



DEPARTMENT OF THE ARMY
UNITED STATES ARMY RESEARCH LABORATORY
2800 POWDER MILL ROAD
ADELPHI, MARYLAND 20783-1197

REPLY TO
THE ATTENTION OF

NOV 22 1996

Risk Management Division

Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, Pennsylvania 19406-1415

Dear Director:

This letter is being submitted to inform your agency of our October 1, 1996 decision to begin making preparations to cease principal activities at our Co-60 facility, and request your review of our proposed approach.

While preparations are being made, ARL plans to continue meeting license and regulatory requirements so that the facility can continue to be used to conduct in-pool and in-air irradiations up until the time the irradiator sources are removed. Operation of the facility is currently licensed under NRC license 19-17250-05.

In addition to the irradiator sources, the current license also authorizes the use of three calibration sources. Following removal of the irradiator sources, ARL will request the license be amended to delete the irradiator sources but permit the continued use of the calibration sources. The calibration sources will be retained to continue supporting non-personnel thermoluminescent dosimetry capabilities used with ARL's electronic sources of ionizing radiation.

Both the irradiator sources and calibration sources are sealed, and have been periodically leak tested in accordance with license requirements. No source leakage has ever been detected. Upon delivery of 8 new source pencils in 1986, the pool liner, pool water, pool hardware, and pool water resin filters became slightly contaminated from contamination on the rented shipping cask in which the new sources were delivered. It was determined at the time of delivery that the contamination did not originate from the irradiator sources. Contractual stipulations required the company delivering the new sources to decontaminate the facility at that time, back to background levels, which was accomplished. Following decontamination, and prior to the delivery of the new sources, quarterly wipe tests of facility surfaces and pool hardware have never revealed contamination.

Since the facility has been shown to be free of contamination, ARL does not consider the 10CFR30.36(d) requirement to submit a decommissioning plan applicable. ARL proposes to proceed by arranging for the transfer of the irradiation sources to another authorized licensee, either for use, recycling, or disposal. Following transfer, ARL will conduct a final survey of the facility, and submit with the

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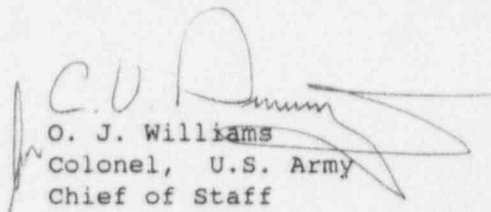


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final survey a completed NRC form 314, "Certificate of Disposition of Materials". In the event that contamination is found during the survey that requires a decommissioning plan per 10CFR30.36(f)(1), a decommissioning plan will be prepared and submitted for NRC review. As stated earlier, ARL will then request the license be amended to remove the irradiator provisions and requirements, but permit the continued use of the three calibration sources. License termination will therefore not be sought.

Request that your office verify the approach outlined above. Further request your office notify us of any regulation based timelines that apply to our proposed plan of action. Your consideration in this matter is greatly appreciated. If you need any additional information, please feel free to contact my Radiation Protection Officer, Mr. Michael Borisky, at (301) 394-2218.

Sincerely,


O. J. Williams
Colonel, U.S. Army
Chief of Staff

Copy Furnished:

U.S. Army Materiel Command Safety Office (Mr. John Manfre)