

April 9, 2014

Dr. Robert Cherry, Radiation Safety Staff Officer  
U.S. Army Installation Management Command  
ATTN: IMSO/301  
Building 2261  
2405 Gun Shed Road  
JBSA Fort Sam Houston, TX 78234-1223

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION STAFF REVIEW OF U.S. ARMY  
VEGETATION SAMPLING PLAN FOR SCHOFIELD BARRACKS  
(DOCKET NUMBER 040-09083)

Dear Dr. Cherry:

On October 23, 2013, the U.S. Nuclear Regulatory Commission (NRC) issued source material license SUC-1593 to the U.S. Army Installation Management Command (the Army) to allow the possession of depleted uranium (DU) from the Davy Crockett M101 spotting round (Agency Document Access and Management System (ADAMS) Accession No. ML13259A062). License Condition 23 of SUC-1593 states: "The licensee shall provide a plant sampling plan to the NRC within 90 days of [effective date of this license] for review and approval. Until the plant sampling results are approved by NRC, the licensee will conduct activities on the ranges in accordance with previously approved restrictions and provisions." On January 15, 2014, the Army submitted a plant sampling plan in accordance with License Condition 23 of source material license SUC-1593 (ML14027A075).

The NRC staff has completed its review of the Army's vegetation sampling plan, and finds the plan acceptable, contingent on the Army's ability to adequately address the comments identified in Section 4.4 of the enclosed Technical Evaluation Report (TER) and summarized below:

- Given the ambiguities present in Table 2-2 of the plan, the NRC staff finds that the Army should include in the documentation of the sampling results a clear description of the methodology for determining the final sample locations.
- Section 4 of the plan is not specific as to the amount of time that may lapse between the samples being placed in bags, and when they will be stored on ice. Given the hot climate in the area, the NRC staff is concerned about the potential for sample degradation prior to shipment. Therefore, in the documentation of the results, the Army should clarify the sample preparation and explain any potential impacts resulting from sample preparation.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC web site at <http://www.nrc.gov/reading-rm/adams.html>.

R. Cherry

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If you have any questions concerning the NRC staff comments, please contact me at 301-415-6722 or by e-mail at [Chad.Glenn@nrc.gov](mailto:Chad.Glenn@nrc.gov).

Sincerely,

**/RA/**

Chad Glenn, Senior Project Manager  
Materials Decommissioning Branch  
Decommissioning and Uranium Recovery  
Licensing Directorate  
Division of Waste Management  
and Environmental Protection  
Office of Federal and State Materials  
and Environmental Management Programs

Docket Number: 040-09083

License Number: SUC-1593

Enclosure: Technical Evaluation Report

R. Cherry

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If you have any questions concerning the NRC staff comments, please contact me at 301-415-6722 or by e-mail at Chad.Glenn@nrc.gov.

Sincerely,

**/RA/**

Chad Glenn, Senior Project Manager  
Materials Decommissioning Branch  
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**ML14083A460**

<b>OFC</b>	DWMEP	DWMEP	OGC	DWMEP	DWMEP
<b>NAME</b>	CGlenn	AWalker-Smith	SChidakel	MNorato	CGlenn
<b>DATE</b>	3/27/14	3/27/14	4/8/14	4/9/14	4/9/14

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