

From: [Snyder, Amy](#)
To: geomike5@att.net
Subject: RE: Pohakuloa Training Area Fire and need for monitoring
Date: Thursday, February 23, 2017 12:51:00 PM

Aloha Dr. Reimer,

Thank you for your interest in the depleted uranium (DU) at the Army's Pohakuloa Training Area in Hawaii. In your February 3, 2017 email, you indicated that there is a fire at the Pohakuloa Training Area (PTA) and that air monitoring for DU would be appropriate. Also, you ask whether U.S. Nuclear Regulatory Commission (NRC) would be receptive to funding a citizen's air monitoring program.

As you know, air monitoring is not required by the license even under conditions of live high explosive (HE) fire or physical fire located on a range with Davy Crockett DU (referred to as radiation control areas or RCAs). The NRC staff assessed the effects of impacts due to HE fire and physical fire on the DU located on the Army ranges or RCAs. The NRC staff's review of impacts affecting the air pathway is summarized in Sections 4.3.2.1 and 2.5 of the NRC staff's safety evaluation (SER) for license amendment 1 (Agencywide Documents and Management System [ADAMS] Accession No. ML16039A230). Section 4.3.2.1 of the SER summarizes the NRC staff's review of the Army's position that air sampling during ground disturbing activities should not be required. Section 2.5 of the SER summarizes the NRC staff's review of potential releases of DU in the air pathway. The NRC staff finds that the Army's position, in total, adequately demonstrate that airborne materials leaving the RCAs/impact areas are highly unlikely to exceed regulatory exposure or monitoring requirements and do not pose a danger to the public. The NRC concluded that HE ordinance aerosolization of DU materials would bound airborne materials resulting from range fires that may occur within the RCA. Explosions provide much greater motive force to aerosolize materials bound in a soil matrix than a physical range fire which wouldn't necessarily disturb the soil.

Regarding your question about the NRC being receptive to a citizen's monitoring program and supporting it through funding, the NRC does not have a program for providing equipment to the public for air monitoring and as a regulatory agency the NRC is unable to fund such a program. The Army is responsible for environmental monitoring in accordance with its license (SUC-1593). The NRC approved the Army's programmatic environmental radiation monitoring program (ERMP) with license amendment number 1 (ADAMS Accession No. ML16039A230). The documents applicable to environmental monitoring at the PTA are the Programmatic ERMP, "Programmatic Approach for Preparation of Installation-specific Environmental Radiation Monitoring Plans", dated September 15, 2016 (ADAMS Accession No. ML16265A218) and the Final Site-Specific Environmental Radiation Monitoring Plan, Pohakuloa Training Area, Hawaii, Annex 17 (ADAMS Accession No. ML16265A231). The NRC provides regulatory oversight through inspection to ensure that the Army is meeting all requirements as stated in its license and in the NRC's regulations.

I hope that I clarified for you why air monitoring is not required. Also, I hope that I have reassured you that the NRC has considered impacts to the DU material to include fires and that radiological airborne materials leaving the RCAs/impact areas are highly unlikely to exceed radiological regulatory exposure or monitoring requirements and do not pose a

danger to the public. The NRC appreciates the community's interest in these issues. While the community, local government, or State may proceed with any measures within their jurisdiction that they believe are appropriate, as stated above the NRC does not have and cannot fund a program for the community to conduct air monitoring.

Sincerely,

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Amy Snyder, Senior Project Manager
Materials Decommissioning Branch (MDB)
Division of Decommissioning, Uranium Recovery, and Waste Programs (DUWP)
Office of Nuclear Material Safety and Safeguards (NMSS)
U.S. Nuclear Regulatory Commission (NRC)
Washington, D.C. 20555

 Office: (301) 415-6822

 Fax: (301) 415-5369

 Mail Stop: T8-F5M

★ Location: T8-E45

 E-mail: amy.snyder@nrc.gov

From: geomike5@att.net [mailto:geomike5@att.net]

Sent: Friday, February 03, 2017 3:24 PM

To: Snyder, Amy <Amy.Snyder@nrc.gov>

Subject: [External_Sender] Pohakula Training Area Fire and need for monitoring

Aloha Amy,

There is a fire at Pohakuloa Training Area, Hawaii, burning the last few days and involving 700 acres of grass and brush. This is an ideal time for air monitoring for DU and as far as I know, there is no air monitoring.

Would NRC be receptive to funding a citizens' monitoring program?

There are a number of concerned residents who have the knowledge, skills, and willingness to initiate a long-term program. The advantage is that there are no salaries, benefits, or overhead to cover, just expenses including purchasing the equipment for sampling and the analytical costs.

Ideally, we would like to involve educational facilities as part of enhancing the various STEM programs on the Island That would be more expensive as it could involve some salary and costs for K-12 and university staff. A higher expense step would be

involving relevant County and State agencies. Naturally, we would invite the US military to participate but as you know, we have not received favorable responses in the past. One of the best monitoring programs was that of Rocky Flats near Denver, Colorado that was an excellent example of stakeholder consortium.

In addition, we would like to involve NRC in this citizens' monitoring program as we feel that could benefit your programs to provide evaluation of a field test, as it would be, that would help the general citizenry understand that radiation is part of everyday life and in large part can be controlled so as not to introduce any additional health risks.

Alternatively, and with a higher cost, we would solicit or NRC could solicit RFPs and have the work done exclusively under contract.

I look forward to your response,

Mahalo nui loa,

Michael Reimer, Ph.D.
Retired Geologist
GeoMike5@att.net