

U.S. NUCLEAR REGULATORY COMMISSION  
REGION I

INSPECTION REPORT

Report No. 030-33261/97-001 Program Code 03211

Docket No. 030-33261

License No. 37-30062-01 Priority 1 Category B

Licensee: Defense Logistics Agency  
Defense Distribution Region East  
DDRE-DW (Safety Office)  
New Cumberland, Pennsylvania 17070-5001

Facility Name: Susquehanna, Letterkenny, and Tobyhanna Depots

Inspection At: New Cumberland, Chambersburg, and Tobyhanna, Pennsylvania

Inspection Conducted: February 26 - 28 and April 7 - 8, 1997

Inspectors: C. Thor Oberg, Health Physicist

June 4, 1997  
date

Approved By: John D. Kinneman, Chief  
Nuclear Materials Branch 2  
Division of Nuclear Materials Safety

6/5/97  
date

Inspection Summary: Routine Unannounced Safety Inspection Conducted February 26 - 28 at Susquehanna and Letterkenny Depots, and April 7 - 8, 1997 at Tobyhanna Depot (Inspection Report No. 030-33261/97-001).

Areas Inspected: Organization and scope, commodity inventories, security and control of materials, nondestructive DEMIL operations, and review of typical problems.

Results: No safety issues or violations were identified.

RETURN ORIGINAL TO  
REGION I

## DETAILS

### 1. Persons Contacted

- \* James L. Vick, Colonel, USAF, Deputy Commander, DLA, DDRE, DDSP
- ◆ \* ◆ \* Allen Hilsmeier, RSO, DLA, DDRE, DDSP & DDLP
- ◆ \* ◆ \* James D. Wood, ARSO, DLA, DDRE, DDSP & DDLP
- ◆ John Stamatellos, Safety & Occupational Health Mgr., DLA, DDRE, DDSP
- \* ◆ \* Michael A. Coogen, HP, Env. & Safety Policy, (DLA HQ, Ft. Belvoir, VA,) DLA, DDRE, DDSP & DDLP
- Eric Greene, RPO, DLA, DDRE, DDSP
- Ed Skocik, ARPO, DLA, DDRE, DDSP
- Carol Melvin, DLA, DDRE, DDSP Acting Branch DDSP-X
- ◆ \* Stephen G. Wheeler, Lieutenant Colonel, USA, Depot DLA Commander, DDRE, DDLP
- ◆ \* Ronald E. Snyder, Chief, Support Office, DDLP-X, DLA, DDRE, DDLP
- ◆ \* Larry Wenger, RPO, DLA, DDRE, DDLP
- ◆ Dennis Johnson, ARPO, DLA, DDRE, DDLP
- ◆ Eldon Holtry, RPO, LEAD
- Others from Shipping, Receiving, and Warehouse Storage, DLA, DDRE, DDSP & DDLP
- \* Paul Bethke, Lieutenant Colonel, USA, Depot DLA Commander, DDRE, DDTP
- ◆ Ron Wassil, RPO, DLA, DDRE, DDTP
- \* Stan Tasselmyer, ARPO, DLA, DDRE, DDTP
- ◆ \* John Nidoh, RPO, DOA, TOAD
- Robert Barnikow, Director, Safety Office, DOA, TOAD
- Joseph Maciejewski, Director, Risk Management, DOA, TOAD
- Others from Shipping, Receiving, and Warehouse Storage, DLA, DDRE, DDTP
- + Barry Silber, RSO, DOA, Ft. Monmouth, NJ, AMSEL, SF CECOM

- ◆ - Those who attended the entrance interview
- \* - Those who attended the exit interview
- + - Telecon discussion

### 2. Organization and Scope

A Defense Logistics Agency (DLA), Defense Distribution Region East (DDRE), unofficial, organization chart is presented in Attachment A. Attachment B is a Radiation Protection Program organization chart. A listing of the DDRE Radiation Control Committee (RCC) members is presented in Attachment C. Attachment D is a tabulation of the Radiation Protection Officers (RPO)s and Alternate RPOs (ARPO)s at the various depots locations under the DLA, DDRE.

The DLA, DDRE, consisting of 11 Defense Distribution Depots within this Region, is a warehouse agency for the Department of Defense (DOD). The DLA holds a Type A Specific License of Broad Scope that authorizes receipt, possession,

storage, packaging, and distribution of serviceable radioactive materials and commodities for the various agencies of the DOD.

Each Defense Distribution Depot has a RPO and ARPO plus Radiation Monitors and Radiation Workers who conduct radiation surveys and/or handle radioactive material or commodities under the supervision of the RPO/ARPO.

Thousands of materials and commodities, including those containing radioactive material (RAM), with radioactivity ranging from exempt amounts to curie levels, are maintained under the DLA license. The RAM, in the form of sealed sources, foils or plated sources, solid metal alloys, optical systems coated with thorium compounds, and resins, is received, possessed, stored, packaged, and distributed by the DLA. The storage and movement of the radioactive materials and commodities (RAM/commodities) by the DLA is based on the demands of the various DOD organizations (services, branches, agencies, groups, departments, etc.) and controlled by an "Item Manager" (IM) for each organization.

Commodities and RAM/commodities are returned to DLA as no longer needed, for repair, or for disposal. The DLA also receives new commodities and RAM/commodities to replace depleted stock as determined by the IM. The DLA inventory of RAM/commodities can attain kilocurie quantities of radioactivity for some commodities.

Returned RAM/commodities are placed on inventory in storage by the DLA or, depending on condition, will be set aside for final disposition (repair and/or return to inventory, demilitarized and disposal, or cannibalized for reusable parts). This decision is made by the IM based on information returned with these commodities and the inspection and surveys conducted by the DLA personnel upon receipt. For each RAD/commodity shipment received, the DLA radiation monitors/workers survey, open, and verify the contents and included documentation. The receipts are categorized and the commodities or RAM/commodities are transferred to their designated storage location.

Commodities marked for disposal, which can also mean release or sale to the general public as directed by the IM, are turned over to the Defense Reutilization Marketing Office (DRMO) by the DLA for this purpose. However, because the DRMO cannot accept any RAM or RAM/commodities, these must first be demilitarized (DEMIL) to remove the RAM. The demilitarization cannot be done by the DLA, only by persons licensed to conduct DEMIL. The decision for disposal is based on the findings of the DLA Depot receiving inspection by the RPO or ARPO. DLA radiation workers and the RPO/ARPO inspect the RAM/commodities and advise the IM of their findings to aid the final decision.

No safety issues or violations were identified.

3. Commodity Inventories

Inventories of RAM/commodities, identified by a National Stock Numbers (NSNs), specific RAM/commodity identification codes, and specific storage location codes, are maintained by each depot. Using these numbers and codes, the RAM/commodity inventory is appropriately updated with every commodity addition or removal. Quarterly summaries of materials in stock are included in the RCC meeting minutes which are submitted to DLA, DDRE, from each depot. Radionuclide inventories are conducted annually by each depot and submitted to DLA, DDRE, during the month of November.

The inspector reviewed the DLA radionuclide inventory for 1996, as tabulated by the quantity at each depot, and the inventory submitted by the depots for the inventory. In addition, the current inventory was reviewed at the depots inspected.

An inventory of the commodities and the RAM/commodities held by the DLA for is maintained by the individual DOD organization's IM. Based on the needs of the particular organization, the IM will request an amount/number of commodities and/or RAM/commodities be withdrawn from stock and shipped to a specified location by the DLA.

No safety issues or violations were identified.

4. Security and Control of Material

Based on interviews and observations, the DLA has established sufficient and adequate checks and rechecks to preclude the possibility of RAM/commodities being inadvertently released to unrestricted areas, for unauthorized use, or to the public domain. The RAM/commodities are stored in designated warehouse buildings within the security fenced and guarded area of the depots. The buildings or inside staging areas are maintained secure against unauthorized use or removal of RAM/commodities.

RAM/commodity inventories, as discussed in the foregoing Section 3., are also employed as a means of material control verification.

The DLA personnel verify the identification of RAM/commodities, conduct radiation and contamination surveys, and stage the RAM/commodities for handling. However, repairs, DEMIL for final disposition, or disposal as radioactive waste of RAM/commodities, cannot be done by the DLA. These operations are accomplished by persons licensed to do these type operations. Following such operations, the DLA conducts radiation surveys to verify the work was done correctly. Repaired RAM/commodities are surveyed and returned to storage and DEMIL commodities are surveyed and checked for RAM and contamination and transferred to the DRMO, (which handles the final disposition of nonradioactive

commodities). RAM and RAM/commodities slated for disposal to the authorized burial site are packaged, surveyed and shipped by an authorized licensee. These repair, DEMIL, and RAM waste handling operations are usually performed under a Department of the Army DOA license or their contracted licensee. If storage is necessary prior to final shipment of this waste, the DLA will arrange for this and conduct the appropriate surveys.

Before commodities, that have been DEMILed and transferred to the DRMO, are released for distribution or sale they are again surveyed for additional verification that no RAM or contamination remains. This is done by licensee that conducted the DEMIL work and frequently, at the request of the DRMO, also by the DLA.

A sampling of survey records maintained by the depots was reviewed by the inspector. The inspector observed that RAD/commodities were verified by the receipt survey and that and radioactive contamination identified was properly decontaminated.

No safety issues or violations were identified.

#### 5. Nondestructive DEMIL Operations

During the inspection at the Tobyhanna, PA depot, DDTP, the inspector found that DEMIL operations were being conducted by DLA employees. The work was done on overtime hours and not during routine daily DLA activities. Further, the work was being done under a Communications-Electronics Command (CECOM), DOA, license and not that of the DLA. The workers and a Radiation Supervisor were trained as Radiation Monitors/Radiation Workers (RM/RW) under the DLA license. They are also experienced personnel who were doing this work under the DOA license for a significant period of time before the inception of the DLA license.

The DEMIL procedures are provided by the DRMO and the IM for the CECOM mission. These are nondestructive, disassembly DEMIL procedures that require the use of only screwdrivers and wrenches to remove the RAM component from the commodity. As an example of this, certain CECOM radio sets (a very large number of which are being disposed of to be replaced by new models) contain meters and toggle switches internally painted with radioluminescent radium-226 (Ra-226) paint and appropriately sealed within these items. The radio sets are to be disposed of (sold to the public) by the DRMO after the DEMIL operations. The procedures require the removal of screws and/or nuts and bolts holding these components in place. The wires attached to these components are cut and the item containing the RA-226 is free to be removed from the radio set. The nondestructively removed RAM component is deposited in a Low Level Radioactive Waste (LLRW) container. The radio set is surveyed and checked again to verify that no RAM or contamination remains in or on it. The inspector was informed that in consideration of the size and number of these radio sets taken out of service, this and similar nondestructive, disassembly DEMIL operations



conducted by experienced and trained DLA personnel, under a license authorizing such operations, are cost effective as opposed to the expense of disposal of the entire RAM/commodity (radio set) as LLRW.

While inspecting the DLA receiving area at the DDTP depot, the inspector was informed that both RAM/commodities and nonRAM/commodities are received here. The DLA RM/RW arranges for the transfer of nonRAM/commodities to their storage location and checks the RAM/commodities (shipping papers, package labels, radiation surveys, and visual inspection). On occasion, depending on the number and type of RAM/commodities received, he has performed nondestructive, disassembly DEMIL operations on certain RAM/commodities (CECOM radio sets) containing only radium 226, not licensed by the NRC, at the receiving area. This DEMIL involves simple disassembly of dials and switches. The radio sets are checked after the DEMIL operations and, if free of RAM, can be released for final disposition through the DRMO. Other RAM/commodities are transferred from receiving to their proper storage location.

No safety issues or violations were identified.

#### 6. Review of Typical Problems

Problems encountered by DLA are discussed below.

As described in a letter dated June 2, 1995, from the DLA to RI NRC, on three occasions between March 17 and May 19, 1995, the DDLP (Letterkenny Depot) received RAD/commodity shipments from field installations under the control of DOA NRC License No. 12-00722-06, Rock Island, Illinois. The RAM/commodities were returned for repair or disposition as unserviceable. All three shipments were to contain tritium subcomponents such as Fire Control Quadrants, M-17 Quadrants, and Telescope Level Vials. Upon receipt and inspection by DLA the RPO found that not all of the RAM/commodity subcomponents were in the package. RAM/commodities that were in the packages were accepted and stored for subsequent disposition by the DDLP depot DLA

Normally, shipments, from a DOA license to DLA, of unserviceable RAD/commodities have documentation from the shipper indication that materials are missing, broken, etc. Because this documentation was missing in these shipments, the matter was brought to the attention of the DOA IM as required by DOD procedure. The DLA notified the DOA IM of the missing RAM items via a Report of Discrepancy (ROD). No response has subsequently been received by the DLA.

Because of the apparent lack of notification to RI from DLA as follow-up documentation on these commodities, the RI inspector reviewed the occurrences at the DDSP and at the DDLP depots. The inspector found that, as of April 11, 1997, neither the RSO at the DDSP Depot nor the RPO at the DDLP Depot have

received any documents from the shippers in response to the RODs regarding the missing RAM/commodity subcomponents. The NRC Region III staff at Lisle, Illinois, are presently investigating the performance of the DOA licenses based at Rock Island, Illinois.

Other problems encountered by the DLA are the occasional misidentification of RAM/commodities, the identification of nonRAM/commodities as RAM because of a Hazard Code misidentification by shippers, or the failure of the IM arranging the RAM/commodity shipment or the commodity supplier to specify that it contains RAM components. Further, the depot DLA infrequently receives packages from DOA licensed field locations that are internally contaminated or contain contaminated RAM/commodities. The package is closed and sealed, then set aside for decontamination by an authorized licensee before acceptance for possession by the DLA.

No safety issues or violations were identified.

#### 7. Exit Interviews

The routine inspection of the Defense Logistics Agency (DLA), Defense Distribution Region East (DDRE), License No. 37-30062-01, at the Defense Distribution Depot Susquehanna, PA (DDSP), Defense Distribution Depot Letterkenny, PA (DDL P), and Defense Distribution Depot Tobyhanna, PA (DDTP), was completed on April 8, 1997. The findings of the inspections were discussed at each exit interview at the DDL P, DDSP, and DDTP depots, held respectively on February 10, 11 and April 8, 1997, with those individuals identified in Section 1. of this report.

No violations were identified during the inspection.

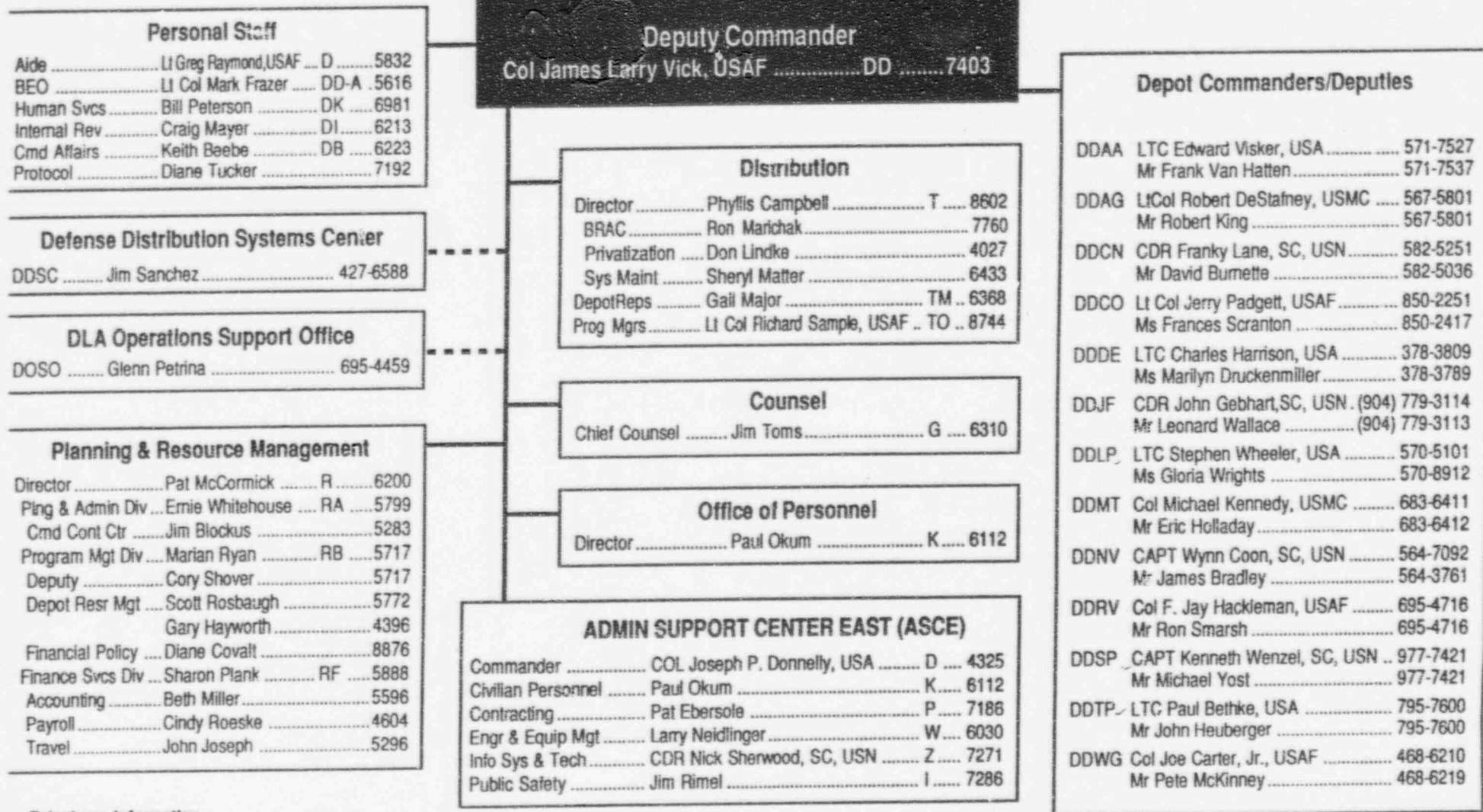
ATTACHMENT A: DEFENSE DISTRIBUTION REGION EAST  
ORGANIZATION CHART (UNOFFICIAL)



# Defense Distribution Region East

DDRE

New Cumberland, PA 17070-5000



## Telephone Information

Commercial ..... 717) 770-EXT  
 JSN ..... 977-EXT  
 On Site ..... Dial 4 before last four digits  
 Hot Line ..... 6440

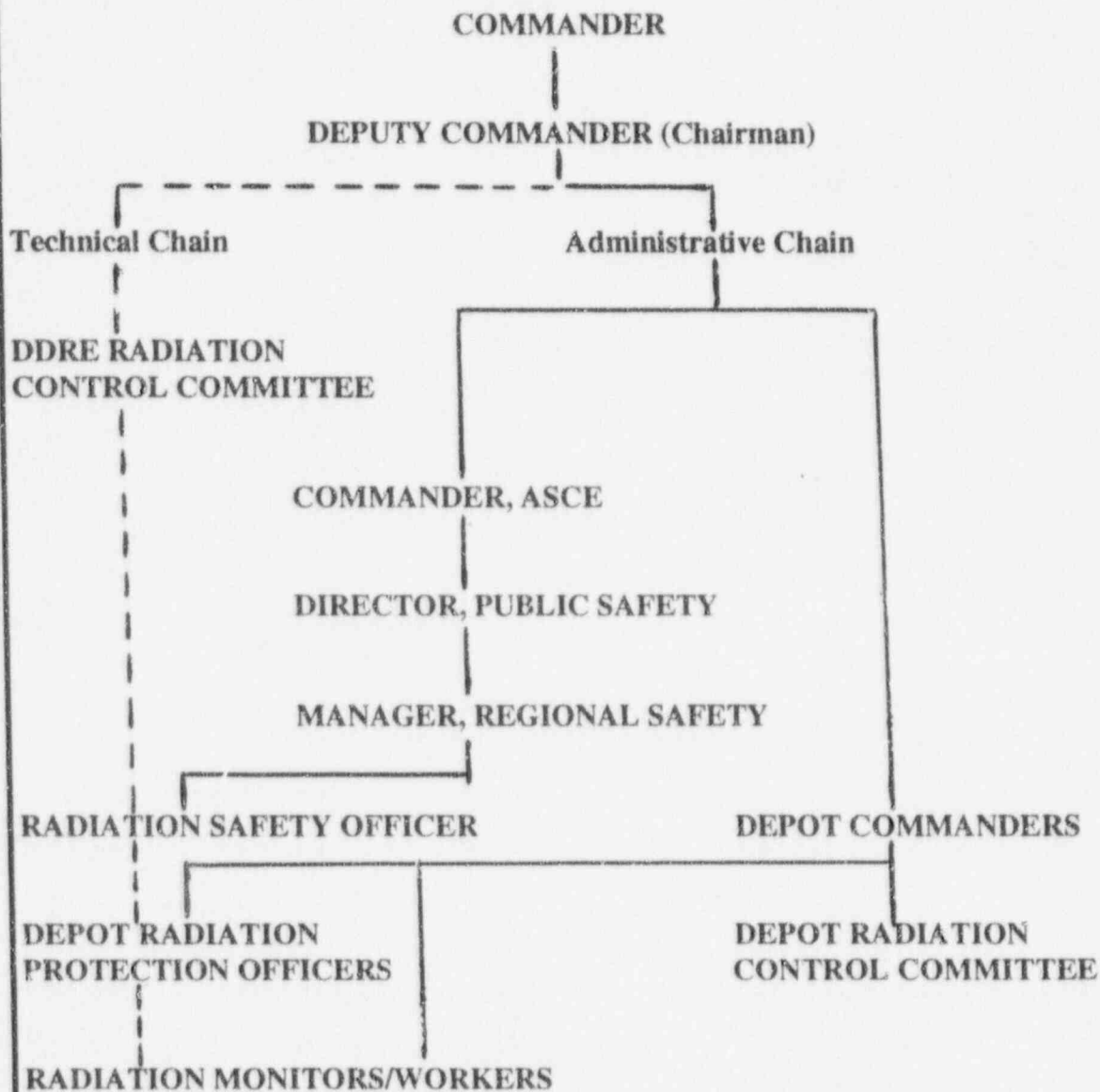
Operator ..... 6011  
 DoD Fraud/Waste/Abuse ... 800-424-9098  
 Weather ..... 558-6410

This is NOT an Official Organization Chart  
 Prepared by Protocol - Oct 96  
 D9665.pm5

ATTACHMENT B: DEFENSE DISTRIBUTION REGION EAST  
RADIATION PROTECTION PROGRAM  
ORGANIZATION

# DEFENSE DISTRIBUTION REGION LAST RADIATION PROTECTION PROGRAM

## ORGANIZATION



----- Unofficial Communication  
\_\_\_\_\_ Official Communication

ATTACHMENT C: THE RADIATION CONTROL COMMITTEE  
DEFENSE DISTRIBUTION REGION EAST



DEFENSE LOGISTICS AGENCY  
DEFENSE DISTRIBUTION REGION EAST  
NEW CUMBERLAND, PA 17070-5001



IN REPLY

REFER TO DDRE-DW

NOV 27 1995

MEMORANDUM FOR DDRE-DW/TO/RA/ ASCE-IP/IF

SUBJECT: Appointment of DDRE Radiation Control Committee

The Nuclear Regulatory Commission License 37-30062-01, issued to DDRE, and DDREM 6055.20, Radiation Safety Program, 1 July 1995, paragraph 1-7a(1)(e), requires the Commander, DDRE, to appoint a Radiation Control Committee (RCC).

In accordance with the above references, the following appointments are made for the DDRE RCC:

Col James Larry Vick	Commander, Chairperson*
Mr. John Stamatellos	Safety & Occupational Health Manager*
Mr. Allen Hilsmeier	Radiation Safety Officer*
Mr. James Wood	Alternate Radiation Safety Officer*
Mr. Fred Young	DDRE-RA
Mr. Larry Finley	DDRE-TO
Mr. James Derstine	ASCE-IF
Mr. Darrell Shears	ASCE-IP

The RCC shall meet quarterly or at the discretion of the Commander. If a quarterly meeting is not held for lack of substantive content, the cancellation shall be documented and approved by the Commander. Only two cancellations shall occur in a year.

Each member of the RCC can have a representative attend in his/her absence. At least three members designated with an asterisk, or their representatives, and one other member or their representative, must be present to constitute a quorum.



ATTACHMENT D: DEPOT RADIATION PROTECTION OFFICERS  
DEFENSE LOGISTICS AGENCY  
DEFENSE DISTRIBUTION REGION EAST 2



## DEPOT RADIATION PROTECTION OFFICERS

<u>DEPOT</u>	<u>NAME</u>	<u>PHONE</u>
DDAA	DAVID BALLARD ROBERT CURRY (ALTERNATE)	DSN 571-6939
DDAG	MICHAEL JAMES MICHAEL ORTEGA (ALTERNATE)	DSN 567-5850
DDCN	RON HAWKINS WILLIAM BOWEN (ALTERNATE)	DSN 582-2335
DDJF	LEO LOUNSBERRY LARRY TODE (ALTERNATE)	COM (904) 779-3277
DDL P	LARRY WENGER DENNIS JOHNSON (ALTERNATE)	DSN 570-8104
DDNV	RON HARTMAN PAUL BRANNIGAN (ALTERNATE)	DSN 565-2005
DDRV	ARIEL ROSA RANDY MORLEY (ALTERNATE)	DSN 695-5121
DDSP	ERIC GREENE ED SKOCIK (ALTERNATE)	DSN 977-8814
DDTP	RON WASSIL STAN TASSELMYER (ALTERNATE)	DSN 795-6675
DDWG	ROGER HAYES LOUIS COPELAND (ALTERNATE)	DSN 468-6450