

From: Lawyer, Dennis
Sent: Thursday, May 24, 2012 10:08 AM
To: 'Fota, Francis M LTC MIL USA CAPMED FBCH'
Cc: 'Taylor, Casmere H COL NNMC'; Ullrich, Elizabeth
Subject: Department of the Army, Request for Additional Information Concerning Application for a License Amendment, Control 577436

Dear LTC Fota,

This is in reference to your letter dated April 19, 2012, requesting for amendment to Nuclear Regulatory Commission License No. 08-01738-02, Docket No. 03001317. All questions are in reference to the Final Status Survey Report dated April 2012. In order to continue our review, we need the following additional information:

1. On page 76, Building 2: SU2-1-1 states the survey unit consisted of room 1H23 and others. On the map it appears that the room 1H25 was surveyed and room 1H23 does not appear to have been surveyed. Please explain why 1H23 does not appear to be a part of the survey.
2. On page 76, Building 2: SU2-1-2 and on page 77, Building 2: SU 2-1-3 stated the summary of the results of the surveys for these rooms. The specific survey results were not located within the submitted information. Please submit the specific survey data for these two survey units.
3. Page 84, Building 2: SU2-7-4 section of the report did not include an assertion from the licensee that the results rejected the null hypothesis. Please provide the statements as written for other survey units.
4. Pages 96-99, summarizes the survey results for Building 41. The specific survey results were not located within the submitted information. Please submit the specific survey results.
5. On page 101, Building 54: SU54-B-2 summarizes the survey results and gives the highest gross alpha measurement as 13 disintegrations per minute (dpm) per 100 square centimeters. On page C-313, shows two bias surveys over the alpha DCGL of 100 dpm per 100 square centimeters and one reading at the limit. No additional actions, surveys or explanations are given associated with these results. Please evaluate these readings and provide further evaluations like post decontamination surveys, quantified areas of hot spot, increase of Class.
6. On page 102, Building 54: SU54-B-3 more information about the survey and range locations is needed. Since this area was suspected to be used as a depleted uranium firing range, it was difficult from the maps to discern which area had the actually firing of the weapons and target. The survey unit was developed to be large enough that it appears that maybe only one fixed point was obtained in the actual firing range. The bias readings are not marked to the specific locations and thus may not represent an adequate check in the firing range. Scan surveys have a MDC of 7 times the derived concentration guideline level and would be insufficient without appropriate fixed readings. Please review this survey unit for appropriate sizing of the survey unit given the potential and appropriate bias surveys. Please give detailed information about the room purposes and locations of all fixed readings including bias surveys.
7. On page 106, Building 54: SU54-G-4, the summary report states the highest alpha bias reading was 16 dpm per 100 square centimeters. On page C-565, there was a bias survey of 92 dpm per 100 square centimeters which is not above the DCGL but is statistically approximately the DCGL. Please review this survey point or perform more surveys of the Tan air duct to determine if DCGL is exceeded or the reason for the elevated survey.
8. On page 119, Building 54: SU:54-5-1 gives the summary of the survey results. The map on page C-499 appears to be SU:54-4-4 instead of SU:54-5-1. Please submit the correct map and scan locations.

9. On page 126, Building 92: SU92-G-2 gives the summary of the survey results. The map for this location was not submitted. It appears that the map for SU92-G-1 was placed in the appendix twice instead. Please submit a map for SU92-G-2.
10. Appendix G, Evaluation of Varian CLINACs did not include the tables. Please include the tables.
11. The instrument efficiencies used in the report were not supported by the documents in the report. Please send in method of determining efficiencies of the instrumentation and documentation supporting the instrument efficiencies.
12. In the historical site assessment the following rooms were included that did not appear to be included in the Final Status Survey: Building 2, rooms 1847, 1848, 1849; Building 7, room G-42; and Building 54 rooms 5007, 5044, and 5050. Please state why these surveys were not included, were included but not explicitly stated, or were included and where they are included in the survey.
13. In Appendix E to Appendix H was an electronic file 36 MS RP Inventory pp 1-247.pdf and a subset of the file 42 MS RP Inventory p197-247.pdf which was marked as "Official Use Only." Information which is marked must be processed in accordance with 10 CFR 2.390. If during our review as stated in 10 CFR 2.390 that this information is not sensitive, we will release this information. You may request the document be withdrawn or destroyed prior to that review. Alternately, you could supply more information to why this document was labeled as "Official Use Only."

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office and refer to Mail Control No. 577436. If you have technical questions regarding this letter, please call me at (610) 337-5366.

Please note that the Region I Division of Nuclear Materials Safety has moved effective May 9, 2012. Our new address is:

USNRC – Region I
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406-2713

Please note that you may not reply to this letter by return e-mail. Your reply must be in writing by letter or facsimile (610-337-5269). If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application.