

From: [Lawyer, Dennis](#)
To: ["matthew.k.church.civ@mail.mil"](mailto:matthew.k.church.civ@mail.mil)
Subject: Department of the Army, Request for Additional Information Concerning Application for a License Amendment, Control 609333
Date: Tuesday, July 31, 2018 1:32:00 PM

Dear Mr. Church,

This is in reference to your NRC Form 314 dated July 6, 2018, requesting for amendment to Nuclear Regulatory Commission License No. STB-1554, Docket No. 04009011. In order to continue our review, we need the following additional information:

The NRC Form 314 did not provide the address to mail all future correspondence regarding this license. Please provide where we should address all future correspondence regarding this license.

You have provided surveys of the area where the gun tubes were cut and stored. The guidance for unrestricted release of the facility is contained in NUREG- 1757, Volume 1, Revision 2, "Consolidated Decommissioning Guidance Decommissioning Process for Materials Licensees." You may demonstrate that the facility, or portion of the facility, meets NRC criteria for unrestricted use by using the dose screening methodology described in Section 6.6. Guidance on surveys is found in Figure 8.1 and Section 15.4 of this volume and Volume 2 of this NUREG. Figure 8.1 on page 8-2 provides a simplified survey method to release these areas. It appears that you tried to implement this guidance. Figure 8.1 states that you need to provide one hundred percent scanning of all surfaces in the area of the facility where licensed material was used or stored, using an appropriate radiation detection instrument (including scan sensitivity). It is unclear if scans were performed, what was the scan sensitivity and if it met the requirements for the derived concentration guideline levels for depleted Uranium. The survey provided of the building surfaces did not provide the detector probe manufacturer and model number, nor it calibration certificate. Please provide the detector manufacturer and model number, and efficiency for detecting depleted Uranium. For your reference, it appears that you have done a similar survey for removal of thorium from your license. Please refer to your letter dated March 7, 2005.

The surveys provided were not clear to the location they were taken. Based on records, it appears that depleted uranium had been used in the radiologically controlled area in room 168 of Building 115 and the High Bay area of Building 115. Additionally based on records review, it appears that depleted uranium had been stored in Building 119, Room 102. An NRC inspection in dated May 28, 1998, stated it was in Building 119. An inventory dated August 19, 1992, stated that depleted uranium was stored in the room. Please clearly designate the locations.

Prior to termination of a license, 10 CFR 40.36(f), 40.42(k)(4) and 40.62 require that you submit to the NRC certain records. Please submit the following records, or explain why such records are not applicable

- a. for unsealed materials with half-lives greater than 120 days, records for disposal made pursuant to 10 CFR 20.2002 (alternate disposal procedures, including burial authorized prior to January 28, 1981), 20.2003 (disposals to the sanitary sewerage system), 20.2004 (incineration of wastes), 20.2005 (disposal of specific wastes including liquid scintillation cocktail and animal

tissue), and 20.2103(b)(4), evaluations of effluent releases.

- b. records important for decommissioning as described in 30.35(g), 40.36(f) and 70.25(g). Examples of such records include but are not limited to: records of contamination, identifying the radionuclides, quantities and concentrations; as-built drawings and modifications of structures and equipment in restricted areas and locations of inaccessible contamination such as buried pipes; a single list, updated at least every 2 years, of areas to which access is limited for the purpose of radiation protection (restricted areas); and records related to the provision of financial assurance.

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office (Address below) and refer to Mail Control No. 609333. If you have technical questions regarding this letter, please call me at (610) 337-5366.

Your reply must be an originally signed and dated letter. The letter may be scanned and submitted as a pdf document attached to an email; or it may be transmitted by facsimile to (610) 337-5269; or it may be sent by regular mail. If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application OR amendment request.

Please respond by e-mail to acknowledge that you have received the e-mail request for additional information.

Region 1 Office Mailing Address: Licensing Assistance Team, US Nuclear Regulatory Commission Region I, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406-2713.

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