



DEPARTMENT OF THE NAVY
OFFICE OF THE CHIEF OF NAVAL OPERATIONS
2000 NAVY PENTAGON
WASHINGTON, DC 20350-2000

IN REPLY REFER TO

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5104

Ser 455C/N5U9011484

08 November 2005

From: Chairman, Naval Radiation Safety Committee
To: Commanding General, Marine Corps Logistics Command, Albany
Via: Commandant Marine Corps, Director Safety Division

Subj: RADIOLOGICAL AFFAIRS SUPPORT PROGRAM (RASP) RE-INSPECTION
OF MARINE CORPS LOGISTICS COMMAND, ALBANY

Ref: (a) OPNAVINST 6470.3
(b) NAVSEAINST 5100.18A
(c) NAVSEA S0420-AA-RAD-010
(d) NRSC ltr 5104 Ser N455C/N45U9011243 of 4 Mar 05
(e) CG MARCORLOGCOM ltr 5104 L14 (x5511) of 7 Mar 05
(f) CG MARCORLOGCOM ltr 5104 L14/L11 of 14 Mar 05
(g) CG MARCORLOGCOM ltr 5104 L14 of 6 Apr 05
(h) CG MARCORLOGCOM ltr 5104 L14 of 17 May 05
(i) CG MARCORLOGCOM ltr 5104 L14 of 1 Jul 05
(j) CG MARCORLOGCOM ltr 5104 L14 of 1 Aug 05
(k) CG MARCORLOGCOM ltr 5104 L11/L14 of 1 Sep 05
(l) CG MARCORLOGCOM ltr 5104 L14 of 30 Sep 05
(m) NRSC ltr 5104 Ser N455C/N5U9011357 of 9 Jun 05

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Encl: (1) Findings of Radiological Affairs Support Program Re-
Inspection of Radioactive Commodity Management
Operations Authorized by NRMP No. 10-67004-T1NP (RASP
Usage Code T) Issued to Marine Corps Logistics Base,
Albany Conducted on 18-20 October 2005 at Marine Corps
Logistics Base, Albany, Georgia
(2) Recommendations for Improving Radioactive Commodity
Management Operations

1. References (a), (b) and (c) designate the Naval Sea Systems
Command Detachment, Radiological Affairs Support Office
(NAVSEADET RASO) as technical support center to the Chairman,
Naval Radiation Safety Committee (CNO N45) and the Naval Sea
Systems Command (SEA 04N). Under this authority, a re-
inspection of radioactive commodity operations managed by the
Marine Corps Logistics Command (MARCORLOGCOM), Albany was
conducted at Marine Corps Logistics Base, Albany, Georgia on 18-
20 October 2005. Team leader for the re-inspection was Mr.
Timothy P. Hart of NAVSEADET RASO.

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Additional inspectors were Lieutenant Commander Jesse Aldridge and Mr. Paul Feeser of NAVSEADET RASO. Captain Lino Fragoso, Executive Secretary, Naval Radiation Safety Committee (Chief of Naval Operations (OPNAV N445)) and Captain Tyrone Naquin, Director, Radiological Controls, Naval Sea Systems Command (SEA 04N) accompanied the inspection team.

2. The re-inspection evaluated radioactive commodity management operations authorized by Naval Radioactive Materials Permit (NRMP) No. 10-67004-T1NP which is issued to Marine Corps Logistics Base, Albany (currently MARCORLOGCOM.) A previous RASP inspection of these operations conducted by NAVSEADET RASO on 24-28 January 2005 resulted in the assignment of an unsatisfactory rating as reported by reference (d). The re-inspection included an evaluation of the operations previously rated unsatisfactory by reference (d) for compliance with references (a), (b), (c), and federal regulations, with verification of the adequacy of the corrective actions delineated in references (e) through (l).

3. The re-inspection resulted in the continuing assignment of an unsatisfactory rating for the overall performance of RASP radioactive commodity management operations under NRMP No. 10-67004-T1NP. While the re-inspection found marked improvement in NRMP management operations and the establishment of a baseline inventory, it also identified two Severity Level III, two Severity Level IV, and three Severity Level V findings. Enclosure (1) provides the findings identified during the re-inspection. Three of the findings identified during the re-inspection were repeat findings. These repeat findings are indicative of ineffectual management of the NRMP. Enclosure (2) provides a recommendation that should improve the command's radioactive commodity management operations.

4. Reference (1) provided the latest 30-day progress report to address the immediate actions and cited inspection findings of reference (d). Completion of corrective actions for two immediate actions and 10 inspection findings are still pending. However, when and if implemented, all proposed corrective actions stated in reference (1) would be considered acceptable for closeout of the January 2005 inspection. Monthly progress reports are required until the corrective actions have been completed.

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5. Per reference (m), progress reports on completion of corrective actions in response to the immediate actions and findings listed in reference (d) shall be provided on the first of each month until all corrective actions have been completed. To reduce the administrative burden, the responses to the findings of the re-inspection may be incorporated into future progress reports on corrective actions in response to reference (d). Therefore, responses to enclosure (1) shall be made on the first of the month to Officer in Charge, NAVSEADET RASO, NWS P.O. Drawer 260, Yorktown, VA 23691-0260. The response shall include: (1) the reason for the violation(s) or, if contested, the basis for disputing the violation(s); (2) corrective steps that have been taken and the results achieved; (3) corrective steps that will be taken to avoid further violation(s); and (4) date when full compliance was or will be achieved. Progress reports are required monthly for corrective actions that cannot be completed within the first month following the date of this letter.

6. For further information, contact NAVSEADET RASO at DSN 953-4692 or commercial (757) 887-4692.



L. L. FRAGOSO

By direction

Copy to:
NRC Region I
COMNAVSEASYS COM (SEA 04N)
NAVSEADET RASO

FINDINGS OF RADIOLOGICAL AFFAIRS SUPPORT PROGRAM INSPECTION
OF RADIOACTIVE COMMODITY MANAGEMENT OPERATIONS
AUTHORIZED BY NRMP NO. 10-67004-T1NP (RASP USAGE CODE T)
ISSUED TO MARINE CORPS LOGISTICS BASE, ALBANY
CONDUCTED ON 18-20 OCTOBER 2005 AT
MARINE CORPS LOGISTICS BASE, ALBANY, GEORGIA

NUMBERING CORRESPONDS WITH CHECKLIST USED DURING INSPECTION	
A.	COMMAND PROGRAM
A.1	<p>REQUIREMENT: NAVSEA S0420-AA-RAD-010, Section 2.12.1.2 requires the inspected command to provide (during the in-brief) a detailed listing of all RASP operations and an accurate inventory of all RASP ionizing radiation sources, and, where applicable, the license or NRMP number which authorizes the operations.</p> <p>FINDING: The inventory of ionizing radiation sources provided at the in-brief was not correct.</p> <p>This is a Severity Level V finding.</p>
A.7	<p>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.</p> <p>FINDING: Commanding General MARCORLOGCOM letter 5104 L14 of 14 March 2005 reported 27 CAMs and 11 ACADAs as missing. Commanding General MARCORLOGCOM letter 5104 L14 of 17 May 2005 reported 23 of the 27 missing CAMs and 10 of the 11 missing ACADAs as being found. The baseline inventory provided during the inspection did not include any of the 23 CAMs and 4 of the 10 ACADAs reported as found. Additionally, these items are not currently reported as missing.</p> <p>This is a Severity Level III finding and is considered a Repeat Finding for failure to report loss of radioactive material.</p>

E.	SURVEYS AND INSPECTIONS
E.7	<p>REQUIREMENT: NRMP 10-67004-T1NP application of 7 June 2002, Item 7.b(6) requires the LRSO to conduct semi-annual audits to ensure radioactive commodities are being handled in accordance with NRMP conditions. Marine Corps Logistics Base Radiological Controls Program Inspection Manual dated 21 September 2001 requires that the results of the audit be reported through an official letter with an attachment that lists the findings.</p> <p>FINDINGS: 1. The internal audit of the Radiological Controls Office by the LRSO conducted on 28 April 2005 had not been finalized as of 20 October 2005.</p> <p>2. The official correspondence reporting the results of the Radiological Controls Office audit of FIRST MEF sites conducted on 16-18 May 2005 had not been issued as of 20 October 2005.</p> <p>This is a Severity Level IV finding.</p>
E.7	<p>REQUIREMENT: Marine Corps Logistics Base Radiological Controls Program Inspection Manual dated 21 September 2001, requires the audits of Marine Corps activities to demonstrate compliance with the NRMP.</p> <p>FINDING: Contrary to the above requirement, the four Radiological Controls Office audits of CSFs conducted by the LRSO on 22-23 August 2005 did not include a review of compliance with NRMP requirements. Specifically, the audits did not evaluate if the command inventory matched the MARCORLOGCOM inventory.</p> <p>This is a Severity Level IV finding and a Repeat Finding.</p>

F.	REQUIRED LOGS AND RECORDS
F.37	<p>REQUIREMENT: NAVSEA S0420-AA-RAD-010, Section 2.8.12 and 10 CFR 30.51(a)(2) require records of transfer of sealed sources be retained for at least three years after such transfer.</p> <p>FINDING: Records of transfer of sealed sources to DLA and to Northrup Grummon were not available for review.</p> <p>This is a Severity Level V finding.</p>
F.45	<p>REQUIREMENT: 10 CFR 30.51(a)(1) requires records of the receipt of sealed sources be retained as long as the material is held by the activity and for periods of at least three years following transfer or disposal of material.</p> <p>FINDING: Receipts for material received from DLA were not available for review.</p> <p>This is a Severity Level V finding.</p>

I.	SITE SPECIFIC FINDING
I.1	<p>REQUIREMENT: COMMARCORLOGBASE letter 5104/67004 L140(X5511) of 16 January 2003, 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 MARCORLOGBASE, Albany, Georgia; and the LRSO has responsibility for accountability and management of radioactive commodities used throughout the Marine Corps.</p> <p>FINDING: The COMMARCORLOGCOM LRSO has not executed his responsibilities for radioactive commodity operations as evidenced by the findings identified during the inspection and the nature of the repeat findings. The LRSO demonstrated his ineffectiveness in managing his NRMP by failing to:</p> <ol style="list-style-type: none"> 1. Provide an accurate inventory at the inspection in-brief; 2. Ensure that lost or missing radioactive material was reported as required; and 3. Perform audits of Marine Corps activities properly and in a timely manner. <p>This is a Severity Level III finding and a Repeat Finding.</p>

RECOMMENDATION FOR IMPROVING RADIOACTIVE COMMODITY
MANAGEMENT OPERATIONS

The Hazardous Material Information Codes (HMIC) and Hazardous Cargo Codes (HCC) for Chemical Agent Monitors, stock number 6665-99-725-9996, and Automatic Chemical Agent Detector Alarms, stock number 6665-01-438-6963, should be updated in the Defense Standardization System (DSS), the Stock Control System (SCS) and FEDLOG.