



**DEPARTMENT OF THE AIR FORCE
HEADQUARTERS UNITED STATES AIR FORCE
WASHINGTON DC**

4 February 2022

MEMORANDUM FOR NRC REGION IV
ATTN: Ms. Allyce Bolger

FROM: AFMRA/SG3PB
7700 Arlington Blvd
Falls Church, VA 22042

SUBJECT: Kirtland Air Force Base Department of the Air Force Inspection Agency (DAFIA)
Severity Level III Rationale

1. During the December 2021 inspection, the Department of the Air Force Inspection Agency (DAFIA) issued a Severity Level III finding on the Kirtland Air Force Base Permit NM-00602-02/00AFP.
2. REQUIREMENT: 10 CFR 20.1801 requires the licensee (Permittee) to secure from unauthorized removal or access licensed materials that are stored in controlled or unrestricted areas. Additionally Permit Condition 14 requires that permitted material shall be stored in a secured area when not under the direct supervision of an authorized user and that access to the sites shall be controlled by the Permit Radiation Safety Officer (RSO) and the Installation RSO as described in the current permit application.
3. VIOLATION: Contrary to the above, on 13 December 2021, the entrance to the chain link fence securing at Training Site 3 was found to be inadequate to prevent access. The radioactive material located within this area is unsealed Brazilian thorium (Th-232) oxide sludge (with trace amounts of Uranium-238 and Uranium-234). There is a maximum total of 1774 kilograms, 193 millicuries over all four of the training sites. The opening to this site is wide enough for a person to fit through.



Figure 1: Training Site 3 Fence (Pre- Corrective Action)

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4. There are security measures in place that are exterior to TS-3's fence. The installation is surrounded by a barbed-wired fence-line or mountain range along with military police patrols.

5. Corrective Action: The TS-3 gate has been secured with a second chain and lock plus two ratchet straps. The additional chain and straps have secured the gate so that a person is not able to gain access. Bioenvironmental is updating the OT-10 access OI to accurately reflect the current approved procedures. The Permit RSO has submitted a work order (#M-5236) with the 377th Civil Engineering Squadron to have the gate replaced. In addition, BE have added monthly physical security checks to their standard operating procedures. The checks include all six gates, plus walking the fence line to ensure integrity of the secure area.

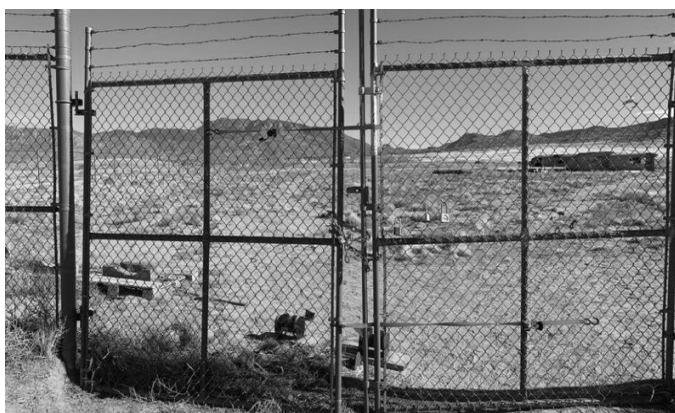


Figure 2: Training Site 3 Fence (Post - Corrective Action)

6. Should you have any questions, please contact me at (703) 681-7876 or via email at christina.peace.mil@mail.mil.

PEACE.CHRISTIN
A.1258846024
CHRISTINA PEACE, Lt Col, USAF, BSC
Chief, Radioisotope Committee Secretariat
Office of the Air Force Surgeon General

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From: [Peace, Christina \(Restin\) Lt Col USAF AFMRA \(USA\)](#)
To: [Bolger, Allyce](#)
Subject: [External_Sender] OT-10 Site (UNCLASSIFIED)
Date: Tuesday, February 22, 2022 9:56:43 AM

CLASSIFICATION: UNCLASSIFIED

Good morning, Ms. Bolger. It is a reasonable assumption that TS-3 has less than half of the material at this location. There is a maximum total of 1774 kilograms, 193 millicuries over all four of the training sites. Please let me know if you have additional questions. Thank you.

v/r

CHRISTINA "RESTIN" PEACE, Lt Col, USAF, BSC
Chief, Radiation Health
Office of the Air Force Surgeon General
Defense Health Headquarters
ATTN: AFMRA/SG3PB
7700 Arlington Blvd. Suite 5151
Falls Church, VA 22042
703-681-7876 (DSN: 761)
NIPR: christina.peace.mil@mail.mil
SIPR: christina.peace.mil@mail.smil.mil

I am currently teleworking on Mondays, Wednesdays and Fridays, I can be reached directly via email or [REDACTED]

The AF Radioisotope Committee after hours/emergency phone number is 301-981-5058, (DSN 858). Please note this number is for the Andrews Regional Command Post. When calling, inform them you are calling for the on-call member of the RIC Secretariat and be prepared (if asked) to give: your name, on/off duty phone number, location, and nature of emergency.

CLASSIFICATION: UNCLASSIFIED