



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION I  
475 ALLENDALE ROAD  
KING OF PRUSSIA, PA 19406-1415

April 25, 2000

Docket No. 040-07455

License No. SMA-1018

Bennett F. Moore  
President  
Whittaker Corporation  
1955 Surveyor Avenue  
Simi Valley, CA 93063-3386

SUBJECT: INSPECTION NO. 040-07455/2000-01

Dear Mr. Moore:

On March 28, 2000, Steve Shaffer of this office conducted a safety inspection at your Greenville, PA site of activities authorized by the above listed NRC license. The inspection was an examination of your licensed activities as they relate to radiation safety and to compliance with the Commission's regulations and the license conditions. The inspection consisted of observations by the inspector, interviews with personnel, and a selected examination of representative records. The findings of the inspection were discussed with Roy Racino and Patrick Horkman of NES Scientech at the conclusion of the inspection.

Within the scope of this inspection, no violations were identified.

In accordance with Section 2.790 of the NRC's "Rules and Practices," Part 2, Title 10, Code of Federal Regulations, a copy of this letter will be placed in the Public Document Room. No reply to this letter is required.

Your cooperation with us is appreciated.

Sincerely,

***Original signed by Ronald R. Bellamy***

Ronald R. Bellamy, Chief  
Decommissioning and Laboratory Branch  
Division of Nuclear Materials Safety

cc:  
Roy Racino, Radiation Safety Officer  
Roy Woods  
State of California  
Commonwealth of Pennsylvania

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NAME	Sshaffer SWS		Rbellamy RRB1			
DATE	25 April 2000		04/25/00			

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**APPENDIX A**  
**MATERIALS DECOMMISSIONING INSPECTION RECORD**  
**FOR FACILITIES NEEDING SIGNIFICANT DECOMMISSIONING EFFORT**  
**Region I**

Licensee (Name & Address):		Inspection Report No. :	2000-01
Whittaker Corporation 1955 Surveyor Avenue Simi Valley, California 93063-3386		License No.:	SMA-1018
		Docket No. :	040-07455
		Telephone No.:	805-526-5700
Licensee Contact:	Bennett F. Moore, President		
Priority:	1	Date of Last Inspection:	13 April 1999
Program Code:	11900	Date of This Inspection:	28 March 2000
Type of Inspection:	<input checked="" type="checkbox"/> Announced	<input type="checkbox"/> Unannounced	
	<input checked="" type="checkbox"/> Routine	<input type="checkbox"/> Special	
	<input type="checkbox"/> Initial Decommissioning	<input checked="" type="checkbox"/> Reinspection of Decommissioning	
Next Inspection:	March 2001	<input checked="" type="checkbox"/> Normal	<input type="checkbox"/> Reduced <input type="checkbox"/> Extended

**Brief Description of Inspection Activities:**

Reviewed site conditions, the licensee's site maintenance program, characterizations sampling, and the installation of groundwater monitoring wells.

**Brief Description of Findings and Action:**

No safety or regulatory concerns were identified.

**Summary of Findings and Action:**

- No violations cited, clear NRC Form 591 or regional letter issued
- Violation(s), clear NRC Form 591 issued
- Violation(s), regional letter issued
- Followup on previous violations

Inspector:	Steve Shaffer <span style="float: right;"><i>/RA/</i></span>	Date:	04/25/00
	(Type Inspector's Name)		
Approved:	Ronald R. Bellamy, Chief <span style="float: right;"><i>/RA/</i></span> Decommissioning and Laboratory Branch	Date:	04/25/00
	(Type Name of Approving Individual)		

[Field notes are to be used by the inspector to assist with the performance of the inspection. Note that all areas indicated in the field notes are not required to be addressed during each inspection. However, for those areas not covered during the inspection, a notation ("Not Reviewed") should be made in each section where applicable. Additionally, all areas covered during the inspection should be documented in sufficient detail to describe what activities and/or records the inspector observed. The fieldnotes to the "Decommissioning Inspection Procedure for Materials Licensees" should be supplemented with: (1) the applicable inspection procedures for operating facilities provided in the Inspection Procedure (IP) 87100 series; and (2) other written documentation of the inspection, as necessary.]

**1. SUMMARY OF DECOMMISSIONING STATUS**

The checklist below is intended to provide, in a written outline format, summary documentation of the status of the licensee's facility in the decommissioning process. This documentation will be filed as part of the inspection report. The inspector should use this information to develop each inspection plan(s) for the various stages of decommissioning, namely, before dismantlement, during dismantlement and site remediation, and after site remediation.

A. Licensee ceased operational program	X	Y	<input type="checkbox"/>	N
B. Required decommissioning financial assurance mechanisms in place.	X	Y	<input type="checkbox"/>	N
C. Decommissioning Plan (DP) required.	X	Y	<input type="checkbox"/>	N
D. Licensee final survey required.	X	Y	<input type="checkbox"/>	N
E. NRC confirmatory survey required.	X	Y	<input type="checkbox"/>	N
F. NRC closeout inspection required.	X	Y	<input type="checkbox"/>	N
G. Licensee doing decommissioning planning and preparation before dismantlement	<input type="checkbox"/>	Y	<input type="checkbox"/>	N
H. Licensee actively remediating site.	<input type="checkbox"/>	Y	<input type="checkbox"/>	N
I. Licensee completed site remediation.	<input type="checkbox"/>	Y	<input type="checkbox"/>	N

Description of Facility Status:

The facility is properly fenced. The fenced in area is properly posted.

**2. INSPECTION OF KEY DECOMMISSIONING ACTIVITIES**

The following is a generic checklist of major licensee activities occurring at various stages of decommissioning. From this generic checklist and from facility-specific activities you identify, develop the set of licensee activities to be inspected - for each individual inspection throughout the decommissioning process. Plan to inspect licensee activities that present potential high-risk conditions. Then apply the standard health and safety inspection areas in Section 3 of these fieldnotes (taken from the applicable 87100 series IP for the licensee's operational program) to the specific licensee decommissioning activities that are being inspected.

To complete the licensee activities checklist, the inspector will need to obtain information from the Licensing Project Manager, review the DP, make observations at the licensee's facility, review licensee records, take measurements and samples of contaminants, and undertake other investigative measures, to determine whether the licensee is meeting all regulatory and DP commitments for each decommissioning activity the licensee is performing.

- A. LICENSEE ACTIVITIES INSPECTED BEFORE DISMANTLEMENT  N/I  N/A
1. Licensed material used during operations has been removed from site.  Y  N
  2. Facility license conditions are in place and met by licensee.  Y  N
  3. Site security and control of contaminated material being maintained in compliance with 10 CFR 20.1801 and 20.1802.  Y  N
  4. Support systems and services (e.g., lighting, water supply) are in place.  Y  N
  5. Decommissioning schedules are consistent with timeliness requirements in 10 CFR 30.36, 40.42, and 70.38.  Y  N
  6. Licensee's recordkeeping is consistent with 10 CFR 30.35, 40.36, and 70.25.  Y  N
  7. Financial assurance requirements are being maintained in accordance with 10 CFR 30.35, 40.36, and 70.25.  Y  N
  8. Licensee is conducting site characterization in accordance with applicable radiation protection procedures.  Y  N
  9. Construction of new site features (e.g., roads, rail spurs, staging areas, sediment control ponds) conforms to DP and does not compromise health and safety of workers and public.  Y  N
  10. Licensee activities conform to specific license conditions and licensee programs and procedures.  Y  N
  11. Other licensee activities(describe below):

Basis for findings:

- B. LICENSEE ACTIVITIES INSPECTED DURING DECONTAMINATION, DISMANTLEMENT, AND SITE REMEDIATION  N/I  N/A

1. Site security and control of contaminated material being maintained in compliance with 10 CFR Part 20.  Y  N
2. Decontamination and dismantlement of structures are being performed consistent with DP and sound industry practice (structures include buildings, utilities, treatment lagoons, etc.).  Y  N

3. Decontamination and remediation of the following are being performed consistent with DP and sound industry practice:  Y  N
- a. Soil.  Y  N
- b. Sediment.  Y  N
- c. Surface waters.  Y  N
- d. Groundwater.  Y  N
- e. Other mediums (describe below):  Y  N
- 
4. Licensee release and disposal of decommissioning wastes are consistent with DP and approved by NRC for:  Y  N
- a. Liquid wastes (e.g., groundwater, surface water, liquid from treatment ponds, process liquids).  Y  N
- b. Solid wastes (e.g., building materials, process and other facility equipment, concrete rubble, soil).  Y  N
- c. Other wastes (describe below):  Y  N
- 
5. Temporary, on-site storage of low-level radioactive wastes from decommissioning meets license conditions and guidance in IP 84890.  Y  N
6. Packaging and shipment of radioactive waste materials meet requirements in 40 CFR Parts 173-178 and 10 CFR Part 71.  Y  N
7. Restoration of site-Licensee has restored site to meet license conditions and NRC-approved plans.  Y  N
8. Licensee survey of material and equipment for free release sufficient to demonstrate compliance with release criteria.  Y  N
9. Other licensee activities:  Y  N
- 

Basis for Findings:

C. LICENSEE ACTIVITIES INSPECTED AFTER COMPLETION OF SITE REMEDIATION  N/I  N/A

- |    |  |                          |   |                          |   |
|----|--|--------------------------|---|--------------------------|---|
| 1. | Licensee has submitted NRC Form 314 for disposition of licensed material in accordance with 10 CFR 30.36, 40.42, and 70.38.                    | <input type="checkbox"/> | Y | <input type="checkbox"/> | N |
| 2. | Licensee's final survey program is acceptable (see Appendix B for inspection items for final surveys).   | <input type="checkbox"/> | Y | <input type="checkbox"/> | N |
| 3. | NRC confirmatory survey performed.   | <input type="checkbox"/> | Y | <input type="checkbox"/> | N |
| 4. | Site maintenance activities (if any, for restricted use) conform to license conditions and NRC-approved plans and are in place and functional. | <input type="checkbox"/> | Y | <input type="checkbox"/> | N |
| 5. | Other licensee activities:   | <input type="checkbox"/> | Y | <input type="checkbox"/> | N |
- 

Basis for Findings:

**3. INSPECTION OF STANDARD HEALTH AND SAFETY AREAS FROM THE OPERATIONAL INSPECTION PROGRAM**

Identify the standard inspection areas (from the inspection program of the licensee's operational program) to be covered during each decommissioning inspection. [Inspection areas A through L below correspond to the typical inspection areas in the 87100 series IPs that are applicable to decommissioning.] Then identify the new activities within the standard inspection areas undertaken by the licensee during decommissioning. Some of the new activities given below, as well as any other activities the inspector identifies, should be considered inspection items under the general set of health and safety inspection areas used in the applicable 87100 series IP.

**Minimum inspection areas for the initial decommissioning inspection:** decommissioning organization (A.1); decommissioning activities in compliance with NRC-approved DP (A.2); licensee procedures for implementing the DP (A.3); Radiation Safety Committee (RSC) and Radiation Safety Officer (RSO) responsibilities (A.4); and the licensee's decommissioning training program (E.1).

**A. GENERAL OVERVIEW**

- |    |  |                          |   |                          |   |
|----|--|--------------------------|---|--------------------------|---|
| 1. | Describe the licensee's decommissioning organizational structure:                            |                          |   |                          |   |
|    | Licensee's contractor, NES, Inc., reports directly to Whittaker's president.                 |                          |   |                          |   |
| 2. | Licensee is performing decommissioning activities in compliance with its approved DP.        | <input type="checkbox"/> | Y | <input type="checkbox"/> | N |
|    | Licensee has implemented procedures for the decommissioning activities identified in the DP. | <input type="checkbox"/> | Y | <input type="checkbox"/> | N |
|    |  | ---                      |   | ---                      |   |

The RSC and RSO fulfill license requirements to deal with all decommissioning activities.

X   Y    N

Basis for Findings:

**B. FACILITIES**

1. Describe, from field observation, the licensee-identified facilities and outdoor areas to be decommissioned:

2. The licensee's remediation plan includes all the contaminated facilities and areas on-site and off-site  Y  N

3. All essential systems and services (e.g., electrical power, water supply, communications systems) are in place and functional for the planned decommissioning activities.  Y  N

4. Licensee's emergency plan is in place and operative for the duration of decommissioning.  Y  N

5. For complex sites needing site characterization, describe the key site characterization activities to be performed by the licensee to determine the nature and extent of contamination:

The licensee is performing an extensive sampling of the contaminated area and drilling groundwater sampling wells.

6. Licensee's characterization activities performed in conformance with good industry practice.  X   Y    N

Basis for Findings:

**C. EQUIPMENT AND INSTRUMENTATION**

1. Survey instruments are applicable to contaminants of interest.  X   Y    N

2. Use of survey instruments appropriate for site.  X   Y    N

Basis for Findings:

Inspector observations.

A. MATERIALS

1. Radioactive materials licensed during operations have been removed offsite; residual quantities conform to license conditions.  X Y  N
2. Security and control of licensed materials, including contaminated areas, is being maintained.  X Y  N

Basis for Findings:

Inspector observations.

E. TRAINING

1. Licensee has developed training program for new decommissioning activities (e.g., demolition of structures, excavation of soil); program is adequate.  X Y  N
2. Training program being effectively implemented.  X Y  N

Basis for Findings:

Record reviews and inspector interviews.

F. AREA RADIATION SURVEYS AND CONTAMINATION CONTROL

- Area surveys are being performed in areas being decommissioned.  X Y  N
- Where active remediation (e.g., demolition of structures, excavation of soil) is being performed, radiation levels in unrestricted areas do not exceed 2 mrem in any one hour.  X Y  N

Basis for findings:

Inspector observations.

G. RADIATION PROTECTION

- The licensee's approved health physics program is being implemented in the field for new decommissioning activities.  X Y  N
- Site security and control of contaminated material are in compliance with 10 CFR 20.1801 and 20.1802.  X Y  N

Basis for findings:

Inspector observations.

H. RADIOACTIVE WASTE MANAGEMENT/EFFLUENTS/ENVIRONMENTAL MONITORING

THIS SECTION IS NOT APPLICABLE AT THIS TIME

- 1. Offsite disposal of decommissioning wastes conforms to free release criteria and disposal site requirements.  Y  N
- 2. All new effluent releases conform to DP and applicable regulations.  Y  N
- 3. The licensee's environmental monitoring program is being implemented in conformance with the DP and all applicable limits are being met.  Y  N
- 4. Temporary storage/staging areas for radioactive wastes from building demolition, equipment dismantlement, soil excavation, etc., are adequately posted and protected.  Y  N

Basis for findings:

I. RECORDKEEPING FOR DECOMMISSIONING

NOT INSPECTED

- 1. Copies of the licensee's decommissioning cost estimates and funding methods are on file.  Y  N N
- 2. Licensee has adequate records for decommissioning activities performed (e.g., for decontamination and dismantlement of structures; decontamination and remediation of soil, sediment, surface waters, groundwater; surveys of remediated facilities).  Y  N N
- 3. Licensee's financial assurance conforms with the financial assurance requirements of NRC-approved possession limits and NRC regulations.  Y  N N

Basis for Findings:

J. TRANSPORTATION

NOT APPLICABLE AT THIS TIME

1. Describe the licensee's program to package and ship decommissioning waste materials:

[Empty text box]

2. Licensee's program meets all applicable 10 CFR and 49 CFR requirements for marking labeling, placarding, and shipping paper requirements for radioactive waste shipments.  Y  N

Basis for Findings:

[Empty text box]

K. POSTING AND LABELING

1. All contaminated areas, waste processing areas, and waste handling areas are posted in conformance with regulations.  Y  N
2. Packaged radioactive waste materials are labeled in accordance with regulations.  Y  N

Basis for Findings:

Inspector observations.

L. OCCUPATIONAL HEALTH AND SAFETY

1. Describe the occupational health and safety observations made at the licensee's facilities:  
None due to limited work scope during inspection.
2. Licensee and Occupational Safety and Health Administration were informed of occupational health and safety issues observed during the inspection.  Y  N

Basis for Findings:

[Empty text box]

4. **VIOLATIONS, NON-CITED VIOLATIONS, FOLLOWUP ITEMS, AND OTHER ISSUES**

Briefly state (1) the requirements and (2) how and when the licensee violated the requirement. For non-cited violations, indicate why the violation was not cited. Briefly describe followup items and other issues.

