



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

5090

Ser N455/14U132793

20 Oct 14

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

45-23645-01NA  
030-29462

Subj: REQUEST FOR ALTERNATE SCHEDULE FOR SUBMITTAL OF A  
DECOMMISSIONING PLAN, CONTROL NUMBER 581663

The Navy's radioactive materials program is licensed with the Nuclear Regulatory Commission (NRC) under Master Materials License (MML) No. 45-23645-01NA. The Navy is requesting both a delay in submitting a decommissioning plan and an alternate schedule for submittal of the decommissioning plan for Naval Radioactive Material Permit (NRMP) No. 04-62271-D1NP at Naval Postgraduate School (NPS), Monterey, CA. pursuant to 10 CFR 30.36(g)(2). A decommissioning plan will be required for the NPS NRMP.

As of December 2009, the permittee had ceased principal activities of a type B broad scope permit under NRMP No. 04-62271-F1NP. Per 10 CFR 30.36(d) a decommissioning plan is required to be submitted within 12 months if no principal activities under the license have been conducted for a period of 24 months. Per 10 CFR 30.36(g)(2), an alternate schedule for submittal of a decommissioning plan was requested per Office of the Chief of Naval Operations Washington DC letter 5104 Serial N45/13U139729 of 9 August 2013. The diversity of activities at the site and research into broad scope activities outside the physical boundaries of NPS Monterey have resulted in unanticipated delays in completing the historical radiological assessment (HRA) within the original estimated time frame. Office of the Chief of Naval Operations Washington DC letter 5090 Serial N455/14U132720 of 17 July 14 requested a ten year delay for submittal of a decommissioning plan and commencing decommissioning activities.

Enclosure (1) provides an alternate schedule for submittal of a decommissioning plan to justify the ten year delay request. Enclosure (2) provides evidence that the extension of the initiation of decommissioning activities will not be detrimental to public health and safety and is otherwise in the best interest of the U.S. Navy and the public.

REC'D IN LAT 10/22/2014

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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

- Enclosure: 1. Alternate Schedule for Submittal of  
a Decommissioning Plan  
2. Evidence that the Extension of the Initiation of  
Decommissioning Activities Will Not Be Detrimental  
to Public Health and Safety

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

ALTERNATE SCHEDULE FOR SUBMITTAL OF A DECOMMISSIONING PLAN

1. Completed Milestones

a. In December 2009, the permittee provided notification that they had ceased all principal activities under the type B broad scope permit, No. 04-62271-F1NP.

b. On 17 September 2010, NRMP 04-62271-F1NP was converted to 04-62271-D1NP, that only authorizes storage of radioactive materials pending decommissioning.

c. The command provided funding for the historical radiological assessment (HRA) in August of 2012 and on 21 September 2012, a two year contract was awarded to Aleut World Solutions (AWS) to research and write an HRA. The contractor commenced research in December 2012.

2. Original Projected Milestones

a. Radiological Affairs Support Office (RASO) completes the review of the contractor supplied HRA by March 2015.

b. RASO forwards the HRA and a recommended final decommissioning group to Naval Radiation Safety Committee (NRSC) by April 2015.

c. NRSC forwards HRA and recommended decommissioning group to the NRC for approval by May 2015.

d. NRC approves the decommissioning group and HRA by mid to end of 2015 (estimated).

e. RASO completes the review of the decommissioning plan provided by the contractor and supplementary funding requested by November 2015.

f. RASO forwards decommissioning plan to the NRSC by December 2015.

g. NRSC forwards the decommissioning plan to the NRC for approval by January 2016.

h. NRC approves the decommissioning plan and incorporates the work plans into the MML by mid 2017 (estimated).

### 3. Revised Projected Milestones

a. 1 July 2016: NPS completes the HRA and forwards to Radiological Affairs Support Office (RASO) for review.

b. 1 February 2017: RASO completes review of HRA and forwards the HRA and a recommended final decommissioning group to Naval Radiation Safety Committee (NRSC).

c. 1 August 2017: NRSC forwards HRA and recommended decommissioning group to the NRC for approval.

d. 1 September 2018 (estimated): NRC approves the decommissioning group and HRA.

e. 1 March 2019: NPS develops contract requirements to perform remedial investigation surveys, remediation/clean up actions, and final status surveys as part of the decommissioning plan.

f. 1 March 2021: NPS obtains funding and awards the contract for development of the decommissioning plan. Funding approval for developing the decommissioning plan may take approximately 2 years.

g. 1 March 2022: NPS submits the decommissioning plan for RASO review. NPS requests funding for the decommissioning plan and decommissioning activities.

h. 1 March 2023: RASO completes the review of the decommissioning plan and forwards to NRSC.

i. 1 September 2023: NRSC forwards the decommissioning plan to the NRC for approval.

j. 1 September 2024 (estimated): NRC approves decommissioning plan.

k. 1 March 2025: If funding has been approved, NPS awards the contract and starts decommissioning activities.

EVIDENCE THAT THE EXTENSION OF THE INITIATION OF DECOMMISSIONING  
ACTIVITIES WILL NOT BE DETRIMENTAL TO PUBLIC HEALTH AND SAFETY

To demonstrate that delaying the start of decommissioning will not be detrimental to public health and safety, the following amplifying information is provided:

1. Inspections of NRMP No. 04-62271-D1NP, for storage of radioactive materials only, indicate that Naval Postgraduate School, Monterey, CA, has complied with U.S. Navy's regulatory requirements. Ongoing compliance inspections and continued permitting actions during the decommissioning process will ensure continued compliance.

2. The permittee has developed, documented, and implemented a radiation safety protection program commensurate with the scope and extent of permitted activities and sufficient to ensure compliance with the provisions of 10 CFR 20.1101. This will ensure that public health and safety will be protected during the extension period. The following health and safety plan elements will be in effect during the standby period:

a. Operations for the use of any of the permitted radioactive materials is prohibited. Emergency procedures have been developed covering potential casualty scenarios (e.g., fire, contamination spread, theft, loss of material, etc.).

b. Naval Postgraduate School, Monterey, CA, is a military facility with controlled access and active federal security limiting unescorted public access. The radiation safety staff have physical custody and control of areas known to have been used for licensed operations and for the storage of radioactive materials pending disposal or transfer. The permittee has developed and implemented command procedures for the security, inventory, and accountability of permitted radioactive materials.

c. The permittee has committed to performing annual compliance audits of the radiation safety program content and implementation until the NRMP is terminated.

d. The permittee uses procedures and engineering controls based upon sound radiation protection principles to achieve occupational doses and doses to members of the public that are as low as is reasonably achievable (ALARA). Area dosimetry and radiation survey monitoring of offices and spaces adjacent to radioactive material storage areas are performed to ensure compliance with public dose limits.

e. The permittee performs periodic radiation and contamination surveys to assess any changes in the radiological conditions of radioactive material storage areas. Leak tests of sealed sources will be performed and verified prior to the transfer of any permitted material to an authorized recipient. The permittee has sufficient monitoring in place to insure that any residual contamination and exposure from stored radioactive material does not become a public or a worker health and safety issue.

To demonstrate that an extension of the time period for initiation of decommissioning is otherwise in the best interest to the U.S. Navy and the public, the following information is provided:

1. The command has a long history of use and experimenting with a wide variety of radioactive materials. The decommissioning will encompass both Navy permitted activities from the 1980s to the present and Atomic Energy Commission/Nuclear Regulatory Commission licensed activities prior to the establishment of the Master Materials License. Due to the large volume of work with sealed and unsealed radioactive materials at numerous locations, it has been determined that it will take additional time to complete the historical radiological assessment (HRA) for this command. The Navy believes that development of a detailed HRA and a subsequent carefully executed decommissioning plan will help reduced overall decommissioning costs. The extension of the time period for initiation of decommissioning presents no undue risk from radiation to the public safety and is otherwise in the public interest.

2. Postponing the initiation of decommissioning is not anticipated to result in the spread of contamination. Corporate knowledge indicates that all of the sites requiring decommissioning are located on military facilities or federally controlled areas with limited public access.

3. Facilities used for past permitted operations and the storage of radioactive materials are not abandoned and will not significantly deteriorate during a standby period. These facilities are sufficiently maintained such that decommissioning will not be significantly more complex at a later date.