



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-4005**

September 9, 2003

Lt. Col. Kali Mather
Department of the Air Force
USAF Radioisotope Committee
HQ AFMOA/SGZR
110 Luke Ave, Suite 405
Bolling AFB, DC 20322-7050

SUBJECT: NRC INSPECTION REPORT 030-28641/03-008 AND NOTICE OF VIOLATION

Dear Lt. Col. Mather:

An NRC inspection was conducted on August 11-14, 2003, at Kirtland Air Force Base, New Mexico. The inspection was limited to a review of decommissioning activities authorized under Master Materials License 42-23539-01AF and Air Force Permit No. NM-03110-01/07AFP for Installation Restoration Program Site OT-10. Within this area, the inspection consisted of selected examination of procedures and representative records, observations of decommissioning activities, and interviews with personnel. An exit briefing was conducted with the Kirtland Air Force Base staff at the completion of the onsite inspection on August 14, 2003. The enclosed report presents the results of this inspection.

Based on the results of this inspection, the NRC has determined that a Severity Level IV violation of NRC requirements occurred. The violation was evaluated in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600. "The current Enforcement Policy is included on the NRC's Web site at www.nrc.gov; select What We Do, Enforcement, then Enforcement Policy". The violation is cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding it are described in detail in the subject inspection report. The violation concerns occasions observed by the inspector when the removal of debris from the outside surfaces of filled intermodal containers was not performed as required by procedure prior to removing the containers from the controlled area.

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and to prevent recurrence is already adequately addressed on the docket in a memorandum from Kirtland Air Force Base dated August 19, 2003. Therefore, you are not required to respond to this letter unless the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response (if any) will be made available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at

<http://www.nrc.gov/reading-rm/adams.html> . To the extent possible your response should not include any personal privacy, proprietary, or safeguards information so that it may be made possible to the public without redaction.

Should you have any questions concerning this inspection, please contact Mr. R. Rick Muñoz at (817) 860-8220 or the undersigned at (817) 860-8197.

Sincerely,

/RA/

Jack E. Whitten, Acting Chief
Nuclear Materials Licensing Branch

Docket No.: 030-28641
License No.: 42-23539-01AF

Enclosures:

1. Notice of Violation
2. NRC Inspection Report
030-28641/03-008

cc w/enclosures:
New Mexico Radiation Control Program Director

bcc w/enclosures: (via ADAMS e-mail)
 EECollins
 DBSpitzberg
 CLCain
 JEWhitten
 ADGaines
 RRMuñoz
 NBHolbrook
 RIV Nuclear Materials File - 5th Floor

ADAMS: X Yes Initials: rrm
 X Publicly Available X Non-Sensitive

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ENCLOSURE 1

NOTICE OF VIOLATION

Department of the Air Force
Kirtland Air Force Base
Albuquerque, New Mexico

Docket No. 030-28641
License No. 42-23539-01AF

During an NRC inspection conducted on August 11-14, 2003, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violation is listed below:

License Condition 18.O states that the licensee shall adhere to statements and representations contained in the Decommissioning Plan (DP), dated July 2002, as revised, for the Defense Nuclear Weapons School Radiation Training Sites at Kirtland Air Force Base, regarding release of radiation training sites for unrestricted use.

Section 4.1.5 of the DP requires that written operating procedures be required for performing all major tasks associated with the DP and that the licensee has generalized written procedures developed for contamination control, equipment decontamination, access/egress control, and monitoring of waste packages, trucks, and railcars for compliance and release.

Section 5.1.2 of procedure MKMP-050 "Processing Full Intermodal (IP-1) Containers," directs the operator to seal the intermodal containers and remove any debris from all outside surfaces.

Contrary to the above, on August 13, 2003, the licensee failed to adhere to standard operating procedure MKMP-050, which requires the removal of any debris from all outside surfaces of the sealed intermodal containers. On at least two occasions, debris was not removed from intermodal containers before leaving the contamination zone in TS6 training site located in the Installation Restoration Program Site OT-10.

This is a Severity Level IV violation (Supplement VI).

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence and the date when full compliance was achieved is already adequately addressed on the docket in a memorandum from Kirtland Air Force Base dated August 19, 2003. However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation," and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555 with a copy to the Regional Administrator, Region IV, within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

If you choose to respond, your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. Therefore, to the extent possible, the response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days.

Dated at Arlington, Texas
this 9th day of September 2003

ENCLOSURE 2

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket No. 030-28641

License No. 42-23539-01AF

Air Force Permit No. NM-03110-01/07AFP

Report No. 030-28641/03-008

Licensee: Department of the Air Force

Facility: Installation Restoration Program Site OT-10
Training Sites TS5, TS6, TS7, and TS8

Location: Kirtland Air Force Base
Albuquerque, New Mexico

Dates: August 11-14, 2003

Inspector: Rick Muñoz, Health Physicist
Fuel Cycle and Decommissioning Branch

Approved By: D. Blair Spitzberg, Ph.D., Chief
Fuel Cycle and Decommissioning Branch

Attachment: Supplemental Information

ADAMS Entry IR 030-28641/03-008; on 08/11-14/2003; Department of the Air
Force; Kirtland Air Force Base. Decommissioning Report.
Violation 030-28641/0308-01

EXECUTIVE SUMMARY

Department of the Air Force
NRC Inspection Report 030-28641/03-008

The inspector noted that Kirtland Air Force Base had conducted site remediation activities at the Installation Restoration Program Site OT-10 (OT-10 Site) that included former training sites TS5, TS6, TS7 and TS8 in preparation for the remediation of the four sites and release for unrestricted use. This inspection included a review of the OT-10 Site status, radiation protection, remediation activities, in-process review of decommissioning efforts, an examination of transportation and radioactive waste management, and waste disposal activities.

Site Decommissioning Status and Review

- With the exception of one violation noted in Section 1.2(c) of the report, the licensee was performing activities in accordance with the guidance provided in the approved decommissioning plan and 10 CFR Part 20 requirements (Section 1).
- Records reviewed by the inspector were complete, descriptive of the work completed, and contained the decommissioning data accumulated by the licensee to date. Remediation activities observed during the site tour were conducted in accordance with the decommissioning plan (DP). Procedures and practices were in place to implement the program at the OT-10 Site with one exception (Section 1).
- A violation was identified by the inspector for the licensee's failure on two occasions to adhere to the approved procedure for processing full intermodal containers containing remediation waste soils (Section 1).

Radiation Protection

- The licensee had monitored occupational radiation exposures in accordance with the monitoring program specified in the DP. Measurements taken by the licensee indicated that no occupational exposure was received in the first half of calendar year (CY) 2003 (Section 2).

Follow-up

- An inspection follow-up item identified during a previous inspection was reviewed and closed (Section 3).

Report Details

Summary of Facility Status

From 1961 through 1990, four sites seeded with thorium sludge were used by the Department of the Air Force for training of radiological response personnel. The four training sites were designated as TS5, TS6, TS7, and TS8. Training site TS8 included two contaminated building bunkers. During August 2002, the Air Force submitted a revised DP to the NRC to address the remediation and release for unrestricted use of these four training sites. NRC subsequently reviewed and approved the revised DP. NRC Materials License 42-23539-01AF was amended on January 6, 2003, to incorporate the revised DP into License Condition 18.O.

At the time of the onsite inspection, the Air Force Permittee (Permittee) had completed most of the decommissioning activities in training sites TS5, TS6 and TS7. However, at the time of the inspection the Permittee was involved in making an assessment of whether additional remediation would be required based on the results of derived concentration guideline level elevated measurement comparison (DCGL_{EMC}) analysis. The Permittee, at the time of this inspection was actively engaged in decommissioning training site TS6 where two stock piles were being loaded into intermodal containers for offsite disposal. After careful review of its options, the Permittee decided to keep and maintain the two bunkers in training site TS8. Building 28010 will be cleaned, surveyed, released for unrestricted use, and then used for storage while Building 28005 will be maintained by the Defense Threat Reduction Agency for the Defense Nuclear Weapons School as a training site and maintained on the license as a contaminated building. The Permittee's plan is to complete the remediation of all four training sites by October 2003.

1 Decommissioning Inspection Procedure for Materials Licenses (87104)

1.1 Inspection Scope

This onsite inspection was performed to determine whether decommissioning activities were being conducted safely and in accordance with NRC requirements and the licensee's approved DP. The inspection included a review of records, discussion with site personnel, and observation of remediation and survey activities in progress, and the observation of the licensee's contractor's loading of radioactive waste into intermodal containers. Since the licensee had not completed all excavation at its training sites, confirmatory measurements were not taken by the NRC during this inspection.

1.2 Observations and Findings

a. Organizational Structure

The inspector determined that the reclamation work was being conducted by a contract workforce of about 12 individuals. Montgomery Watson Harza (MWH) Americas, the prime contractor, provided project management oversight. A subcontractor, MKM Engineers, provided the operators and heavy equipment for site remediation. MKM Engineers also served as waste broker and was responsible for shipping the radioactive

wastes for permanent disposal. Another subcontractor, Environmental Restoration Group, Inc. (ERG), provided the site radiation protection program and conducted selected radiological surveys.

Section 4.1.1 of the DP states, in part, that all contractor-performed activities will be monitored by the Air Force to assure compliance with the DP and health and safety plans. During the onsite inspection, the inspector discussed with the Permittee its plans to monitor the reclamation work being performed on behalf of the Permittee. The Permittee plans to conduct at least one formal audit during reclamation activities. An audit of the Permittee was conducted May 20-22, 2003, by an Air Force inspector. The audit concluded that the Permittee did not always have site-specific radiation safety procedures available. This finding by the Air Force inspector was noted in the last NRC inspection report as an inspection follow-up item. The licensee provided to the inspector a list of all major decommissioning tasks for the OT-10 Site that required procedures be established. The list of major tasks and all associated procedures were reviewed by the inspector and found to be appropriate to the tasks currently being performed on the OT-10 Site. A follow-up to this item will be discussed under Section 3 of this report.

b. Remediation Activities

The licensee's NRC approved DP contains the objective of site remediation activities. This objective is to ensure that the total effective dose equivalent to the average member of a critical group will not exceed 25 millirems per year from all exposure pathways. The DP contains the licensee's considerations for developing their derived concentration guideline levels (DCGLs). The licensee in its decommission activities used a DCGL of 5.9 pCi/g in soils. The licensee used the RESRAD computer model to derive the soil DCGLs. The licensee at the time of this inspection was assessing elevated areas using the "Modifying Area Only" scenario. Table 5-3 in Section 5 of the DP allows the licensee to use a multiple of the DCGL of 3.65 for an area of 1-square meter. Assuming 100 percent area coverage the allowable DCGL using this method is 21.5 pCi/g. During remediation activities, the Permittee conducted remedial action support surveys to ensure removal of contaminated soils exceeding the modified criteria. The surveys used by the licensee consisted of a 100 percent walkover survey of the former training sites using a gamma scan/global positioning system thus assuring 100 percent coverage. Any survey measurement above the established action level of 20,000 counts per minute indicated that additional remediation activities may be necessary. This survey activity resulted in the delineation of various sized polygons within the survey unit requiring the licensee conduct elevated measurement comparison analysis according to Section 5 of the DP. The licensee had identified and delineated polygons within the Class I training sites where gamma scan readings exceeded 20,000 counts per minute. The largest polygon observed by the inspector was approximately 800 square meters located in training site TS5. This inspector noted that this training site had the largest number of polygons (75) that required additional analysis be conducted by the licensee.

The Permittee had begun remediation of the training sites on March 5, 2003, and had completed the major portion of this work in July 2003. At the time of the inspection, the preliminary indication by the Permittee was that although remediation activities in

training sites TS5, TS6, TS7 and TS8 were completed, Kirtland Air Force Base had requested the sites be further evaluated by the contractor using area factors for the elevated measurement comparison $DCGL_{EMC}$ over the 1-square meter areas. The licensee concluded that this assessment would identify how much additional remediation, if any, would be required. The eligibility for release of each of these survey units was assessed by the contractor using the Wilcoxon Rank Sum (WRS) test. Since the WRS test applies only to uniform distributions of residual activity within the survey unit, elevated areas were addressed using the approved $DCGL_{EMC}$ area factor multiple of the DCGL described above.

The Permittee also collected soil samples for onsite analysis to supplement the remedial action support surveys. The licensee used a combination of in-situ gamma radiation levels and onsite analysis of soil samples to guide excavation work. At the time of this onsite inspection, the Permittee was actively decommissioning training site TS6. The inspector observed the licensee's contractor loading two stock piles of the material for training site TS6 into intermodal containers for permanent off-site disposal. Based on the analytical results of soil samples and additional gamma scan surveys, the inspector determined that more excavation may be necessary.

The decommissioning work for the OT-10 Site included excavation and packaging of contaminated soils, vegetation, and surface debris (if any). The inspector during his onsite tour noted that there were no buildings located within training site TS6 that required remediation. The construction work observed by the inspector consisted of a front end loader transferring contaminated soils to intermodal containers, and packaging by the licensee's contractor of the intermodal containers for shipment as described in the NRC approved procedure MKMP-050 "Processing Full Intermodal Containers". The inspector noted that the Permittee had failed to adhere to standard operating procedure MKMP-050 Section 5.1.2, which required the removal of any debris from all outside surfaces of the sealed intermodal containers. On at least two occasions on August 13, 2003, the inspector observed that the licensee's contractor had not removed debris from intermodal containers before leaving the contamination zone located in training site TS6.

License Condition 18.0 states, in part, that the licensee shall adhere to statements and representations contained in the DP, dated July 2002, as revised, for the Defense Nuclear Weapons School Radiation Training Sites at Kirtland Air Force Base, when releasing areas for unrestricted use. Section 4.1.5 of the DP states, in part, that written operating procedures will be required for performing all major tasks associated with the DP and that the licensee will have developed written procedures for contamination control, equipment decontamination, access/egress control, and monitoring of waste packages, trucks, and railcars for compliance and release. Radiation safety procedure MKMP-050 for "Processing Full Intermodal (IP-1) Containers" was approved and implemented by the Permittee. Section 5.1.2 of the written procedure directed operators to seal the containers and remove any debris from all outside surfaces. Contrary to the written procedure, on August 13, 2003, the licensee failed to remove all debris from outside surfaces of the sealed intermodal containers on at least two occasions before leaving the contamination zone located within training site TS6. This was identified by the inspector as a violation of License Condition 18.0 [Violation 030-28641/0308-01].

The licensee provided a response to the NRC inspection activities of the OT-10 Site decommissioning project via a memorandum dated August 19, 2003. The memorandum documents that the OT-10 Site project team had implemented actions in response to the inspector's observations. Actions immediately implemented included cleaning the two affected waste containers, an emergency radiation safety meeting on the morning of August 14, 2003, briefing field staff on the incident and how to implement corrective action to avoid future procedures lapses. The licensee added a second inspection of the intermodal containers inside the exclusion zone prior to removal. Additional staff will be added by the licensee's contractor during periods of peak activity and for non-routine tasks. In addition, a third and final inspection of the intermodal container will be conducted by a radiation control technician outside the exclusion zone prior to loading on transport trucks.

The inspector concluded that the information provided regarding the corrective actions taken to correct the violation and prevent recurrence, and the date when full compliance was achieved has been adequately addressed. As a result of the information provided in the August 19, 2003, memo by the licensee, no response is required for this violation. The corrective actions implemented by the licensee will be reviewed and verified during the next scheduled inspection.

c. Transportation/Waste Disposal Activities

During the site remediation activities conducted by the Permittee and its waste broker contractor, waste material was packaged and shipped to a commercial low-level waste facility in Utah for permanent disposal. Intermodal containers were loaded at the site, shipped by truck to a local rail yard, and then shipped by rail to the disposal facility. The inspector noted that the Permittee planned to use approximately 240 intermodal containers for the project, and the total number of shipments to the commercial low-level waste facility in Utah for permanent disposal is expected to be about 1200 shipments.

Based on the radiological data reviewed by the inspector of numerous samples the Permittee had to the date of this inspection only shipped the waste classified by the U.S. Department of Transportation (DOT) as exempt material. All shipments reviewed by the inspector had not exceeded concentrations greater than 54.5 pCi/g of thorium-232. The inspector reviewed the sampling data and determined that the licensee had established and maintained supporting documentation and recorded sufficient information to ensure that all radioactive waste shipments made by the Permittee were properly classified. These records indicated that the Permittee properly characterized the waste. If all radioactive waste shipments for the OT-10 Site project remain at concentrations less than 2000 pCi/g, DOT regulations for any licensed radioactive material shipped will not apply. If any packages were to exceed these levels, the licensee will designate the package for special handling and it may not be shipped as non-DOT regulated. The intermodal containers satisfied DOT requirements as industrial packages IP-1. The licensee had transported intermodal containers by rail, but since the rate of waste generation had decreased, a decision was made by the licensee to convey all shipments by truck as exclusive use shipments. The waste broker contractor had used four primary drivers but also had provided training to six backup/alternate drivers. The

training provided to 8 of the 12 drivers included function specific training stipulated by 49 CFR 172.704.

The inspector observed that wastes were being manifested and shipped by an NRC-licensed waste broker, MKM Engineers. The inspector confirmed that the waste broker had established a program for sampling the waste material as it was being loaded, surveying the intermodal containers for compliance with DOT's radiological limits, and preparing shipping papers and manifests based on waste sample results. The inspector reviewed the shipping papers and determined that the papers were in agreement with requirements established in 10 CFR Part 20, Appendix G, "Requirements for Transfers of Low-Level Radioactive Waste Intended For Disposal at Licensed Land Disposal Facilities and Manifests." As of August 9, 2003, the Permittee had completed 633 intermodal shipments for disposal equaling 11893 cubic yards. Seventeen loaded containers were staged on site at the time of this inspection waiting shipment. Additionally, a low specific activity (LSA) placarded intermodal container was labeled and staged at training site TS8. The LSA placarded intermodal container contained two 55-gallon drums of thorium ore in overpacks. This thorium ore was once located inside bunker Building 28005. The placarded intermodal container was staged awaiting more LSA material.

1.3 Conclusions

With the exception of the violation noted below, the inspector noted that the licensee had performed decommissioning activities in accordance with the guidance provided in the approved DP and the provisions of 10 CFR Part 20. Records reviewed by the inspector were complete and descriptive of the work completed and supporting data accumulated to the date of this inspection. Remediation activities were conducted by the licensee in accordance with the DP and the implementing procedures. With one exception the inspector noted that practices were in place to implement the program at the site. A violation was observed by the inspector for failures of the licensee on two occasions to adhere to the approved procedure for processing full intermodal containers containing remediation waste soils.

2 Radiation Protection (83822)

2.1 Inspection Scope

The inspector interviewed individuals regarding the implementation of the health physics program and reviewed applicable radiation protection records.

2.2 Observations and Findings

The inspector reviewed the exposure reports through July 14, 2003, submitted by the external dosimetry supplier, selected licensee reports and internal memorandums related to external dosimetry.

The inspector noted that the external dosimetry supplier was Landauer. Landauer supplied the Permittee with Luxel optically stimulated luminescence dosimeters (OSL) as the primary means of determining the dose of record. Although the exchange frequency for the OSL devices is quarterly, the Permittee exchanged the devices on a monthly basis. The inspector observed that no occupational dose was received for any of the months reviewed. The highest dose recorded was 20 mRem to one individual for the period covering June 15 through July 14, 2003.

Initial whole body monitoring for onsite workers was conducted at Sandia National Laboratory. Additionally, all workers submitted pre-operational baseline in-vitro urine samples. Energy Laboratories performed the urinalysis for the licensee. Future bioassay samples will be conducted at the discretion of the site radiation safety officer. The need for additional bioassay samples will be based on site work conditions, in response to incidents, and for terminated employees. Of the 36 baseline results, 3 individuals recorded positive results for thorium-232. Although these results were positive, the levels detected in the bioassay samples were low and did not indicate any intake of radioactive material. Two of the three individuals with positive results were resampled, and after resampling the individuals showed negative results. The third individual chose not to be resampled. The Permittee recognized that although bioassay techniques are useful in assessing relatively large intakes, they are not capable of providing routine monitoring for intakes that are substantially below the ALI.

2.3 Conclusions

The licensee has monitored occupational radiation exposures in accordance with the program as specified in the DP. Measurements taken by the licensee indicated that no occupational exposure was received in the first half of CY 2003.

3 **Follow-up (92701)**

3.1 (Closed) Inspection Follow-up Item 30-28641/0303-01: Written standard operating procedures for all major tasks associated with the Decommissioning Plan

Section 4.1.5 of the DP outlines the standard operating procedure requirements for radiation protection. Section 4.1.5 states, in part, that written standard operating procedures are required for performing all major tasks associated with the DP. Section 3.2.1, states, in part, that the licensee prepare detailed construction procedures for the OT-10 Site decommissioning activities associated with excavating and loading of contaminated soil. Site specific procedures for all major tasks that are associated with decommissioning activities, including construction activities, were not complete at the time of this inspection. Also the inspector noted that some of the specific tasks identified at the time of the last inspection were promptly addressed and corrected. However, there appeared to be no procedural control in developing other specific tasks.

After a telephonic conference was held between the inspector and the Permittee, a list of all major decommissioning tasks that will be performed by the Permittee during the decommissioning of the OT-10 Site for which procedures would be established by the

Permittee was provided and received in the Region IV office on June 25, 2003. The inspector reviewed the list of major tasks and associated site procedures provided by the licensee and concluded that following these procedures properly would address all major tasks associated with the decommissioning activities. Inspection followup item (IFI) was closed by the inspector as a result of the Permittee providing a list of all major tasks and developing and implementing procedures for all major tasks.

Followup of Open Issues Identified in Safety Evaluation Report

Section 14.6 of the Safety Evaluation Report dated January 6, 2003, provided a list of open issues identified during the NRC's review of the DP. Several of the issues were reviewed with the Permittee during the last onsite inspection. Most remaining open items address the final status survey (FSS) and will be reviewed when the FSS is submitted.

3 Exit Meeting Summary

The inspection results were presented to representatives of Kirtland Air Force Base staff at the conclusion of the onsite inspection in an exit briefing conducted on August 14, 2003. Representatives of the Permittee acknowledged the findings as presented by the inspector. The Permittee's representatives did not identify any information reviewed by the NRC inspector as being proprietary.

ATTACHMENT

SUPPLEMENTAL INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

Department of the Air Force, Kirtland Air Force Base

C. Lanz, Chief, Restoration Section
J. Poland, Director, Environmental Management
J. Sillerud, Project Manager
R. Ederer, Restoration Section
E. Sheely, Maj., AMDS/SGPB

MWH Americas, Inc.

J. Johnson, Project Manager
N. Wrubel, Environmental Scientist
C. Timm, HP Technician
A. McQueen, Environmental Scientist

MKM Engineers, Inc.

L. Splattstoesser, Senior Broker
J. Cehn, Radiation Safety Officer, MKM Engineers
S. Neralla, Senior Project Manager, MKM Engineers
A. Kasnavia, Assistant Broker
F. Hormuzdi, Site Manager
D. DeGering, HP Supervisor
J. Krebsbach, MRT Heavy Hauling
W. Williams, MRT Heavy Hauling
E. Waldo, MRT Heavy Hauling
E. Raiel, MRT Heavy Hauling
W. Hendricks, HP Technician
D. Mendez, HP Technician

ERG

K. Baker, Site Radiation Safety Officer, ERG
N. Johnson, ERG
D. Mendez, HP Technician
L. Miter, HP Technician
S. Heronimus, HP Technician

INSPECTION PROCEDURES USED

IP 87104	Decommissioning Inspection Procedure for Material Licenses
IP 83822	Radiation Protection
IP 92701	Follow-up

ITEMS OPENED, CLOSED AND DISCUSSED

Opened

030-28641/0308-01 VIO A violation was identified for failures observed on two occasions to adhere to the approved procedure for processing full intermodal containers containing remediation waste soils. Corrective actions submitted will be reviewed during the next scheduled inspection.

Closed

030-28641/0303-01 IFI No procedural control established for some specific tasks underway.

A list of all major decommissioning tasks that will be performed during the decommissioning of the OT-10 Site for which procedures would be established was provided and received in the Region IV office on June 25, 2003. This list was found to properly address all major tasks associated with the decommissioning. During this inspection, it was determined that procedures had been developed for the activities identified.

Discussed

None

LIST OF ACRONYMS USED

DP	Decommissioning Plan
DOT	Department of Transportation
DCGS	Derived Concentration Guideline Levels
pCi/g	picocuries per gram
EMC	Elevated Measurement Comparison
IFI	Inspection Follow-up Item
Lt	Lieutenant
LSA	Low Specific Activity
OSL	Optically Stimulated Luminescence
RESRAD	Residual Radioactivity
SDP	Site Decommissioning Plan
TS	training site