

From: [Kauffman, Laurie](#)
To: [Lamoreaux, Richard W CIV \(US\) \(richard.w.lamoreaux.civ@mail.mil\)](#)
Cc: [Parks, Leah](#); [Kauffman, Laurie](#)
Subject: Telephone Conversation Follow-up and 2nd Request for Additional Information
Date: Thursday, March 20, 2014 10:13:00 AM

Docket No. 04006377
License No. SUB-348
Control No. 581537

Dear Mr. Lamoreaux:

This is to document our discussion regarding your response to our request for additional information (RAI) e-mail dated January 28, 2014. During our telephone conversation on March 17, 2014, you stated that you will revise your Response to RAI letter dated February 21, 2014. The following information was discussed:

- 1) You stated that you decided to adhere to a separate Derived Concentration Guideline Limit (DCGL_W) for each uranium isotope and would follow the unity rule (sum of the fractions) approach to demonstrate compliance with 10 CFR 20 Subpart E.

For guidance, refer to Section 2 (specifically, sections 2.5 and 2.7) of NUREG-1757, Vol. 2, Rev.1, "Consolidated Decommissioning Guidance: Characterization, Surveys, and Determination of Radiological Criteria", dated September 2006. <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1757/v2/>; and NUREG-1505, Rev. 1, "A Nonparametric Statistical Methodology for the Design and Analysis of Final Status Decommissioning Surveys". <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1505/>.

- 2) The DCGL_W for the radium 226 (Ra-226) was changed from using the State of New Jersey's residential use limit of 3 picocuries per gram (pCi/g) in Revision 3 to a DCGL_W of 1pCi/g in the Revision 4 of your Decommissioning Plan (DP).

You stated that if you decide to use the State of New Jersey's residential use limit as the DCGL_W for Ra-226, you would provide justification.

Likewise, if you decide to develop a DCGL_W using RESRAD, you would provide the associated input parameters.

- 3) Request for Additional Information:
We noted that the following RESRAD parameters were adjusted from their default values and requested that you provide an explanation for each site-specific parameter.
 - i. Average annual wind speed (m/sec)
 - ii. Precipitation (m/yr)
 - iii. Length parallel to aquifer flow (m)
 - iv. Radius of shape factor array (indicate if these values are related to the shape in Figure 5 Interior Open Detonation Pit Area Cell Layout, page 16)

- v. Contamination fraction of meat
- vi. Contamination fraction of milk

Because our technical review is not yet complete, we may request additional information regarding your DP.

REMINDER:

Your submittal should not contain personally identifiable information (PII), such as date of birth, social security number, home addresses, and home telephone numbers. For additional information, refer to Regulatory Information Summary (RIS) 2007-04, "Personally Identifiable Information Submitted to the U.S. Nuclear Regulatory Commission", dated March 9, 2007, <http://www.nrc.gov/reading-rm/doc-collections/gen-comm/reg-issues/2007/ri200704.pdf>.

Your submittal also should not contain any Official-Use-Only Security-Related Information. The NRC issued guidance to its nuclear materials and export/import stakeholders to ensure information is not unnecessarily disseminated that terrorists could use to plan or execute an attack against facilities or citizens in the United States. This guidance is found in Regulatory Issue Summary (RIS) 2005-31, "Control of Security-Related Sensitive Unclassified Non-Safeguards Information Handled by Individuals, Firms, and Entities Subject to NRC Regulation of the Use of Source, Byproduct, and Special Nuclear Material." The RIS refers to the materials as "Security-Related Sensitive Information." <http://www.nrc.gov/reading-rm/sensitive-info/materials.html>.

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Nuclear Materials; Med, Ind, & Academic Uses**; then **Licensee Toolkits, see our toolkit index page**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 581537. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5323.

Please note that you may not reply to this letter by return email. Your reply must be either 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 email, we will assume that you do not wish to pursue your application.

Sincerely,

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