



December 3, 1999

ATGOR-99.032

Distribution: Orysia Masnyk Bailey, U.S. NRC Region II
Lisa Kingsbury, Office of Directorate of Environment, Fort McClellan

Originator: Lee Young, ATG, Inc.

Subject: Electronic Copy (CD) of Critical Elements of the Decommissioning Plan
for the Fort McClellan 'Burial Mound'

'Burial Mound' Decommissioning Plan
U.S. Army Fort McClellan, Alabama
HQ, IOC Project Number USA 98-046

Prepared by:

Allied Technology Group, Inc. (ATG)
669 Emory Valley Road
Oak Ridge, TN 37830
Contract DAAA09-C-0039, Modification No. P00002
September 9, 1999

Files

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|----------------------|-------------------|-----------------------------|
| 1. D&Dplan1 | Word Perfect | Plan Narrative, Rev. 1 |
| 2. PelhamBurialMound | Microsoft Word | DCGLs, Rev. 2 |
| 3. ApxARev2 | Microsoft Word | Attachment A, RESRAD Output |
| 4. Moundd&d | Microsoft Project | Schedule |

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MEMORANDUM

DATE: 9/16/99

TO: Distribution

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FROM: Lee Young

SUBJECT: Revised Decommissioning Plan for the Fort McClellan
'Burial Mound'

Pursuant to the recently conveyed comments on the earlier Plan submission from the IOC, NRC and EPA, ATG has edited critical elements as represented in the enclosed documents. Please replace the Plan narrative and Appendix 6 (Development of "Derived Cleanup Guidelines for the Pelham Range 'Burial Mound', Fort McClellan") of the earlier submittals with the enclosed revisions.

All references to the expected end-user scenario of national guardsman, hunter, and trespasser have been removed. The target receptor scenario now considered is that of the residential family living on the site immediately after decommissioning for free release. The residential scenario considered includes consumption of vegetation from a backyard garden and exposure via the cow pathway. The residential scenario provides for both adult and child exposure evaluation.

Note: The basic approach provides for the comprehensive screening of soil hot spots via the conveyor/monitor. The failed waste stream is to be disposed off-site. The accepted material will be further surveyed by walkover scans and heavily sampled, as the sensitivity of the monitoring system now rivals the acceptance criteria. The final (screened) pile and the excavated hole after remediation of the 'Burial Mound' will be formally surveyed per the described MARSSIM protocol. With the earlier sampling campaign included in the CHPPM report and the subsequent statistical analysis of the average not hot-spot

material to be screened and ultimately returned as backfill, the approach is technically sound to strive for free release. Based on the results of the final verification survey, the annual exposure rate will be re-calculated to test the outcome, which is assured to result in < 25 mrem/yr. The EPA risk comparisons are given, as well as actual EPA references cited.

Changes

The intent for the latest revision is to supersede the previous submission of both the Work Plan Narrative and Appendix 6, respectfully, in their entireties.

Specific Work Plan revisions are limited to:

1	Cover Page	First Page	Revised date.
2	Approval Page	Second Page	Revised issue period.
3	Section 1.3	P. 1 – 4	Deletion of last sentence referring to possible future occupancy.
4	Section 2.1	P. 2 – 1	Inserted Paragraph of objectives.
5	Section 2.1.1.1	P. 2 – 2	Revised doc. ref. (A&A).
6	Section 2.1.1.7	P. 2 – 2	Deletion of date of lic. term.
7	Section 2.1.4	P. 2 – 15	Insertion of regulator notification task into the schedule introduction.
8	Section 2.1.4	P. 2 – 16 P. 2 – 17 P. 2 – 18 P. 2 – 19	Insertion of Task 2.1, gen. rev. Schedule revision. Schedule revision. Schedule revision.
9	Section 4.2.2	P. 4 – 3	Deletion of para. ref. DCGLs.
10	Section 6.8.2	P. 6 – 4&5	Criteria revision.
11	Section 6.8.3	P. 6 – 5	Deletion of paragraph (partial).
12	Section 6.13.1	P. 6 – 8 P. 6 – 9	Revised dose-rate equivalent.
13	Section 9.0	P. 9 – 2	Revised reference (12.).

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