



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

5090  
Ser N455/14U132796  
27 Oct 2014

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

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03029462

Subj: REQUEST ALTERNATE SCHEDULE FOR COMPLETION OF  
DECOMMISSIONING AT NAVAL SURFACE WARFARE CENTER,  
DAHLGREN DIVISION

The Navy's radioactive materials program is licensed with the Nuclear Regulatory Commission (NRC) under Master Materials License Number 45-23645-01NA. Radiological operations involving licensed radioactive materials at Naval Surface Warfare Center, Dahlgren Division (NSWCDD) were authorized by Naval Radioactive Materials Permit (NRMP) No. 45-00178-S1NP. This NRMP was converted to 45-00178-Y1NP for storage of residual contamination pending decommissioning. Chief of Naval Operations Washington DC letter 6470 Serial N456S/8U158077 of 4 March 2008 provided the decommissioning plan to the NRC for NSWCDD, Building 200.

Title 10 Code of Federal Regulations 40.42(i)(1) states that the Commission may approve a request for an alternate schedule for completion of decommissioning of the site, separate building, or outdoor area if the Commission determines that an alternative is warranted. It is requested that an alternate schedule for completion of decommissioning activities at NSWCDD be set for 30 July 2018. The reason for this request is that, while site remediation has been performed the NSWCDD final status survey (FSS) report initially forwarded to the NRC has incongruities which must be clarified before final review by the NRC. We no longer believe that a decommissioning completion date of 31 October 2014 is feasible. There is a high probability that we will be required to hire another contractor to re-perform the FSS and report for this project.

REC'D IN LAT 10-27-14  
via e-mail

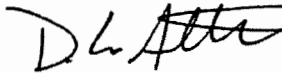
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Enclosure (1) provides an alternate schedule for completion of decommissioning activities to justify the delay request. Enclosure (2) provides evidence that the extension of decommissioning activities presents no undue risk because the remediation has already been completed and providing accurate and complete FSS report is in the best interest of the U.S. Navy and the public.

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  
Commander, Medical Service Corps,  
United States Navy  
Executive Secretary  
Naval Radiation Safety Committee

Enclosures: 1. Alternate Schedule for Completion  
of Decommissioning Activities  
2. Evidence that the Extension 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 (nsscnavsearasoadmin@navy.mil)

## ALTERNATE SCHEDULE FOR COMPLETION OF DECOMMISSIONING ACTIVITIES

### 1. Projected Milestones

a. 30 June 2015: RASO develops performance and independent government estimate to re-perform final status survey (FSS) and report for Building 200.

b. 30 September 2015: Chief of Naval Operations Washington DC provides funding for completion of the FSS and report.

c. 30 January 2016: RASO finalizes the contract requirements for the FSS and report, and awards the contract.

d. 30 September 2016: Contractor completes the FSS and submits the final report to RASO for review.

e. 30 March 2017: RASO completes the review of the FSS report and forwards it to NRSC.

f. 30 April 2017: NRSC forwards the FSS report to NRC.

g. 30 July 2018: NRSC terminates the Naval Radioactive Materials Permit.

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

In order to demonstrate that the extension of decommissioning activities will not be detrimental to public health and safety, the following amplifying information is provided:

1. Naval Surface Warfare Center Dahlgren Division is a military facility with controlled access and active security apparatus limiting unescorted public access. The radiation safety staff has physical custody and control of the buildings known to have been used for licensed operations.

2. As part of the decommissioning activities that the Navy has undertaken, remediation is completed and waste has been shipped from the site and disposed of in accordance with the decommissioning plan. Therefore, there are no waste disposal and contamination control issues that would impact the Navy's ability to complete decommissioning.

3. Facilities used for past permitted operations will not significantly deteriorate during the delay period. Facilities will be sufficiently maintained such that decommissioning is not significantly more complex at a later alternate decommissioning date.