


Cook, Jackie

From: Jay Pride [JPride@itsi.com]
Sent: Monday, August 29, 2011 9:37 PM
To: Cook, Jackie
Cc: Randy Pride; Kent Baugh
Subject: Notification On use of ITSI License number 04-29353-01
Attachments:  Aug 29 notification to NRC on license use at HPS Site IR-03.pdf

RECEIVED

AUG 29 2011

DNMS

Re: NOTIFICATION OF INNOVATIVE TECHNICAL SOLUTIONS, INC. (ITSI) NRC LICENSE (No. 04-29353-01) USE AT THE FORMER HUNTERS POINT NAVAL SHIPYARD

Background

The U. S. Navy has requested that ITSI provide radiological services in support of the IR-03 Site Characterization & Bench-Scale Treatability Study, Contract No. N62473-IO-D-0808 CTO 002 at the former Hunters Point Naval Shipyard (HPS) in San Francisco, California which is owned by the Navy under exclusive federal jurisdiction. These services have been contracted by the Naval Facilities Engineering Command, Southwest (NAVFAC SW) in support of the Base Realignment and Closure Program Management Office West in San Diego, California. As a requirement of the contract, radiological services will be performed by ITSI under ITSI's Nuclear Regulatory Commission Radioactive Materials License No. 04-29353-01.

If you have any questions please contact me at 865-389-8048.

Jay

Jay Pride
Program Manager DOE & Nuclear
Radiation Safety Officer
Innovative Technical Solutions, Inc.
A Gilbane Company
865-483-5200
865-389-8048 Cell
865-483-1011 Fax



RECEIVED

AUG 29 2011

DNMS

August 29, 2011

Nuclear Materials Licensing Branch
Attn: Jackie Cook
U. S. Nuclear Regulatory Commission, Region IV
612 E. Lamar Boulevard, Suite 400
Arlington, TX 76011-4125

Dear Ms. Cook

Re: NOTIFICATION OF INNOVATIVE TECHNICAL SOLUTIONS, INC. (ITSI) NRC LICENSE (No. 04-29353-01) USE AT THE FORMER HUNTERS POINT NAVAL SHIPYARD

Background

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Radiological operations involving licensed radioactive materials at the former Hunters Point Naval Shipyard were previously authorized by Atomic Energy Commission (AEC) licenses as appropriate for the time of operation. All previous licenses have been terminated. Additionally, previous radiological operations at this site involved the use of 91b materials, radioluminescent materials, technically enhanced naturally occurring radioactive materials (TENORM), and naturally occurring and accelerator-produced radioactive materials (NARM). Currently, the Navy is authorized use of NRC licensed radioactive materials through a NRC Master Materials License and is recognized as owner of the all radioactive materials at HPS. The Naval Sea Systems Command Detachment, Radiological Affairs Support Office (NA VSEADET RASO), as technical support center to the Naval Radiation Safety Committee, oversees radiological work performed by ITSI for the Navy.

IR Site 03 is an irregularly shaped land area measuring approximately 45,000 square feet and located within IR Site 02 Central. IR Site 03 was the location of the former HPS fuel oil reclaiming plant, and is a possible disposal area for assorted shipyard wastes, which may have included 226Ra and 90Sr

No. 5 7 5 9 0 1



devices and oil. The ROCs at IR Site 03 are 137Cs, 226Ra, and 90Sr. The HRA concluded that contamination is likely in this area at moderate to low levels.

Note that an additional site specific memorandum of understanding governs NRC license activities, including radioactive disposal, between all other NRC licensed contractors operating at HPS. The intent of this memorandum is to outline the general applicability and responsibilities between ITSI and the

Navy as it applies to their scope of work and license implementation. This memorandum is also intended for use to meet the requirements of ITSI license No. 04-29353-01, Conditions 13 and 14.

General Use of Individual Licenses

The dividing line of organization responsibilities is the point at which the radioactive material transfers custody from the Navy to ITSI, or from ITSI back to the Navy. Because the radioactive material controlled under radiological remediation is inferred by historical references and not known or adequately quantified, both organizations realize that an exact inventory of radioactive material is not feasible. However, a conservatively high estimate based on professional judgment and best available technology will be used. The following contains an expected progression of the radiological remediation and decontamination process, and the organization specific responsibilities.

Prior to ITSI mobilization for radiological remediation and decontamination work, the Navy is responsible for the inventory of radioactive material, posting radiological areas in accordance with 10 CFR 20, and providing radiation awareness training to individuals with access to the radiologically impacted site. The Navy shall provide ITSI with information that gives a conservative estimate of the type, quantity, and physical form of radioactive material they are likely to recover and the site locations where radioactive material is located or has potential to exist. This information is necessary to ensure that the radioactive material quantities will not exceed the limits listed in the ITSI NRC license, and to ensure that an accurate 14-day notification is made to the NRC as required by the ITSI license No. 04-29353-01, Condition 13A.

Upon ITSI mobilization to perform radiological remediation and decontamination work, ITSI will be responsible for posting radiological areas in accordance with 10 CFR 20, and providing the appropriate awareness training to individuals with access to the radiologically impacted site under ITSI control. At the point that any radioactive material is removed from a surface or soil, that material becomes the responsibility of ITSI for radioactive material inventory. The inventory estimate may be based on radioanalytical measurement or thumb rules based on instrument measurements but it must be isotope specific. Note that these measurements may be conducted by other contractors as defined in a HPS site-specific MOU between ITSI and other site radiological contractors. Any radioactive material that remains in the original location remains in the possession of the Navy. Although the Navy will retain legal possession of radioactive material that has been identified but left in place, ITSI will identify the location and maintain control of the radioactive material and provide appropriate posting in accordance with 10 CFR 20 until the end of the contract. In the event of any radiological emergency, such as a spill of radioactive material, ITSI will provide initial emergency response, stabilize the situation, and obtain Navy concurrence on final resolution prior to returning to work. Unless specifically stipulated in a site specific contract, ITSI is not obligated to engage in any radiological clean up as the result of an accident not caused by a ITSI employee or its contracted partners.



ITSI will work with the on-site radioactive waste contractor to obtain appropriate containers for radioactive waste found during remediation and decontamination efforts. Prior to demobilization from the work site, ITSI will ensure that all radioactive and mixed waste has been appropriately transferred to the custody of the on-site radioactive waste contractor for packaging, transportation and disposal.

Upon completion of ITSI radiological work or termination of the ITSI contract, the Navy will resume responsibility for radiological posting and training requirements in accordance with 10 CFR 20 for those sites not free released without restrictions, including areas where radioactive material was found but left in place. ITSI shall return any remediated radioactive material that has no means of disposal to the custody of the Navy or other entity that possesses an appropriate NRC license, as directed by the Navy. ITSI shall provide a written listing of current areas containing radioactive material identified during radiation survey operations prior to relinquishing responsibilities to the Navy.

Occurrence Reporting

In all non routine events during ITSI radiological remediation operations under a contract between ITSI and the Navy, the ITSI Radiation Safety Officer (RSO) or designee will notify the Navy, including NA VSEADET RASO as soon as practical. Non-routine events are defined as but not limited to:

- Contamination events that require personnel decontamination.
- Contamination levels including airborne contamination or dose rates that stop operations.
- Any regulatory reporting event.
- Any noncompliance with the above requirements.

The ITSI RSO or designee shall be responsible for reporting noncompliance issues to the applicable regulatory agencies as required by their NRC license or as specified in their contract with the Navy.

ITSI LICENSE CONDITION 13 WORK DETAILS - Condition 13 requires details concerning the work as detailed in the following five areas.

1. **Estimated type, quantity, and physical/chemical forms of licensed material to be used.**

Type	Estimated Quantity	Physical/Chemical form
Ra-226	35mCi	Solids* and Liquids
Cs-137	31µCi	Solids* and Liquids
Sr-90	21µCi	Solids* and Liquids
* Soil, swipes, PPE, etc		

The above limits are based upon a conservative 1000 pounds of soil at the high level readings on Parcel E Rad Addendum.

2. **The specific site location.**

Hunters Point Naval Shipyard (HPS), IR-3 Site located at shown on attached map.

3. **The description of planned activities including waste management and disposition.**

Reference the General Use of Individual Licenses description above.



The characterization activities by ITSI at IR-03 are designed to define the vertical and lateral extent of non-aqueous phase hydrocarbons (NAPL) in the subsurface. These objectives will be accomplished through field investigations and a bench-scale treatability study. IR-03 was the site of two former oil reclamation ponds, and free product is present in numerous wells at IR-03. Along with the NAPL characterization, Activities that will be conducted in accordance with the Work Plan include conducting cone penetration testing (CPT) with laser-induced fluorescence (LIF) and selected soil and groundwater sampling and analyses to characterize the radionuclides concentrations and extent of NAPL and organic contaminants at IR-03. Based on the field investigation results, NAPL-impacted soil samples will be collected and submitted to a permitted treatability laboratory for the bench-scale testing.

4. **The estimated start date and completion date for the job:**

Early start - September 12, 2011; Late finish November 10, 2011

5. **The names and contacts for ITSI including information on how to contact the individuals.**

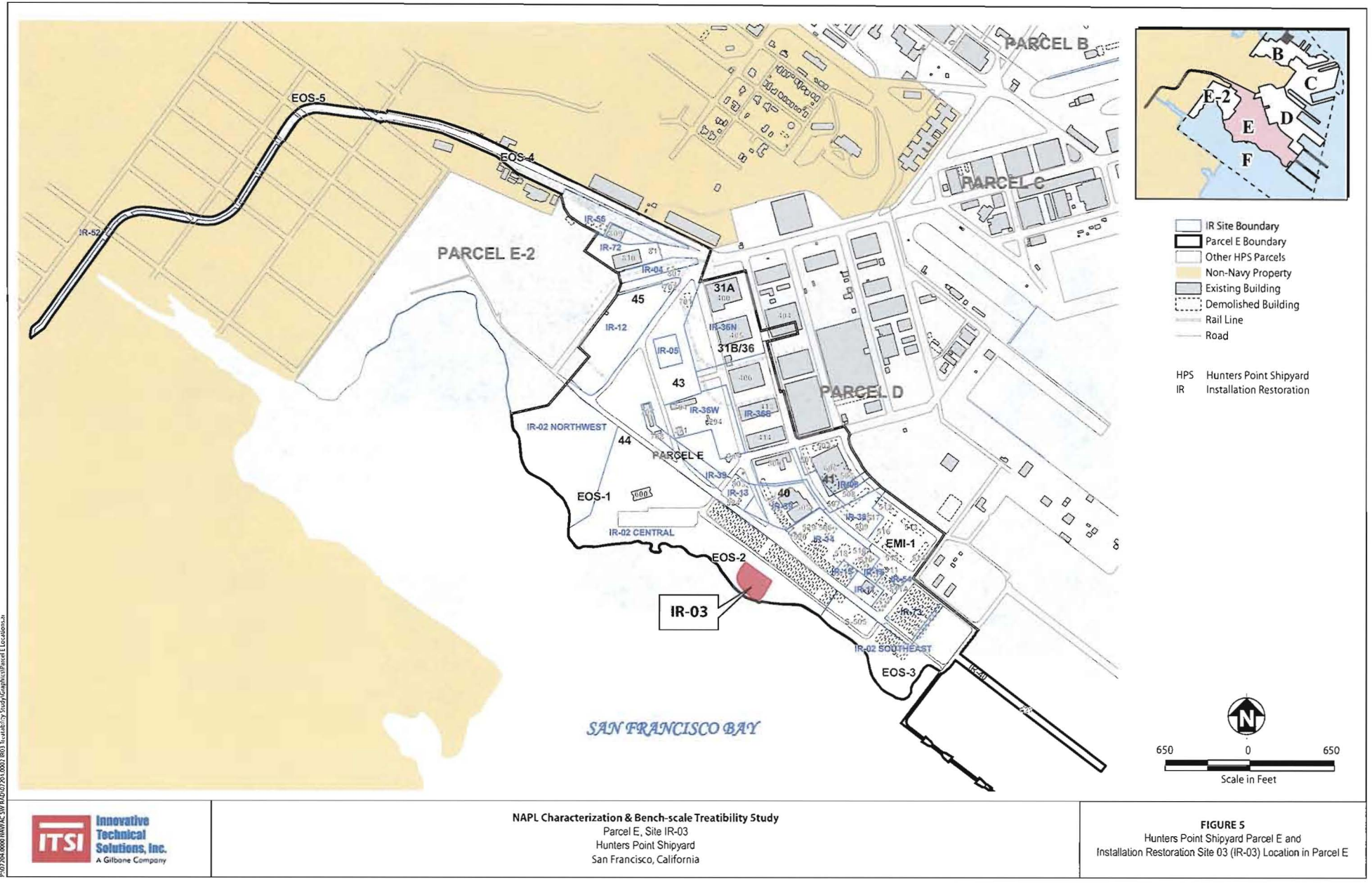
- ITSI Corporate Radiation Safety Office Jay Pride 865 389 8049 jitsi
- Site Radiation Safety Officer Representative: Randy Pride 865 684 6995
rpride@itsi.com
- ITSI Project Manager Kent Baugh, PhD, PE (925) 285-3776 (mobile)
kbaugh@itsi.com

If you have any questions, please contact me at (865) 483-5200 or cell (865) 389-8048.

Sincerely,

Jay Pride
Radiation Safety Officer

16 5 7 5 9 0 1



AUG 30 2011

DATE

This is to acknowledge the receipt of your letter/application dated AUG 29 2011, and to inform you that the initial processing, which includes an administrative review, has been performed.

☒ There were no administrative omissions. Your application will be assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

☐ Please provide to this office within 30 days of your receipt of this card:

The action you requested is normally processed within 90 days.

☐ A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned **Mail Control Number** 15 7 5 9 0 1
When calling to inquire about this action, please refer to this mail control number.
You may call me at 817-860-8103.

Sincerely,


Licensing Assistant

NRC F- RM 532 (RIV)
(10-2006)

BETWEEN:

Accounts Receivable/Payable
and
Regional Licensing Branches

[FOR ARPB USE]
INFORMATION FROM LTS

Program Code: 03234
Status Code: Pending Amendment
Fee Category: 1D 3N 4B
Exp. Date:
Fee Comments:
Decom Fin Assur Req: N

License Fee Worksheet - License Fee Transmittal

A. REGION

1. APPLICATION ATTACHED

Applicant/Licensee: INNOVATIVE TECHNICAL SOLUTIONS
Received Date: 08/29/2011
Docket Number: 3038058
Mail Control Number: 575901
License Number: 04-29353-01
Action Type: Amendment

2. FEE ATTACHED

Amount: _____

Check No.: _____

3. COMMENTS

Signed: _____



Date: _____

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered / /)

1. Fee Category and Amount: _____

2. Correct Fee Paid. Application may be processed for:

Amendment: _____

Renewal: _____

License: _____

3. OTHER _____

Signed: _____

Date: _____