



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

September 4, 2007

Docket No. 03004552

License No. 19-10306-01

Eric M. Kujala
ECBC Radiation Safety Officer
Department of the Army
US Army Research, Development and Engineering Comm
Edgewood Chemical Biological Center
5183 Blackhawk Road
Aberdeen Proving Ground, MD 21010-5424

SUBJECT: REVIEW OF BUSH RIVER STUDY AREA FINAL STATUS SURVEY PLAN
RADIOACTIVE WASTE MANAGEMENT FACILITY, DRAFT, JULY 2007

Dear Mr. Kujala:

This is in response to your letter dated July 18, 2007. The following is a list of comments associated with the Draft Final Status Survey Plan for Bush River Study Area Radioactive Waste Management Facility, Weston Solutions, Inc., July 2007. Although we normally do not comment on draft submissions, we recognize the level of complexity associated with this site and are submitting the following comments.

1. In section 2.1, please list the county which the site is located. Please include description of current land uses in and around the site along with a summary of anticipated land uses.
2. In section 3.1, you state that the Adamsite Vaults final report provides reasonable documentation that radioactive contamination was minimal in that area. Please submit that report.
3. Table 4-2, Characterization Sample and Measurement Data needs units to be placed in the table.
4. Section 4.2.6 discusses the abandoned 22nd Street Landfill Sump. Survey results need to be included in the document or referenced.
5. Section 4.3.2 references Table 4-3 which should be Table 4-5
6. Section 5.1.2 does not discuss the positive strontium 90, carbon 14, or technicium 99 in the samples listed on Tables 5-1 or 5-2. Why were these contaminants not of a concern?
7. Table 5-1 has two separate groupings of data. Please discuss the difference between the groupings and their significance.

8. The Data Quality Objectives, Table 5-5, gives the specifics for the soil areas but does have the objectives for the building surfaces portion of the release.
9. Section 5.5 states that WESTON maintains a Corporate Quality Assurance Program. The following attributes are contained in the Appendix D, Decommissioning Plan Checklist, NUREG-1757 Volume 1, Rev 2, 'Consolidated NMSS Decommissioning Guidance, Decommissioning Process for Materials Licensees'. Since a decommissioning plan was not required many of the attributes a decommissioning plan need addressed in the Final Status Survey Plan. Please submit the program or provide the following attributes:
 - a. A description of the QA program management organization
 - b. A description of how work performance is evaluated
 - c. An organization chart of the QA program organization
 - d. A commitment that activities affecting the quality of final site survey will be subject to the applicable controls of the QA program and activities covered by the QA program are identified on program defining documents
 - e. A brief summary of the company's corporate QA policies
 - f. A description of the management reviews, including the documentation of concurrence in these quality-affecting procedures
 - g. A description of the quality-affecting procedural controls of the principal contractors
 - h. A description of how NRC will be notified of changes (a) for review and acceptance in the accepted description of the QA program as presented or referenced in the final survey plan before implementation and (b) in organizational elements within 30 days after the announcement of the changes
 - i. A description of how management regularly assesses the scope, status, adequacy, and compliance of the QA program
 - j. A description of the instruction provided to personnel responsible for performing activities affecting quality
 - k. A description of the training and qualifications of personnel verifying activities
 - l. A description of the self-assessment program to confirm that activities affecting quality comply with the QA program
 - m. A commitment that persons performing self-assessment activities are not to have direct responsibilities in the area they are assessing
 - n. A description of the organizational responsibilities for ensuring that activities affecting quality are (a) prescribed by documented instructions, procedures, and drawings and (b) accomplished through implementation of these documents
 - o. A description of the procedures to ensure that instructions, procedures, and drawings include quantitative acceptance criteria and qualitative acceptance criteria for determining that important activities have been satisfactorily performed
 - p. A summary of the types of QA documents that are included in the program

- q. A description of how the licensee develops, issues, revises, and retires QA documents

The following items did not seem to be addressed:

10. A map or drawing of the buildings classified by residual radioactivity levels, divided into survey units with an explanation of the basis for division into survey units.
11. A description of calibration and operational checks of all instrumentation. In particular, what will be the acceptance criteria of the daily source checks.
12. A description of the how the samples to be analyzed in the laboratory will be collected, controlled, and handled.
13. A description of the clean fill placed over the soil areas and how that will affect surveys performed now.
14. A description of how you will determine the random start point of the survey unit.
15. A description of the radiation safety training that the licensee will provide to each employee.
16. A description of any daily worker "jobside" or "tailgate" training that will be provided at the beginning of each workday or job task to familiarize workers with job-specific procedures or safety requirements
17. A description of the documentation that will be maintained to demonstrate that training commitments are being met.

Thank you for allowing us to comment on this document.

Sincerely,

Original signed by Dennis R. Lawyer

Dennis R. Lawyer
Health Physicist
Commercial and R&D Branch
Division of Nuclear Materials Safety

E. Kujala
Department of the Army

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