UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

December 30, 2004

Docket No. 04009011 License No. STB-1554
Control No. 136080

Colonel Donald C. Olson
Commander
Department of the Army
Watervliet Arsenal
Safety Office, SMCWV-SF
1 Buffington Street
Watervliet, NY 12189-4000

SUBJECT: DEPARTMENT OF THE ARMY, REQUEST FOR ADDITIONAL INFORMATION CONCERNING APPLICATION FOR AMENDMENT TO LICENSE, CONTROL NO. 136080

Dear Colonel Olson:

This is in reference to your letter dated November 22, 2004, requesting to amend Nuclear Regulatory Commission License No. STB-1554. This also refers to the telephone discussion on December 30, 2004, with Mr. Leslie Cole, the contractor technical manager. In order to continue our review, we need the following additional information:

In Section 1 of the final survey plan, it states that the survey procedure to be followed is the alternate simplified method as described in Appendix B of NUREG-1757, Volume 2. This method is applicable if the screening values can be used as the derived concentration guideline level (DCGL); and the removable residual radioactivity is less than 10% of the DCGL; and the minimum detectable concentration (MDC) for scans, static or direct measurements, and sampling and analysis is between 10 and 50% of the DCGL. If these criteria are met, then 30 samples/measurements are required and 100% of the surfaces must be scanned. However, section 6 of the final survey plan states that the scan MDC does not meet the criteria, and an alternate method, using a series of static surveys, was proposed. This alternate method of meeting the 100% scanning requirement is not adequate.

If you cannot meet all the criteria of the alternate simplified method, you should perform a regular survey using Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM) methodology. Section 7 of the final survey plan considers the room a single Class 3 survey unit. A Class 3 survey unit requires that a statistical test be done to demonstrate compliance, based on random direct measurements and judgmental scanning of areas based on knowledge of which areas have the highest probability for elevated activity. (See Section 2.5 of MARSSIM)

Confirm that you will perform a Class 3 MARSSIM survey, or describe another method of meeting the alternate simplified survey 100% scanning requirement.

Please note that on October 25, 2004, the NRC suspended public access to ADAMS, and initiated an additional security review of publicly available documents to ensure that potentially sensitive information is removed from the ADAMS database accessible through the NRC's web site. Interested members of the public may obtain copies of the referenced documents for review and/or copying by contacting the NRC Public Document Room pending resumption of public access to ADAMS. The NRC Public Document Room is located at NRC Headquarters in Rockville, MD, and can be contacted at 800-397-4209 or 301-415-4737 or pdr@nrc.gov.

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 136080. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5040.

If we do not receive a reply from you within 30 calendar days from the date of this letter, we shall assume that you do not wish to pursue your application.

Sincerely,

Original signed by Elizabeth Ullrich

Betsy Ullrich
Senior Health Physicist
Commercial and R&D Branch
Division of Nuclear Materials Safety

cc:
S. D'Agostino, Radiation Safety Officer
L. Cole

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