



DEPARTMENT OF THE ARMY

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April 3, 2003

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Q-5

REPLY TO  
ATTENTION OF  
BRAC Field Office

Ms. Elizabeth Ullrich  
United States Nuclear Regulatory Commission  
Region 1  
Division of Nuclear Materials Safety  
Nuclear Materials Safety Branch 2  
475 Allendale Road  
King of Prussia, PA 19406-1415

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Mail Control No. 132746

Dear Ms. Ullrich,

Thank you for the NRC's quick response to our request for concurrence to our license termination plan for NRC license SUC-1275. In response to your questions in your March 13, 2003 letter the following clarification is provided:

1. The comment concerning Section 2.2.1 referring to "present day standards", refers to the prevailing dose criterion, either the NRC's 25 mrem/yr standard, or New York State's 10 mrem.yr standard. Since none of the license termination areas were former release sites, the question of what standard would apply never arose.
2. The comment concerning Section 5.4.2 refers to the survey unit sizes for building 612. Based on a review of the raw data collected we now propose reclassifying building 612 from Class 1 to Class 2. All references in the Plan will be changed to reflect this reclassification.
3. In regards to your comment on storage bunkers, it is our intent that each storage bunker be surveyed as a separate Class 3 survey unit.
4. This comment addresses text in Sec 5.4.2 of the Plan that states that contamination, if present, is expected to be confined to floors for all buildings, and further states that walls and ceilings in all buildings will receive only biased scanning surveys. The comment correctly points out that for rooms classified as Class 1 and Class 2 require direct samples to be collected from all surfaces including walls and perhaps ceilings. Affected buildings include 612 (previous Class 1), and buildings 5, 306, 2073, and S-2084, portions of which include a total of 21 Class 2 survey units. However, while the Plan did not explicitly call for such samples, systematic direct measurements on walls and ceilings were taken in the actual surveys conducted of these survey units. This sampling will be reviewed for sufficiency for supporting the pre-designated survey unit classification. If

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insufficient sampling was conducted, additional sampling will be done in the affected surfaces. The Plan will be revised to reflect the requirement for the collection of such measurements in Class 1 and 2 survey units.

5. The comment asks that Sec 5.4 address the classification of soil survey areas outside of buildings. Sec 5.5.1.2 indicates that all storage bunkers "and surrounding grounds" will be surveyed as Class 3 areas. Sec 5.4 currently does not address outdoor survey units or their classification. During the surveys that were conducted of the storage bunkers and other buildings, no evidence of contamination was apparent. On this basis, it was concluded that contamination of surrounding grounds was highly unlikely. Therefore, no soil areas were surveyed or direct measurements taken. It is proposed that outdoor areas be classified as un-impacted under MARSSIM. Sec 5.4 will be revised to reflect this classification of outdoor areas.

6.a. The comment indicates that some survey parameters might change, e.g., the required number of direct measurements in a survey unit, if final DCGLs are different from those in the Plan. It appears that such changes are unlikely, as the Plan over-specified by about 50% the number of samples required as compared to what MARSSIM calculations indicated. Further, the revised DCGLs are, for the most part, somewhat higher than the original values and would require fewer samples than indicated in the Plan. In any case, the sufficiency of sampling will be reviewed upon final approval of DCGLs.

6.b. This comment, in reference to Table 5-4, raises the issue of data quality assessment (DQA). DQA requires reviewing the sufficiency of the data collected after the fact when the actual coefficient of variance (CV) of measurements is known. The Plan assumed an initial CV of 30% as suggested in MARSSIM. While the sample numbers specified are expected to prove to be sufficient, data quality assessment will be performed to verify the CV assumption and the sufficiency of sample numbers using the results of the collected data.

The plan will be revised to incorporate these changes and any additional changes on the proposed DCGLs, when they become available. We look forward to working with the NRC on this issue of great importance to the United States Army.

Sincerely,



Stephen M. Absolom  
Commander's Representative