



DEPARTMENT OF THE ARMY  
HEADQUARTERS, U.S. ARMY COMMUNICATIONS-ELECTRONICS COMMAND  
6002 COMBAT DRIVE  
ABERDEEN PROVING GROUND, MARYLAND 21005-1845

January 22, 2015

Subject: U.S. Nuclear Regulatory Commission (NRC) License Number 19-31447-01

U.S. Nuclear Regulatory Commission  
Region I  
2100 Renaissance Boulevard  
Suite 100  
King of Prussia, PA 19406-2713

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19-31447-01/2014001

REC'D 101 27 15 PM 1109

Attention: Ms. Kathleen Modes, Senior Health Physicist

This refers to U.S. Nuclear Regulatory Commission (NRC) License Number 19-31447-01, Docket No. 03038471, Control No. 585379, to our January 9, 2015 telephone conversation between Messrs. Craig S. Goldberg, Barry J. Silber, Michael S. Gray and Marcos S. Vicente of our staff, and Ms. Kathleen D. Modes of your Commission, to our letter dated November 25, 2014, and to our November 20, 2014 telephone conversation between Messrs. Craig S. Goldberg and Michael S. Gray of our staff, and Ms. Kathleen D. Modes of your Commission.

During the referenced November 20, 2014 telephone conversation we reported that we had self-identified that we exceeded our possession limit for Americium 241 under Condition 8.T of this license used in the Lightweight Laser Designator Rangefinder (LLDR). This memo is a follow-up report identifying the causal factors for the noncompliance as well as the short and long term corrective actions that have been developed/implemented to bring us into compliance and prevent recurrence.

Reason for the violations: When the original license amendment was submitted for the LLDR, it was our understanding that the operational requirement would not exceed 500 units. Due to the high dollar value and the sensitive nature of the weapon system, Product Manager Soldier Precision Targeting Devices (PM SPTD) was required to implement stringent controls on the system, to include quarterly inventory and accountability. Since there were a limited number of systems, the Licensee deferred to the PM for maintaining accountability of these assets with minimal oversight. Further, the primary liaison between the CECOM Directorate for Safety (DS) and PM SPTD was the assigned Safety Engineer (which was passed among several engineers over the years due to personnel changes), not a licensee representative such as a Health Physicist.

Causal factors for the violation: PM SPTD personnel misinterpreted license conditions to believe the license authorized a higher quantity than it actually did, so they did not notify the Licensee of the need for a license amendment to increase the authorized limit when procurement decisions were made to buy more systems. Assigned Safety Engineers (internal to CECOM DS) also did not inform Health Physicists when reviewing program documentation relating to the

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additional acquisitions. The Licensee did not implement appropriate internal controls to verify that the operational needs remained as originally planned and did not change over time.

Corrective steps taken and results achieved:

- a. We have done a full accountability of all LLDRs and requested a license amendment to increase the authorized amount (license amendment granted, 4 Dec 2014).
- b. We have performed an extent of condition review to ensure that there are no other instances where we have exceeded authorized license limits.
- c. An internal meeting was conducted December 4, 2014, between Health Physicists and Chief, System Safety Division, to discuss the breakdown in internal communication between System Safety and Radiation Safety Divisions.
- d. Meeting held with CECOM DS (both radiation and system safety personnel), PM SPTD and the Logistics Readiness Center, December 9, 2014, to identify causal factors and to determine path forward to prevent recurrence.
- e. Health Physicists have been granted access to Logistics Information Warehouse database which allows visibility of real-time information on the status of LLDR assets.

Additional corrective steps to be taken to avoid further violations:

- a. Quarterly meetings will be conducted with PM SPTD to review the status of the program and to assess potential future requirements.
- b. At the next CECOM DS Town Hall, a session will be conducted for Safety Engineers to reinforce the importance of keeping Health Physicists advised of new and additional acquisitions involving radioactive material.

With the implementation of the above corrective actions and the issuance of license amendment No. 4, dated 4 December 2014, we are in full compliance with the requirements of the license. Please let us know if you have questions or require clarification on any of the above.

Sincerely,



Steven C. Hart  
Director  
Directorate for Safety