October 5, 2004

Colonel Mike G. Mullins Office of the Commander Department of the Army 1 Rock Island Arsenal Rock Island, IL 61299-5000

## SUBJECT: REQUEST FOR DETAILS ABOUT PARAMETERS NEEDED FOR OFF-SITE TRANSPORT MODELS FOR JEFFERSON PROVING GROUND (LICENSE SUB-1435)

Dear Colonel Mullins:

In a letter to the NRC dated February 4, 2003, the Army made a contingent request for an alternative schedule for submittal of a Decommissioning Plan (DP) for the termination of the Jefferson Proving Ground (JPG) license. You state: "The alternate schedule is necessary due to the acknowledged unexploded ordnance and the personnel safety hazard that would be created should the Army be requested by NRC to provide additional site specific data during technical review to further validate termination of the JPG license under 10 CFR 20.1403, restricted conditions."

In a letter to the Army dated April 8, 2003, the NRC staff responded that the off-site transport models need to be validated before it could terminate the Army's license and cease environmental monitoring. The Army has stated that many of the parameters used for modeling were determined from literature values of these parameters and not from actual field measurements. To validate the off-site transport models, the staff's position is that site-specific data are needed. However, the Army notes that the collection of this data could result in an imminent personnel safety hazard because of the presence of unexploded ordnance (UXO). The inability to validate the models severely limits the staff's options regarding approval of the DP.

The NRC staff is evaluating the Army's proposed possession-only license amendment for JPG with a five-year renewal period. To support this evaluation, the staff would like the Army to provide specific details about the parameters needed for off-site transport modeling that

M. Mullins

currently cannot be collected due to the presence of UXO. We would appreciate your response within 45 days of the receipt of this request. If you have any questions, I can be reached at (301) 415-5869.

Sincerely

## /RA/

Tom McLaughlin, Project Manager Materials Decommissioning Section Division of Waste Management and Environmental Protection Office of Nuclear Material Safety and Safeguards

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\*See previous concurrence

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