



DEPARTMENT OF THE ARMY
INSTALLATION MANAGEMENT COMMAND
US ARMY GARRISON-ROCK ISLAND ARSENAL
1 ROCK ISLAND ARSENAL
ROCK ISLAND, ILLINOIS 61299-5000

REPLY TO
ATTENTION OF:

NOV 28 2011

Office of the Garrison Manager

Dr. Michael P. Lee
Low-Level Waste Branch
Environmental Protection and Performance Assessment Directorate
Office of Federal and State Materials and Environmental Management Programs
Materials Decommissioning Branch
Division of Waste Management and Environmental Protection
U.S. Nuclear Regulatory Commission
11545 Rockville Pike
Rockville, Maryland 20852-2738

Dear Dr. Lee:

We request an extension of twenty months for the submittal of the Decommissioning Plan (DP) and Environmental Report (ER) for SUB-1435 to not later than the end of September 2013. Condition 13 of U.S. Nuclear Regulatory Commission (NRC) license number SUB-1435 currently requires us to submit a DP and ER to the NRC not later than the end of calendar year 2011.

The NRC staff identified a number of comments and questions regarding the site-specific partition coefficient (K_d) study for Jefferson Proving Ground (JPG). In the most recent letter to the Army dated November 2, 2011, the NRC appears to have agreed with the Army's plan to re-collect all of the samples needed to conduct the site-specific K_d study to ensure the usage of defensible data of sufficient quality in the DP and ER. To address the only remaining concern identified in the letter, the Army will collect soils other than the Pre-Wisconsin Till from the 0- to 4-foot soil column depth.

Although the site-specific K_d is the final critical component needed to complete site characterization and fate and transport modeling and it appears that all collection and analysis issues have been resolved, we have a number of reasons why we cannot meet the deadline:

- We voluntarily stopped work on the DP/ER since the site-specific K_d testing had not commenced while awaiting NRC response to our proposed methodology.
- Collecting site-specific K_d data was agreed upon with NRC staff to ensure our report will be sufficient. Submitting the DP without site-specific K_d data will bring more delays and possibly more issues to resolve and develop proper courses of actions.

- Building the DP based on published K_d values may produce an inappropriate plan as evidenced by previous NRC comments on this issue. This process is one-of a kind, thus the Army wants NRC's review of site-specific K_d data prior to submitting the DP to avoid submitting an incomplete version.
- Organizational reviews of the DP (internal Army and independent peer review conducted by Los Alamos National Laboratory) will entail 180 days or more.

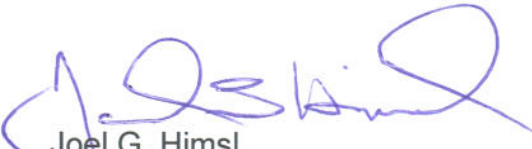
We believe that for the benefit of the Army and NRC an extension of twenty months for the submittal of the DP and ER for SUB-1435, to not later than the end of September 2013, is warranted and should be issued by the NRC in the form of a license amendment to SUB-1435. The Army will continue to perform the semi-annual environmental radiation monitoring (ERM) and reporting of the results to the NRC on the analysis of the soil, sediment, groundwater and surface water at JPG for the potential migration of DU and impacts to human health at JPG.

The reasoning behind the 20-month extension is as follows:

- Winter weather has begun setting in and by the time the sampling can occur, the snow will be covering much of the DU Impact Area and the ground and water will be frozen, making it difficult and unsafe for the sampling team to collect surface soil and water needed for the study. The earliest that samples could be collected is in April 2012.
- Analytical analyses at the laboratory will take about three months to complete (July 2012).
- Completing the fate and transport and residual dose modeling and analyzing that information will take another six months (January 2013), which includes time to submit a modeling report with the site-specific K_d data for NRC's review and comment.
- Internal Army reviews will take six months to complete (July 2013). The current plan is to issue the ER/DP to NRC by September 2013.

My point of contact regarding this letter is the License Radiation Safety Officer, Dr. Robert Cherry, who may be reached at 210-466-0368 or at e-mail address robert.cherry@us.army.mil.

Sincerely,



Joel G. Himsl
Garrison Manager