



DEPARTMENT OF THE ARMY
HEADQUARTERS, US ARMY ARMAMENT, MUNITIONS AND CHEMICAL COMMAND
ROCK ISLAND, ILLINOIS 61299-6000

REPLY TO
ATTENTION OF:
AMSNC-SFS

21 OCT 1985

SUBJECT: Inventory Requirements for AMCCOM NRC Licenses

THRU: U.S. Army Materiel Command
Attention: AMCSF-P
5001 Eisenhower Avenue
Alexandria, Virginia 22333-0001

TO: Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Sir:

Reference Mail Control Numbers 18088, 18149, and 18150.

This letter is in response to your letter dated March 27, 1985, regarding NRC license requirements for physical inventories.

Your letter addressed the annual physical inventory requirements of our licenses BML 12-00722-09, BML 12-00722-11, BML 12-00722-13, BML 12-00722-04, and BML 12-00722-07. The annual physical inventory requirement is being met for the items covered in these licenses.

The procedures which the U.S. Army currently has in place to ensure end user and any intermediate materiel accountability and proper disposal are addressed for each license in a separate enclosure to this letter.

Our NRC license BML 12-00722-06 has semi-annual physical inventory requirements. Since the Army regulations already in place require annual physical inventories, a request to have this license amended is addressed in a separate enclosure, also.

Proper disposal of radioactive commodities is assured by Army regulations described in the enclosures and by AMCCOM Pamphlet 385-1, which is issued to all installations who use Army radioactive materials. A copy is enclosed for your information only. The AMCCOM Pamphlet 385-1 is not included in any NRC license application since updates are made frequently.

8602190181 860110
REG LIC30
12-00722-13 PDR

FEE EXEMPT

RECEIVED
NOV 6 1985
REGION III

-2-

The point of contact in this office is Mrs. Katheryn LaFrenz
(301) 782-2966 or FTS 367-2966.

Sincerely

David P. Skogman

David P. Skogman
Acting Chief, Safety Office

Enclosures

Table of Contents

<u>Title</u>	<u>Enclosure Number</u>
1. BML 12-00722-09, BML 12-00722-04, and BML 12-00722-07	Enclosure 1
2. BML 12-00722-11	Enclosure 2
3. BML 12-00722-13	Enclosure 3
4. BML 12-00722-06	Enclosure 4
5. AMCCOM Pamphlet 385-1	Enclosure 5

BML 12-00722-09, BML 12-00722-04, and BML 12-00722-07

Physical inventories and individual records for the radioactive items covered by this license are not centrally maintained by this command. Accountability is maintained by each individual installation Accountable Property Officer for the radioactive items involved.

Accountability for the user is required by AR 710-2 and AR 740-26. Hand receipt holders must perform an annual physical inventory and perform records reconciliation update six months later. Transaction reporting is required by property book and Base Operation Supply Systems. Transactions include receipts, issues, and adjustments. AR 740-26 requires annual inventory of radioactive items at the intermediate level by standard military system.

By AR 725-50, the users and intermediates file a Report of Excess, DD Form 1348, for broken, damaged, outdated, excess material, and other material to be disposed of. This form goes through their supply channels and by the NSN, the report for an AMCCOM managed item is sent to this headquarters. The disposal instructions are then provided to the users and intermediates through supply channels.

By AR 735-11, causative research at user and intermediate levels is required by the accountable officer prior to the approval of losses. Hand receipt holders and property book officers must initiate a report of survey for all losses to determine cause for loss and to identify negligence, willful misconduct, or theft. Approving authority for reports of survey must be of military rank O6, Colonel, or above.

BML 12-00722-11

This license is for use of the MIAI sealed Co-60 source. The MIAI requires semi-annual leak testing. Therefore, a higher level of accountability is maintained in addition to the routine procedures described in enclosure 1.

For the MIAI, accountability and inventory are maintained at this command through the submitted leak test reports. A current resume of the individual responsible for each source is on file at this command and available for inspection by your office. Each individual is personally approved by the AMCCOM RPO before the source is released to his custody.

If a wipe test is not timely received, a reminder letter is generated to the responsible individual. If a wipe test is still not timely received in response to the reminder letter, the source is immediately recalled for storage.

BML 12-00722-13

In addition to the procedures described in enclosure 1, a more advanced accountability is maintained for the M43A1 chemical agent detector.

The tracking procedure for the M43A1 chemical agent detector is described in detail in Annex VIII, enclosure 5 of the NRC license application, and will not be repeated here. The tracking procedure requires this headquarters to maintain accountability of each item throughout the life cycle.

BML 12-00722-06

As described in enclosure 1, regulations are already in place in the Army requiring annual physical inventories by Army installation.

Request this license be amended to reduce the requirement from semi-annual to annual inventories.

Note to Region III:

Army - Rock Island - 18088, 18150, 18149
Amendments

See deficiency letter dated 3/27/85.

This case involves accountability and
inventory procedures. Bruce Carrico
may be contacted if there are any questions.

12-00722-09 is also timely renewal (18548).

John Wicker
3/25/85