**UNITED STATES**
**NUCLEAR REGULATORY COMMISSION**
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

January 24, 2001

Kenneth E. Hitch, P.E.
Chief, Engineering/Planning Division
Department of the Army
New England District
Corps of Engineers
696 Virginia Road
Concord, MA 01742-2751

SUBJECT GSA PROPERTY, WATERTOWN, MASSACHUSETTS

Dear Mr. Hitch:

This responds to your letter of December 27, 2000 summarizing your understanding of the results from the NRC meeting held on November 1, 2000 regarding remediation of the subject property. You requested that NRC defer licensing of the property and proposed a schedule for submittal of the derived concentration guideline levels (DCGL) report and additional site evaluations to support the deferral.

During the meeting we discussed NRC regulatory requirements and different approaches needed to satisfy licensing and cleanup guidelines. These included the requirements for issuance of a specific license under 10 CFR 40.3, “License Requirements,” for possession (or to provide for long-term care) of source material, and the methodology used to meet 10 CFR 20 dose limits for unrestricted site release.

In your “Historical Site Assessment “ (HSA) dated October 2000, it was shown that current soil characterizations identified the presence of depleted uranium at site locations in concentrations exceeding NRC unrestricted release guidelines of 35 pCi/g. The uranium contamination resulted primarily from licensed activities at the Watertown Arsenal. Accordingly, 10 CFR 40.3 requires a specific NRC license for the GSA property. The proposed schedule of expected decommissioning activities refers only to additional site evaluations while actions to remediate licensable quantities of radioactive materials remaining on the property are not described. This does not provide sufficient basis for NRC to consider your request for license deferral.

The HSA was reviewed to determine how NRC staff comments noted in our April 11, 2000 letter to Mr. D. Waskiewicz, U.S. Army Corps of Engineers were addressed. Of particular note are comments related to the “GSA Site as a Whole” (pp. 7-8) concerning construction of buildings on contaminated fill material (comment 2) and extent of subsurface sampling throughout the site (comment 4).

HSA section 4.1, “History”, indicates that uranium ore testing at the Arsenal began in 1946, approximately the same time Buildings 234 and 235 were constructed. Information provided in figures 5-3 and 5-4 identifies soil sample locations adjacent to the buildings. Sample results for material immediately under buildings could not be found in the HSA. Additional details describing the extent of subsurface contamination at sufficient depths throughout the property will be expected in the Sampling and Analysis Plan and Final Status Survey Report.

We acknowledge the Army's efforts to assist the General Services Administration in characterization and cleanup of the property, and the proposed schedule for submittal of the DCGL Report, Sampling and Analysis Plan, and Final Status Survey Report by October 2001. Please keep us apprised of your progress in meeting these goals and we encourage you to continue to coordinate further remediation plans with the GSA.

Should you have any questions, please contact Craig Gordon, NRC project manager at (610) 337-5216. Thank you for your cooperation.

Sincerely,

***Original signed by Mark Roberts***

Ronald R. Bellamy, Chief
Decommissioning and Laboratory Branch
Division of Nuclear Materials Safety

cc:
Michael Borisky, US Army Research Laboratory
Thomas O'Connell, Commonwealth of Massachusetts

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