

From: [Yadav, Priya](#)
To: ["Cherry, Robert N CIV USARMY IMCOM HQ \(USA\)"](#)
Cc: [Koenick, Stephen](#); [Gersey, Linda](#); [Irvin, Ian](#)
Subject: RE: Davy Crockett DU at YPG
Date: Tuesday, January 14, 2020 12:36:24 PM

Dr. Cherry,

Thank you for notifying us of the U.S. Army's recent discovery and review of the Archive Search Reports (ASR) that Davy Crockett M101 rounds were historically fired at Yuma Proving Ground, AZ and Aberdeen Proving Ground, MD. Your notification is in accordance with the License Condition 12 of SUC-1593 which requires:

"If the licensee identifies information indicating that Davy Crockett-related DU may be present at a U.S. Army installation not identified in License Condition 10 or included on another U.S. Nuclear Regulatory Commission (NRC) license, then the licensee will notify the NRC in writing within 15 calendar days of the identification of this information and this notice must include a schedule for evaluating the presence of DU. The evaluation schedule should not exceed 90 calendar days from the date of the notification letter."

Both sites that the U.S. Army identified are currently covered under existing NRC licenses. After our review, we have concluded that based on the possession limits in each license (36 curies and 200,000 kg, respectively), the existing monitoring programs at Yuma and Aberdeen, NRC's regular inspections at each site, and the ASR statements indicating a high confidence that the spotting rounds were recovered, the NRC staff have reasonable assurance that depleted uranium in the U.S. Army munitions is adequately licensed and the historical use of Davy Crockett M101 spotting rounds at these sites is covered under existing NRC License SMB-1411 (Yuma PG) and NRC License SUB-834 (Aberdeen PG). We conclude that Yuma PG and Aberdeen PG do not need to be added to the Davy Crockett License No. SUC-1593.

I will be placing this email and your emails with all the information on Yuma PG and Aberdeen PG into ADAMS as publicly available.

Please contact me with any questions,

Priya Yadav, P.E.
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-----Original Message-----

From: Cherry, Robert N CIV USARMY IMCOM HQ (USA) <robert.n.cherry.civ@mail.mil>
Sent: Thursday, December 12, 2019 5:36 PM
To: Svoboda, Mary B CIV USARMY ATEC (USA) <mary.b.svoboda.civ@mail.mil>
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Subject: [External_Sender] Davy Crockett DU at YPG

Mary (and all on the BCC line),

FYSA:

Linda Gersey, an NRC inspector who inspected my DU license activities at JBLM, said I should talk to Mary about the subject. I just FTPed the USACE archive search report (ASR) about subject to Mary. The ASR executive summary says "Approximately 50 Cartridges, 20mm Spotting XM101 were fired during 1961 at YTC. All fired XM101 rounds were recovered." [it is late in the day and I have not yet looked at the APG ASR. More on APG tomorrow after I look at it.]

In the early days of setting up my license, Greg Komp and I told the NRC that any Davy Crockett DU at YPG and APG should be covered by the existing DU licenses at APG and YPG. (I did not read the YPG ASR and saw the conclusion until today although I have always had it!) The NRC seemed to accept that, but Linda is not so sure that the NRC ever took any action on this. I think that though Greg, Gurvis, and I talked about this often, I think that no one at NRC, YPG, or APG ever added it to the APG and YPG licenses' inventory.

I considered that this was business between ATEC, YPG, APG, and the NRC, so I stayed out of it because I had my own worries to set up my license at 16 other installations. Now it looks like the NRC has noticed this again, so hence this email.

I still believe that the APG and YPG DU licenses cover this stuff if any of it is there, but we obviously need some formal action that involves the NRC. I recommend that Gurvis contact the NRC with the information in the YPG ASR, so the NRC, for the record, can remove YPG from any future consideration about Davy Crockett DU at YPG. If the NRC accepts the ASR conclusion (the NRC did not accept my similar conclusion about this topic for Cold Weather test site at Fort Greely and at the Franklin Arsenal test site at Fort Dix, but after reading the YPG ASR conclusion, I may try again; more on this tomorrow, too].

If the NRC want to license YPG Davy Crockett DU and someone decides that IMCOM rather than ATEC should add YPG and APG Davy Crockett DU to our license, we should begin negotiations that will include an alert to my command group and the NRC.

Bob

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