NRC FORM 591 PART 1
(8-1997)
10 CFR 2.201

U.S. NUCLEAR REGULATORY COMMISSION

SAFETY AND COMPLIANCE INSPECTION

1. LICENSEE	2. REGIONAL OFFICE
U.S. Army Communication Electronics Command AMSEL - SF Fort Monmouth, New Jersey REPORT NUMBER(S) 2000-001	REGION I US NUCLEAR REGULATORY COMMISSION 475 ALLENDALE ROAD KING OF PRUSSIA PA 19406-1415

3. DOCKET NUMBER(S)	4. LICENSE NUMBER(S)	5. DATE(S) OF INSPECTION
030-29741	29-01022-14	August 29, 2000

LICENSEE:
The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Nuclear Regulatory Commission (NRC) rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector. The inspection findings are as follows:

☒ 1. Based on the inspection findings, no violations were identified.

☐ 2. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy, NUREG-1600, to exercise discretion, were satisfied. _____ non-cited violation(s) were discussed involving the following requirement(s): _____

☐ 3. During this inspection certain of your activities, as described below and/or attached, were in violation of NRC requirements and are being cited. This form is a NOTICE OF VIOLATION, which is required to be posted in accordance with 10 CFR 19.11.

STATEMENT OF CORRECTIVE ACTIONS

I hereby state that, within 30 days, the actions described by me to the Inspector will be taken to correct the violations identified. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201 (corrective steps already taken, corrective steps which will be taken, date when full compliance will be achieved). I understand that no further written response to NRC will be required, unless specifically requested.

TITLE	PRINTED NAME	SIGNATURE	DATE
LICENSEE			
NRC INSPECTOR	Judith A. Joustra	Judith A. Joustra	8/29/00

APPENDIX A
INDUSTRIAL/ACADEMIC/RESEARCH INSPECTION RECORD (IP 87110)

REGION I

Insp. Report #	2000-002	License #	29-01022-14	Docket #	030-29741
Licensee Name	U.S. Army Communication- Electronic Command				
Street Address	AMSEL-SF				
City, State, Zip	Fort Monmouth, NJ 07703-5024				
Location (Authorized Site) Being Inspected	same as above				
Licensee Contact Name	Barry Silber, HP			Phone #	(732)427-4427
Priority	3	Program Code	03222	Description	sealed source /calibration commodities
Date of Last Inspection:	8/95			Date of This Inspection	8/29/00

Type of Insp.	Announced		Routine	X	Initial		
	Unannounced	X	Special				
Next Insp. Date	8/2005	Normal		Reduced		Extended	X

Justification for change in normal inspection frequency:	this inspection resulted was clear and a 591 was issued, the previous inspection of this license was also clear

Summary of Findings and Actions

No violations, Clear 591 or letter issued	X	Non-cited violations	
Violation(s), 591 issued		Violation(s), letter issued	
Follow up on previous violations:	NONE		

Inspector - Printed Name	Judith A. Joustra		
- Signature	***/RA/***	Date	09/07/00
Approved - Printed Name	John D. Kinneman		
- Signature	***/RA/***	Date	09/28/00

PART I-LICENSE, INSPECTION, INCIDENT/EVENT, AND ENFORCEMENT HISTORY		
1.	**AMENDMENTS AND PROGRAM CHANGES**	
License amendments issued since last inspection, or program changes noted in the license.		
Amendment No.	Date	Subject
13	4/3/97	Removal of RAM from license
14	9/30/97	Decommissioning
15	5/19/98	Add CDV-790 and CDV-794 calibrators to license
16	7/7/98	add H-3 sealed light sources and H-3 compasses, and bulk storage of commodities
17	8/25/98	Radiological Characterization Plan
18	12/14/99	radiological status surveys/ decommissioning
2.	**INSPECTION AND ENFORCEMENT HISTORY**	
Unresolved issues; previous and repeat violations; Confirmatory Action Letters; and orders.		
NONE		
3.	**INCIDENT/EVENT HISTORY**	
List any incidents or events reported to NRC since the last inspection. Citing “None” indicates that regional event logs, event files, and the licensing file have no evidence of any incidents or events since the last inspection.		
NONE		
PART II - INSPECTION DOCUMENTATION		
NOTE: References that correspond to each inspection documentation topic are in Inspection Procedure 87110, Appendix B, “Industrial/Academic/Research Inspection References.”		

The inspection documentation part is to be used by the inspector to assist with the performance of the inspection. Note that not all areas indicated in this part are required to be addressed during each inspection. However, for those areas not covered during the inspection, a notation ("Not Reviewed" or “Not Applicable”) should be made in each section, where applicable.

All areas covered during the inspection should be documented in sufficient detail to describe what activities and procedures were observed and/or demonstrated. In addition, the types of records that were reviewed and the time periods covered by those records should be noted. If the licensee demonstrated any practices at your request, describe those demonstrations. The observations and demonstrations you describe in this report, along with measurements and some records review, should substantiate your inspection findings. Attach copies of all licensee documents and records needed to support violations.

1.	**ORGANIZATION AND SCOPE OF PROGRAM**

Management organizational structure; authorized locations of use, including field offices and temporary job sites; type, quantity, and frequency of material use; staff size; delegation of authority.

See attached organization chart. This license authorizes the use and possession of Army Commodities through out the U.S. The only licensed material authorized on this licensee that is maintained at Fort Monmouth is 1 CDV-790 and 1 CDV-794 waiting for disposal. Fort Monmouth retains oversight control for the authorized material and assures that requirements for the following are met: inventory, leak tests, training of RPOs, and that adequate facilities are maintained.

2.	**MANAGEMENT OVERSIGHT**

Management support to radiation safety; Radiation Safety Committee (RSC); Radiation Safety Officer (RSO); program audits, including annual reviews of program and as low as is reasonably achievable (ALARA) reviews; control by authorized users.

There is a staff of HPs located at Fort Monmouth, and there is also a Radiation Control Committee (authorized under another NRC license for Fort Monmouth) which does discuss activities under this license. Annual audits are performed of Fort Monmouth activities by CECOM. The last such audit was performed 12/99. CECOM, Fort Monmouth staff, TACOM, AMCOM and SBCOM also perform audits of the user locations in the US these group rotate inspection effort to different sites each year so that the same group does not always inspect the same site. Reports of findings are prepared and reviewed and corrective action are verified. Each site is inspected annually. Each site submits request for RAM and supplies information on training and facilities. Each site is responsible for assuring compliance.

3.	**FACILITIES**

Facilities as described; uses; control of access; engineering controls; calibration facilities; shielding; air flow:

The storage facility is secured and posted.	
4.	**EQUIPMENT AND INSTRUMENTATION**
Operable and calibrated survey equipment; procedures; 10 CFR Part 21.	
The inspector did not review instrument calibration during this inspection due to limited use of RAM under this license at this site.	

5.	**MATERIAL USE, CONTROL, AND TRANSFER**
Materials and uses authorized; security and control of licenses materials; and procedures for receipt and transfer of licensed material.	
Material and uses are as authorized on the license but at sites remote from Fort Monmouth. RAM is moved/transferred and is tracked by the use of a Radioactive Material movement Form. A call is placed to CECOM and Fort Monmouth staff will confirm receipt with the recipient. RAM movement forms are maintained. Each use site is responsible for assuring security of RAM. A computer system is maintained which identifies the location of each commodity. No service or maintenance is performed on commodities under this license.	

6.	**AREA RADIATION SURVEYS AND CONTAMINATION CONTROL**
Radiological surveys; air sampling; leak tests; inventories; handling of radioactive materials; contamination controls; records; and public doses.	
Area surveys are performed in the storage area at Fort Monmouth. Results are documented . Fort Monmouth sends out a reminder to sites that a leak test is due and sends a leak test kit to site with instructions. When returned to Fort Monmouth for analysis it takes about one to two days to provide results to the site. No leaking sources have been reported.	
7.	**TRAINING AND INSTRUCTIONS TO WORKERS**
Training and retraining requirements and documentation; interviews and observations of routine work; staff knowledge of all routine activities; 10 CFR Parts 19 and 20 requirements; emergency situations; and supervision by authorized users.	
Site RPOs training is reviewed by Fort Monmouth staff . Each site is responsible for assuring that users are trained in accordance with requirements for each commodity. RPOs are required to take either the course offered by Fort Monmouth or the 40 hr. source offered by by the U.S Army Chemical School. RPOs are retrained every two years. The HP staff on site during the inspection appeared knowledgeable of all activities and applicable regulations.	
8.	**RADIATION PROTECTION**

Radiation protection program with ALARA provisions; external and internal dosimetry; exposure evaluations; dose and survey records and reports; annual notifications to workers; bulletins and other generic communications.	
Each use site is responsible for evaluating the need for dosimetry and assigning dosimetry to users. Dosimetry results are reviewed during audits performed at use sites.	
9.	**RADIOACTIVE WASTE MANAGEMENT**
Disposal; effluent pathways and control; storage areas; transfer; packaging, control, and tracking procedures; equipment; incinerators, hoods, vents and compactors; license conditions for special disposal method.	
Disposal is through the ARMY waste program.	
10.	**DECOMMISSIONING**
Records relevant to decommissioning; decommissioning plan/schedule; notification requirements; cost estimates; funding methods; financial assurance; and Timeliness Rule requirements; changes in radiological conditions since decommissioning plan was submitted.	
NI.	
11.	**TRANSPORTATION**
Quantities and types of licensed material shipped; packaging design requirements; shipping papers; hazardous materials (HAZMAT) communication procedures; return of sources; procedures for monitoring radiation and contamination levels of packages; HAZMAT training; and records and reports.	
The licensee maintains a procedure for transport of RAM. When RAM is transported by common carrier, instructions are provided which includes packaging, labeling and shipping paper information. This varies depending on which commodity is being shipped. Some RAM is transported in Army vehicles only. The inspector briefly reviewed parts of the procedure and discussed it with the an HP. The portion of the procedure reviewed by the inspector appeared correct.	
12.	**NOTIFICATIONS AND REPORTS**
Reporting and followup of theft; loss; incidents; overexposures; change in RSO; authorized user; and radiation exposure reports to individuals.	
NONE	
13.	**POSTING AND LABELING**
Notices; license documents; regulations; bulletins and generic information; posting of radiation areas; and labeling of containers of licensed material.	

Storage area was posted with Caution Radioactive Material sign. No other material under this license is on site at Fort Monmouth. Other postings in place are do to other NRC licensed activities.

14.	INDEPENDENT AND CONFIRMATORY MEASUREMENTS
Areas surveyed, both restricted and unrestricted, and measurements made; comparison of data with licensee's results and regulations; and instrument type and calibration date.	
The inspector performed a confirmatory survey of the storage area and readings were comparable to licensee results. Bkg in storage area ave. .04 to .06 mR/hr and increased on or near shielded sources. A Ludlum 14 C was used by the inspector Calibrated 7/13/00 serial # 019615	

15.	VIOLATIONS, NON-CITED VIOLATIONS (NCVs), AND OTHER SAFETY ISSUES
State requirement and how and when licensee violated the requirement. For NCVs, indicate why the violation was not cited. Attach copies of all licensee documents needed to support violations.	
NONE	

16.	PERSONNEL CONTACTED
Identify licensee personnel contacted during the inspection (including those individuals contacted by telephone). Use # to indicate individual present at entrance meeting. Use * to indicate individual present at exit meeting.	

Name	Title	Phone No.	In Person or By phone
Craig Goldberg	HP	(732)532-9723 ext. 6405	in person
Barry Silber	HP	(732)532-9723 ext. 6440	in person
Steve LaPoint	Director	(732)532-9723 ext. 6401	in person

17.	PERFORMANCE EVALUATION FACTORS				
A.	Lack of senior management involvement with the radiation safety program and/or RSO oversight.	Y		N	X
B.	RSO too busy with other assignments.	Y		N	X

C.	Insufficient staffing.			Y		N	X
D.	RSC fails to meet or functions inadequately.	N/A	X	Y		N	
E.	Inadequate consulting services or inadequate audits conducted.	N/A	X	Y		N	

REMARKS :(Consider the above assessment and/or other pertinent Performance Evaluation Factors (PEFs) with regard to the licensee's oversight of the radiation safety program)

18.	**SPECIAL CONDITIONS OR ISSUES**
NONE	Special license conditions; year-2000 effects of computer software and embedded systems.
NI	

PART III - POST- INSPECTION ACTIVITIES

1.	**REGIONAL FOLLOWUP ON PEFs**

2.	**DEBRIEF WITH REGIONAL STAFF**
Post-inspection communication with supervisor, regional licensing staff, Agreement State Officer; and/or State Liaison Officer.	
Branch Chief	

3.	**YEAR-2000 ISSUES**
Convey, to the NMSS Year-2000 Coordinator, all year-2000 licensee-identified problems and corrective actions taken.	
NONE	

TO ADVANCE TO NEXT SECTION OF FORM - PUSH **PAGE DOWN** KEY

APPENDIX A - ATTACHMENT A DECOMMISSIONING TIMELINESS INSPECTION			
Licensee:		Date of Inspection:	

1.	**COMPLIANCE WITH DECOMMISSIONING TIMELINESS RULE**					
(NOTE: Repeat the answers given in Section 12 of the main body of the inspection record. The issues in subsequent sections are dependent on the answers to these questions.)						
	A.	License to conduct a *principal activity* has expired or been revoked:	Y		N	X
	B.	Licensee has made a decision to permanently cease *principal activities* at the entire site, or any separate buildings, or any outdoor areas, including inactive burial grounds:	Y		N	X
	C.	A 24-month duration has passed in which no *principal activities* have been conducted under the license at the site, or at any separate buildings, or any outdoor areas, including inactive burial grounds:	Y		N	X
	D.	If "Yes" to either A or B or C above:				
		(1) Identify Site/Bldg./Area:				
		(2) Date of occurrence of A, B, or C:				
2.	**NOTIFICATION REQUIREMENTS**					
	A.	Licensee has provided written notification to U.S. NRC within 60 days of the occurrence of 1.A., 1.B., or 1.C. above.	Y		N	
	If "Yes," date of notification:					
	B.	If the licensee is requesting to delay initiation of the decommissioning process, the licensee has provided written notification to NRC within 30 days of occurrence of 1.A., 1.B., or 1.C. above:	N/A	Y	N	
	If "Yes," date of notification:					
Basis for Findings:						
3.	**DECOMMISSIONING PLAN/SCHEDULE REQUIREMENTS**					

	A.	Licensee is required to submit a decommissioning plan per 10 CFR 30.36(g), 40.42(g), 70.38(g), or 10 CFR Part 72?	N/A		Y		N	
	If "No" to 3.A., answer the following items B - F:							
	B.	The decommissioning work scope is covered by current license conditions.			Y		N	
	C.	Decommissioning has been initiated within 60 days of notification to NRC, or NRC has granted a delay.			Y		N	
	D.	If licensee has initiated decommissioning, give date the decommissioning was initiated:						
	E.	If decommissioning has been completed, it was completed within 24 months of notification to NRC.	N/A		Y		N	
	F.	If decommissioning is still scheduled to be completed, it is on schedule to be completed within 24 months of notification to NRC.	N/A		Y		N	
Basis for Findings:								
	If "Yes" to 3.A., answer the following items G - J:							
	G.	The decommissioning plan has been submitted to NRC within 12 months of notification.			Y		N	
	If "Yes," date of submittal:							
	If NRC approved, date of NRC approval:							
	H.	Has the licensee submitted an alternative schedule request?			Y		N	
	If "Yes," date of submittal:							
	I.	If decommissioning has been completed, it was completed within 24 months after approval of the decommissioning plan.	N/A		Y		N	
	J.	If decommissioning is still scheduled to be completed, it is on schedule to be completed within 24 months after approval of the decommissioning plan.	N/A		Y		N	
Basis for Findings:								
Violations identified, if any:								

END

RADIOACTIVE MATERIAL MOVEMENT FORM

CHECK ONE: _____ SHIPMENT _____ RECEIPT	MOVEMENT NUMBER:_____
From:	To:

COMMODITY DESCRIPTION

Number of Containers	QTY	NSN	Nomenclature	Isotope	Activity	Total Activity

MODE OF SHIPMENT	PHYSICAL CHARACTERISTICS	RADIATION SURVEY RESULTS
_____ Air _____ Truck _____ Rail _____ Water _____ Parcel Post _____ Other	_____ Special Form _____ Normal Form _____ Solid _____ Liquid _____ Gas	Instrument Used:_____ Calibration Due:_____SN:_____ Transport Index:_____ Surface:_____mrad/hr _____µGy/hr One Meter: _____ mrad/hr _____µGy/hr Background:_____mrad/hr _____µGy/hr

WIPE TEST RESULTS

Wipe	Sample	Removable: _____ dpm/100 cm^2
Taken by:_____ Date:_____	Counted by:_____ Date:_____	LLD: _____ µCi_____ Bq

BASIC DESCRIPTION

_____ Radioactive Material, Excepted Package – Instruments & Articles, 7, UN 2910

_____ Radioactive Material, Excepted Package – Limited Quantity of Material, 7, UN2910

_____ Radioactive Material, Excepted Package – Articles Manufactured from Natural or Depleted Uranium or Thorium, 7, UN 2910

_____ Radioactive Material, Special Form, n.o.s., 7, UN 2974

_____ Radioactive Material, Low Specific Activity LSA, n.o.s., 7, UN 2912

_____ Radioactive Material, Fissile, n.o.s., 7, UN 2918

_____ Radioactive Material, Excepted Package - Empty Packaging, 7, UN 2910

Labeling	Marking	Shipping Papers
_____ White I _____ Yellow II _____ Yellow III _____ Exempt	_____ Radioactive _____ Radioactive LSA _____ Waste Class A, B, C _____ Other (_____) _____ Exempt	_____ Included & Complete _____ Exempt

24 HOUR EMERGENCY RESPONSE PHONE NUMBER ( )
EACH INSTRUMENT & ARTICLE DOSERATE < 10 mrem/hr AT 4 INCHES _____ (initial).
CERTIFICATION STATEMENT INCLUDED: _____ (INITIAL).
COMMENTS:

Printed Name of RSO or Designee:	Signature:	Date:

CURRENT

Director
GM 803-15

Auth 36
OBS 31
Vac 5

Deputy Director
GS-14

Plans/Prgrms 018/13
Budget 560/11
Pgrm Analyst 343/09

RE
1306-14/11 CIV
Team leader

4 GS-1306/13 HP
1 GS-0855/13 EE
1 GS-1306/12 HP
1 GS-0018/12 OSH
3 GS-1306/12 VAC

C4S
0803-14/10 CIV
Team leader

3 GS-0855/13 EE
1 GS-0803/13 SE
3 GS-0803/12 SE
1 GS 0803/13 VAC
1 GS 0803/12 VAC

IEW/S
0803-14/11 CIV
Team leader

3 GS-0803/13 SE
1 GS-0803/12 SE

FORT BELVOIR FIELD OFFICE

3 GS-0803/13 SE
1 GS-0690/13 IH
1 GS-0018/12 OSH