

January 25, 2021

USNRC, Region II,
245 Peachtree Center Avenue, NE.
Suite 1200
Atlanta, GA 30303-1257

Submitted via email to: RidsRgn2MailCenter@nrc.gov

SUBJECT: 14 Day Advanced Notice prior to Initiation of Activities Associated with License # 41-35520-01, Docket 030-39147; NAS JAX

Dear Sir or Madam,

This letter is to inform the NRC of the invocation of this license for fieldwork associated with a project at US Navy Air Station in Jacksonville, Florida. In accordance with 18. A. of the above-mentioned license, the following information is provided:

- (1) The estimated type, quantity, and physical/chemical forms of licensed material to be used:

The radionuclide of concern for this project is radium-226 (Ra-226). The exact quantity is currently unknown, however concentrations are expected to be less than 50 pCi/g. The physical/chemical form anticipated is radium sulfate primarily.

- (2) The specific site location:

The project location is at Navy Air Station (NAS), Jacksonville (JAX), Florida. Specifically, an area within the Fleet Readiness Center South East (FRCSE) Building 101 Administrative Office at NAS JAX is to be remediated.

- (3) A description of the planned activities including waste management and disposition:

The planned activities are removal of approximately 100 feet of pipe and surrounding soil under a concrete slab. Low level radioactive waste (LLRW) removed during the project will be under Perma-Fix oversight prior to transfer to the Navy's LLRW broker.

- (4) The estimated start date and completion date for the job:

The estimated start date for field work is February 8th, 2021. Completion is expected on or about March 19th, 2021.

- (5) A copy of the written agreement between the licensee and the customer as described by condition 15:

A Memorandum of Understanding (MOU) between the NAS JAX, Whitesell-Green, Inc. (WGI), and Perma-Fix is in final draft and, with that draft provided as attachment to this notice. The signed MOU will be provided once available.

Please let me know if you have any questions. I may be reached at 808-987-7555 or via email at emiller@perma-fix.com.

Best Regards,



S. Eric Miller, CHP
Corporate RSO
Perma-Fix Environmental Services

Attachments:

- MOU Between Naval Facilities Engineering Command Southeast, Naval Sea Systems Command, Naval Sea Systems Command Detachment Radiological Affairs Support Office, Whitesell-Green, Inc., and Perma-Fix Environmental Services, Inc.

MEMORANDUM OF UNDERSTANDING

Between

**Naval Facilities Engineering Command Southeast, Naval Sea Systems Command,
Naval Sea Systems Command Detachment Radiological Affairs Support Office,
Whitesell-Green, Inc., and Perma-Fix Environmental Services, Inc.**

**RE: PERFORMANCE OF RADIOLOGICAL SERVICES BY PERMA-FIX AT NAVAL
AIR STATION, JACKSONVILLE, FLORIDA**

1. Background

a. Naval Facilities Engineering Command Southeast (NAVFAC SE) entered into Contract No. N69450-16-D-1109, T.O. N69450-18-F-0727 with Whitesell-Green, Inc. (WGI) to provide services in connection with remediation of an area within the Fleet Readiness Center South East (FRCSE) Building 101 Administrative Office at Naval Air Station (NAS) Jacksonville, FL (JAX). WGI subcontracted Perma-Fix Environmental Services, Inc. (Perma-Fix) to perform radiological services under Perma-Fix's Nuclear Regulatory Commission (NRC) Radioactive Materials License (RML) 41-35520-01 and Radiological Protection Plan (RPP). This Memorandum of Understanding (MOU) serves as clarification of the agreement between the U.S. Department of Navy (DoN), WGI (contractor), and Perma-Fix (WGI's subcontractor) regarding the coordination of radiological activities, roles, and responsibilities as required by Perma-Fix's RML.

b. The Historical Radiological Assessment Report for Naval Air Station Jacksonville, Florida, completed in August 2016 provides a history of the use of general radioactive materials from 1940 to 2015. The report identifies the "Assembly and Repair Department/NARF Complex" as a potential G-RAM area, which encompasses Building 101. Follow-up research was conducted in November 2019 for the Historical Radiological Assessment report and based on information recently discovered at a similar FRC building located at another installation. With this information, RASO is concentrating on identifying former radium paint shops, one of which was identified in Building 101. Although the DoN is recognized as owner of the radioactive materials at NAS JAX the DoN's Master Material's License (MML) is not invoked for the work conducted pursuant to this contractual agreement.

2. Organizational Responsibilities.

The intent of this section is to outline the general applicability and responsibilities of the DoN, WGI pursuant to its contract, and Perma-Fix pursuant to its NRC RML. Each organization has distinct areas of responsibility.

a. In accordance with the contract specific in paragraph 1.a above, Perma-Fix shall:

(1) Ensure access is controlled to all work areas under Perma-Fix's control for activities where radioactive materials are known or suspected of being present.

(2) Control radioactive materials used for operational check of radiation detection and/or laboratory equipment.

(3) Perform work using radiologically sound work practices following standard

operating procedures consistent with Perma-Fix's NRC-approved RML and radiological protection plan (RPP), work performance documents (i.e., work plan, sampling and analysis plan, etc.) approved by the DoN and Federal and/or state agency regulators, as appropriate.

(4) Maintain training and dose records for WGI, Perma-Fix, and other subcontractors, as appropriate.

(5) Prepare, issue, and maintain radiation work permits for work controlled by Perma-Fix.

(6) Provide radiological oversight and controls in accordance to Perma-Fix's NRC approved RML/RPP the DoN's radioactive materials including low-level radioactive waste (LLRW) removed during work performance prior to transfer to the Department of Defense (DoD's) LLRW waste broker.

(7) Characterize and inventory LLRW removed during the performance of field work and provide these characterization data to NAVSEA DET RASO to coordinate transfer to the DoD's LLRW broker.

(8) Submit reports and other administrative requirements concerning work activities/performance, including daily progress reports during times of field activity; and radiological surveys to NAVSEA DET RASO, and additional DoN representatives, as requested. Information will be provided regarding the radiological conditions of work areas, radioactive contamination found, and status of any identified waste.

(9) Assess radiological levels in indoor and outdoor areas and on materials and equipment.

(10) Perform radiological surveys of materials and equipment, areas, and spaces used during the performance of site work to confirm and document the as-left conditions are suitable for restoration of the drain-pipe.

(11) Coordinate public health and safety assurance issues with the DoN and WGI.

(12) Assist the DoN with site clean-up if there is an accident.

b. WGI shall:

(1) Ensure Perma-Fix complies with the requirements of this MOU.

(2) Follow work control and radiological direction of Perma-Fix while conducting contracted work.

(3) Allow unimpeded communication between the DoN and Perma-Fix concerning project radiological issues and operations.

c. The DoN shall:

- (1) Provide periodic oversight of the field work.
- (2) Allow Perma-Fix to perform work using radiologically sound work practices following standard operating procedures approved under Perma-Fix's NRC RML/RPP, and DoN and regulator approved field work documents, health and safety plan, radiation health plan, and performance work statement.
- (3) Address Perma-Fix performance issues with the Contracting Officer.
- (4) Monitor site work by performing on-site visits, tracking on daily progress reports, and/or participating in conference calls.
- (5) Review site investigation data.
- (6) Provide information about former radiological operations or possible DoN radioactive materials that could be encountered during site work.
- (7) Coordinate with DoD's LLRW broker to provide transport and disposal of radioactive materials or mixed waste found as a result of conduct of site work.
- (8) Work with Perma-Fix to address any unexpected contamination or radiological control issues.
- (9) Provide assistance with public health and safety assurance issues.
- (10) Issue public statements regarding radiological issues.
- (11) Review/approve radiological surveys of as-left conditions to confirm suitability for restoration work to proceed.

3. Jurisdictional Issues and Changes.

Jurisdictional issues or specific situations not covered under this agreement will be discussed between the DoN and Perma-Fix for resolution and documented by amendment to this MOU.

4. Effective Period:

This MOU is effective upon signatures by all parties and will expire at the end of the contract awarded to WGI.

5. Approval:

Karen Strange, Construction Manager
NAVFAC SE, Jacksonville

Date

Eric Lieberman, Health Physicist
NAVSEA DET RASO, Virginia

Date

Christian Mauldwin, Project Manager
Whitesell-Green, Inc.

Date

Eric Miller, CHP, Corporate Radiation Safety Officer
Perma-Fix Environmental Services, Inc.

Date