



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
611 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TEXAS 76011-4005**

September 20, 2005

MEMORANDUM TO: Jack E. Whitten, Chief  
Nuclear Materials Licensing Branch  
Division of Nuclear Material Safety

FROM: D. Blair Spitzberg, Chief **/RA/**  
Fuel Cycle & Decommissioning Branch  
Division of Nuclear Material Safety

SUBJECT: SAFETY EVALUATION REPORT FOR EGLIN AIR FORCE BASE

Attached is the Safety Evaluation Report for Eglin Air Force Base, Materials License 42-23539-01AF. The licensee submitted a decommissioning plan (DP) to the NRC by Memorandum dated May 24, 2002. Supplemental information was provided by Memoranda dated November 1, 2002, August 21, 2003, October 27, 2004, January 13, 2005, and August 5, 2005. The licensee requested NRC approval of the proposed DP so it could remediate Test Area C-74L, a former depleted uranium munitions test facility, in accordance with guidance provided in the DP.

The attached Safety Evaluation Report is DNMS/FCDB staff's evaluation of the radiological consequences of the proposed licensing action. This Safety Evaluation Report was prepared using the guidance provided in NUREG-1757, Volume 1, Revision 1, Appendix G, "Template for a Safety Evaluation Report."

The facility was determined to meet the criteria of a Group 4 decommissioning site. Group 4 refers to a site that has site-specific screening criteria with no groundwater contamination. Table 1.2 of NUREG-1757, Volume 1, provides the principle regulatory features of the seven decommissioning groups. Provided below is a status of each of the principle regulatory features for a Group 4 project:

Principle Regulatory Feature	FCDB Comments
NEPA Compliance - completion of an Environmental Assessment	EA & FONSI were published in the Federal Register on July 11, 2005 (70 FR 39804)
Restricted or Unrestricted Use	Licensee requested an unrestricted release
DP Required - Yes or No	Yes - DP submitted May 24, 2002
DP Review Documentation	Safety Evaluation Report (attached)

Radioactive Material Disposition Documentation	This information is expected to be included in the final status survey report
Method for Demonstrating Site is Suitable for Release - Survey or Demonstration	Final status survey report is expected to be submitted to NRC prior to end of 2005
Confirmatory or Side-by-Side Survey	A confirmatory survey was conducted in May 2005 (Inspection Report 030-28641/05-002)
Closeout Inspection	NRC may conduct a closeout inspection concurrent with inspection of shipment of waste material to Envirocare
FRN Used to Inform the Public of Staff Actions	Public informed via Federal Register Notice dated February 3, 2003 (68 FR 5311)
Documentation Used to Support License Termination	NMLB is requested to issue a license amendment to approve the DP; license is not being terminated

The Region has considered whether a consultation with U.S. Environmental Protection Agency is required per the EPA-NRC Memorandum of Understanding dated October 9, 2002. The need for an EPA consultation is under review by the applicable NMSS project manager (Derek Widmayer). The question of whether a consultation is necessary is not clear because DU is not specifically mentioned in Table 1, "Consultation Triggers for Residential and Commercial/Industrial Soil Contamination," of the MOU.

In summary, the review of the Eglin AFB DP is complete. The DP meets the criteria of NUREG-1757 and similar guidance documents; therefore, FCDB approves the DP and its supplements. Please issue a license amendment for Control No. 469166 authorizing the DP dated May 24, 2002, as supplemented by Memoranda dated November 1, 2002, August 21, 2003, October 27, 2004, January 13, 2005, and August 5, 2005, for Eglin Air Force Base Test Area C-74L.

License No. 42-23539-01AF  
Docket No. 030-28641  
Control No.: 469166

Attachment: Safety Evaluation Report

Jack E. Whitten, Chief

-3-

bcc w/enclosure (via ADAMS e-mail distribution):

LDWert

MTMiller, Region I

DBSpitzberg

JEWhitten

RSBrowder

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RIV Nuclear Materials File - 5<sup>th</sup> Floor

SISP Review Completed: RJE

ADAMS: : Yes ☒ No Initials: RJE

: Publicly Available ☒ Non-Publicly Available ☒ Sensitive : Non-Sensitive

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## **SAFETY EVALUATION REPORT**

### **EGLIN AIR FORCE BASE, TEST AREA C-74L DECOMMISSIONING PLAN**

#### **1.0 Executive Summary**

The Department of the Air Force submitted a decommissioning plan (DP) to the NRC by Memorandum dated May 24, 2002. Supplemental information was provided by Memoranda dated November 1, 2002, August 21, 2003, October 27, 2004, January 13, 2005, and August 5, 2005. The licensee requested that the DP for Test Area C-74L at Eglin Air Force Base (AFB) be approved. The NRC is considering the issuance of an amendment to Master Materials License 42-23539-01AF which will approve the DP. This Safety Evaluation Report is the NRC staff's evaluation of the radiological consequences of the licensee's request. Based on the results of this evaluation, NRC staff recommends approval of the DP, and as such, the licensee will be allowed to conduct decommissioning activities in accordance with the DP.

#### **2.0 Facility Operating History**

##### **2.1 License Number/Status/Authorized Activities**

Master Materials License 42-23539-01AF allows the Air Force to possess byproduct, source, and special nuclear material for uses as authorized by the USAF Radioisotope Committee. Possession of depleted uranium (DU) at Eglin AFB is allowed by Radioactive Material Permit FL-08883-02/01AFP. Condition 15 of the Permit states in part that the permittee (Eglin AFB) is authorized to collect and store DU fragments at Test Area C-74L.

##### **2.2 License History**

Test Area C-74L consists of a 4-acre radiologically controlled area, fire control/ballistics building, gun corridor, target area, well house building, drum storage area, and surrounding land. From late-1974 to 1978, the area was used for pre-production testing of a gun system which used DU ammunition. The licensee subsequently elected to discontinue DU munitions testing at this location. An estimated 16,315 pounds of DU was expended at the site. Approximately 9,257 pounds of DU were collected and disposed of during remediation activities conducted between March 1978 and June 1987. The remainder of the material has since been remediated, was dispersed or vaporized as part of DU ordinance testing, or remained onsite.

##### **2.3 Previous Decommissioning Activities**

The portions of the site that may have been contaminated with DU fragments include the ballistic building interior, ballistic building and well house building exteriors, drum storage area, target area, 4-acre radiologically restricted grounds, and two drainage ditches. Limited reclamation activities have been conducted several times since 1980. A detailed site characterization study was conducted during 1999 followed by additional limited characterization studies during 2000-2001. At that time, the only area remaining to be remediated was the 4-acre radiologically controlled area. The permittee

subsequently remediated this area between 2002-2005. As of May 2005, the date of the last NRC inspection, the licensee had completed the reclamation of the site. The licensee conducted the decommissioning prior to NRC approval of the DP because of funding and scheduling considerations. The licensee is authorized by the master materials license to conduct reclamation; however, the licensee cannot free-release the property without prior NRC approval.

#### 2.4 Spills

The radioactive material possessed at this site was DU, a heavy metal. The permittee did not use radioactive materials in liquid form. There is no evidence of surface spills at the site.

#### 2.5 Prior Onsite Burials

There is no evidence that the permittee buried radioactive material at the facility. The site permit does not specifically authorize burial of wastes.

### 3.0 Facility Description

#### 3.1 Site Location and Description

Test Area C-74L is located in Walton County, Florida, within the north-central portion of Eglin AFB. The site is located approximately 14 miles northwest of the city of Niceville, Florida. The test area lies within Section 11 of Range 21 West, Township 2 North.

#### 3.2 Population Distribution

The test area is located on Eglin AFB property. The area around the site is sparsely populated. Since the test area continues to be used as a test range for non-radioactive munitions, there are no houses or businesses in the immediate vicinity of the property. The nearest resident is about 3.6 miles from the site.

#### 3.3 Current/Future Land Use

The licensee plans to continue using the site for munitions testing. The area is closed to members of the public. Hunting and other recreational activities are not allowed. Because of the inherent danger of munitions testing and potential for unexploded ordnance, the area will most likely be tightly controlled by the licensee for the foreseeable future.

#### 3.4 Metrology and Climatology

Eglin AFB has a humid, semi-tropical climate. The area experiences seasonal tropical storms and hurricanes. Winters are mild with occasional frost between November and February. Average annual rainfall is over 63 inches. The wettest month is July; the driest month is October. The average high temperature is 90.8 degrees Fahrenheit during July; the average low temperature is 38.2 degrees in January.

### 3.5 Geology and Seismology

The area surrounding the site is characterized by flat to rolling uplands, typical for coastal plains. The ground elevations range from 200 to 250 feet above mean sea level. The area is dissected by perennial creeks within steep ravines. Rocky Creek is located about 700 feet south of the site, and a tributary to Rocky Creek is located about 1800 feet west of the site. A small dammed pond is located on the western tributary. The site itself exhibits little relief, although the terrain around the site is wooded and slopes steeply to the south towards Rocky Creek and its tributaries.

Florida is considered a stable geological area with little potential for large tremors or earthquakes. Florida does not have any volcanoes or documented faults, two geological events that cause earthquakes.

### 3.6 Surface Water Hydrology

There are no ponds or streams on the property. As stated earlier, Rocky Creek is located about 700 feet south of the site and a tributary to Rocky Creek is located about 1800 feet west of the site. Because of the relatively low site relief and sandy soils, most storm water runoff will percolate into the subsurface or be subjected to evapo-transpiration. An asphalt-covered earthen berm is located on the southern portion of the site to inhibit storm water runoff into Rocky Creek. A shallow drainage ditch trending northeast has been constructed to draw storm water away from the eastern part of the site.

### 3.7 Groundwater Hydrology

Groundwater is found about 50-60 feet below land surface. The surficial aquifer beneath the site extends to an approximate depth of 125 feet below land surface. The Pensacola Clay separates the surficial aquifer from the underlying Floridan aquifer system. The Pensacola Clay layer is about 160 feet thick and extends to a depth of about 285 feet below land surface. Groundwater flows generally south towards Rocky Creek and its tributaries.

There is one active water supply well on the property. Well No. 38 is connected to the Floridan aquifer system at a depth of 644 feet below land surface. The well is located up-gradient of the radiologically controlled area and is not considered a potential target for contaminant migration.

### 3.8 Natural Resources

The permittee claims that there are no natural resources in the vicinity of the test range which may be impacted by remediation of the area.

### 3.9 Ecology/Endangered Species

Eglin AFB is the home to several endangered species including the Okaloosa snail darter, indigo snake, and red cockaded woodpecker. The Air Force had concluded that the proposed activities will have no effect on either species or habitat. During the

development of the Environmental Assessment, the NRC consulted with the U.S. Fish and Wildlife Service of Panama City, Florida. The U.S. Fish & Wildlife Service concluded that the proposed action was not likely to adversely affect resources protected by the Endangered Species Act of 1973; therefore, no further consultation is required.

#### **4.0 Radiological Status of Facility**

##### **4.1 Contaminated Structures**

A site characterization report was provided in Section 8 of the DP. There were three structures onsite, a gun ballistics building, a well house, and the gun targets. The interior and exterior of the gun ballistics building were designated as Class 3 areas using the guidance provided in NUREG-1575, Revision 1, "Multi-Agency Radiation Survey and Site Investigation Manual" (MARSSIM). The exterior of the well house was also designated a MARSSIM Class 3 area, although it was constructed after discontinuance of DU munitions testing.

The gun targets included large concrete blocks and a catch box. The target catch box structure was recently reclassified as a MARSSIM Class 1 area based on final status and NRC confirmatory survey results. The concrete blocks were considered unaffected because they had been moved into the target area after discontinuance of DU testing. The concrete blocks were surface surveyed and free released from the site during March 2005. The original concrete blocks were disposed at a low-level waste facility about 1980.

##### **4.2 Contaminated Systems and Equipment**

As stated earlier, decommissioning activities have occurred several times since 1980. Remaining contaminated equipment includes a metal gun mount structure located adjacent to the ballistics building in the radiologically controlled area. This area was classified as a MARSSIM Class 1 area because of the level of contamination discovered during previous radiological surveys. No other systems or equipment currently require remediation or disposal.

##### **4.3 Surface Soil Contamination**

Surface soil contamination consisted primarily of DU fragments in the 4-acre radiologically controlled area. This area has been designated as a MARSSIM Class 1 area. The vast majority of the fragments were expected to be in the top 6-inches of soil, although DU fragments have been found up to 4 feet below the ground surface in discrete locations.

The licensee developed derived concentration guideline levels (DCGLs) that correspond to the 25-millirem per year dose limit specified in 10 CFR 20.1402. The NRC-approved DCGL is 469 picocuries total uranium per gram of soil. If the licensee removes all DU contaminated soil that is greater than the soil DCGL, then the site is assumed to be capable of being released for unrestricted use.

#### 4.4 Subsurface Soil Contamination

Subsurface contamination, up to 4 feet in depth, was not anticipated but was discovered during remediation in a few discrete locations in the radiologically controlled area. Widespread subsurface contamination was not identified during remedial action, site characterization, and final status surveys.

#### 4.5 Surface Water

There are no ponds or streams within the test area. Nearby creeks and drainage ditches were radiologically sampled as part of characterization studies. No contamination above the soil DCGL was identified in the streams and ditches.

#### 4.6 Groundwater

The NRC-approved wide area average soil concentration DCGL ( $DCGL_w$ ) of 469 pCi/g was based on dose modeling. The NRC's probabilistic analyses indicated that if the soil were uniformly contaminated with an average of 469 pCi/g of DU, the adult peak dose (25 millirems) would occur at 874 years into the future.

Dose modeling suggested that the limiting pathway was the drinking water pathway. Although the remaining DU has a possibility of negatively impacting groundwater in the long term, the critical group doses will be within current regulatory limits as long as the soil contamination remains at or below the release limit of 469 pCi/g. The NRC conducted confirmatory sampling during its May 2005 inspection at Test Area C-74L. Confirmatory sampling indicated that the DU concentrations in soil were less than a third of the release limit.

Although the onsite well was located up-gradient of the radiologically controlled area, the permittee collected one water sample from the onsite well during June 2005 for analysis of total uranium concentration in the groundwater. The sample result indicated that the total uranium concentration was less than the instrument detection level. There are no other wells within a mile of the site.

### 5.0 Dose Modeling Evaluations

#### 5.1 Unrestricted Release using Screening Criteria

The licensee conducted dose modeling evaluations using site-specific information, not generic screening criteria.

#### 5.2 Unrestricted Release using Site-Specific Information

Section 2.5 of NUREG-1757, Volume 2, "Consolidated NMSS Decommissioning Guidance," recommends that licensees demonstrate compliance with the dose criteria by using dose modeling or DCGLs and final status survey results. The licensee's request to release the site for unrestricted use will be based on use of DCGLs and final status survey results.



In the DP, the licensee proposes DCGLs for building interior surfaces, building exterior surfaces, equipment, and site soils. Through the internal Technical Assistance Request review process, the NRC accepted the licensee's building and equipment DCGLs but rejected the licensee's soil DCGL. The NRC proposed an alternate wide area average soil concentration  $DCGL_w$  to the Air Force by letter dated April 24, 2003. By Memorandum dated August 21, 2003, the licensee accepted the NRC's alternate proposal for soil DCGL. The NRC-approved DCGLs consist of:

- Building interior  $DCGL_w$  of 99 dpm/100 cm<sup>2</sup> net alpha
- Building exterior  $DCGL_w$  of 5000 dpm/100 cm<sup>2</sup> net alpha
- Equipment  $DCGL_w$  of 5000 dpm/100 cm<sup>2</sup> net alpha
- Soil  $DCGL_w$  of 469 pCi/g total uranium

Because DU fragments are randomly dispersed in the soil, the licensee proposed using ambient gamma scan results to supplement onsite soil sampling. Accordingly, the licensee proposed an elevated measurement comparison DCGL ( $DCGL_{EMC}$ ) of 22,000 cpm as measured on Field Instruments for the Detection of Low-Energy Radiation (FIDLERs). The count rate of 22,000 cpm corresponds to a DU concentration of 300 pCi/g in soil. The NRC staff has determined that this methodology is acceptable because the DU is not homogeneously mixed in the site soils.

Upon completion of the decommissioning project, the licensee is expected to submit the final status survey results to the NRC for review and approval. In addition, the NRC conducted confirmatory sampling during May 2005. If the results of the final status survey and any confirmatory surveys performed are below the NRC-approved DCGLs, the site will be found to be in compliance with the annual dose limit provided in 10 CFR 20.1402. The licensee is expected to submit the final status survey report to the NRC by the end of calendar year 2005.

### 5.3 Restricted Release using Site-Specific Information

The licensee did not request a restricted release of the site as allowed by 10 CFR 20.1403.

### 5.4 Release Involving Alternate Criteria

The licensee did not request a site release using alternate criteria for license termination as allowed by 10 CFR 20.1404.

## 6.0 Decommissioning Activities

### 6.1 Contaminated Structures

A detailed remedial action plan is provided in Section 9 of the DP. Contaminated structures, primarily the gun target catch box, will be remediated as necessary to ensure compliance with the NRC-approved building interior and exterior  $DCGL_w$ . If the structures cannot be remediated, then the permittee plans to dispose of the material as low-level radioactive wastes.

## 6.2 Contaminated Systems and Equipment

Contaminated systems and equipment, primarily the metal gun mount slots located adjacent to the ballistics building, will be remediated as necessary to ensure compliance with the NRC-approved equipment DCGL<sub>w</sub>, otherwise, the material will be disposed as radioactive wastes.

## 6.3 Soil

Identification and removal of contaminated soil will be conducted using a combination of ambient gamma radiation surveys and soil sampling. A worker will perform a walk-over survey of the area using a FIDLER detector. Areas exceeding the action level (22,000 cpm) will be remediated using hand-held tools or a back-hoe tractor. Soil samples will be collected to supplement the walk-over survey to ensure that the area has been effectively remediated of DU fragments. The results of the soil samples will be compared to the NRC-approved soil DCGL<sub>w</sub>. Following completion of the in-process remedial action surveys, a final status survey will be conducted to ensure that the site has been effectively remediated. Remediated soils will be stored onsite and subsequently disposed at an offsite licensed low-level waste disposal facility.

## 6.4 Surface and Groundwater

There is no surface water at the site. Previous soil sampling events indicated that the local creeks and drainage ditches did not contain radioactive material in excess of the soil DCGL<sub>w</sub>. The permittee installed an earthen berm to help prevent storm water runoff from washing DU fragments into Rocky Creek and its tributaries.

The NRC staff concluded that previous licensed operations most likely did not result in radioactive material being introduced into the groundwater, in part, because of the depth of the water table (50-60 feet below surface) relative to the depth of the DU fragments (less than 4 feet below surface). As discussed in Section 4.6 above, any residual DU has the possibility of negatively impacting the drinking water pathway in the long term. As long as the soil DCGL<sub>w</sub> remains below 469 pCi/g, then critical group doses will not exceed the current regulatory limit of 25 millirems per year.

## 6.5 Schedules

A preliminary schedule was included in Section 6 of the DP. The licensee originally planned to complete reclamation during 2002. The licensee chose to commence with decommissioning because of timing and funding considerations. Site reclamation was subsequently complete by May 2005. The licensee is expected to submit the final status survey report to the NRC by the end of calendar year 2005.

## 7.0 Project Management and Organization

Details of the licensee's proposed organization are provided in Section 7 of the DP. The work was to be conducted by contractors under the oversight of the Air Force.

Technical support services were also provided by the U.S. Army Corps of Engineers. Site staffing was reviewed during NRC inspections conducted in February 2003, February 2004 and May 2005. The inspectors determined that the permittee and its contractor had sufficient qualified personnel to conduct the work.

## **8.0 Radiation Safety and Health Program**

Sections 6, 9, and 11 of the DP provided the radiological safety program commitments. Work was conducted primarily by an Air Force contractor. The contractor conducted decommissioning using its internal procedures and radiation safety program. Health and safety controls used during reclamation included protective clothing while in the restricted area and body scans for contamination upon exiting the restricted area. Training was provided to workers, and radiation work permits were used to inform workers of site conditions. The inspectors reviewed the implementation of the licensee's and contractor's radiation safety programs as part of the routine licensing and inspection processes.

During recent NRC inspections, several discrepancies were identified between commitments made in the DP and actual conditions in the field. These discrepancies involved use of silt fencing and plastic sheets, collection of bioassays, and issuance of personnel monitoring. In response, the Air Force submitted proposed changes to the DP. For example, the Air Force chose to discontinue bioassays and personnel monitoring based on actual experience at this site. The licensee provided an explanation for its decision in each instance, and each explanation were reviewed as part of the inspection process.

The major health and safety hazard at the site was unexploded ordnance. Air Force support personnel were available at all times to protect workers from the hazards of unexploded munitions.

## **9.0 Environmental Monitoring Program**

Other than perimeter air sampling, the licensee did not intend to conduct environmental monitoring. Plus, perimeter sampling was only required at the discretion of the on-site radiation safety officer. The permittee planned to establish environmental controls to prevent erosion, to manage storm water runoff, and to minimize dust emissions. The permittee subsequently discontinued some of these environmental controls because reclamation activities had a minimal impact on the environment.

The licensee sampled the environs of the site as part of the site characterization process. Radioactive material in excess of the NRC-approved DCGLs was not identified offsite during recent site characterization studies suggesting that the DU material, a heavy metal, was not migrating outside of the site boundary.

## **10.0 Radioactive Waste Management Program**

The licensee originally estimated that it would remediate about 500 cubic yards of material. In reality, the licensee collected about 1880 cubic yards of material for

disposal. As of May 2005, the material was being stored onsite in accordance with Permit FL-08883-02/01AFP. The packaged wastes consisted of 150 lift liner sacks, 110 B-25 boxes, and 10 roll-off boxes.

Since the original DP submittal in 2002, the licensee changed its plans for disposal of the packaged wastes. In its August 5, 2005, submittal to the NRC, the licensee provided updated information of its waste management plan. The licensee plans to remove all DU waste material from the 120 boxes and place the material in lift liner sacks. The approximately 210 sacks of waste material will be transferred to a local rail spur for loading and transport to an out-of-state disposal site. Once the material has been removed from the site, the former storage area will be radiologically surveyed as part of the final status survey program.

The licensee commits to ship all wastes in accordance with U.S. Department of Transportation requirements including labeling, marking, and radiological surveying. Shipping papers and manifests will be developed as required. The Air Force plans to delegate responsibility for shipment of the wastes to a radioactive waste broker. Details of the broker's responsibilities are provided in the licensee's August 5, 2005, submittal.

## **11.0 Quality Assurance Program**

Quality assurance requirements are provided in Section 12 of the DP. The requirements include control of collected data, control of instrumentation used to collect the data, and quality control checks. The Air Force also conducts an independent annual program review as part of its quality assurance program.

## **12.0 Facility Radiation Surveys**

### **12.1 Release Criteria**

Discussion of the release criteria is provided in Section 5.2 of this Safety Evaluation Report.

### **12.2 Characterization Surveys**

The licensee conducted site characterization surveys as necessary to locate and remediate radioactive material. Site characterization information was provided in Section 8 of the DP. Previous investigations and activities included six soil sampling events that were conducted between 1976 and 1999. Additional characterization studies were conducted by the permittee's contractor in 2000-2001.

### **12.3 Remedial Action Support Surveys**

Remedial action support surveys were conducted as part of reclamation activities. As DU fragments were identified during site characterization surveys or remedial action support surveys, the material was collected for disposal.

#### **12.4 Final Status Survey Design/Report**

The licensee's final status survey plan was provided in Section 10 of the DP and in selected DP supplements. The guidance provided in NUREG-1575, Revision 1, "Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM)," was used in the development of the final status survey plan. The final status survey consists of two major portions, land area surveys and structure surveys.

In general, the final status survey of land areas consists of FIDLER surveys and collection of soil samples. The licensee claims that, once the final status survey is complete, the survey units will have been radiologically surveyed using FIDLER equipment a minimum of six times. Also, at least 90 soil samples will have been collected to supplement the FIDLER surveys.

The building and structure surveys will include measurement of total surface contamination, removable surface contamination, and soil surface scans in the immediate vicinity of the structures. Drains and sumps will be surveyed to ensure that these areas are free of DU fragments. Measurements will include alpha, beta, and gamma contamination surveys. The percentages of the surface areas to be scanned will be based on MARSSIM classification.

As of May 2005, the licensee had completed the final status survey of the site, with the exception of the area where the waste material is being stored. Draft final status survey information, including the licensee's MARSSIM classification of land and buildings, was reviewed as part of the inspection process. The licensee is expected to submit the results of the final status survey to the NRC prior to the end of calendar year 2005.

#### **13.0 Financial Assurance**

Regulation 10 CFR 30.35(f) states that financial assurance for decommissioning must be provided. Regulation 10 CFR 30.35(f)(4) states that in the case of Federal, State, or local government licensees, an acceptable method is a statement of intent containing a cost estimate for decommissioning and that funds for decommissioning will be obtained when necessary. Section 13 of the DP provides a decommissioning cost estimate and a statement that funds have been approved and are available for decommissioning activities.

#### **14.0 Restricted Use/Alternate Criteria**

The licensee did not request a restricted site release as allowed by 10 CFR 20.1403 or use of alternate criteria as allowed by 10 CFR 20.1404. Therefore, this subject area was not reviewed.