



DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND
2405 GUN SHED ROAD
JOINT BASE SAN ANTONIO FORT SAM HOUSTON, TX 78234-1223

REPLY TO
ATTENTION OF

December 19, 2017

ATTN: Document Control Desk
Deputy Director, Division of Decommissioning, Uranium Recovery and Waste Programs
Office of Nuclear Material Safety and Safeguards
Mailstop T8 F5
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Deputy Director:

This letter is a request to amend Source Materials License no. SUC-1593, docket number 040-09083. Specifically, we request that the enclosed paragraphs and figures be added to the Programmatic RSP, "Radiation Safety Plan for IMCOM Ranges Affected by M101 Davy Crockett Spotting Round Depleted Uranium," dated December 31, 2015 (ML16004A369) (see item 11 in the license).

If you approve this request, we will provide to you a revised Programmatic RSP with a new date that you can include in item 11 of the license to replace the current Programmatic RSP.

The enclosed revised paragraphs and figures include support for this request. Personnel at Fort Jackson and Fort Hunter Liggett, independent of each other, asked me to obtain relief from RSP requirements that are impediments to effective and efficient training at each location.

The Archive Search Report annexes for Fort Jackson and for Fort Hunter Liggett both say that "minimal" M101 spotting round debris is expected to be found in the radiation control areas at each installation. Approval of our request will have no measurable impact on health, safety, or the environment, but will enhance Army training.

Thank you for your consideration of this request. If you have any questions concerning this letter, please contact me by telephone at (210) 466-0368 or by email at robert.n.cherry.civ@mail.mil.

Sincerely,

Robert N. Cherry

License Radiation Safety Officer

Enclosure

NMSSOT

4.5 Training in Fort Hunter Liggett Range C8 Target Zone/Impact Area

All personnel directly involved in Improvised Explosive Device (IED) Defeat Lane training events in the Fort Hunter Liggett Range C8 RCA (see Figure 4-1) are exempt from the radiation safety requirements of this RSP. This exemption does not apply to routine activities (see Section 4.3) that may occur in this RCA, such as target maintenance. This exemption is permissible because:

- Less than 30 kilograms of DU (estimated 135 M101 rounds) are in three RCAs with a total area of 3 square kilometers (about 740 acres) at Fort Hunter Liggett. Encountering a random M101 round is unlikely.
- Routine road grading that has occurred since the 1960s before the establishment of the RCA likely moved any M101 rounds that may have been in the roadway to the sides of the road.
- All personnel entering a training range receive instructions to leave undisturbed any ordnance, which includes M101 rounds, they may encounter.
- Exit monitoring (over 10,000 individual checks, mostly at Hawaii ranges) has never detected any DU contamination on people, equipment, and vehicles any time anywhere.
- Avoiding the 0.7-mile portion of the IED Defeat Lane that is within the Range C8 Target Zone/Impact Area RCA adds no less than 2.7 miles and up to 3.9 miles of unproductive travel around the RCA.

4.5.1 Training events

Training events in the Range C8 may involve a platoon-sized element consisting of approximately fifty soldiers or may focus on a company-sized element of approximately 150 soldiers. Operations may include training on the following types of tactical operations:

- Dismounted counter IED
- Conduct attack
- Conduct security
- Integration of enablers
- Company intelligence support team
- Re-supply
- Movement techniques
- React to contact
- Fire support planning
- Clearance of fires
- Conduct care under fire
- Evacuate casualties

4.5.2 Road Maintenance

Road maintenance is included in this exemption as long as workers remain in their vehicles. Workers will inform the Garrison RSO before maintenance begins, so that the Garrison RSO is aware and can provide brief instructions to the workers.

If workers perform road maintenance dismounted from their vehicles, the Garrison RSO will perform contamination surveys in accordance with section 11 and relevant SOPs.

4.5.3 Training controls

Vehicles are restricted to the IED Defeat Lane road within the Range C8 RCA (see Figure 4-1). Units will maneuver on foot only within 200 yards of the IED Defeat Lane road within the Range C8 RCA.

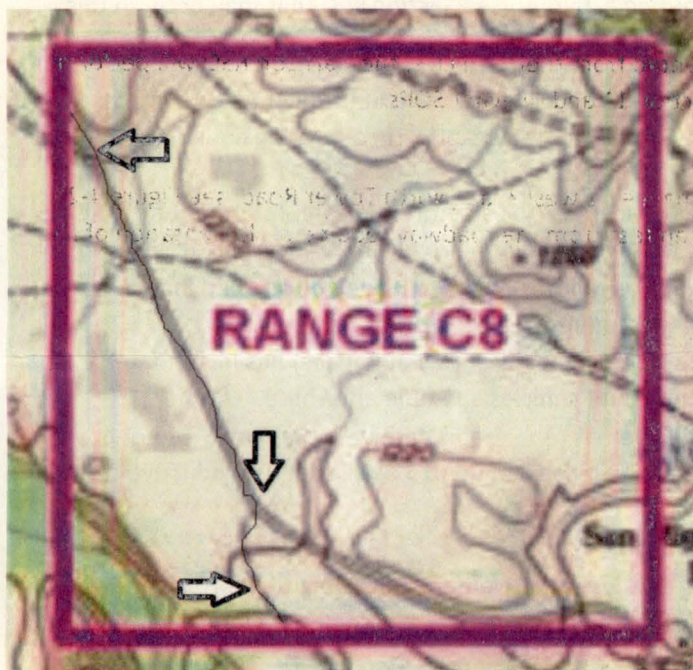


Figure 4-1 IED Defeat Lane (shown by arrows) in Range C8 RCA at Fort Hunter Liggett

4.6 Vehicle Passage through the Fort Jackson Range 62

All personnel and equipment riding in vehicles passing through the Fort Jackson Range 62 RCA on the North Tower Road (see Figure 4-2) and the vehicles themselves (including road maintenance vehicles on the main road) are exempt from the radiation safety requirements of this RSP. This exemption does not apply to routine activities (see Section 4.3) that may occur at other times in the RCA. This exemption is permissible because:

- Less than 30 kilograms of DU (estimated 135 M101 rounds) are in the RCA with a total area of 1 square kilometer (about 247 acres) at Fort Jackson. Encountering a random M101 round is unlikely.
- Routine road grading that has occurred since the 1960s before the establishment of the RCA likely moved any M101 rounds that may have been in the roadway to the sides of the road.
- All personnel entering a training range receive instructions to leave undisturbed any ordnance, which includes M101 rounds, they may encounter.
- Exit monitoring (over 10,000 individual checks, mostly at Hawaii ranges) has never detected any DU contamination on people, equipment, and vehicles any time anywhere.
- No one will exit the vehicle while it is in the RCA except for emergencies (see section 22.3) or vehicle breakdowns.
- Avoiding the RCA to reach areas east of the RCA adds more than two miles of unproductive travel. The alternate roads themselves are often unusable because of bad weather.

4.6.1 Road Maintenance

Road maintenance is included in this exemption as long as workers remain in their vehicles. Workers will inform the Garrison RSO before maintenance begins, so that the Garrison RSO is aware and can provide brief instructions to the workers.

If workers perform road maintenance dismounted from their vehicles, the Garrison RSO will perform contamination surveys in accordance with section 11 and relevant SOPs.

4.6.2 Controls

Vehicles and personnel are restricted to the main east-west road (North Tower Road, see Figure 4-2) while in the RCA. Departures for more than ten feet from the roadway require implementation of all pertinent RSP requirements.

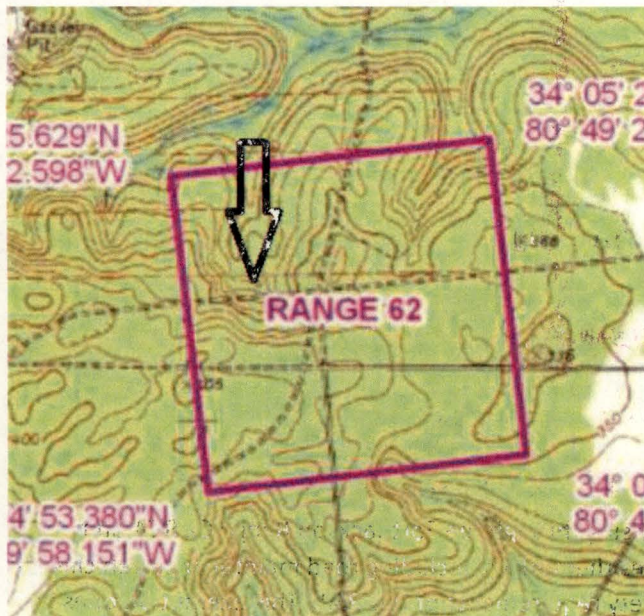


Figure 4-2 North Tower Road (shown by arrow) in Fort Jackson RCA.