environmental permits for RSL-Nellis in 2010**

Permit Number	Description	Expiration Date	Reporting
<b>Wastewater Discharge</b>			
CCWRD-080	Industrial Wastewater Discharge Permit	June 30, 2010/2011	Quarterly
<b>Air Quality</b>			
Facility 348, Mod. 3	Clark County Authority to Construct/Operating Permit for a Non-Major Testing Laboratory	None	Annually
<b>Hazardous Materials</b>			
8512	RSL-Nellis Hazardous Materials Permit	February 28, 2011	Annually
<b>Waste Management</b>			
U1576-33N-01	RSL-Nellis Waste Management Permit-Underground Storage Tank	December 31, 2010	None

### A.2.1 Compliance with Wastewater Contribution Permit CCWRD-080

Discharges of wastewater from RSL-Nellis are required to meet permit limits set by the Clark County Water Reclamation District (CCWRD). These limits support the permit limits for the POTW operated by Clark County. The wastewater permit for this facility requires quarterly monitoring and reporting. Table A-7 presents the mean concentration of outfall measurements collected once per quarter in 2010. All contaminants in the outfall samples were below permit limits. Quarterly reports were submitted to the CCWRD on March 9, May 11, September 9, and December 5, 2010. The CCWRD also conducted two inspections of RSL-Nellis in 2010. The inspections resulted in no findings or corrective actions for the facility.

**Table A-7. Mean concentration of outfall measurements at RSL-Nellis in 2010**

Contaminant/Measure	Permit Limit (mg/L)	Outfall (mg/L)
Ammonia	NL <sup>(a)</sup>	22.1
Cadmium	0.35	0.00076
Chromium (Total)	1.7	0.00209
Copper	3.36	0.330
Cyanide (Total)	1	<0.006
Lead	0.99	0.0017
Nickel	10.08	0.00426
Oil and Grease as SGT-HEM	100	<5.0
Phosphorus	NL	6.2
Silver	6.3	0.0011



**Table A-8. Mean concentration of outfall measurements at RSL-Nellis in 2010 (continued)**

Contaminant/Measure	Permit Limit (mg/L)	Outfall (mg/L)
Total Dissolved Solids	NL	1,094
Total Suspended Solids	NL	411
Zinc	23.06	0.463
pH (Standard Units)	5.0–11.0	8.28
Temperature (degrees Fahrenheit)	140	76.3

(a) No limit listed on permit

### A.2.2 Compliance with Air Quality Permits

Sources of air pollutants at RSL-Nellis are regulated by the Facility 348 Authority to Construct/Operating Permit for the emission of criteria pollutants and HAPs issued by the Clark County DAQEM. There were no modifications to the permit in 2010.

The estimated quantities of criteria air pollutants and HAPs emitted at RSL-Nellis in 2010 are presented in Table A-8. Natural gas consumption is also reported in accordance with the requirements of the consolidated air permit issued for RSL-Nellis. The emissions inventory for 2010 was submitted to the DAQEM on March 15, 2011.

**Table A-9. Summary of air emissions for RSL-Nellis in 2010**

Criteria Pollutant (Tons/yr) <sup>(a)</sup>					HAPs	Natural Gas Consumption (ft <sup>3</sup> ) <sup>(c)</sup>
CO	NO <sub>x</sub>	PM10 <sup>(b)</sup>	SO <sub>2</sub>	VOC	(Tons/yr)	
0.346	0.709	0.135	0.002	0.037	0.011	5,717,600
<b>Total Emissions of Pollutants = 1.229</b>						

(a) 1 ton equals 0.91 metric tons

(b) Particulate matter equal to or less than 10 microns in diameter

(c) Cubic feet

The RSL-Nellis air permit requires that equipment be observed each day it is operated. If visible emissions are observed, then opacity readings are recorded by a certified visible emissions evaluator. In 2010, two NSTec employees from RSL-Nellis were recertified by Carl Koontz Associates to conduct opacity readings. Readings were taken for generators, a paint booth, aluminum sander, and sand blaster. Emissions for all of the equipment were well below the Clean Air Act NAAQS opacity limit of 20 percent.

### A.2.3 Compliance with Hazardous Materials Regulations

In 2010, the chemical inventory at RSL-Nellis was updated and submitted to the State in the NCA Report on February 22, 2011, in accordance with the requirements of the Hazardous Materials Permit 8512 (see Section 2.6 of this report for a description of the content, purpose, and federal regulatory driver behind the NCA Report). No accidental or unplanned release of an EHS occurred at RSL-Nellis in 2010. Also, no annual usage quantities of toxic chemicals kept at RSL-Nellis exceeded specified thresholds (see Section 2.6 concerning Toxic Chemical Release Inventory, Form R).

### A.2.4 Compliance with Waste Management Regulations

The underground storage tank program at RSL-Nellis consists of three active permitted tanks (one for unleaded gasoline, one for diesel fuel, and one for used oil), one deferred tank (in accordance with Title 40 Code of Federal Regulations Part 280.10[d]) for emergency power generation, and three unregulated tanks. The active tanks are inspected annually by SNHD. No deficiencies were noted during the 2010 inspection.

## *Appendix B: Glossary of Terms*

- A** **Absorbed dose:** the amount of energy imparted to matter by ionizing radiation per unit mass of irradiated material, in which the absorbed dose is expressed in units of rad or gray (1 rad equals 0.01 gray).
- Accuracy:** the closeness of the result of a measurement to the true value of the quantity measured.
- Action level:** defined by regulatory agencies, the level of pollutants that, if exceeded, requires regulatory action.
- Alluvium:** a sediment deposited by flowing water.
- Alpha particle:** a positively charged particle emitted from the nucleus of an atom, having mass and charge equal to those of a helium nucleus (two protons and two neutrons), usually emitted by transuranic elements.
- Analyte:** the specific component measured in a chemical analysis.
- Aquifer:** a saturated layer of rock or soil below the ground surface that can supply usable quantities of groundwater to wells and springs, and be a source of water for domestic, agricultural, and industrial uses.
- Area 5 Radioactive Waste Management Complex (RWMC):** the complex in Area 5 of the Nevada National Security Site at which low-level waste (LLW), mixed low-level waste (MLLW) may be received, examined, packaged, stored, or disposed. Limited quantities of onsite-generated transuranic waste (TRU) are also stored temporarily at the RWMC. It is composed of the Area 5 Radioactive Waste Management Site (RWMS) and the Waste Examination Facility (WEF) and includes supporting administrative buildings, parking areas, and utilities. The operational units of the Area 5 RWMS include active, inactive, and closed LLW and MLLW cells and a Real Time Radiography Building. The operational units of the WEF include the TRU Pad, TRU Pad Cover Building, TRU Loading Operations Area, WEF Yard, WEF Drum Holding Pad, Sprung Instant Structure, and the Visual Examination and Repackaging Building.
- Atom:** the smallest particle of an element capable of entering into a chemical reaction.
- B** **Background:** as used in this report, background is the term for the amounts of chemical constituents or radioactivity in the environment that are not caused by Nevada National Security Site operations.
- Becquerel (Bq):** the International System of Units unit of activity of a radionuclide, equal to the activity of a radionuclide having one spontaneous nuclear transition per second.
- Beta particle:** a negatively charged particle emitted from the nucleus of an atom, having charge, mass, and other properties of an electron, emitted from fission products such as cesium-137.
- Biological oxygen demand (BOD):** a measure of the amount of dissolved oxygen that microorganisms need to break down organic matter in water; used as an indicator of water quality.
- C** **CAP88-PC:** a computer code required by the U.S. Environmental Protection Agency for modeling air emissions of radionuclides.
- Code of Federal Regulations (CFR):** a codification of all regulations promulgated by federal government agencies.
- Collective population dose:** the sum of the total effective dose equivalents of all individuals within a defined population. The unit of collective population dose is person-rem or person-sievert. Collective population dose may also be referred to as “collective effective dose equivalent” or simply “population dose.”
- Committed dose equivalent:** the dose equivalent to a tissue or organ over a 50-year period after an intake of a radionuclide into the body. Committed dose equivalent is expressed in units of rem or sievert.

**Committed effective dose equivalent (CEDE):** the sum of the committed dose equivalents to various tissues in the body, each multiplied by an appropriate weighting factor representing the relative vulnerability of different parts of the body to radiation. Committed effective dose equivalent is expressed in units of rem or sievert.

**Community water system:** as defined in Nevada Revised Statute 445A.808, it is a public water system that has at least 15 service connections used by year-round residents of the area served by the system; or regularly serves at least 25 year-round residents of the area served by the system.

**Compliance Level (CL):** the Clean Air Act National Emission Standards for Hazardous Air Pollutants Concentration Level for Environmental Compliance. The CL value represents the annual average concentration that would result in a dose of 10 millirem per year, which is the federal dose limit to the public from all radioactive air emissions.

**Cool roof:** a low-sloped roof (pitch less than or equal to 2:12) that is designed and installed with a minimum 3-year aged solar reflectance of 0.55 and a minimum 3-year aged thermal emittance of 0.75, or with a minimum 3-year aged solar reflectance index (SRI) of 64. Cool steep-sloped roofs (pitch exceeding 2:12) have a 3-year SRI of 29 or higher.

**Cosmic radiation:** radiation with very high energies originating outside the earth's atmosphere; it is one source contributing to natural background radiation.

**Criteria pollutants:** those air pollutants designated by the U.S. Environmental Protection Agency as potentially harmful and for which National Ambient Air Quality Standards under the Clean Air Act have been established to protect the public health and welfare. These pollutants include sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), ozone, lead, and particulate matter equal to or less than 10 microns in diameter (PM10). The State of Nevada, through an air quality permit, establishes emission limits on the Nevada National Security Site for SO<sub>2</sub>, NO<sub>x</sub>, CO, PM10, and volatile organic compounds (VOCs). Ozone is not regulated by the permit as an emission, as it is formed in part from NO<sub>x</sub> and VOCs. Lead is considered a hazardous air pollutant (HAP) as well as a criteria pollutant, and lead emissions on the Nevada National Security Site are reported as part of the total HAP emissions. Lead emissions above a specified threshold are also reported under Section 313 of the Emergency Planning and Community Right-to-Know Act.

**Critical Level (L<sub>C</sub>):** the counts of radioactivity (or concentration level of a radionuclide) in a sample that must be exceeded before there is a specified level of confidence (typically 95 or 99 percent) that the sample contains radioactive material above the background; called the Critical Level (L<sub>C</sub>) or the decision level.

**Curie (Ci):** a unit of measurement of radioactivity, defined as the amount of radioactive material in which the decay rate is  $3.7 \times 10^{10}$  disintegrations per second or  $2.22 \times 10^{12}$  disintegrations per minute; one Ci is approximately equal to the decay rate of one gram of pure radium.

**D Daughter nuclide:** a nuclide formed by the radioactive decay of another nuclide, which is called the parent.

**Decision level:** the counts of radioactivity (or concentration level of a radionuclide) in a sample that must be exceeded before there is a specified level of confidence (typically 95 or 99 percent) that the sample contains radioactive material above the background; also known as the Critical Level (L<sub>C</sub>).

**Depleted uranium:** uranium having a lower proportion of the isotope <sup>235</sup>U than is found in naturally occurring uranium. The masses of the three uranium isotopes with atomic weights 238, 235, and 234 occur in depleted uranium in the weight-percentages 99.8, 0.2, and  $5 \times 10^{-4}$ , respectively; see Table 3-7 and related discussion.

**Derived Concentration Guide (DCG):** concentrations of radionuclides in water and air that could be continuously consumed or inhaled for 1 year and not exceed the U.S. Department of Energy primary radiation dose limit to the public of 100 millirem per year effective dose equivalent.

**Dose:** the energy imparted to matter by ionizing radiation; the unit of absorbed dose is the rad, equal to 0.01 joules per kilogram for irradiated material in any medium.

**Dose equivalent:** the product of absorbed dose in rad (or gray) in tissue and a quality factor representing the relative damage caused to living tissue by different kinds of radiation, and perhaps other modifying factors representing the distribution of radiation, etc., expressed in units of rem or sievert.

**Dosimeter:** a portable detection device for measuring the total accumulated exposure to ionizing radiation.

**Dosimetry:** the theory and application of the principles and techniques of measuring and recording radiation doses.

**E Effective dose equivalent (EDE):** an estimate of the total risk of potential effects from radiation exposure; it is the summation of the products of the dose equivalent and weighting factor for each tissue. The weighting factor is the decimal fraction of the risk arising from irradiation of a selected tissue to the total risk when the whole body is irradiated uniformly to the same dose equivalent. These factors permit dose equivalents from non-uniform exposure of the body to be expressed in terms of an EDE that is numerically equal to the dose from a uniform exposure of the whole body that entails the same risk as the internal exposure. The EDE includes the committed effective dose equivalent from internal deposition of radionuclides and the EDE caused by penetrating radiation from sources external to the body, and is expressed in units of rem or sievert.

**Effluent:** used in this report to refer to a liquid discharged to the environment.

**Emission:** used in this report to refer to a vapor, gas, airborne particulate, or to radiation discharged to the environment via the air.

**F Federal facility:** a facility that is owned or operated by the federal government, subject to the same requirements as other responsible parties when placed on the Superfund National Priorities List.

**Federal Register:** a document published daily by the federal government containing notification of government agency actions, including notification of U.S. Environmental Protection Agency and U.S. Department of Energy decisions concerning permit applications and rule-making.

**Fiscal year:** the U.S. Department of Energy, National Nuclear Security Agency Nevada Site Office's fiscal year is from October 1 through September 30.

**G Gamma ray:** high-energy, short-wavelength, electromagnetic radiation emitted from the nucleus of an atom, frequently accompanying the emission of alpha or beta particles.

**Gray (Gy):** the International System of Units unit of measure for absorbed dose; the quantity of energy imparted by ionizing radiation to a unit mass of matter, such as tissue. One gray equals 100 rads, or 1 joule per kilogram.

**Gross alpha:** the measure of radioactivity caused by all radionuclides present in a sample that emit alpha particles. Gross alpha measurements reflect alpha activity from all sources, including those that occur naturally. Gross measurements are used as a method to screen samples for relative levels of radioactivity.

**Gross beta:** the measure of radioactivity caused by all radionuclides present in a sample that emit beta particles. Gross beta measurements reflect beta activity from all sources, including those that occur naturally. Gross measurements are used as a method to screen samples for relative levels of radioactivity.

**H Half-life:** the time required for one-half of the radioactive atoms in a given amount of material to decay; for example, after one half-life, half of the atoms will have decayed; after two half-lives, three-fourths; after three half-lives, seven-eighths; and so on, exponentially.

**Hazardous waste:** hazardous wastes exhibit any of the following characteristics: ignitability, corrosivity, reactivity, or Extraction Procedure toxicity (yielding excessive levels of toxic constituents in a leaching test), but other wastes that do not necessarily exhibit these characteristics have been determined to be hazardous by the U.S. Environmental Protection Agency (EPA). Although the legal definition of hazardous waste is complex, according to the EPA, the term generally refers to any waste that, if managed improperly, could pose a threat to human health and the environment.

**High-efficiency particulate air (HEPA) filter:** a throwaway, extended-media, dry-type filter used to capture particulates in an air stream; HEPA collection efficiencies are at least 99.97 percent for 0.3-micrometer diameter particles.

**Hydrology:** the science dealing with the properties, distribution, and circulation of natural water systems.

**I Inorganic compounds:** compounds that either do not contain carbon or do not contain hydrogen along with carbon, including metals, salts, various carbon oxides (e.g., carbon monoxide and carbon dioxide), and cyanide.

**Instrument detection limit (IDL):** the lowest concentration that can be detected by an instrument without correction for the effects of sample matrix or method-specific parameters such as sample preparation. IDLs are explicitly determined and generally defined as three times the standard deviation of the mean noise level. This represents 99 percent confidence that the signal is not random noise.

**Interim status:** a legal classification allowing hazardous waste incinerators or other hazardous waste management facilities to operate while the U.S. Environmental Protection Agency considers their permit applications, provided that they were under construction or in operation by November 19, 1980, and can meet other interim status requirements.

**International System of Units (SI):** an international system of physical units that includes meter (length), kilogram (mass), kelvin (temperature), becquerel (radioactivity), gray (radioactive dose), and sievert (dose equivalent). The abbreviation, SI, comes from the French term *Système International d'Unités*.

**Isotopes:** forms of an element having the same number of protons in their nuclei, but differing numbers of neutrons.

**L L<sub>C</sub>:** see Critical Level (L<sub>C</sub>).

**Less than detection limits:** a phrase indicating that a chemical constituent or radionuclide was either not present in a sample, or is present in such a small concentration that it cannot be measured as significantly different from zero by a laboratory's analytical procedure and, therefore, is not identified at the lowest level of sensitivity.

**Low-level waste (LLW):** defined by U.S. Department of Energy Manual DOE M 435.1-1, "Radioactive Waste Management Manual," as radioactive waste that is not high-level radioactive waste, spent nuclear fuel, transuranic waste, byproduct material (as defined in section 11e.(2) of the Atomic Energy Act of 1954, as amended), or naturally occurring radioactive material.

**Lower limit of detection:** the smallest concentration or amount of analyte that can be detected in a sample at a 95-percent confidence level.

**Lysimeter:** an instrument for measuring the water percolating through soils and determining the dissolved materials.

**M Maximally exposed individual (MEI):** a hypothetical member of the public at a fixed location who, over an entire year, receives the maximum effective dose equivalent (summed over all pathways) from a given source of radionuclide releases to air. Generally, the MEI is different for each source at a site.

**Maximum contaminant level (MCL):** the highest level of a contaminant in drinking water that is allowed by U.S. Environmental Protection Agency regulation.

**Minimum detectable concentration (MDC):** also known as the lower limit of detection, the smallest amount of radioactive material in a sample that can be quantitatively distinguished from background radiation in the sample with 95 percent confidence.

**Metric units:** metric units, U.S. customary units, and their respective equivalents are shown in Table 1-6. Except for temperature, for which specific equations apply, U.S. customary units can be determined from metric units by multiplying the metric units by the U.S. customary equivalent. Similarly, metric units can be determined from U.S. customary equivalent units by multiplying the U.S. customary units by the metric equivalent.

**Mixed low-level waste (MLLW):** waste containing both radioactive and hazardous components.

**N National Emission Standards for Hazardous Air Pollutants (NESHAP):** standards found in the Clean Air Act that set limits for hazardous air pollutants.

**National Pollutant Discharge Elimination System (NPDES):** a federal regulation under the Clean Water Act that requires permits for discharges into surface waterways.

**Non-community water system:** as defined in Nevada Revised Statute 445A.828, it is a public water system that is not a community water system. Private water system: on the NNSS, a water system that is not a public water system and is not regulated under State of Nevada permits.

**Nuclide:** any species of atom that exists for a measurable length of time. A nuclide can be distinguished by its atomic mass, atomic number, and energy state.

**O Offsite:** for effluent releases or in the nuclear testing area, any place outside the Nevada National Security Site and adjacent Nevada Test and Training Range.

**Onsite:** for effluent releases or in the nuclear testing area, any place inside the Nevada National Security Site and adjacent Nevada Test and Training Range.

**P Part B Permit:** the second, narrative section submitted by generators in the Resource Conservation and Recovery Act permitting process that covers in detail the procedures followed at a facility to protect human health and the environment.

**Parts per million (ppm):** a unit of measure for the concentration of a substance in its surrounding medium; for example, one million grams of water containing one gram of salt has a salt concentration of 1 ppm.

**Perched aquifer:** an aquifer that is separated from another water-bearing stratum by an impermeable layer.

**Performance standards (incinerators):** specific regulatory requirements established by the U.S. Environmental Protection Agency limiting the concentrations of designated organic compounds, particulate matter, and hydrogen chloride in incinerator emissions.

**pH:** a measure of hydrogen ion concentration in an aqueous solution. Acidic solutions have a pH from 0 to 7, basic solutions have a pH greater than 7, and neutral solutions have a pH of 7.

**PM10:** a fine particulate matter with an aerodynamic diameter equal to or less than 10 microns.

**Point source:** any confined and discrete conveyance (e.g., pipe, ditch, well, or stack).

**Private water system:** a water system that is not a public water system, as defined in Nevada Revised Statute 445A.235, and is not regulated under State of Nevada permits.

**Public water system (PWS):** as defined in Nevada Revised Statute (NRS) 445A.235, it is a system, regardless of ownership, that provides the public with water for human consumption through pipes or other constructed conveyances, if the system has 15 or more service connections, as defined in NRS 445A.843, or regularly serves 25 or more persons. The three PWSs on the NNSS are permitted by the State of Nevada as non-community water systems.

**Q Quality assurance (QA):** a system of activities whose purpose is to provide the assurance that standards of quality are attained with a stated level of confidence.

**Quality control (QC):** procedures used to verify that prescribed standards of performance are attained.

**Quality factor:** the factor by which the absorbed dose (rad) is multiplied to obtain a quantity that expresses (on a common scale for all ionizing radiation) the biological damage to exposed persons, usually used because some types of radiation, such as alpha particles, are biologically more damaging than others. Quality factors for alpha, beta, and gamma radiation are in the ratio 20:1:1.

**R Rad:** the unit of absorbed dose and the quantity of energy imparted by ionizing radiation to a unit mass of matter such as tissue; equal to 0.01 joule per kilogram, or 0.01 gray.

**Radioactive decay:** the spontaneous transformation of one radionuclide into a different nuclide (which may or may not be radioactive), or de-excitation to a lower energy state of the nucleus by emission of nuclear radiation, primarily alpha or beta particles, or gamma rays (photons).

**Radioactivity:** the spontaneous emission of nuclear radiation, generally alpha or beta particles, or gamma rays, from the nucleus of an unstable isotope.

**Radionuclide:** an unstable nuclide. See nuclide and radioactivity.

**Rem:** a unit of radiation dose equivalent and effective dose equivalent describing the effectiveness of a type of radiation to produce biological effects; coined from the phrase “roentgen equivalent man.” The product of the absorbed dose (rad), a quality factor (Q), a distribution factor, and other necessary modifying factors. One rem equals 0.01 sievert.

**Risk assessment:** the use of established methods to measure the risks posed by an activity or exposure by evaluating the relationship between exposure to radioactive substances and the subsequent occurrence of health effects and the likelihood for that exposure to occur.

**Roentgen (R):** a unit of measurement used to express radiation exposure in terms of the amount of ionization produced in a volume of air.

**S Sanitary waste:** most simply, waste generated by routine operations that is not regulated as hazardous or radioactive by state or federal agencies.

**Saturated zone:** a subsurface zone below which all rock pore-space is filled with water; also called the phreatic zone.

**Sensitivity:** the capability of methodology or instrumentation to discriminate between samples having differing concentrations or containing varying amounts of analyte.

**Sievert (Sv):** the International System of Units unit of radiation dose equivalent and effective dose equivalent, that is the product of the absorbed dose (gray), quality factor, distribution factor, and other necessary modifying factors; 1 Sv equals 100 rem.

**Source term:** the amount of a specific pollutant emitted or discharged to a particular medium, such as the air or water, from a particular source.



**Specific conductance:** the measure of the ability of a material to conduct electricity; also called conductivity.

**Subcritical experiment:** an experiment using high explosives and nuclear weapon materials (including special nuclear materials like plutonium) to gain data used to maintain the nuclear stockpile without conducting nuclear explosions banned by the Comprehensive Test Ban Treaty.

**T Thermoluminescent dosimeter (TLD):** a device used to measure external beta or gamma radiation levels, and which contains a material that, after exposure to beta or gamma radiation, emits light when processed and heated.

**Total dissolved solids (TDS):** the total mass of particulate matter per unit volume that is dissolved in water and that can pass through a very fine filter.

**Total effective dose equivalent (TEDE):** The sum of the external exposures and the committed effective dose equivalent (CEDE) for internal exposures.

**Total organic carbon (TOC):** the sum of the organic material present in a sample.

**Total organic halides (TOX):** the sum of the organic halides present in a sample.

**Total suspended solids (TSS):** the total mass of particulate matter per unit volume suspended in water and wastewater discharges that is large enough to be collected by a very fine filter.

**Transpiration:** a process by which water is transferred from the soil to the air by plants that take the water up through their roots and release it through their leaves and other aboveground tissue.

**Tritium:** a radioactive isotope of hydrogen, containing one proton and two neutrons in its nucleus, which decays at a half-life of 12.3 years by emitting a low-energy beta particle.

**Transuranic (TRU) waste:** material contaminated with alpha-emitting transuranium nuclides that have an atomic number greater than 92 (e.g., <sup>239</sup>Pu), half-lives longer than 20 years, and are present in concentrations greater than 100 nanocuries per gram of waste.

**U Uncertainty:** the parameter associated with a sample measurement that characterizes the range of the measurement that could reasonably be attributed to the sample. Used in this report, the uncertainty value is established at  $\pm 2$  standard deviations.

**Unsaturated zone:** that portion of the subsurface in which the pores are only partially filled with water and the direction of water flow is vertical; also referred to as the vadose zone.

**V Vadose zone:** the partially saturated or unsaturated region above the water table that does not yield water to wells; also referred to as the unsaturated zone.

**Volatile organic compound (VOC):** liquid or solid organic compounds that have a high vapor pressure at normal pressures and temperatures and thus tend to spontaneously pass into the vapor state.

**Vulnerable Sites List:** a list updated at least annually by National Security Technologies, LLC, of sites located on the Nevada National Security Site at which there is current or future risk of environmental impact from the release of contaminants in the absence of active management. They can include legacy sites such as abandoned storage areas for wastes with no identified disposal path and active sites such as tanks and containers, generators or other remote equipment, and regulated units like sewer systems or septic tanks. Sites are added to the list based on the combination and ranking of the following factors: (1) frequency of site inspections, (2) site remoteness, (3) the potential for regulatory non-compliance or fines if a release occurred, (4) the effectiveness of current containment measures/structures at the site, and (5) the cost and scope of site remediation if an accidental release occurred.

**W Waste accumulation area (WAA):** an officially designated area that meets current environmental standards and guidelines for temporary (less than 90 days) storage of hazardous waste before offsite disposal.

**Wastewater treatment system:** a collection of treatment processes and facilities designed and built to reduce the amount of suspended solids, bacteria, oxygen-demanding materials, and chemical constituents in wastewater.

**Water table:** the underground boundary between saturated and unsaturated soils. It is the point beneath the surface of the ground at which natural ground water is found. It is the upper surface of a zone of saturation where the body of groundwater is not confined by an overlying impermeable formation. Where an overlying confining formation exists, the aquifer in question has no water table.

**Weighting factor:** a tissue-specific value used to calculate dose equivalents that represents the fraction of the total health risk resulting from uniform, whole-body irradiation that could be contributed to that particular tissue. The weighting factors used in this report are recommended by the International Commission on Radiological Protection.

**Wind rose:** a diagram that shows the frequency and intensity of wind from different directions at a specific location.

## *Appendix C: Acronyms and Abbreviations*

ac	acre(s)	CAS	Corrective Action Site
Ac	actinium	CAU	Corrective Action Unit
ACM	asbestos-containing material	CCWRD	Clark County Water Reclamation District
AEA	Atomic Energy Act	CEDE	committed effective dose equivalent
AEC	Atomic Energy Commission	CEM	Community Environmental Monitor
AFV	alternative fuel vehicle	CEMP	Community Environmental Monitoring Program
AIWS	American Indian Writer's Subgroup	CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
ALARA	as low as reasonably achievable	CFR	Code of Federal Regulations
Am	americium	CGTO	Consolidated Group of Tribes and Organizations
APP	affirmative procurement program	Ci	curie(s)
ARL/SORD	Air Resources Laboratory, Special Operations and Research Division	CL	compliance level (used in text for the Clean Air Act National Emission Standards for Hazardous Pollutants Concentration Level for Environmental Compliance)
ARPA	Archaeological Resources Protection Act	cm	centimeter(s)
ASER	Annual Site Environmental Report	CNLV	City of North Las Vegas
ASN	Air Surveillance Network	CNTA	Central Nevada Test Area
ATM	Atomic Testing Museum	Co	cobalt
BA	Benham aquifer	CO	carbon monoxide
BCG	Biota Concentration Guide	CP	Control Point
Be	beryllium	cpm	counts per minute
BEEF	Big Explosives Experimental Facility	CR	Closure Report
BFF	Bureau of Federal Facilities	CRM	Cultural Resources Management
bgs	below ground surface	Cs	cesium
BLM	Bureau of Land Management	CV	coefficient of variation
BN	Bechtel Nevada	CWA	Clean Water Act
BOA	Basic Ordering Agreement	CX	Categorical Exclusion
BOD <sub>5</sub>	5-day biological oxygen demand	CY	calendar year
Bq	Becquerel	DAF	Device Assembly Facility
BREN	Bare Reactor Experiment–Nevada	DAQEM	Department of Air Quality and Environmental Management (Clark County)
BSDW	Bureau of Safe Drinking Water	DCG	Derived Concentration Guide
BTU	British thermal unit	DM&P	Directives Management and Publications
C	carbon	DNWR	Desert National Wildlife Refuge
CA	Composite Analysis	DoD	U.S. Department of Defense
CAA	Clean Air Act	DOE	U.S. Department of Energy
CAB	Community Advisory Board		
CADD	Corrective Action Decision Document		
CAI	Corrective Action Investigation		
CAIP	Corrective Action Investigation Plan		
CAP	Corrective Action Plan		
CAPP	Chemical Accident Prevention Program		
CAP88-PC	Clean Air Package 1988		

DOECAP	U.S. Department of Energy Consolidated Audit Program	FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
DOE/NV	U.S. Department of Energy, Nevada Operations Office	ft	foot or feet
DQA	Data Quality Assessment	ft <sup>2</sup>	square feet
DQO	Data Quality Objective	ft <sup>3</sup>	cubic feet
DRI	Desert Research Institute	FWS	U.S. Fish and Wildlife Service
DU	depleted uranium	FY	fiscal year
E1	Environmental 1	g	gram(s)
E2	Environmental 2	gal	gallon(s)
EA	Environmental Assessment	GCD	Greater Confinement Disposal
EDE	effective dose equivalent	GHG	greenhouse gas
EERE	Office of Energy Efficiency and Renewable Energy	GIS	Geographic Information System
EHS	extremely hazardous substance	gpm	gallon(s) per minute
EIS	Environmental Impact Statement	gsf	gross square feet
EM	Environmental Management	Gy	gray(s)
EMAC	Ecological Monitoring and Compliance	Gy/d	gray(s) per day
EMAD	Engine Maintenance, Assembly, and Disassembly	<sup>3</sup> H	tritium
EMC	Energy Management Council	ha	hectare(s)
EMS	Environmental Management System	HAP	hazardous air pollutant
EO	Executive Order	HENRE	High-Energy Neutron Reactions Experiment
EODU	Explosive Ordnance Disposal Unit	HEPA	high-efficiency particulate air
EP	Environmental Protection	HEST	High Explosives Simulation Test
EPA	U.S. Environmental Protection Agency	HMA	Herd Management Area
EPCRA	Emergency Planning and Community Right-to-Know Act	HQ	Headquarters
EPEAT	Electronic Product Environmental Assessment Tool	HTO	tritiated water
EPP	Environmentally Preferable Purchasing	HW	hazardous waste
ER	Environmental Restoration	HWAA	Hazardous Waste Accumulation Area
ERA	Environmental Research Associates	HWSU	Hazardous Waste Storage Unit
ESA	Endangered Species Act	IAEA	International Atomic Energy Agency
ETDS	E-Tunnel Waste Water Disposal System	ICPT	Integrated Contractor Purchasing Team
Eu	europium	ID	identification number
EWG	Environmental Working Group	IDL	instrument detection limit
F&I	Facility and Infrastructure	IH	Industrial Hygiene
FD	field duplicate	IL	investigation level
FFACO	Federal Facility Agreement and Consent Order	in.	inch(es)
FFCA	Federal Facility Compliance Act	INL	Idaho National Laboratory
		ISMS	Integrated Safety Management System
		ISO	International Organization for Standardization
		ISWG	Interagency Sustainability Working Group

IT	International Technology Corporation	mm	millimeter(s)
JASPER	Joint Actinide Shock Physics Experimental Research	mmhos/cm	millimhos per centimeter
K	potassium	Mod.	Modification
kg	kilogram(s)	MQO	Measurement Quality Objectives
kg/d	kilogram(s) per day	mR	milliroentgen(s)
km	kilometer(s)	mR/d	milliroentgen(s) per day
km <sup>2</sup>	square kilometer(s)	mR/yr	milliroentgen(s) per year
L	liter(s)	mrad	millirad(s)
LANL	Los Alamos National Laboratory	mrem	millirem(s)
lb	pound(s)	mrem/yr	millirem(s) per year
L <sub>c</sub>	Critical Level (synonymous with Decision Level)	MSDS	Material Safety Data Sheet
LCA	lower carbonate aquifer	mSv	millisievert(s)
LCS	laboratory control sample	mSv/yr	millisievert(s) per year
L/d	liter(s) per day	mTCO <sub>2</sub> e	metric ton carbon dioxide equivalent
LEED	Leadership in Energy and Environmental Design	mton	metric ton(s)
LLNL	Lawrence Livermore National Laboratory	MTRU	mixed transuranic
LLW	low-level waste	μCi/mL	microcurie(s) per milliliter
L/min	liter(s) per minute	μg/L	microgram(s) per liter
LoC	Level of Concern	μR/hr	microroentgen(s) per hour
log	logarithmic	μS/cm	microseimen(s) per centimeter
lpm	liter(s) per minute	N	nitrogen
LQAP	Laboratory Quality Assurance Plan	NAAQS	National Ambient Air Quality Standards
m	meter(s)	NAC	Nevada Administrative Code
m <sup>2</sup>	square meter(s)	NAGPRA	Native American Graves Protection and Repatriation Act
m <sup>3</sup>	cubic meter(s)	NCA	Nevada Combined Agency
M&O	Management and Operating	NCRP	National Council on Radiation Protection
MAPEP	Mixed Analyte Performance Evaluation Program	NDEP	Nevada Division of Environmental Protection
MBTA	Migratory Bird Treaty Act	NDOA	Nevada Department of Agriculture
mCi	millicurie(s)	NEPA	National Environmental Policy Act
MCL	maximum contaminant level	NESHAP	National Emission Standards for Hazardous Air Pollutants
MDC	minimum detectable concentration	NHPA	National Historic Preservation Act
MEDA	Meteorological Data Acquisition	N-I	Navarro-Intera, LLC
MEI	maximally exposed individual	NLVF	North Las Vegas Facility
MET	meteorological	NNES	Navarro Nevada Environmental Services, LLC
MGD	million gallons per day	NNHP	Nevada Natural Heritage Program
mg/L	milligram(s) per liter	NNSA	U.S. Department of Energy, National Nuclear Security Administration
mGy/d	milligray(s) per day	NNSA/NSO	U.S. Department of Energy, National Nuclear Security Administration Nevada Site Office
mi	mile(s)		
mi <sup>2</sup>	square mile(s)		
MLLW	mixed low-level waste		

NNSA/SSO	U.S. Department of Energy, National Nuclear Security Administration Sandia Site Office	PLall	prediction limit for all enriched tritium measurements
NNSS	Nevada National Security Site	PM	particulate matter
NNSSER	Nevada National Security Site Environmental Report	PM10	particulate matter equal to or less than 10 microns in diameter
NO <sub>x</sub>	nitrogen oxides	POTW	Publicly Owned Treatment Works
NPDES	National Pollutant Discharge Elimination System	PT	proficiency testing
NPTEC	Nonproliferation Test and Evaluation Complex	PTE	potential to emit
NRC	U.S. Nuclear Regulatory Commission	Pu	plutonium
NRHP	National Register of Historic Places	PWS	public water system
NRS	Nevada Revised Statutes	QA	quality assurance
NSPS	New Source Performance Standards	QAP	Quality Assurance Program
NSSAB	Nevada Site Specific Advisory Board	QAPP	Quality Assurance Program Plan
NSTec	National Security Technologies, LLC	QC	quality control
NTS	Nevada Test Site	QSAS	Quality Systems for Analytical Services
NTSER	Nevada Test Site Environmental Report	R	roentgen(s)
NTTR	Nevada Test and Training Range	Ra	radium
NVLAP	National Voluntary Laboratory Accreditation Program	rad	radiation absorbed dose (a unit of measure)
ODS	ozone-depleting substance	rad/d	rad(s) per day
OSTI	Office of Scientific and Technical Information	RC	Radiological Control
oz	ounce(s)	RCD	Radiological Control Department
P03	Pit 3 Mixed Waste Disposal Unit	RCRA	Resource Conservation and Recovery Act
P06A	Pit 6 Asbestiform Low-Level Solid Waste Disposal Unit	RCT	radiological control technician
P2	pollution prevention	rem	roentgen equivalent man (a unit of measure)
P2/WM	pollution prevention/waste minimization	RER	relative error ratio
PA	Performance Assessment	RMAD	Reactor Maintenance, Assembly, and Disassembly
PAAA	Price-Anderson Amendments Act	RNCTEC	Radiological/Nuclear Countermeasures Test and Evaluation Complex
PAID	Performance Analysis and Improvement Division	RPD	relative percent difference
Pb	lead	RREMP	Routine Radiological Environmental Monitoring Plan
PCB	polychlorinated biphenyl	RSL	Remote Sensing Laboratory
pCi	picocurie(s)	RTR	Real Time Radiography
pCi/g	picocurie(s) per gram	RW	Radioactive Waste
pCi/L	picocurie(s) per liter	RWAP	Radioactive Waste Acceptance Program
pCi/mL	picocurie(s) per milliliter	RWMC	Radioactive Waste Management Complex
PI	prediction interval	RWMS	Radioactive Waste Management Site
PIC	pressurized ion chamber	SA	Supplement Analysis
		SAA	Satellite Accumulation Area

SAD	surface area disturbance	TTR	Tonopah Test Range
SAFER	Streamlined Approach for Environmental Restoration	U	uranium
SAM	Software Asset Management	UGT	underground test
SAP	Sampling and Analysis Plan	UGTA	Underground Test Area
SARA	Superfund Amendments and Reauthorization Act	U.S.	United States
SC	specific conductance	USACE	U.S. Army Corps of Engineers
SD	standard deviation	USAF	U.S. Air Force
SDWA	Safe Drinking Water Act	USC	United States Code
SE	standard error of the mean	USGS	U.S. Geological Survey
SF <sub>6</sub>	Sulfur hexafluoride	UST	underground storage tank
SHPO	State Historic Preservation Office	VOC	volatile organic compounds
SI	International System of Units	VZM	vadose zone monitoring
SNHD	Southern Nevada Health District	WEF	Waste Examination Facility
SNJV	Stoller-Navarro Joint Venture	WGS	Waste Generator Services
SNL	Sandia National Laboratories	WIPP	Waste Isolation Pilot Plant
SORD	Special Operations and Research Division	WM	waste minimization
SO <sub>2</sub>	sulfur dioxide	WNV	West Nile virus
Sr	strontium	WO	Waste Operations
SRI	Solar Reflectance Index	WW	water well
SSC	structures, systems, and components	yr	year(s)
SSP	Site Sustainability Plan	Z2CS	Zone 2 Construction Supervision
SSPP	Strategic Sustainability Performance Plan		
S.U.	standard unit(s) (for measuring pH)		
Sv	sievert(s)		
SWEIS	Site-Wide Environmental Impact Statement		
SWO	Solid Waste Operations		
T <sub>½</sub>	half-life		
Tc	technetium		
TDR	time domain reflectometry		
TDS	total dissolved solids		
TEDE	total effective dose equivalent		
Th	thorium		
TLD	thermoluminescent dosimeter		
TMCC	Timber Mountain caldera complex		
TOC	total organic carbon		
TOX	total organic halides		
TPCB	Transuranic Pad Cover Building		
TRI	Toxic Release Inventory		
TRU	transuranic		
TSA	Topopah Spring aquifer		
TSCA	Toxic Substances Control Act		
TSS	total suspended solids		



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