



DEPARTMENT OF THE NAVY
OFFICE OF THE CHIEF OF NAVAL OPERATIONS
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WASHINGTON, DC 20350-2000

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Ser N455/14U132722
17 Jul 14

Ms. Orysia Masnyk Bailey
U.S. Nuclear Regulatory Commission
Region I, DNMS
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406-2713

G7
45-23645-01NA
03029462

Dear Ms. Bailey:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION CONCERNING REQUEST
FOR ALTERNATE DECOMMISSIONING SCHEDULE, CONTROL NO.
581662

Nuclear Regulatory Commission (NRC) Control No. 581662 letter dated 18 June 2014 requested that the Naval Radiation Safety Committee (NRSC) provide the NRC with additional information in order to continue their review for an alternate schedule of decommissioning for Naval Radioactive Material Permit (NRMP) No. 04-66001-D1NP at Space and Naval Warfare (SPAWAR) Systems Center Pacific.

Office of the Chief of Naval Operations letter 5104 Serial N45/13U139727 dated 7 August 2013 forwarded additional information that was not included in the Office of the Chief of Naval Operations letter 5104/66001 Serial N45/13U139629 dated 15 April 2013 referred to in your letter. As the 7 August 2013 letter is an important reference to the SPAWAR decommissioning we request that this letter be added for consideration if it was not previously reviewed by the NRC.

The specific answers to your request for information are provided below.

The Navy is requesting alternate schedule to start decommissioning pursuant to 10 CFR 30.36(f).

A decommissioning plan will be required for the SPAWAR NRMP.

There is no known contamination source associated with the SPAWAR NRMP that risks the spread of contamination by airborne or waterborne pathways. All known sources of unsealed material were removed during previous operations. Further investigation is in

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progress as part of the historical radiological assessment and any change in the status will be reported.

The cause of the NRMP conversion and Navy imposed sanctions was a failed inspection of naval regulations and expectations as opposed to nuclear regulatory commission regulations. The command immediately took actions which have improved their regulatory performance. The Radiation Safety Officer (RSO) was replaced with an active-duty commissioned officer. The command also hired a very experienced Assistant RSO from another high performing Navy command to provide experience and enhance continuity for program support. The command maintains a Radiation Safety Committee to ensure management involvement in the command's program. Subsequent unannounced inspections in January 2013 and March 2014 and an unannounced site visit in December 2013 showed satisfactory performance. No safety related violations and only 2 Navy-specific administrative findings were identified during this period. The Navy administrative findings were quickly and effectively corrected. Since the permit change the Navy has and will continue to inspect the command on a priority 1 (annual) basis to provide oversight to the command's strict compliance.

This letter requests a ten year delay in the start of decommissioning activities and updates the decommissioning schedule previously reported.

If you have additional questions, please do not hesitate to contact me via telephone at (703) 695-5259 or through electronic mail at douglas.w.fletcher@navy.mil.

Sincerely,



D. W. FLETCHER
CDR, Medical Service Corps
United States Navy
Executive Secretary
Naval Radiation Safety Committee

Copy to: Naval Sea Systems Command (04N)
Naval Sea Systems Command Detachment, Radiological
Affairs Support Office