



UNITED STATES MARINE CORPS
MARINE CORPS LOGISTICS COMMAND
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ALBANY, GEORGIA 31704-0301

45-23645-01NA
63029462/2005001

IN REPLY REFER TO:
5104
L14
MAY 17 2005

From: Commanding General
To: Officer in Charge, Naval Sea Systems Command Detachment,
Radiological Affairs Support Office (RASO), NSWC, PO
Drawer 260, Yorktown, VA 23691-0260

Subj: 30-DAY UPDATE ON THE RESPONSE TO THE RADIOLOGICAL
AFFAIRS SUPPORT PROGRAM (RASP) INSPECTION OF NAVAL
RADIOACTIVE MATERIAL PERMIT NO. 10-67004-T1NP,
AMENDMENT 6, OF 24-28 JANUARY 2005

Ref: (a) Chairman, Naval Radiation Safety Committee ltr
5104/Ser N455C/N45U9011243 of 4 Mar 05
(b) CG, MARCORLOGCOM ltr 5104 L14 of 14 Mar 05
(c) CG, MARCORLOGCOM ltr 5104 L14 of 6 Apr 05
(d) CG, MARCORLOGCOM ltr 5104 L14 of 30 Mar 05
(e) Naval Radioactive Material Permit No. 10-67004-T1NP,
Amendment No. 6, 3 March 2005
(f) CG, MARCORLOGCOM ltr 5104 L14 of 16 May 05

Encl: (1) 30 Day Update to the Response to Findings of RASP
Inspection Conducted on 24-28 January 2005
(2) Items Reported Lost/Missing 14 Mar 05
(3) Assistant Radiation Safety Officer, Robert J. Truver,
Radiological Controls Office, MARCORLOGCOM email of
22 Mar 04
(4) OIC, NAVSEASYSCOMDET ltr 5104/67004 Ser 02/250 of 11
May 05
(5) DoN, MROC Decision Memo 67-2003.5000 of 14 Oct 03

1. Reference (a) is the report of findings for the subject inspection sent by the Chairman, Naval Radiation Safety Committee (NRSC). Reference (b) is the report of missing and presumed lost radioactive commodities in the Marine Corps inventory. Reference (c) is the MARCORLOGCOM response to specific findings corresponding to reference (a).

2. As requested in reference (a), we are providing a progress report for the deficiencies that we were unable to correct within the past 30 days. Enclosure (1) contains the 30-day update for the findings specified in reference (a). We shall

MAY 23

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SECTION 1

NMSS/RGNI MATERIALS-004

Subj: 30-DAY UPDATE ON THE RESPONSE TO THE RADIOLOGICAL
AFFAIRS SUPPORT PROGRAM (RASP) INSPECTION OF NAVAL
RADIOACTIVE MATERIAL PERMIT NO. 10-67004-T1NP, AMENDMENT
6, OF 24-28 JANUARY 2005

continue to provide progress reports every 30 days until all of the corrective actions are completed.

3. Paragraph 4(d) of reference (a) requests a JAGMAN investigation to revisit the failure of the MARCORLOGCOM RADCON office to report the missing 85 chemical agent monitors (CAMs) to the Naval Radiation Safety Committee. The investigation was completed on 8 April 2005.

4. Although we have accounted for approximately 98.7% of our March 2005 inventory, 46 items were not reported for this cycle. Included in the 46 items not reported, are 4 CAMs and 1 ACADA that were not reported for the Sep 2004 inventory. Per enclosure (4), reference (f) lists the 4 CAMs and 1 ACADA that we have declared lost.

5. Enclosure (2) contains a list of ACADAs and CAMs previously identified in reference (b) as lost or missing. These devices are now reestablished back into the inventory.

6. Reference (e) requires an annual leak test of CAMs not in storage. As of 6 May 2005, 526 CAMs do not have a valid leak test, and are under investigation. Any CAMs without a valid leak test will be identified in a Naval Message to be released on 16 May 2005 per references (d) and (e). On 2 May 2005, 500 leak tests kits were sent to Iraq in support of OIF and OEF.

7. As stated in reference (d), MARCORLOGCOM is committed to ensuring that all conditions of our permit are met. We will continue to work diligently to bring the Marine Corps to a level of full compliance.

8. Point of contact at this command is Mr. Larry Davis, DSN 567-5511, or commercial telephone (229) 639-5511.


E. G. PAYNE

Copy to:

CMC

COMNAVSEASYSOM (SEA 04N)

~~Chairman, NRSC (N13)~~

CMC (SD)

**Update to the Response to Findings of RASP Inspection
Conducted on 24-28 January 2005**

I. REFERENCES.

- A. NRSC ltr 5104 Ser N455C/N45U911293 of 25 Mar 05
- B. COMMARCORLOGBASES ltr 5104/67004 L140 of 6 Feb 03
- C. NRSC ltr 5104 Ser N455C/N45U911243 of 4 Mar 05
- D. SCMC ltr 5104/67004 of 12 Mar 04

**II. RESPONSE TO FINDINGS FOR 24-28 JANUARY 2005
RADIOLOGICAL AFFAIRS SUPPORT PROGRAM (RASP) INSPECTION.**

A. Command Program

FINDING A.4.

REQUIREMENTS. NAVSEADET SO420-AA-RAD-010, Section 1.3.8.4 requires the Radiation Safety Officer (RSO) to have written authority allowing direct access to the Commanding Officer on matters dealing with radiation safety.

FINDING.

a. Contrary to the above requirements the Logistics Radiation Safety Officer (LRSO) does not have written authority allowing direct access to the Commanding General.

b. This is a Severity Level IV finding. This is a Repeat finding that was identified during the 24-25 October 2000 inspection.

CORRECTIVE ACTION. The corrective action taken for this finding is adequate and complete per reference (B).

A.7

REQUIREMENTS:

NRMP No. 10-67004-T1NP, Amendment No. 5, Condition 23 requires notification of theft or loss of radioactive material to be reported by OPREP-3 NAVY BLUE Report in accordance with OPNAVINST 3100.6.

NRMP No. 10-67004-T1NP, Amendment No. 5, Enclosure (2), Item 10.D.7 requires that CAMs that are not accounted for in two successive inventory cycles shall be considered lost and shall be reported by issuing a OPREP-3 NAVY BLUE Report.

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FINDING:

Contrary to the above requirements records provided at the time of the inspection identified that approximately 86 CAMs had been missing for more than two inventory cycles without being reported.

This is a Severity Level III finding. This is a Repeat finding that was identified during the 24-25 October 2000 inspection

CORRECTIVE ACTION.

1. Reason for the violation.

a. Background.

(1) During the 24-25 October 2000 inspection, the RASO inspector required an OPREP-3 Navy Blue Report be issued for CAMs that had already been reported as lost by the Naval Radiation Safety Committee to the US Nuclear Regulatory Commission in April 2000 by official correspondence.

(2) During January 2003, the RADCON Office anticipated problems with inventory management because of Operation Enduring Freedom (OEF) and Operation Iraqi Freedom (OIF), and began discussing this problem with the RASO team leader. This discussion included telephone conversations and electronic mail. The Command sent a letter to the RASO OIC on 6 February 2003, reference (B), asking for guidance on this issue. Based on these discussions with the RASO, the RADCON Office began incorporating deferments in their Naval Messages. These messages allowed units in a deployed status for OEF and OIF to not leak test their CAMs and defer reporting their physical inventories until they returned from deployment. The RASO Team Leader confirmed the recommendations in reference (B) to the LRSO via telephone, and by email. However, the LRSO commenced action without receiving official guidance in writing from the RASO or the NRSC. The requirements of the permit cannot be casually waived by phone call or email.

(2) An OPREP-3 Navy Blue Report was not sent for the following reasons. We discovered our data was suspect, and therefore, we did not have confidence in the inventory and could not reconcile the data in a timely manner.

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Furthermore, the ongoing investigation of deployed units and reconciliation of the inventory was complicated by the Naval Messages approved by the LRSO to allow deployed units to defer their inventory reports, and leak testing of devices until their equipment returned from deployment. In addition, a mistake was made interpreting the reporting cycle defined in NRMP No. 10-67004-T1NP, Amendment No. 5. The RADCON staff incorrectly assumed that the OPREP-3 Navy Blue Report would not be required until they had completed their investigation of the September 2004 inventory, and incorrectly applied the two cycle reporting requirement to two years, rather than six-month cycles. This meant that only devices not inventoried prior to September 2002 would require an OPREP-3 Navy Blue Report.

b. Causal factors for the violation.

(1) The LRSO did not confirm a waiver to defer reporting inventories and CAM leak tests, by official correspondence from RASO.

(2) Although discrepancy reports were sent to RASO during April and October 2004, the devices under investigation still required reporting via an OPREP-3 Navy Blue Report per the current permit requirement.

(3) The RADCON Staff did not correctly interpret reporting conditions in the permit pertaining to the requirement for the OPREP-3 Navy Blue, which contributed to the non-reporting of the devices as an OPREP-3 Navy Blue Report as follows:

(i) Although the commodities on this permit are inventoried every 6 months, a mistake was made interpreting a cycle under the Navy Master Materials License to be one year. This is why in reference (D), paragraph 3.c. it states, "The CAM discrepancies, older than September 2002, must be resolved by 30 March 2004, so the Command can notify the Navy Radiation Safety Committee that the devices are either missing or lost." CAM discrepancies older than September 2002 would go back to the March 2002 cycle and hence, 2 years from the 30 March 2004 inventory.

(ii) RADCON Staff also incorrectly interpreted the permit conditions to be that until the September 2004 inventory was finalized, attempts and investigations to locate missing CAMs could continue, and an OPREP-3 NAVY

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BLUE REPORT would not be required until the September 2004 inventory cycle was finalized.

(iii) The RADCON Staff asked for guidance on the need to do the OPREP-3 NAVY BLUE REPORT with the RASO Program Managers and the Marine Corps Health Physics Manager at CMC (SD). These discussions included phone conversations and emails; however, no letter was drafted and sent to the RASO nor the NRSC for guidance on this issue.

2. Corrective steps taken and the results achieved. The Sep 2004 inventory was reconciled via on-site inspections by the RADCON staff, conducted at CONUS Marine Corps bases, and through support from installation and command RSO's at OCONUS bases and stations. In addition, the Commandant of the Marine Corps released MARADMIN 089/05, directing Marine Corps commands to conduct a physical inventory and a JAGMAN investigation of discrepancies that existed beyond two (six-month) reporting cycles. The Command sent its official declaration of Marine Corps losses in a letter addressed to RASO on 14 Mar 2005.

3. Corrective steps to be taken to avoid further violations.

(1) The Command commits to assure inventories will be reconciled and completed in a timely manner, even if electronic media fails.

(2) The Command will not deviate from permit requirements without an official correspondence from the NRSC or RASO.

(3) A request to amend NRMP 10-67004-T1NP shall be submitted to replace reporting the loss of devices via an OPREP-3 Navy Blue Report, with a formal correspondence from the Command.

(4) The staff training on permit requirements will be completed by 30 May 2005. This will include the amendment no. 6.

d. DATE WHEN FULL COMPLIANCE WAS OR WILL BE ACHIEVED. A request to amend the permit will be submitted by 30 Jun 2005. Full compliance will be obtained upon approval of the amendment.

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B. Procedures.

B.9

REQUIREMENTS.

NAVSEA SO420-AA-RAD-010, Section 2.3.1.3 requires the operating and emergency procedures in use are the same as those in the NRMP application.

FINDING.

1. Contrary to the above requirement the procedures being used for inventorying CAMs and ACADAs are not the same as the procedures described in the command application, reference (d).
2. Contrary to the above requirement the programs audit conducted by the LRSO dated 9 February 2005 did not use the audit guide provided in the command application, reference (d).

This is a Severity Level IV finding.

CORRECTIVE ACTION.

1. Reason for the violations.

Finding 1.

a. Background. Since the implementation of the NMCI system, access to the DMDS is undependable. Computers migrated to the NMCI no longer have the capability to access the DMDS. Furthermore, when the computer containing the inventory reports migrated to the NMCI, all of the Naval Messages were lost. Emails were used to overcome this deficiency, thus delinquency notices were sent via email rather than as a Naval Message. The permit, however, requires reporting by Naval Message. We were hesitant to send a Naval Message reporting delinquencies to the commands since we were not confident that we received all of the DMDS reports. Emails were sent directly to the action officers bypassing the chain of command.

b. Causal Factors for the violation.

1. The RADCON Staff and material managers did not enforce all of the reporting conditions in the permit. Specifically, Item 10.D.4(c) requires within 15 days after

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notification of the inventory discrepancy or delinquency, the cognizant MEF or MARFOR headquarters will provide to the LRSO a detailed account of the root cause for the discrepancy, immediate corrective actions and actions taken to prevent reoccurrences. The Naval Message reviewed by the RADCON Office for release in November 04, only listed units that had not reported their inventories. The information regarding Item 10.D.4(c) should have been included in the message.

2. Units who did not respond to emails did so without repercussions from their management, because the chain of command was bypassed.

3. Three different material managers assigned to support this program. The training of the material managers was not kept up-to-date.

4. There were no written control procedures in place for reconciliation of the inventory according to permit conditions.

Finding 2.

A. Background. The LRSO mistakenly used an earlier version of internal audit checklist found in the file cabinet.

B. Causal Factor. Document controls were not in place to ensure the correct form was used.

2. Corrective steps taken and the results achieved:

a. The RADCON Office and SCMC collaborated to develop a written quality process control procedure for radioactive material. This procedure includes: physical inventory and reconciliation, database updates, reporting requirements, shipping/receipt, unit deployment, program/command transfer, and recovered/lost material. This document was signed on 11 March 2005. Training on these procedures was completed on 26 April 2005.

b. There is now a dedicated material manager to support this program.

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c. We have a contract in place to assist with inventory management and reconciliation. This contract started on 6 May 2005.

d. We destroyed previous versions of the internal audit checklist.

3. Corrective steps to be taken to avoid further violations:

A. Training. The RADCON Staff and the material managers supporting the office must be trained on permit conditions.

B. The current internal audit checklist will be changed to include verifying the training of all persons who support the program.

C. The checklist for the internal audits will be established as a controlled procedure by annotating the version number of the document.

4. Date when full compliance was or will be achieved:

The request to amend the permit will be submitted by 30 Jun 2005.

E. Surveys and Inspections.

FINDING E.7.

REQUIREMENTS.

Reference (d), Enclosure (2), Item 10.B.2.b requires, in part, the LRSO to perform internal audits to verify compliance with NRMP.

FINDING.

Contrary to the above requirement the internal audit conducted by the LRSO on 9 February 2004 did not include a review of compliance with NRMP requirements such as reviewing leak test records and procedures.

This is a Severity Level IV finding.

CORRECTIVE ACTION.

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1. **The reason for the violation.** The LRSO used the "Not Observed" option on the checklist. This format was approved in the permit, however, the LRSO did not explain why the leak test records were not observed, and did not annotate when the records were scheduled to be reviewed.
2. **Corrective steps taken and the results achieved.** The use of "Not Observed" on the checklist will only be used if circumstances prevent the LRSO or the Assistant LRSO (ALRSO) from viewing a specific element in an audit. This action is not an exemption from the requirements to review the element. Progress on all "Not Observed" elements will be tracked to completion.
3. **Corrective steps to be taken to avoid further violations.** The Internal Operating Procedure (IOP) 101 for inspections will be updated to define the use of the "Not Observed" option on the checklist.
4. **Date when full compliance was or will be achieved.** A request to amend the permit shall be submitted by 30 Jun 2005.

E.9

REQUIREMENTS.

NAVSEA SO420-AA-RAD-010, Section 2.6.12.5 requires all discrepancies found during an inspection or audit to be tracked to completion and a record of the corrective actions maintained for a minimum of three years.

FINDING.

Contrary to the above requirement a number of the discrepancies identified during the internal audits dated 9 February 2004 and 31 October 2004 were not tracked to completion. There was no POA&M for corrective actions, no method for closing out completed actions.

This is a Severity Level IV finding.

CORRECTIVE ACTION:

1. **The reason for the violation.**

- a. The corrective actions were not included in the task-tracking matrix used by the office for either audit.

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b. The tracking method used for the 30 October 2004 audit was esoteric and not all the findings were being tracked. Specifically, an item was identified as unknown, but was not tracked with the other findings.

2. Corrective steps taken and the results achieved.

Previous internal audits were reviewed to add any outstanding corrective actions to the office matrix. All outstanding corrective actions, including the April 2005 internal audit, and supporting POA&M, will be added to the matrix by 19 May 2005.

3. Corrective steps to be taken to avoid further

violations. The Internal Operating Procedure (IOP) 101 for inspections will be updated to include the addition of corrective actions and POA&M to the office matrix for the purpose of tracking all corrective actions to completion. Records of all corrective actions will be maintained for a minimum of three years. This change will be documented in a future amendment.

4. Date when full compliance was or will be achieved. A request to amend the permit shall be submitted by 30 Jun 2005.

F. Required Logs and Records.

F.56

REQUIREMENT.

NRMP 10-67004-T1NP, Amendment No.5, Condition 19, requires, in part, that the command shall conduct a physical inventory every six months to account for all sources and/or devices received and possessed under this permit.

FINDING.

Records provided at the time of the inspection indicates that 934 of the 2565 CAMs were not inventoried since March 2004 or before. 86 of the 934 CAMs have been missing for three inventory cycles or more.

This is a Severity Level III finding. This is a Repeat Finding that was identified during the 9 March 2000, 24-25 October 2000, 16-19-April 2001, 19-20 November 2002 and the 24-26 February 2004 inspections.

CORRECTIVE ACTION.

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1. Reason for the violation.

a. Background. Although this finding is repeated in the referenced inspections, the corrective action in 2001 was to baseline our inventory back to the original purchase documents, and develop a computer database capable of reconciling the inventory. This corrective action was documented and the finding closed during the 23-25 October 2001 inspection. This was not a repeat finding during the 19-20 November 2002 inspection. Both inspections were rated as satisfactory.

b. Causal factors for the violation.

(1) The electronic inventory system used by the RADCON Office was lost prior to the September 2003 inventory cycle. This system was put out of action due to new restrictions imposed by the Navy Marine Corps Intranet (NMCI) system. This electronic inventory system facilitated reconciliation of the CAM and ACADA inventories and leak test actions. It tracked important processes such as the inventory (including the serial number and RUC) and wipe test dates, and the name of each person performing these actions.

(2) The RADCON Office lacked a written procedure for inventory reconciliation that included the process management of information necessary for permit compliance. As new personnel were used in the process, there was not an effective process in place for them to follow. The RADCON Office did not ensure that new personnel in the inventory and inventory reconciliation process were properly trained.

(3) The RADCON Office did not electronically transfer the inventories to a spreadsheet prior to the loss of the computer database.

2. Corrective steps taken and the results achieved.

a. The corrective action to replace the computer database lost to the NMCI system was the development of a web inventory management system.

(1) Phase I of the web inventory program was completed ahead of schedule. Inventory data is being entered into

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the system. The leak test data can now be entered into the new web inventory program as well.

(2) Phase II will allow less man-hours and less input error for the web inventory system. It will also allow regulators like the RASO to see the status of the inventory and other critical permit conditions at any time.

b. The RADCON Office and SCMC collaborated to develop a written quality process control procedures for radioactive material. This procedure includes: physical inventory and reconciliation, database updates, reporting requirements, shipping/receipt, unit deployment, program/command transfer, and recovered/lost material. This document was signed on 11 March 2005. Training on these procedures was completed on 26 April 2005.

c. Excel spreadsheets have been developed to track the inventory. Critical information such as which CAMs and ACADAs have missed one or two inventory cycles is easy to ascertain. Other critical data such as determining, which CAMs are not in storage and do not have a valid leak test are now possible.

(1) We initiated an action plan from February to March 2005 to resolve the discrepancies in the inventory. The plan was highly successful and reduced the number of devices that missed two inventory cycles and were reported as lost from 335 to 38. Recently, all but 5 of the 38 devices have been identified.

(2) The inventory for the CAMs has been reestablished back to the original purchase documents.

(3) A contract is now in place to assist with inventory management and reconciliation. This contract started on 6 May 05.

3. Corrective steps to be taken to avoid further violations.

a. The Command commits to aggressively reconcile the inventories in a timely manner even if electronic media fails.

b. Develop written office procedures that can be used for training new personnel and for refresher training.

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4. Date when full compliance was or will be achieved.

We will continue to use Excel spreadsheets to aid our aggressive pursuit of an accurate inventory, until the web inventory program is completed and fully implemented for the next inventory cycle. We will initiate the next inventory cycle on 15 August 2005.

F. 60

REQUIREMENT:

NRMP 10-67004-T1NP, Amendment No.5, Condition 19, requires, in part, that the inventory records include source identification number, radioisotope, chemical and physical form, activity and date of activity determination and custodian.

FINDING:

The October 2004 inventory records did not include radioisotope, chemical and physical form, activity and date of activity determination.

This is a Severity Level V finding. This is a Repeat finding that was identified during the 24-25 October 2000 inspection.

CORRECTIVE ACTION.

1. The reason for the violation.

a. Every inventory after October 2000 and prior to September 2004 had the required information. The September 2004 inventory had not been finalized. Consequently the inspectors were provided a working copy and not the final version of the inventory.

2. Corrective steps taken and the results achieved.

A memorandum with the required information was placed in the beginning of the inventory files. The information was verified as satisfactory by the RASO during a 26-27 April 2005 site visit by the RASO.

3. Corrective steps to be taken to avoid further violations.

a. All inventory files will have the required information placed in the beginning of the inventory.

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b. The web inventory program will automatically incorporate all of the required information.

4. Date when full compliance was or will be achieved.

Full compliance was achieved and verified on 27 April 2005 by the RASO.

F. 74

REQUIREMENT.

NRMP No. 10-67004-T1NP, Amendment No. 5, Conditions 17.a and 17.b require that each Chemical Agent Monitor (CAM) be leaked tested at intervals not to exceed 12 months when not in storage.

FINDING.

Available records showed that at least 25% of the CAMs fielded under this NRMP have not been leak tested within the specified periodicity in 2004. A review of 20 CAMs, selected at random, showed that only four of the 18 in use had been leak tested within the last year. Five of the 20 had no record of ever being leak tested. 9 March 2000, 24-25 October 2000, 16-19 April 2001 and the 24-26 February 2004 inspections.

This is a Severity Level III finding. This is a repeat finding that was identified during the 9 March 2000, 24-25 October 2000, 16-19 April 2001 and the 24-26 February 2004 inspections.

CORRECTIVE ACTION.

1. The reason for the violation.

a. Background.

(1) During January 2003, the RADCON Office anticipated problems with leak test and inventory management because of Operation Enduring Freedom (OEF) and Operation Iraqi Freedom (OIF), and began discussing this problem with the RASO team leader. This discussion included telephone conversations and electronic mail. The Command sent a letter to the RASO OIC on 6 February 2003, reference (B), asking for guidance on these issues. Based on the discussions with the RASO, the RADCON Office began

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incorporating deferments in their Naval Messages. These messages allowed units in a deployed status for OEF and OIF to not leak test their CAMs and defer reporting their physical inventories until they returned from deployment. The RASO Team Leader confirmed the recommendations in reference (B) to the LRSO via telephone, and by email. However, the LRSO commenced action without receiving official guidance in writing from the RASO or the NRSC. The requirements of the permit cannot be casually waived by phone call or email.

(2) Many units sent us their leak test samples prior to deployment when possible, and some submitted samples when they returned from deployment. At times, the Marine Expeditionary Force (MEF) redirected gear among its units to assure the units deploying for OEF and OIF received 100% of their allowance. Our inability to track the exchange of CAMs among those units within the MEF, made it difficult to ensure that units performed their leak tests. We also lost visibility of the responsible POCs because of these deployments. The resulting loss of control made it difficult to discern which CAMs required leak tests, an action that was compounded by the lack of a reconciled inventory.

b. Causal factors for the violation.

(1) The LRSO did not confirm a waiver to defer reporting inventories and CAM leak tests, by official correspondence from RASO or the NRSC.

(2) The US Army eliminated the leak test requirement for the CAMs all together, except when damaged or for maintenance; Marines likely confused leak test requirements during joint Army/Marine Corps operations.

(3) The frequency and tempo of unit deployments also contributed to a decrease in leak test submissions. We did not have a system in place to compensate for the lack of information.

2. Corrective steps taken and the results achieved.

a. On 27 February 04 we released a Naval Message to rescind the deferment of leak testing CAMs and inventorying their gear.

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b. On 2 May 2005, 500 leak test sample kits were mailed to units deployed for OIF.

c. Since we have reestablished a baseline for our CAMs and reconciled our March 2005 inventory, we were able to develop Excel spreadsheets that allowed us to identify CAMs that did not have a valid leak test.

d. On 16 May 2005 a Naval Message was released directing units with leak test discrepancies to leak test their CAMs. The suspense for the units to meet the leak test requirement is 25 May 2005.

e. In the event the Excel database is lost, the leak test results for 2004 have been printed out by serial number and cross-referenced by RUC.

f. The Consolidated Storage Facilities have already had a positive impact in the ability to leak test the CAMs in a more efficient manner.

3. Corrective steps to be taken to avoid further violations.

a. The Command will not deviate from permit requirements without an official correspondence from the NRSC or RASO.

b. The movement to a web based inventory system for tracking these devices will enhance the visibility of leak test discrepancies. Hard copies of inventories will be maintained incase the electronic accounting system is lost.

c. Recent changes to a radioactive sealed source and device registry make elimination of the leak test for the CAMs a possibility that needs to be investigated. The Command will submit the information and evidence in an official correspondence to the RASO for review and amendment to the permit.

4. Date when full compliance was or will be achieved. We will continue to use Excel spreadsheets to aid our aggressive pursuit of delinquent leak tests, until the web inventory program is completed and fully implemented for the next inventory cycle. We will initiate the next inventory cycle on 15 August 2005.

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I. Site Specific Finding

I. 1

REQUIREMENTS:

NRMP 10-67004-T1NP, Amendment no. 5, Condition 12, requires radioactive material to be used by or under the supervision of individuals trained per the commands NRMP application along with the procedures and information contained in the application packages.

FINDING:

Contrary to the above requirement users at the Consolidated Supply Facilities (CSFs) have not received training per the command NRMP application

This is a Severity Level IV finding.

CORRECTIVE ACTION.

1. The reason for the violation.

a. Background.

(1) NRMP No. 10-67004-T1NP, Amendment No. 5, Item 8, paragraphs A.8(f) and B.7(f), states,

"Initial training for RPAs shall be provided by the appointed IRSO/CRSO. The IRSO/CRSO shall ensure that training is conducted for all designated RPAs; the training provided meets the requirements of MCO 5104.3A and this NRMP; and that training records are maintained for inspection by the LRSO for a minimum of 3 years." A discussion of this change was included in the summary of the NRMP No. 10-67004-T1NP, Amendment No. 4, which removed the requirement for the LRSO to maintain these records.

(2) Users defined in NRMP No. 10-67004-T1NP, Amendment No. 5, Item 8, A.1 and B.1. are

"considered to be any active duty military, reserve military, civilian, or civilian contractor employed by the Marine Corps who will use, maintain, or store devices containing radioactive sources in the performance of their regularly assigned duties." Contrary to this, the

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definition of users in NRMP No. 10-67004-T1NP, Amendment No. 5, Item 7, states, "will be used by military and civilian personnel with the Department of the Navy (DoN) on Department of Defense (DoD) property and temporary job sites throughout the world." This second definition does not include contractors, and therefore may confuse the reader. The intent was to include contractors in both definitions.

(d) The LRSO considered the mission support contractor for the CSF as an extension of the Marine Corp Systems Command (MARCORSYSCOM). An employee of the contractor was designated as the person responsible for radiation safety, and was trained by the Assistant LRSO (ALRSO).

(e) The LRSO determined that the training provided by the ALRSO was sufficient for this person to serve as the company Radiation Protection Assistant (RPA), and therefore, this person could then train the company employees as users.

(2) Causal factors for the violation. The LRSO did not ask for guidance from the RASO concerning whether or not contractor RPAs could be trained by LRSOs, CRSOs, or IRSOs, and if a contractor RPA could train users of the CAM and ACADA. This is because the LRSO interpreted that the permit covered contractors serving as RPAs.

3. Corrective steps taken and the results achieved.

a. Coordination is ongoing with Installation and Command RSO's to provide training for the mission support contractor. We are working to train the majority of CSF personnel by 30 May 2005; however, a CSF has yet to be established for every base, so the training will be accomplished prior to completing the fielding of the last facility, on 31 July 2005. Updates will be provided to report on the status of training.

b. The General Counsel's from the MARCORLOGCOM and MARCORSYSCOM collaborated and provided a legal opinion concerning the risk of tort liability to government trainers. They concluded that, given the regulatory requirements, it was more of a risk to not train contractors than risking lawsuits under the Federal Tort Liability Act.

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c. The program of instruction is under development to standardize this training throughout the Marine Corps.

3. Corrective steps to be taken to avoid further violations. An amendment will be submitted to clarify who can provide training under the NRMP.

4. Date when full compliance was or will be achieved. Full compliance will be obtained upon approval of the amendment, and completion of the training by 31 July 2005.

I. 2

REQUIREMENT:

COMMARCORLOGBASES ltr 5104/67004 L140 (X5511) of 16 Jan 03, Enclosure (2), Item 10.H.1c(1) requires units receiving CAMs to have an approved allowance and be designated as an authorized recipient.

FINDING:

Approximately 1500 CAMs and ACADAs have been shipped to the CSFs without approved allowances being established for these commands.

This is a Severity Level IV finding.

CORRECTIVE ACTION:

1. Reason for the violation.

(a) Background.

(1) During 2003, the Marine Corps established the CSF to correct several program deficiencies: for example, the equipment management responsibilities increased at a cost to unit operational readiness; equipment and management shortfalls were repeatedly identified in audits by GAO, DoD IG, and the Naval Audit Agency; and repeated training and equipment shortfalls were identified in formal status reports.

(2) The course of action selected by the Marine Corps Oversight Council (MROC), a general officer committee chaired by the Assistant Commandant of the Marine Corps, was to consolidate the CSF at each MEF area, enclosure (5).

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The NBC Defense equipment could then be managed from localized facilities that were most responsive and optimized for rapid distribution, which was best for the commander's ownership. It allowed the MEF to have 100% of its NBC Defense equipment Table of Authorized Equipment on hand, and was most supportive to bases and stations and Homeland Defense. Since the supply structure was not part of the NRMP, the LRSO did not consider the overall concept as a change to the supply structure, especially since the equipment was still the responsibility of the unit commander who owned the gear. The concept in effect, would increase the control and accuracy of the MEF radioactive material inventories, which the LRSO considered most valuable.

(3) The concept of "bulk" storage, as used in the NRMP 10-67004-T1NP applications, is for a long-term storage facility where the equipment was not routinely leak tested except prior to use, and devices are usually packaged together in a single container. In fact, the actual number of devices was not defined in our use of the term "bulk" storage. The Defense Logistics Agency (DLA) Instruction 4145.11, (NAVSUP PUB 573, & MCO 4450.12A) has the closest definition for "bulk" in its definition of "bulk packaging", i.e., *"A packaging with no intermediate form of containment, that has a maximum capacity of 400 Kg."* The DLA defines this packaging as a palletized load, which could include a tri-wall container. We compare this with the definition of a "single-packaging", i.e., *"A non-bulk packaging other than a combination packaging."* The bulk storage facilities by these definitions are located at depot level, and are why Marine Corps Logistics Bases Albany and Barstow are specifically listed on the permit application. In contrast to this, each CSF operates as a ready storage and issue facility, and only temporarily holds equipment stored with its individual packaging (SL3 bag) until a Marine Corps unit draws its gear. The CAM and ACADA devices are still owned by the unit commander, and tracked by serial number via the NBC Tracker database. The unit commander is also responsible to inspect his gear at anytime he chooses, and he must provide a report on its status.

(4) Oversight of the government owned-contractor operated facilities is via a mission support contract, issued to the Marine Corps Systems Command. Initially, the consolidation effort was managed by the NBC Defense Systems

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Program Manager, but has since been delegated to the Strategic Logistics Asset Management Office, located under the PM NBC/Combat Equipment Support Systems. The facilities are under the surveillance of the installation RSO, Command RSO, MEF and subordinate command NBC Chiefs, and the unit commander responsible for the equipment stored at the facility.

b. Causal factors for the violation. The concept for the Consolidated Storage Facility and Marine Corps Requirements Oversight Council decision was not coordinated with NAVSEADDET RASO to clarify its operation prior to its implementation.

2. Corrective steps taken and the results achieved.

a. A meeting was held on 27-28 Apr 2005 between the OIC, NAVSEADDET RASO, the RASO Marine Corps Program Manager, and the LRSO, to discuss the progress of corrective actions applied to the findings from the 24-28 Jan 2005 inspection. The functions and operation of the CSF were discussed during this meeting. Several concerns were discussed, and in fact, were incorporated into this response. One area in particular was to define the causal factor, which was a lack of communication on behalf of the LRSO.

b. The LRSO initiated the review of CSF inventories and transfer documents to ensure the robust accounting of devices covered by the NRMP. A member of the RADCON Office is auditing the I MEF from 16-18 May 2005 which will include the audit of supporting CSF facilities and verification of their inventory.

c. Training is being scheduled to ensure contractor employees are aware of the permit requirements and the hazard controls.

3. Corrective steps to be taken to avoid further violations.

a. To prevent discrepancies from occurring on future NRMP applications, the LRSO shall coordinate such actions prior to implementation.

b. A description of the CSF functions and operations shall be included in a permit amendment request.

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4. Date when full compliance was or will be achieved.

(a) Training of contractor personnel shall be completed by 31 Jul 2005.

(b) The request to amend the permit will be submitted by 30 Jun 2005.

I. 3

REQUIREMENT.

NRMP 10-67004-T1NP, Amendment no. 5, Condition 15 requires COMMARLOGBASES to maintain records sufficient to document operational compliance with the conditions of the permit.

FINDING.

Contrary to the above requirement inventory reconciliation records, training records and records of corrective actions were not available for review.

This is a Severity Level IV finding.

CORRECTIVE ACTION.

1. Reason for the violations.

a. Background.

(1) A summary of changes was provided in NRMP No. 10-67004-T1NP, Amendment No. 4, paragraph 3., that revised Item 8, paragraph 8(f)(4), which stated the following:

"Command Radiation Safety Officer (CRSO) and Alternate Command Radiation Safety Officer (ACRSO) Training. Change text to read as follows: CRSO/ACRSO appointment letters and records of successful completion of the required RSO training may ~~comprise~~ consist of a certificate or official memorandum. Appointment letters and course completion records shall be maintained ~~by the LRSO and~~ in local program files indefinitely until appointment is rescinded, and shall be made available for inspection and review by the LRSO and NAVSEADET RASO."

(2) A summary of changes was provided in NRMP No. 10-67004-T1NP, Amendment No. 4, paragraph 3, that revised Item 8, paragraph 8(g)(4), which stated the following:

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"Installation Radiation Safety Officer (IRSO) and Alternate Installation Radiation Safety Officer (AIRSO) Training. Change text to read as follows: IRSO/AIRSO appointment letters and records of successful completion of the required RSO training may ~~comprise~~ consist of a certificate or official memorandum. Appointment letters and course completion records shall be maintained ~~by the LRSO and in local program files indefinitely until~~ appointment is rescinded, and shall be made available for inspection and review by the LRSO and NAVSEADET RASO."

(3) The reason for maintaining training records at the local level and not in the LRSO file was to ensure files are current, and to make certain NRMP compliance was achievable. This change was approved under NRSC ltr 5104, Ser N455C/2U589940 of 7 Jun 02. Submission of this amendment was based on the requirements defined in NAVSEA SO420-AA-RAD-010, Radiological Affairs Support Program Manual, Section 2.2.10, paragraphs 1.a., and 2.a., which required the following:

(i) "Records of initial radiation safety training for radiation workers are a permanent record and shall normally be retained in the individual's service record for military and official personnel folder for civilian employees."

(ii) "Records of required periodic radiation safety training for all categories of personnel shall be maintained by the RSO or activity training office for a period of three years."

b. Causal factors for the violation.

(1) The reconciliation records for leak tests were organized in a three-ringed binder by RUC, and not by serial number. This made it difficult to confirm whether-or-not a specific CAM was leak tested. When the inventory database was lost due to NMCI, the leak tests were no longer captured and tracked by electronic means.

(2) The LRSO did not maintain a file of the training records for the Command and Installation RSO's, and Radiation Protection Assistants in the RADCON Office for review by the inspectors.

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(3) The LRSO did not document the corrective actions from internal audits in the office matrix, which made it difficult to track the actions to completion. This requirement was not documented in the approved IOP 101.

2. Corrective steps taken and the results achieved.

a. The web-based inventory system has been set-up to receive leak test records. For the interim, we created multiple Excel spreadsheets to index current and historical leak test records. We also printed the 2004 leak test records from the web-based inventory program by serial number and RUC. This action will enable the efficient review of our leak test records to aid our aggressive pursuit of delinquent leak tests.

b. We have established a training file in our office, and are now collecting copies of training records and appointment orders from Marine Corps CRSOs and IRSOs.

c. Corrective actions were included in the office matrix for tracking purposes.

3. Corrective steps to be taken to avoid further violations.

a. Leak test records will be stored on the web-based inventory system, which will facilitate the review of information such as CAMs without a valid leak test. These data fields will be automatically reported to the LRSO and the user with access to the system.

b. The Marine Corps Order 5104.3A will need to be updated to reflect the change for disposition of training records to now be kept at the RADCON Office.

c. The Inspection IOP 101 will be updated to state that corrective actions shall be added and tracked via the office matrix.

4. Date when full compliance was or will be achieved.

a. The IOP will be corrected by 30 Jun 2005.

b. Changes to MCO 5104.3A will be submitted to the Headquarters Marine Corps by 30 Jun 2005.

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c. The date for completion of this finding is 15 Aug 2005, which allows for the complete uploading of leak test data, prior to the next inventory cycle.

I. 4

REQUIREMENTS:

OPNAVINST 6470.3 requires Commanding Officers to comply with the conditions of specific NRMPs and comply with instructions concerning the safe receipt, possession, distribution, use, transportation, transfer and disposal of radioactive material.

NAVSEA S0420-AA-RAD-010, and conditions of specific NRMPs.

FINDING:

MARCORLOGBASES management has not executed oversight responsibilities for No. 10-67004-T1NP. The result has been a series of violations that collectively represent a significant carelessness toward responsibility for licensed radioactive material. Adequate measures have not been taken to ensure radioactive commodity operations are being conducted in accordance with Marine Corps, Navy and NRC regulations as well as the command's established operating and emergency procedures. This is demonstrated by the large number of repeat findings:

Failure to provide the LRSO direct access to COMMARCORLOGBASES in writing.

Failure to ensure inventories were conducted and reconciled properly.

Failure to ensure program audits were conducted and deficiencies tracked to completion

Failure to ensure reporting of lost material is made in a timely and appropriate manner. A letter from COMMARCORLOGCOM Chief of Staff, reference (e) to Supply Chain Management Center (Code 55) states that "The CAM discrepancies, older than September' 2002, must be resolved by 30 March 2004, so the command can notify the Navy (sic) Radiation Safety Committee that the devices are either missing or lost." The fact that the assets have not been located and that no report had been made as of the date of the inspection indicates a careless disregard by Senior management for the requirement of the permit.

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This is a Severity Level III Finding. This is also repeat finding that was identified during the 24-25 October 2000 and 16-19 April 2001 inspections.

CORRECTIVE ACTION:

1. Reason for the violations:

a. Background.

(1) This finding was similar to the finding identified as J.10 in the RASP inspection of 24-25 Oct 2000. However, since April 2001, the Command established corrective actions that were confirmed during consecutive satisfactory RASP inspections dated 23-25 Oct 2001, 19-20 Nov 2002, and 24-25 Feb 2004, and has not repeated this finding since then. This finding was not identified during the 16-19 Apr 2001 re-inspection of this Command. A RASP inspection did not take place during 2003.

(2) From April 2003 through January 2005 this Command experienced a number of changes both in structure and personnel. The Material Command, once encompassed both Systems Command and Logistics Bases, reduced in size and mission and was designated the Logistics Command on 8 May 2003. During this two-year time-period, the NRMP management was replaced by four Commanding Generals, three Chiefs of Staff, and two Executive Deputies. Continuity in structure was ever changing.

(3) To keep abreast of information, the Commanding General, executive staff, and supporting staff meet regularly on Monday mornings to discuss issues of past, current, and upcoming importance. These issues are documented in the Command's Weekly Highlights. The LRSO provides updates in this forum.

(4) Demanding operational and training missions, and frequent Marine Forces deployments took its toll on the reporting and accuracy of radioactive material inventories and leak tests. Management anticipated that this event would cause havoc in its ability to comply with RASP requirements, and thus, sought guidance and support from the NAVSEADET RASO and NRSC in reference (B). The underlying reason for this request was because senior management was concerned that the safety of Marines

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deployed to OEF and OIF could be jeopardized if they were distracted from their mission, simply to meet less hazardous administrative provisions to inventory and leak test devices.

b. Causal factors for the violations.

(1) The Command lacked a reference guide to provide senior management with information regarding their responsibilities and important actions for NRMP compliance.

(2) Management may not have always been aware of the results of internal audits and information important to compliance. Corrective actions were not recorded in the Weekly Highlight submissions to the Commanding General.

(3) Senior management could not report on the loss or location of assets until the inventory was completely reconciled, which included the cooperation of operational units deployed to OEF and OIF.

(4) The assumption that the MCO 5104.3A adequately provided for the LRSO to have access to the Commanding General, without having to spell out the designation in the LRSO appointment order.

2. Corrective steps taken and the results achieved.

a. New appointment orders were completed on 14 Feb 2005. The finding was resolved and closed by reference (A).

b. Senior management is apprised of important issues related to the NRMP program via inputs by the LRSO to the Weekly Highlights and weekly staff meetings.

c. The Command reported its official CAM and ACADA losses via official correspondence on 14 Mar 2005. This was accomplished by directing the RADCON staff to conduct physical inventories of assets at user locations, and by soliciting support from the Commandant of the Marine Corps to direct Marine Forces Commanders to conduct physical inventories, and to conduct JAGMAN investigations on inventory discrepancies that existed for two or more inventory cycles.

d. A JAGMAN investigation was completed per reference (C).

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3. Corrective steps to be taken to avoid further violations.

a. An appropriate document will be developed as a reference guide to provide senior management with information regarding responsibilities and important actions to complete. This guide will be used during briefings to incoming members of senior management.

b. Important dates, actions, and the status of corrective actions will continue to be included in the Weekly Highlight submissions from the RADCON Office.

4. Date when full compliance was or will be achieved. The reference guide will be completed by 30 Jun 2005. It will be established as the official document provided to senior management to inform them of duties and responsibilities necessary for compliance to NRMP conditions.

I. 5

REQUIREMENT:

Reference (d), Enclosure (2), Item 7 states that the LRSO is responsible for radioactive commodities and devices that are distributed for use throughout the entire Marine Corps, and controlled and managed centrally by the Marine Corps RADCON Office at MARCORLOGBASES, Albany, Georgia. This individual has responsibility for accountability and management for radioactive commodities used throughout the Marine Corps.

FINDING:

COMMARCORLOGBASES LRSO has not executed his responsibilities for radioactive commodity operations as evidenced by the number and severity of findings identified during the inspection and the careless disregard shown toward management of the permit. The LRSO demonstrated careless disregard toward his responsibilities by:

Failure to follow-up and ensure the Supply Chain Management Center took actions to find the missing CAMs, after having references (e) issued and then failing to report the 86 missing CAM as required.

Failing to conduct inventories and internal audits using the procedures committed to by the command reference (d).

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Failing to perform internal audits to verify compliance with the NRMP.

Failing to conduct a physical inventory every six months to account for all sources and/or devices received and possessed under this permit. The process for inventorying and accounting for lost/missing assets is passive at best and resulted in 934 CAMs that were not inventoried during the September 2004 inventory cycle. The failure to complete an accurate inventory that would account for all assets held under this NRMP has been identified in each of the previous five inspection.

Failing to conduct leak tests of the CAMs at the required intervals. This finding has been made in four of the last five inspections.

Failing to ensure individuals had received proper training prior to allowing them access to licensed material.

Failing to ensure the proper allowances had been established before allowing the CAMs and ACADAs to be shipped to the CSFs for storage.

Failing to maintain records sufficient to document operational compliance with the conditions of the permit.

This is a Severity Level III finding.

CORRECTIVE ACTION:

1. Reason for the violations:

a. Background.

(1) The Material Managers, newly assigned to the CAM and ACADA programs, were not experienced in the requirements of the NRMP program. Despite considerable efforts by the RADCON Office to inform them of the NRMP requirements, the Supply Chain Management Center personnel could not resolve the discrepancies in the CAM and ACADA inventories. Consequently, the RADCON Office took over the function to reconcile the inventories. Since the loss of the computer database system due to the NMCI migration, the Office resorted to using Excel spreadsheets and paper copies of files to perform this tedious function.

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(2) The process to account for assets, and subsequent inventory reconciliation is totally dependent upon the quality of data and participation of the users in the field. In this permit, the users are primarily the operational forces. Demanding operational and training missions, and frequent Marine Forces deployments took its toll on the reporting and accuracy of radioactive material inventories and leak tests. Management and the LRSO anticipated that this event would cause havoc in the ability to comply with RASP requirements, and thus, sought guidance and support from the NAVSEADET RASO and NRSC in reference (A). At the time it was felt that the leak test and inventory placed an undue hardship on Marines engaged with the enemy. Numerous discussions took place between the RASO Team Leader and the LRSO concerning these issues. As was expected, the inventory and leak test programs did suffer. The non-reporting units made it difficult to accurately account for all devices under the permit. In addition to these discrepancies, the problems were magnified because units that deployed, changed their RUCs, and also exchanged gear in Iraq and Afghanistan without documenting the exchanges using the normal tools, such as the DD Form 1348 or the unit Consolidated Memorandum of Record. We discovered another complication when we found out that NMCI no longer allowed access to the DMDS Naval Messaging system. We also found that the DMDS was not functional all of the time. In fact, some commands sent their inventories via the DMDS Naval Message board and we never saw the data. These factors made it difficult to notify commands of their delinquencies, when we were not sure ourselves if a unit was delinquent.

(3) NRMP 10-67004-T1NP, Amendment No. 5, Item 8, paragraphs A.8(f) and B.7(f), states the following:

"Initial training for RPAs shall be provided by the appointed IRSO/CRSO. The IRSO/CRSO shall ensure that training is conducted for all designated RPAs; the training provided meets the requirements of MCO 5104.3A and this NRMP; and that training records are maintained for inspection by the LRSO for a minimum of 3 years."

A discussion of this change was included in the summary of NRMP 10-67004-T1NP, Amendment No. 5.

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(4) Although the phrase, "shall be provided by the appointed IRSO/CRSO" could be interpreted to mean that the IRSO/CRSO requests or hires someone to conduct the training of RPAs, reference (D) does not specifically state that contractors can train RPAs. Albeit, the principal employee of the contractor, responsible for training the contract employees was in fact, trained by the Assistant LRSO. The LRSO determined that the training provided by the ALRSO was sufficient for this person to serve as the company Radiation Protection Assistant (RPA), and this person could then train the company employees as users.

(5) During 2003, the Marine Corps established the Consolidated Storage Facilities (CSF) to correct several program deficiencies: for example, the equipment management responsibilities increased at a cost to unit operational readiness; equipment and management shortfalls were repeatedly identified in audits by GAO, DoD IG, and the Naval Audit Agency; and repeated training and equipment shortfalls were identified in formal status reports.

(6) The course of action selected by the Marine Corps Requirements Oversight Council (MROC), a general officer committee chaired by the Assistant Commandant of the Marine Corps, was to consolidate the CSF at each Marine Expeditionary Force (MEF) area, enclosure (5). The NBC equipment could then be managed from localized facilities that were most responsive and optimized for rapid distribution, which was best for the commander's ownership. It allowed the MEF to have 100% of its NBC Defense equipment Table of Authorized Equipment on hand, and was most supportive to bases and stations and Homeland Defense. Since the supply structure was not part of the NRMP, the LRSO did not consider the overall concept as a change to the supply structure, especially since the equipment was still the responsibility of the unit commander who owned the gear. The concept in effect, would increase the control and accuracy of the MEF radioactive material inventories, which the LRSO considered most valuable.

(7) The concept of "bulk" storage, as used in the NRMP 10-67004-T1NP applications, is for a long-term storage facility where the equipment was not routinely leak tested except prior to use, and devices are usually packaged together in a single container. In fact, the actual number of devices was not defined in our use of the term "bulk" storage. The Defense Logistics Agency (DLA) Instruction

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4145.11, (NAVSUP PUB 573, & MCO 4450.12A) has the closest definition for "bulk" in its definition of "bulk packaging", i.e., "A packaging with no intermediate form of containment, that has a maximum capacity of 400 Kg." The DLA defines this packaging as a palletized load, which could include a tri-wall container. We compare this with the definition of a "single-packaging", i.e., "A non-bulk packaging other than a combination packaging." The bulk storage facilities by these definitions are located at depot level, and are why Marine Corps Logistics Bases Albany and Barstow are specifically listed on the permit application. In contrast to this, each CSF operates as a ready storage and issue facility, and only temporarily holds equipment stored with its individual packaging (SL3 bag) until a Marine Corps unit draws its gear. The CAM and ACADA devices are still owned by the unit commander, and tracked by serial number via the NBC Tracker database. The unit commander is also responsible to inspect his gear at anytime he chooses, and he must provide a report on its status.

(8) Oversight of the government owned-contractor operated facilities is via a mission support contract, issued to the Marine Corps Systems Command. The initial consolidation effort was managed by the NBC Defense Systems Program Manager, but has since been delegated to the Strategic Logistics Asset Management Office, located under the PM NBC/Combat Equipment Support Systems. The facilities are under the surveillance of the LRSO, installation RSO, Command RSO, MEF and subordinate command NBC Chiefs, and the unit commander responsible for the equipment stored at the facility. The RADCON Office will play a strategic role of oversight via its audit program.

b. Causal factors for the violation.

(1) The Supply Chain Management Center personnel could not resolve the discrepancies in the CAM and ACADA inventories. Consequently, the RADCON Office took over the function to reconcile the inventories. Since the loss of the computer database system due to the NMCI migration, the Office resorted to using Excel spreadsheets and paper copies of files to perform this tedious function.

(2) An OPREP-3 Navy Blue Report was not sent for the following reasons. We discovered our data was suspect, and therefore, we did not have confidence in the inventory and

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could not reconcile the data in a timely manner. Furthermore, the ongoing investigation of deployed units and reconciliation of the inventory was complicated by the Naval Messages approved by the LRSO to allow deployed units to defer their inventory reports, and leak testing of devices until their equipment returned from deployment. In addition, a mistake was made interpreting the reporting cycle defined in NRMP No. 10-67004-T1NP, Amendment No. 5. The RADCON staff incorrectly assumed that the OPREP-3 Navy Blue Report would not be required until they had completed their investigation of the March and September 2004 inventories, and incorrectly applied the two cycle reporting requirement to two years, rather than six-month cycles. This meant that only devices not inventoried prior to September 2002 would require an OPREP-3 Navy Blue Report.

(3) Documents controls were not in place to make sure the correct forms were used for the February 2004 audit.

(4) Although inventories were requested every six months, it was difficult to reconcile the inventories without the database that was lost due the migration of our computers to the NMCI system. The investigation of the discrepancies was not in compliance with the procedures in the NRMP because email requests were used in place of Naval Messages to be sent via the chain-of-command, and notification of losses was not timely to the NRSC. Emails were used to overcome the loss of the Naval Messages. The permit however, requires reporting by Naval Message. Furthermore, we were hesitant to send a Navy message reporting delinquencies to the Commands since we were not confident we had received all of the Naval Messages. Emails should have been used to compliment Naval Messages and not in lieu of them.

(5) The LRSO used the "Not Observed" option on the checklist. This format was approved in the permit, however, the LRSO did not explain why the leak test records were not observed, and did not annotate when the records were scheduled to be reviewed.

(6) Although a written request for guidance was sent to RASO on 6 Feb 2003, and verbal and email correspondence with the RASO Team Leader concurred with our recommendation to defer inventories and leak tests for deployed units, the

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LRSO did not receive a waiver for this deferment via official correspondence from the RASO.

(7) Causal factors for the violation. The LRSO did not ask for guidance from the RASO concerning whether or not contractor RPAs could be trained by LRSOs, CRSOs, or IRSOs, and if a contractor RPA could train users of the CAM and ACADA. This is because the LRSO interpreted that the permit covered contractors serving as RPAs.

(8) The concept for the Consolidated Storage Facility and Marine Corps Requirements Oversight Council decision was not coordinated with NAVSEADET RASO to clarify its operation prior to its implementation. This is what may have caused the confusion related to the authorized allowance for the CSF.

(9) The reconciliation records for leak tests were organized in a three-ringed binder by RUC, and not by serial number. This made it difficult to confirm whether-or-not a specific CAM was leak tested. When the inventory database was lost due to NMCI, the leak tests were no longer captured and tracked by electronic means.

(10) The LRSO did not maintain a file of the training records for the Command and Installation RSO's, and Radiation Protection Assistants in the RADCON Office for review by the inspectors.

2. Corrective steps taken and the results achieved.

a. A meeting was held on 27-28 Apr 2005 between the OIC, NAVSEADET RASO, the RASO Marine Corps Program Manager, and the LRSO, to discuss the progress of corrective actions applied to the findings from the 24-28 Jan 2005 inspection. The functions and operation of the CSF were discussed during this meeting. Several concerns were discussed, and in fact, were incorporated into this response. One area in particular was to define the causal factor of many of these administrative errors, which was a lack of communication on behalf of the LRSO to seek clarification from NAVSEADET RASO.

b. The Sep 2004 inventory was reconciled via on-site inspections by the RADCON staff, conducted at CONUS Marine Corps bases, and through support from installation and command RSO's at OCONUS bases and stations. In addition,

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the Commandant of the Marine Corps released MARADMIN 089/05, directing Marine Corps commands to conduct a physical inventory and a JAGMAN investigation of discrepancies that existed beyond two (six-month) reporting cycles. The Command sent its official declaration of Marine Corps losses in a letter addressed to RASO on 14 Mar 2005.

c. The RADCON Office and SCMC collaborated to develop a written quality process control procedure for radioactive material. This procedure includes: physical inventory and reconciliation, database updates, reporting requirements, shipping/receipt, unit deployment, program/command transfer, and recovered/lost material. This document was signed on 11 March 2005. Training on these procedures was completed on 26 April 2005.

d. We have a contract in place to assist with inventory management and reconciliation. This contract started on 6 May 2005.

e. We destroyed previous versions of the internal audit checklist.

f. The corrective action to replace the computer database lost to the NMCI system was the development of a web inventory management system.

(1) Phase I of the web-based inventory program was completed ahead of schedule. Inventory data is being entered into the system. The leak test data can now be entered into the new web-based inventory program as well.

(2) Phase II will allow less man-hours and less input error for the web-based inventory system. It will also allow regulators like the RASO to see the status of the inventory and other critical permit conditions at any time.

g. On 27 February 04 we released a Naval Message to rescind the deferment of leak testing CAMs and inventorying their gear.

h. On 2 May 2005, 500 leak test sample kits were mailed to units deployed for OIF.

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i. Since we have reestablished a baseline for our CAMs and reconciled our March 2005 inventory, we were able to develop Excel spreadsheets that allowed us to identify CAMs that did not have a valid leak test.

j. On 16 May 2005 a Naval Message was released directing units with leak test discrepancies to leak test their CAMs. The suspense for the units to meet the leak test requirement is 25 May 2005.

k. In the event the Excel database is lost, the leak test results for 2004 have been printed out by serial number and cross-referenced by RUC.

l. To prevent discrepancies from occurring on future NRMP applications, the LRSO shall coordinate such actions prior to implementation.

m. A description of the CSF functions and operations shall be included in a permit amendment request.

n. The LRSO initiated the review of CSF inventories and transfer documents to ensure the robust accounting of devices covered by the NRMP. A member of the RADCON Office is auditing the I MEF from 16-18 May 2005, which will include the audit of supporting CSF facilities and verification of their inventory.

o. The web-based inventory system has been set-up to receive leak test records. For the interim, we created multiple Excel spreadsheets to index current and historical leak test records. We also printed the 2004 leak test records from the web-based inventory program by serial number and RUC. This action will enable the efficient review of our leak test records to aid our aggressive pursuit of delinquent leak tests.

p. We have established a training file in our office, and are now collecting copies of training records and appointment orders from Marine Corps CRSOs and IRSOs.

q. Corrective actions were included in the office matrix for tracking purposes.

Update to the Response to Findings of RASP Inspection
Conducted on 24-28 January 2005

3. Corrective steps to be taken to avoid further violations. Corrective actions applicable to this finding are listed in the following findings: A.7, B.9, E.7, F.56, F.74, I.1, I.2, and I.3 respectively.

4. Date when full compliance was or will be achieved. All corrective actions will be completed by 15 August 2005.

Item Reported Lost/Missing 14 Mar 05

I. This is our official notification that the following 23 of the 27 CAMs reported as missing/lost in reference (b) have been identified and reestablished into the March 2005 inventory.

CAM's reported Lost/Missing 14 March 2005 September 2004 CAM's missing 2 reporting cycles

Serial No	Cell No	NSN	RUC	Unit ID	Last Inventory
12422	52187	6665-99-725-9996	M98800	ALBANY DLA WAREHOUSE	03/31/01
12471	52318	6665-99-725-9996	M98800	ALBANY DLA WAREHOUSE	02/26/2001
12685	52634	6665-99-725-9996	M98800	ALBANY DLA WAREHOUSE	03/31/01
12721	52295	6665-99-725-9996	M98800	ALBANY DLA WAREHOUSE	DDAG Inventory Sheet
12926	80578	6665-99-725-9996	M13170		CWO FREEMAN
13185	54234	6665-99-725-9996	M21820	SUPPLY OFF 3D AABN 1ST MARDIV	INVENTORY
13705	53966	6665-99-725-9996	M21580		Unknown
13706	53992	6665-99-725-9996	M21580		CWO2 IMPASTATO
14084	54540	6665-99-725-9996	M11110		SSGT JAMES
14285	54104	6665-99-725-9996	M98800	ALBANY DLA WAREHOUSE	INVENTORY
14306	54408	6665-99-725-9996	M69009		GYSGT SAGI
14331	81115	6665-99-725-9996	M27101		
14338	54463	6665-99-725-9996	M98800	ALBANY DLA WAREHOUSE	03/31/01
14360	80164	6665-99-725-9996	M00374		SSGT MILLS
14495	54533	6665-99-725-9996	M11110		CW02 BURNS
14535	54654	6665-99-725-9996	M11110		SSGT JAMES
14553	81457	6665-99-725-9996	M12170		
14556	54403	6665-99-725-9996	M98800	ALBANY DLA WAREHOUSE	03/31/01
15607	21426	6665-99-725-9996	M29001		SSGT JAMES
15615	21322	6665-99-725-9996	M29001		WO BROOKSHIRE
15618	21362	6665-99-725-9996	M29001		WO BROOKSHIRE
15622	21423	6665-99-725-9996	M29001		WO BROOKSHIRE
15794	22003	6665-99-725-9996	M98800	ALBANY DLA WAREHOUSE	6/20/2001

II. This is our official notification that the following 10 of the 11 ACADAs reported as missing/lost in reference (b) have been identified and reestablished into the March 2005 inventory.

ACADA's Reported Lost/Missing 14 March 2005

Serial No	Cell No	NSN	RUC	Unit ID	Last Inventory
03858	03858	6665-01-438-6963	M11160		CPL BULLOCK, J.M.
05272	05272	6665-01-438-6963	M00274		SGT GRAY
05377	05377	6665-01-438-6963	M54063	MARINE CORPS DETACHMENT	SSGT VILLALOBOS
05476	05476	6665-01-438-6963	M21420	2D TANK BATTALION 2D MARDIV	UNKNOWN
06151	06151	6665-01-438-6963	M11160		CPL BULLOCK, J.M.
06177	06177	6665-01-438-6963	M11230	3RD BN 7TH MARINES ATTN SUPO	LCPL CROSS
06701	06701	6665-01-438-6963	M11160		CPL BULLOCK, J.M.
06768	06768	6665-01-438-6963	M11160		CPL BULLOCK, J.M.
06802	06802	6665-01-438-6963	M11160		CPL BULLOCK, J.M.
07408	07408	6665-01-438-6963	M28321		SGT CORNELIUS

Truver CIV Robert J

From: Gizicki, Thomas Mr TACOM-RI [thomas.gizicki@us.army.mil]
Sent: Tuesday, March 22, 2005 5:57 PM
To: Davis CIV Lawrence S
Cc: Gray GS13 Michael S; Truver CIV Robert J; Ackerman, Cynthia Ms TACOM-RI;
Havener, Jeffrey Mr TACOM-RI
Subject: Marine CAMs & ACADAs Accountability

Larry,

We did a scrub of the UIT database from the resent list you sent us. Of all the M22's, we only found 10 ea belonging to the Army. So far we spent about 32 hrs do this search. Our logistician is now tackling the CAM's which will prove to be more difficult. The records from the UIT database search indicate a code of MMFA01 (Marine) as being received. I am providing you a list below of who to contact to see if they possess the M22. I believe they are of the serialization officer for the activity. Sorry we could not be of further help.

Det S/N	Trans date	activity	POC
M-04494	20010408	ARNG	LT Clark
962-4440			
M-03829	20040903	Ft Bragg	Annette Carter
236-3981			
M-03885	20040903	Ft Bragg	same
same			
M-04328	20040903	Ft. Bragg	same
same			
M-05377	2004903	Ft. Bragg	same
same			
M-04905	20030617	Ft Dix	Donna Warren
994-2162			
M-05272	20044110	Ft Lewis	Jerry
Hill 357-1225			
M-05478	20030604	Ft Polk	Rhonda
Fernandez 863-4667			
M-06177	20030602	Ft. Hood	Lt
Brook 737-6455			
M-07408	20020308	Lexington Blue Grass	No POC
859-293-3672			

Respectfully,
Thomas G. Gizicki
Health Physicist
TACOM Safety
DSN 793-2965
Comm. 309-782-2965
Fax 309-782-6768
local email: gizickit@ria.army.mil
ako email: thomas.gizicki@us.army.mil

-----Original Message-----

ENCLOSURE 131



DEPARTMENT OF THE NAVY
NAVAL SEA SYSTEMS COMMAND DETACHMENT
RADIOLOGICAL AFFAIRS SUPPORT OFFICE (RASO)
NWS P.O. DRAWER 290
YORKTOWN, VA 23691-0290

5104/67004
Ser 02/250
11 May 2005

From: Officer in Charge, Naval Sea Systems Command Detachment,
Radiological Affairs Support Office (RASO)
To: Commanding General, Marine Corps Logistics Command,
Albany GA (Attn: Logistics Radiation Safety Officer)

Subj: OPREP 3 NAVY BLUE

1. During the on-site radioactive commodities review conducted by RASO on 27-28 April 2005, the requirement to submit an OPREP 3 NAVY BLUE was discussed with Commander Fragoso, Executive Secretary of the Naval Radiation Safety Committee. During this conversation, it was determined the requirement to submit an OPREP 3 NAVY BLUE for items that have been missing for two reporting cycles is not required for the April 2005 reporting period. This is a one-time exemption.

2. For further information contact NAVSEADET RASO at DSN 953-4692 or commercial (757) 287-4692.

P.T. Featherston for
J. F. ALDRIDGE

Copy to:
CNO (N455)
CMC (SD)



DEPARTMENT OF THE NAVY
HEADQUARTERS UNITED STATES MARINE CORPS
2 NAVY ANNEX
WASHINGTON, DC 20380-1775

IN REPLY REFER TO
5000
MROC
OCT 14 2003

MROC DECISION MEMORANDUM 67-2003

SUBJ: 23 SEPTEMBER 2003 MARINE REQUIREMENTS OVERSIGHT COUNCIL
(MROC) MEETING: NBC DEFENSE EQUIPMENT CONSTITUTION AND
CONSOLIDATION

Encl: (1) NBC Defense Equipment Constitution and Consolidation
Executive Summary of 17 September 2003

1. The MROC convened at 1030 on 23 September 2003. Attendees were:

Members	Organization
Gen Nyland	ACMC
LtGen Bedard and MajGen Huly	PP&O
LtGen Hanlon	MCCDC
LtGen Magnus	F&R
LtGen Hough	AVM
LtGen Kelly	IAL
Mr. Rhodes	NSRA
Also in Attendance	
Mr. Murphy	CL

2. Agenda. The MROC received a decision brief on NBC Defense Equipment (NBCDE) Constitution and Consolidation. Colonel Mark Monroe of PP&O presented the brief.

3. Presentation Executive Summary. Enclosure (1) is the presentation executive summary. The presentation slides are available on the MROC Homepage at <https://hqipom1.hqmc.usmc.mil/portal/servlet/GlobalLogin>, or can be obtained from the MROC Secretariat.

4. Purpose. The purpose of the brief was to obtain MROC approval of the proposed Marine Corps NBC defense equipment constitution and consolidation plan.

5. Recommendation.

a. That the MROC approve Course of Action #3 (COA #3), which entails MEF area consolidation of NBCDE. All Marine Force (MARFOR) NBCDE assets would be managed from 12 localized Contractor Logistic Support (CLS) Consolidated Storage Facilities (CSF). The NBC Defense Systems Program Manager would centrally manage and fund the CLS. Separate NBCDE block allocations would be made for unit training allowances and units with unique requirements (e.g., MEUs, Chemical Biological Incident Response Force, Air Contingency MAGTFs, Marine

SUBJ: 23 SEPTEMBER 2003 MARINE REQUIREMENTS OVERSIGHT COUNCIL
(MROC) MEETING: NBC DEFENSE EQUIPMENT CONSTITUTION AND
CONSOLIDATION

Security Guard Battalion, Marine Corps Security Force Battalion, and training commands).

b. That the Commandant release an ALMAR message publishing the decision and way ahead.

6. MROC Discussion.

a. DC, PP&O prefaced the brief by stating that NBCDE accountability and readiness have been longstanding issues and the magnitude of the problems was apparent during Operation Iraqi Freedom (OIF) preparations. The proposal would improve NBCDE accountability and readiness while allowing unit NBC personnel to concentrate on unit training vice testing, maintaining, and storing equipment.

b. Col Monroe clarified the following:

(1) The term "facilities" in each COA denotes the number of installations that would have CLS-managed NBCDE CSFs. Each installation would host one or more NBCDE warehouses.

(2) The cost estimates provided for the first four years of the plan include anticipated MARFOR, installation, and unique unit CSF costs.

(3) The Facilities Assessment Team will include representatives from PP&O, I&L, MCCDC, MCSC, the MARFORs, MCLC, MCLB Albany, the installations under consideration, and the CLS contractor.

c. The MROC agreed that NBCDE asset management and facilities should be consolidated. The MROC determined that COA #3 (MEF area consolidation) should be pursued subject to the provisions listed in paragraph 7 (MROC Decisions).

d. The MROC agreed that Unit Commanders will continue to report equipment readiness via SORTS and that this initiative must support that effort. For example, commanders would have access to the facilities and the total asset visibility system would be used to identify commanders' assigned equipment.

e. Col Monroe pointed out that the implementation strategy calls for stock rotations to ensure that each site has the appropriate equipment in terms of lots, shelf-life, and sizes; however, equipment stocks will not need to be processed through a central facility as part of the rotation.

f. The MROC enjoined all concerned to prioritize NBCDE program resource requirements appropriately during POM-06 development to ensure that sufficient resources are provided to effect the consolidation and ensure a viable NBCDE program.

SUBJ: 23 SEPTEMBER 2003 MARINE REQUIREMENTS OVERSIGHT COUNCIL
(MROC) MEETING: NBC DEFENSE EQUIPMENT CONSTITUTION AND
CONSOLIDATION

7. MROC Decisions.

a. The MROC concurred that COA #3 (MEF area consolidation) should be pursued subject to the following provisions:

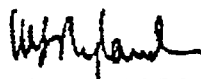
(1) MCB Quantico will be added as a site to support Marine Corps National Capital Region (MNCNR) NECDE requirements.

(2) DC, PP&O (supported by DC, I&L, the MARFORs, and the NEC Defense Systems Program Manager) will consider the consolidation of some NECDE equipment in excess of unit training and homeland defense requirements at one or more centralized locations (e.g., MCLB Barstow) that would facilitate rapid shipping to an Aerial Port of Embarkation (APOE) or Seaport of Embarkation (SPOE).

(3) The Facilities Assessment Team will Address the issue of establishing a site at MCAS New River, as recommended in COA #3. COMMARFORLANT has stated his support for COA #3 modified to omit the MCAS New River site. The MROC is inclined to support COMMARFORLANT, if possible. The team will assess the requirement for a MCAS New River site and forward their recommendation and supporting rationale to DC, PP&O. DC, PP&O will consult with COMMARFORLANT prior to reaching a decision.

(4) The MROC concurred that the NBC Defense Systems Program Manager would manage the consolidation effort and CSFs in the near-term. MCSC will coordinate with DC, I&L and MCLC to eventually transition any appropriate management responsibilities to MCLC.

b. The MROC Chairman agreed to forward the MROC's recommendations to the Commandant for approval. DC, PP&O will prepare an abbreviated brief and draft ALMAR for presentation to the Commandant as soon as practical, and will coordinate with the Assistant Commandant's Office regarding scheduling of the CMC brief.


W. L. NYLAND



UNCLASSIFIED

MROC Executive Summary

Col M.E. Monroe

17 Sep 03

Concept to Execute NBC Defense Equipment Constitution

Purpose

To secure an MROC approval for the preferred USMC NBC Defense Equipment constitution plan.

Background Information

- During Dec 2002, PP&O directed the Program Manager, NBC Defense Systems to develop alternatives to address NBC Defense support issues and to base the alternatives on a centrally managed program.
- During February 2003, a study group was formed and began developing courses of action. The study group included the PM, NBC Defense Systems and representatives from PP&O, I&L, MCCDC, MCSC, MARFORLANT/PAC and LogCom, Albany.

The Problem

- Military Occupational Specialty 5711 NBC Defense equipment management responsibilities have increased at a cost to unit operational readiness.
- GAO, DoDIG and Naval Audit Service audits repeatedly identify shortfalls in NBC Defense equipment management and readiness.
- SORTS reports highlight significant NBC Defense training and equipment shortfalls.

A Solution

The NBC Defense equipment constitution plan developed by the study group will consolidate NBC Defense funding, acquisition and management at the office of the Program Manager, NBC Defense, Marine Corps Systems Command. Operational units will be relieved from NBC Defense equipment storage and maintenance responsibility. Contractor Logistics Support (CLS) will be employed to manage inventory at Consolidated Issue Facilities.

Implementation

We have identified the following three courses of action.

- COA 1: Maximum Consolidation. Majority of CONUS NBC Defense equipment managed from central Dallas Reserve Component Single Site Storage Facility (RCSSSF).
 - Pros: Fewest facilities to maintain. Minimizes space required on USMC installations.

- Cons: Commander's perception (loss of physical possession), Costs of transportation to central location, Single-site asset vulnerability, Limited distribution of equipment for Homeland Defense.

- COA 2: Regional Consolidation. NBC Defense equipment managed from six regional facilities.
 - Pro: Fewer facilities to maintain, Allows MARFOR/MEF to have 100% of NBC Defense equipment Table of Authorized Equipment on hand.
 - Cons: Large regional facilities required for storage at Camp Lejeune and Camp Pendleton, Limited distribution of equipment for Homeland Defense.
- COA 3: Marine Expeditionary Force Area Consolidation. NBC Defense equipment managed from 12 localized facilities.
 - Pro: Most responsive-optimal for rapid distribution, Best for commander's "ownership." Allows MARFOR/MEF to have 100% NBC Defense equipment Table of Authorized Equipment on hand, Most supportive to bases and stations and Homeland Defense, Enables phased implementation.
 - Cons: Biggest challenge is right-sized facility space.

Recommendation

MROC approve COA 3---Publish an ALMAR to inform forces and staff of decision and way ahead.

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