



REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
NEW ENGLAND DISTRICT, CORPS OF ENGINEERS  
696 VIRGINIA ROAD  
CONCORD, MASSACHUSETTS 01742-2751

RECEIVED  
REGION I

2001 JAN -2 PM 3: 46

December 27, 2000

Engineering/Planning Division  
HTRW/Geotechnical Engineering Branch

SUBJECT: Formerly Used Defense Site (FUDS), GSA Property, Watertown,  
Massachusetts

United States Nuclear Regulatory Commission  
Region I  
ATTN: Mr. Ronald R. Bellamy  
475 Allendale Road  
King of Prussia, Pennsylvania 19406-1415

Dear Mr. Bellamy:

During the meeting at Nuclear Regulatory Commission Headquarters on November 1, 2000, your representatives indicated that the radiological clean-up of the GSA site may be possible without the issuance of an NRC license if an aggressive schedule is established and pursued, or if the Army requests to conduct the clean-up under CERCLA as allowed on FUDS sites. During the same meeting, it was acknowledged by all that once the derivation of the DCGL's is completed, everyone will be in a better position to assess the relative risk presented by the low-level contamination at the GSA site, and any risk that might be presented to workers and the environment during remediation, if it is needed.

The Army is requesting that the NRC defer any licensing action at the GSA site. This is requested in light of the aggressive schedule being pursued by the Army. The duration and expected transmittal dates for the following major deliverables are:

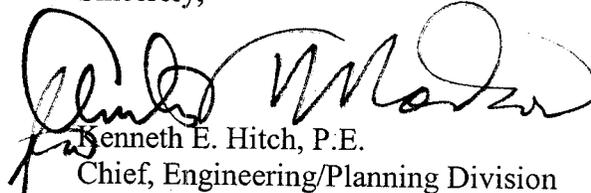
Historic Site Assessment	October 2000
Derived Concentration Guideline Limit Report	January 2001
Sampling and Analysis Plan for Radiological Invest.	May 2001
Final Status Survey Report	October 2001

Furthermore, using site specific parameters for the GSA site, and using the RESRAD 6 dose modeling code, a DCGL is being derived which will satisfy the State of Massachusetts dose and risk based criteria and the 25 mrem/yr NRC unrestricted release

criteria. Based on preliminary numbers, the DCGL corresponding the 25 mrem/yr NRC unrestricted release criteria is well above the average DU contamination levels at the site. In addition, the DCGL number necessary to satisfy the Massachusetts standards will be lower than the DCGL corresponding to the 25 mrem/yr NRC unrestricted release criteria. In an effort to satisfy Massachusetts standards, the Army will work towards the lower DCGL number. The surveys and any necessary response actions will be conducted accordingly to achieve and demonstrate compliance with both the NRC and Massachusetts criteria.

Your consideration of this proposal is greatly appreciated. If you have any questions, please contact Ellen Iorio at 978-318-8174.

Sincerely,



Kenneth E. Hitch, P.E.  
Chief, Engineering/Planning Division

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