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Sent: Wednesday, January 16, 2019 4:19 PM  
To: Evans, Robert; richard.chang@nrc.gov  
Cc: [REDACTED]  
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Subject: Hill Radium Permit Follow-up Email

Dr. Evans/Mr. Chang,

Good afternoon. I wanted to follow up our discussion from this afternoon regarding the permit at Hill AFB authorizing Ra-226 for possession, characterization and decontamination of residual contamination.

The Letter of Understanding (LOU) between the Nuclear Regulatory Commission (NRC) and the US Air Force (USAF) was issued in 2014. The Air Force's policy prior to this time, and before the signing of the Memorandum of Understanding (MOU) between the NRC and the Department of Defense (DoD) in 2016, was to Permit radium sites under the auspices of Air Force Instruction 40-201 (AFI 40-201) rather than the USAF Master Materials License (MML). This allowed the USAF Radioisotope Committee (USAFRIC) to track radium sites within the larger Materials Program without inappropriately bringing it under the governance of the MML.

The Hill Air Force Base Building 214 location was issued a Permit for Ra-226 in 2015, between the signing of the LOU and the MOU. The Permit currently contains an administrative error in it that cites both the USAF MML and AFI 40-201, rather than solely AFI 40-201 per current USAFRIC policy at that time.

Discussions between the USAFRIC Secretariat and NRC Region IV on 16 January 2019 brought to light the error in the Hill AFB Permit, and brought to question whether the Building 214 location was (a) Permitted under the LOU and the USAF MML, or (b) fell into the scope of the MOU. After review of pertinent documentation and further discussion with both NRC Headquarters and NRC Region IV, the USAFRIC Secretariat determined that despite the Permit's issuance a year prior to the MOU being signed, the activity should fall under the MOU agreements.

This was a unique case involving an administrative error in the original Permit, as well as occurring prior to the NRC/DoD agreement on the management and oversight of radium at DoD sites. The USAFRIC believes that placing the Hill AFB Permit for Building 214 under the auspices of the MOU aligns this site with (1) the original intent of the USAFRIC's issuance of the 2015 Permit for radium management at Hill AFB prior to the MOU's inception, and (2) aligns with the current MOU guidance and authorities.

Actions to be taken by the USAFRIC Secretariat:

- 1.) Make appropriate changes to the Hill AFB Building 214 Permit as soon as practical to reflect that this material is not governed by the USAF MML.
- 2.) Ensure the next annual AF MOU inventory listing submission includes the Hill AFB site.
- 3.) Make appropriate updates to the USAF MML/LOU in concert with NRC Region IV to reflect the MOU and any other relevant changes since the 2014 LOU version once the new version of AFI 40-201 is approved by USAF Leadership (estimated two to three months).

The USAFRIC Secretariat believes this to be a "one-off" event, and does not expect similar cases to occur in the future.

V/R,

Lt Col Hale

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