



UNITED STATES MARINE CORPS
MARINE CORPS LOGISTICS COMMAND
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ALBANY, GEORGIA 31704-0301

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IN REPLY REFER TO:
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From: Commanding General
To: Officer in Charge, Naval Sea Systems Command Detachment,
Radiological Affairs Support Office (RASO), NSWC, PO
Drawer 260, Yorktown, VA 23691-0260

Subj: RESPONSE TO RADIOLOGICAL AFFAIRS SUPPORT PROGRAM (RASP)
24-28 JANUARY 2005 INSPECTION OF NAVY RADIOACTIVE MATERIAL
PERMIT NO. 10-67004-T1NP, AMENDMENT 5, MARINE CORPS
LOGISTICS COMMAND, MARINE CORPS LOGISTICS BASE, ALBANY,
GEORGIA

Ref: (a) Chairman, Naval Radiation Safety Committee ltr
5104/Ser N455C/N45U9011243 of 4 Mar 05
(b) CG, MARCORLOGCOM ltr 5104 L14 of 14 Mar 05

Encl: (1) Response to Findings of RASP Inspection Conducted on
24-28 January 2005
(2) CG, MARCORLOGCOM ltr 5104 L14 of 14 Feb 05
(3) Deputy Director USMC RADCON, MARCORLOGCOM email of 23
Dec 04
(4) SCMC ltr 5104 L14 of 12 Mar 04
(5) Radiological Controls Office Logistics Radiation
Safety Officer Internal Audit Checklist
(6) Radiological Controls Office Logistics Radiation
Safety Officer Internal Audit Checklist
(7) RADCON Matrix Active Tasks of 18 Feb 2004
(8) CDR, MARCORLOGCOM ltr 5104/67004 L140 of 6 Feb 03

1. Reference (a) is the report of findings for subject inspection sent by the Chairman, Naval Radiation Safety Committee (NRSC). Reference (b) is the report of missing and presumed lost radioactive commodities in the Marine Corps inventory. Enclosure (1) is the MARCORLOGCOM response to specific findings corresponding to the RASP checklist used by the inspectors from the Naval Sea Detachment (NAVSEADET) Radiological Affairs Support Office (RASO). As requested in your report, we shall continue to provide progress reports every 30 days for those deficiencies that we were unable to correct within the past 30 days.

NMSS/RGNI MATERIALS-004

Subj: RESPONSE TO RADIOLOGICAL AFFAIRS SUPPORT PROGRAM (RASP)
24-28 JANUARY 2005 INSPECTION OF NAVY RADIOACTIVE
MATERIAL PERMIT NO. 10-67004-T1NP, AMENDMENT 5, MARINE
CORPS LOGISTICS COMMAND, MARINE CORPS LOGISTICS BASE,
ALBANY, GEORGIA

2. Based on the preliminary findings of 28 January 05, and your final report in reference (a), I instructed my staff to complete each directive pertaining to the immediate corrective actions as required. Reference (b) highlighted the results of our investigation of discrepancies in the Marine Corps radioactive commodity inventory. By 24 January 05 we had accounted for 82% of our inventory. After the inspection, and as a result of our recent investigation we accounted for almost 98% of our entire inventory. Many of our discrepancies, however, involved devices that were directly involved with contingency operations in either Iraq or Afghanistan, and simply were not reported because of OPTEMPO. I also initiated a JAGMAN investigation on the failure of the Radiological Controls (RADCON) Office to report the missing 85 chemical agent monitors to the NRSC.

3. LOGCOM is committed to ensure that all conditions of our permit will be adhered to, and will work diligently to bring the Marine Corps to the same level of compliance.

4. My point of contact is Mr. Larry Davis, DSN 567-5511, or commercial telephone (229) 639-5511.



E. G. PAYNE

Copy to:
NRC Region II
CMC
COMNAVSEASYSOM (SEA 04N)
Chairman, NRSC (N455)
CMC (SD)
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RESPONSE TO FINDINGS OF RASP INSPECTION
CONDUCTED ON 24-28 JANUARY 2005

NUMBERING CORRESPONDS WITH CHECKLIST USED DURING INSPECTION	
A.	COMMAND PROGRAM
A.4	<p>REQUIREMENTS: NAVSEA SO420-AA-RAD-010, Section 1.3.8.4 requires the RSO to have written authority allowing direct access to the Commanding Officer on matters dealing with radiation safety.</p> <p>FINDING: Contrary to the above requirements the LRSO does not have written authority allowing direct access to the Commanding General.</p> <p>This is a Severity Level IV finding. This is a Repeat finding that was identified during the 24-25 October 2000 inspection.</p> <p><u>CORRECTIVE ACTION:</u></p> <p>1. <u>Reason for the violation:</u> The Marine Corps Order 5104.3A, "assigned the LRSO the authority to immediately halt operations governed by the RADCON Program that the LRSO considers significantly unsafe, and to report directly to the COMMARCORMATCOM (now CG, LOGCOM) and the local commander those circumstances or conditions that adversely affect compliance with commodity NRMPs." The appointment letter in use for the past two years referenced this Order in the duties of the LRSO.</p> <p>2. <u>Corrective steps taken and the results achieved:</u> The appointment letter was revised and signed on 14 February 2005, and is included in enclosure (2).</p> <p>3. <u>Corrective steps to be taken to avoid further violations:</u></p> <p>4. <u>Date when full compliance was or will be achieved:</u> 14 Feb 2005</p> <p><u>Finding resolved on 14 Feb 2005.</u></p>
A. 7	<p>REQUIREMENTS: NRMP No. 10-67004-T1NP, Amendment No. 5, Condition 23 requires notification of theft or loss of radioactive material to be reported by OPREP-3 NAVY BLUE Report in accordance with OPNAVINST 3100.6. Reference (d), Enclosure (2), Item 10.D.7 requires that CAMs that are not accounted for in two successive inventory cycles shall be considered lost and shall be reported by issuing a OPREP-3 NAVY BLUE Report.</p> <p>FINDING: Contrary to the above requirements records provided at the time of the inspection identified that approximately 86 CAMs had been missing for more than two inventory cycles without being reported.</p> <p>This is a Severity Level III finding. This is a Repeat finding that was identified during the 24-25 October 2000 inspection</p> <p><u>CORRECTIVE ACTION:</u></p> <p>1. <u>Reason for the violation:</u> The 86 CAMs were actually part of a larger number of discrepancies that were being investigated during 2004, which totaled 972 CAMs. We conveyed this information in our report to NAVSEADET RASO on 29 Oct 04. The uncertainty in our inventory resulted from the loss of our automated inventory system in 2003, due to implementation of the Navy-Marine Corps Intranet; and, the affects of non-reporting units involved with Operation Iraqi Freedom (OIF) and Operation Enduring Freedom (OEF) from 2002 to the present time. We suspected that many of</p>

	<p>our discrepancies were due to the war and considered it erroneous to report such a large number of discrepancies via an OPREP-3 NAVY BLUE Report. The email per enclosure (3) is evidence we discussed this situation with Mr. Derek Cornette, Marine Corps Program Manager, NAVSEADET RASO, who advised us to send a report by letter in place of an OPREP-3 NAVY BLUE Report. Until the recent inspection, we assumed verbal and electronic mail was official correspondence.</p> <p>2. <u>Corrective steps taken and the results achieved:</u> A more thorough investigation during February 2005 revealed what we suspected about the wartime discrepancies. The investigation included on-site physical inventories conducted by members of the RADCON office, augmented by Systems Command personnel, and aided by the release of the MARADMIN 089/05 message from the Commandant of the Marine Corps. We also contacted the Army, Air Force, DLA, and Crane Naval Surface Warfare Center (NSWC), requesting their assistance to search their inventories for our devices. Our search included the DLA facility at Albany, GA, which uncovered numerous devices that previously appeared on our discrepancy list. The Army also successfully identified a number of our devices, which we took credit for before sending our loss report to NAVSEADET RASO. The Air Force could not locate any of our devices in their inventory because their commodity inventory is not serialized per their master materials license. As of 28 March 2005, none of our devices were identified in the Crane NSWC inventory. Only 27 CAMs and 11 ACADAs required reporting as lost in the 14 March 2005 letter to RASO from the 1188 discrepancies sent to RASO on 29 October 2004. Several ACADAs missing 1 or more inventory cycles were found in Army inventories after 15 March 2005.</p> <p>3. <u>Corrective steps to be taken to avoid further violations:</u> We stepped up the work on the web-based inventory system to complete the data upload and system by 1 Jul 2005. The system will enhance the total asset visibility of the Marine Corps inventory, and should prevent future discrepancies from accumulating to the levels as they have in the past. We were fortunate that units deployed to Iraq were beginning to process home, and were engaged in the transfer of equipment to the replacement Marine Corps units. This action enabled deploying units to report their equipment information. Future web-based inventories will no longer depend on hard copy transfer for reporting information, which is slow and error prone. The web-based system also has reconciliation features. We are confident the process will work even during long-term contingency operations, as currently experienced in Iraq, and will offer a more aggressive solution to identify and report discrepancies and losses. The use of consolidated storage facilities throughout the Marine Corps will also enhance control and reporting of inventories for gear temporarily held in garrison.</p> <p>4. <u>Date when full compliance was or will be achieved:</u></p> <ul style="list-style-type: none"> • The inventory losses were reported to NAVSEADET RASO on 14 March 2005. • Devices found in other DoD inventories will be reported in the next 30-day update. • The web-based inventory system will be fully operational by 1 July 2005.
B	PROCEDURES
B.9	<p>REQUIREMENT: NAVSEA SO420-AA-RAD-010, Section 2.3.1.3 requires the operating and emergency procedures in use are the same as those in the NMRP application.</p> <p>FINDING:</p> <ol style="list-style-type: none"> 1. Contrary to the above requirement the procedures being used for inventorying CAMs and ACADAs are not the same as the procedures described in the command application, reference (d). 2. Contrary to the above requirement the programs audit conducted by the LRSO dated 9 February 2005 did not use the audit guide provided in the command application, reference (d). <p>This is a Severity Level IV finding.</p>

	<p><u>CORRECTIVE ACTION:</u></p> <p><u>1. Reason for the violations:</u></p> <p>a. The loss of our automated inventory system complicated the inventory reconciliation process and made it difficult to confirm discrepancies. This process became more demanding to the RADCON Office, due to the lack of a consistent and knowledgeable inventory manager in the Supply Chain Management Center (SCMC). The SCMC reorganized several times from 2003-2004, and assigned a new CAM and ACADA inventory or material manager with each organizational change. The deficiency was identified in the 9 March 2004 LRSO Internal Audit, and resulted in the request for support being sent to the Director, SCMC, dated 12 March 2004, found at enclosure (4).</p> <p>b. The LRSO mistakenly used an earlier version of the improved internal audit checklist. Enclosure (5) is an approved checklist that was used in the previous internal audit.</p> <p><u>2. Corrective steps taken and the results achieved:</u></p> <p>a. Although the SCMC assigned a material manager for the CAM and ACADA on 4 May 2004, they reorganized again during the summer of 2004 and assigned a new material manager. The new material manager, however, had previously been with the program and was instrumental in mapping and developing the SCMC Quality Process – Control Procedures for Radioactive Materiel, which lays out the process of inventory collection and reconciliation based on the permit requirements. This procedure is available for review upon the re-inspection of the Command program.</p> <p>b. The previous versions of the internal audit checklist were destroyed.</p> <p><u>3. Corrective steps to be taken to avoid further violations:</u></p> <p>a. Until the web-based inventory system is completed, the SCMC Quality Process – Control Procedures for Radioactive Materiel will be used to collect and reconcile the CAM and ACADA inventories.</p> <p>b. Extra caution will be taken to avoid using an unauthorized checklist. Training for the entire RADCON Team and appropriate SCMC material managers will be conducted to ensure all staff are cognizant of the current Amendment 5 requirements.</p> <p><u>4. Date when full compliance was or will be achieved:</u> Staff training will be completed by the following dates:</p> <ul style="list-style-type: none"> • 22 April 2005 – SCMC Quality Process – Control Procedures for Radioactive Materiel. • 13 May 2005 – Amendment 5 requirements.
E	<u>SURVEYS AND INSPECTIONS</u>
E. 7	<p>REQUIREMENT: Reference (d), Enclosure (2), Item 10.B.2.b requires, in part, the LRSO to perform internal audits to verify compliance with NRMP.</p> <p>FINDING:</p> <p>Contrary to the above requirement the internal audit conducted by the LRSO on 9 February 2004 did not include a review of compliance with NRMP requirements such as reviewing leak test records and procedures.</p> <p>This is a Severity Level IV finding.</p>

	<p><u>CORRECTIVE ACTION:</u></p> <p>1. <u>Reason for the violations:</u> The LRSO used the option provided on the checklist that says an item was not observed (N/O), as are options that are identified as yes (Y), no (N), or not applicable (N/A). See enclosure (6). These same options also exist on the approved internal audit checklist found at enclosure (5).</p> <p>2. <u>Corrective steps taken and the results achieved:</u> None.</p> <p>3. <u>Corrective steps to be taken to avoid further violations:</u> If for some reason an item is not observed (N/O) an explanation will be noted as to why an observation wasn't made, and when the item will be inspected.</p> <p>4. <u>Date when full compliance was or will be achieved:</u> All future audits will be appropriately documented as provided in paragraph 3. above.</p>
E.9	<p>REQUIREMENT: NAVSEA SO420-AA-RAD-010, Section 2.6.12.5 requires all discrepancies found during an inspection or audit to be tracked to completion and a record of the corrective actions maintained for a minimum of three years.</p> <p>FINDING: Contrary to the above requirement a number of the discrepancies identified during the internal audits dated 9 February 2004 and 31 October 2004 were not tracked to completion. There was no POA&M for corrective actions, no method for closing out completed actions.</p> <p>This is a Severity Level IV finding.</p> <p><u>CORRECTIVE ACTION:</u></p> <p>1. <u>Reason for the violations:</u> The RADCON Office has a tracking system in place to track important projects, but was not updated regularly due to the shortage of the office staff in early 2004. See enclosure (7).</p> <p>2. <u>Corrective steps taken and the results achieved:</u> Audit findings were added to the office matrix, to track important suspense dates and completion of the findings. The office staff has increased to the official table of organization.</p> <p>3. <u>Corrective steps to be taken to avoid further violations:</u> All future audit findings will be added to the office matrix and will have a suspense date assigned for completion of the corrective action(s). The office staff will be trained on the use and upkeep of the matrix.</p> <p>4. <u>Date when full compliance was or will be achieved:</u> Full implementation will occur upon completion of the April 2005 internal audit. Training will be completed by 29 April 2005.</p>
F.	REQUIRED LOGS AND RECORDS
F. 56	<p>REQUIREMENT: NRMP 10-67004-T1NP, Amendment No.5, Condition 19, requires, in part, that the command shall conduct a physical inventory every six months to account for all sources and/or devices received and possessed under this permit.</p> <p>FINDING: Records provided at the time of the inspection indicates that 934 of the 2565 CAMs were not inventoried since March 2004 or before. 86 of the 934 CAMs have been missing for three inventory</p>

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cycles or more.

This is a Severity Level III finding. This is a Repeat Finding that was identified during the 9 March 2000, 24-25 October 2000, 16-19-April 2001, 19-20 November 2002 and the 24-26 February 2004 inspections.

CORRECTIVE ACTION:

1. Reason for the violations:

a. In the 24-26 Feb 2004 inspection, F.56 on the NAVSEADET RASO checklist indicated that the six-month inventories were performed, and this item was not a finding on the final report. The final report also indicated that the inspectors noted difficulties resulting from the transfer of a critical team member from the staff, because of the loss of the automated inventory system due to the fielding of the Navy-Marine Corps Intranet, and because Operation Enduring Freedom and Operation Iraqi Freedom were initiated.

b. Many of our inventory discrepancies were due to the war. Marine Corps units had difficulty sending reports due to their involvement in OIF and OEF from 2002 to the present time. For example, most I Marine Expeditionary Force (MEF) units deployed before the inventory cycle in early 2003, and returned after the reporting cycle for Sep 2003. Many of those I MEF units redeployed around Jan 2004, are returning home and will leave their equipment behind for use by Marine Corps units deployed to replace them. Typically, when a unit arrived home, the gear did not accompany them, but arrived at a later date via another transport ship. Units experienced a lapse in reporting the inventories, due to the redeployment after the arrival of their gear from the previous deployment.

c. The loss of our automated inventory system complicated the inventory reconciliation process and made it difficult to confirm discrepancies. This process became more demanding in the RADCON Office, especially with the loss of the principal point of contact for inventory in the office, and due to the lack of a consistent and knowledgeable inventory manager in the Supply Chain Management Center (SCMC). The SCMC reorganized several times from 2003-2004, and assigned a new CAM and ACADA inventory or material manager with each organizational change. The deficiency was identified in the 9 March 2004 LRSO Internal Audit, and resulted in the request for support being sent to the Director, SCMC, dated 12 March 2004, per enclosure (4).

d. In the previous response to findings of the RASP inspection of 24-26 Feb 2004, the CG LOGCOM ltr 5104 L14 of 10 May 2004 documented that members of the NAVSEADET RASO directed LOGCOM to "do the best we could during war and document." This guidance resulted from a letter sent by LOGCOM on 6 Feb 2003, requesting immediate support on transportation issues during war, and recommended the waiving of the inventory and leak test requirements. See enclosure (8). The NAVSEADET RASO team leader concurred via unauthorized correspondence, with our recommendation to waive the leak test and inventory by units deployed to OEF and OIF. During Feb and Aug 2003, a naval message was sent instructing Marines deployed to OEF and OIF of this decision, and directed them to immediately leak test and report their inventories within two weeks of the arrival of the equipment back to the unit.

2. Corrective steps taken and the results achieved:

a. During the 24-26 Feb 2004 inspection, the lead inspector directed that LOGCOM rescind the naval messages that authorized deployed units to waive the reporting of inventories and leak tests. This was accomplished on 25 Feb 2004.

b. Recently an action plan was implemented by the RADCON Office to identify and resolve discrepancies from the Sep 2004 inventory cycle. The actions by LOGCOM successfully reduced discrepancies, and thus the total number of losses to 38 CAM and ACADA devices combined.

	<p>These losses were reported to NAVSEA DET RASO on 14 Mar 2005. Reports from other DoD inventories have further reduced this number. The Sep 2004 inventory now represents the most precise and accurate serialized ACADA and CAM inventory of this size in the DoD.</p> <p>3. <u>Corrective steps to be taken to avoid further violations:</u> As previously stated in the response to A.7 above, we stepped up the work on the web-based inventory system to complete the data upload and system fielding by 1 Jul 2005. The system will enhance the total asset visibility of the Marine Corps inventory, and should prevent future discrepancies from accumulating to the levels as they have in the past. We were fortunate that units deployed to Iraq were beginning to process home, and were engaged in the transfer of equipment to the replacement Marine Corps units. This action enabled deploying units to report their equipment information. The future web-based inventory will have a reconciliation feature that will eliminate lapses in data during long-term contingency operations, as currently experienced in Iraq. This web system will offer an aggressive solution to identify and report discrepancies and losses. The use of the consolidated storage facilities throughout the Marine Corps will also enhance control and reporting of inventories for gear temporarily held in garrison.</p> <p>4. <u>Date when full compliance was or will be achieved:</u></p> <ul style="list-style-type: none"> • The inventory losses were reported to NAVSEADET RASO on 14 Mar 2005. • The web-based inventory system will be fully operational by 1 Jul 2005.
F. 60	<p>REQUIREMENT: NRMP 10-67004-T1NP, Amendment No.5, Condition 19, requires, in part, that the inventory records include source identification number, radioisotope, chemical and physical form, activity and date of activity determination and custodian.</p> <p>FINDING: The October 2004 inventory records did not include radioisotope, chemical and physical form, activity and date of activity determination.</p> <p>This is a Severity Level V finding. This is a Repeat finding that was identified during the 24-25 October 2000 inspection.</p> <p><u>CORRECTIVE ACTION:</u></p> <p>1. <u>Reason for the violations:</u> The inventory presented to the RASO and the NRC inspectors lacked some of the requirements per NRMP 10-67004-T1NP, Amendment 5, Condition 19. Attention to detail was not sufficient to include all of the reporting requirements per Amendment 5, Condition 19 for inventory records.</p> <p>2. <u>Corrective steps taken and the results achieved:</u> Meticulous attention to detail has been addressed for the September 2004 inventory record, to include all of the reporting requirements per Amendment 5, Condition 19.</p> <p>3. <u>Corrective steps to be taken to avoid further violations:</u> The appropriate reporting requirements per Amendment 5, Condition 19 will be included in all finalized inventories.</p> <p>4. <u>Date when full compliance was or will be achieved:</u> The September 2004 inventory has been finalized and printed with the required information.</p>
F.74	<p>REQUIREMENT: NRMP No. 10-67004-T1NP, Amendment No. 5, Conditions 17.a and 17.b require that each Chemical Agent Monitor (CAM) be leaked tested at intervals not to exceed 12 months when not in storage.</p>

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	<p>FINDING:</p> <p>Available records showed that at least 25% of the CAMs fielded under this NRMP have not been leak tested within the specified periodicity in 2004. A review of 20 CAMs, selected at random, showed that only four of the 18 in use had been leak tested within the last year. Five of the 20 had no record of ever being leak tested. 9 March 2000, 24-25 October 2000, 16-19 April 2001 and the 24-26 February 2004 inspections.</p> <p>This is a Severity Level III finding. This is a repeat finding that was identified during the 9 March 2000, 24-25 October 2000, 16-19 April 2001 and the 24-26 February 2004 inspections.</p> <p><u>CORRECTIVE ACTION:</u></p> <p><u>1. Reason for the violations:</u></p> <p>a. The discrepancies were a result of the war. The Marine Corps units involved in OIF and OEF experienced difficulty sending their inventory reports and conducting leak tests from 2002 to the present time.</p> <p>b. During the last inspection, the leak test data could not be queried by serial number, which made it difficult to determine if a CAM had been leak tested. This data element was captured in the previous inventory system, prior to the loss of the database due to NMCI.</p> <p><u>2. Corrective steps taken and the results achieved:</u> The database was updated to reference a CAM with a leak test. As a result of this action 80.7% of all CAMs in the Marine Corps inventory, including those in storage, were leak tested in 2004. If you remove the CAMs located in storage, and those in a deployed status, the percentage increases to 88.7%. The web-based inventory system was also updated to include the leak test information. All leak test data is posted on the RADCON web site, and Marine Corps units were notified of this action via a naval message in Mar 2005. The message also instructed units to report if the gear was in a deployed status.</p> <p><u>3. Corrective steps to be taken to avoid further violations:</u></p> <p>a. A request was submitted to RASO on 6 Feb 2003 to waive the requirement for leak testing CAMs involved with OEF and OIF, and a second request was sent on 27 Jan 2005 for the same waiver. Awaiting an official response for this waiver to discontinue leak tests of CAMs involved with OEF and OIF, in accordance with guidance provided during the recent inspection by NAVSEADET RASO and the U.S. Nuclear Regulatory Commission.</p> <p>b. The QA process for leak test data will be completed by mid-May and will enable a complete review of leak test data to ensure permit compliance. All historical leak test data and the 2005 leak test data will undergo the same review. The result of this action will allow a quick analysis for current permit conditions.</p> <p><u>4. Date when full compliance was or will be achieved:</u> The leak test data component of the web inventory program will be fully implemented by 1 Jul 2005.</p>
I	<p style="text-align: center;"><u>SITE SPECIFIC FINDING</u></p>
I.1	<p>REQUIREMENTS:</p> <p>NRMP 10-67004-T1NP, Amendment no. 5, Condition 12, requires radioactive material to be used by or under the supervision of individuals trained per the commands NRMP application along with the procedures and information contained in the application packages.</p> <p>FINDING:</p> <p>Contrary to the above requirement users at the Consolidated Supply Facilities (CSFs) have not</p>

	<p>received training per the command NRMP application</p> <p>This is a Severity Level IV finding.</p> <p><u>CORRECTIVE ACTION:</u></p> <ol style="list-style-type: none"> 1. <u>Reason for the violations:</u> Contractors who were trained by USMC RADCON personnel, trained RPAs and users of permitted material at several of the CSFs. 2. <u>Corrective steps taken and the results achieved:</u> Appropriate USMC personnel are retraining the CSF personnel previously trained by the contractor. 3. <u>Corrective steps to be taken to avoid further violations:</u> Amend our permit to allow training to be conducted by qualified and knowledgeable personnel authorized by the LRSO. 4. <u>Date when full compliance was or will be achieved:</u> All CSF personnel will be trained IAW current permit conditions by 30 May 2005.
I.2	<p>REQUIREMENT: COMMARCORLOGBASES ltr 5104/67004 L140 (X5511) of 16 Jan 03, Enclosure (2), Item 10.H.1c(1) requires units receiving CAMs to have an approved allowance and be designated as an authorized recipient.</p> <p>FINDING: Approximately 1500 CAMs and ACADAs have been shipped to the CSFs without approved allowances being established for these commands.</p> <p>This is a Severity Level IV finding.</p> <p><u>CORRECTIVE ACTION:</u></p> <ol style="list-style-type: none"> 1. <u>Reason for the violations:</u> <ol style="list-style-type: none"> a. Marine Corps NBC defense equipment constitution and consolidation has recently been conducted in accordance with the Marine Requirements Oversight Council Decision Memorandum (MROCDM) 67-2003, dated 23 September 2003 and the CMC signed ALMAR 070/03. These documents direct that all Marine Force (MARFOR) Operating Force Nuclear Biological Chemical Defense Equipment (NBCDE) will be managed from 12 localized Contractor Logistic Support (CLS) CSFs while in garrison. This action was taken, in part, to improve NBCDE accountability and readiness, while allowing NBC personnel to focus on unit training. The CLS would focus on testing, maintaining, and storing the equipment. b. The policy states that unit commanders will continue to report equipment readiness via the Status of Resources and Training System (SORTS). The CLS initiative supports this effort. Commanders will have access to the facilities, and the equipment remains assigned to the unit commanders, not the CSF. Thus, approved allowances remain with the unit commanders, and it is not appropriate to regard the CSFs as separate "commands" with approved allowances, in their own right. Rather, the CSFs store, test, and maintain the unit commanders' allowances as a logistics service (an extension of the using unit warehouse while in garrison). c. The Marine Corps Commandant approved the management process described above via All Marine Corps Activities (ALMAR) 070/03, signed 11/24/2003. d. Furthermore, Marine Administrative Message (MARADMIN) No. 437/04, dated 10/07/2004, provides additional detail on inventory tracking and its transparency and visibility to the unit commanders, with respect to their assigned allowances of NBCDE, including CAMs and ACADAs.

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	<p>e. Additionally, Letter of Instruction (LOI) on Centralized Management and Consolidation of Marine Corps Nuclear Biological, and Chemical Defense Equipment (NBCDE), dated 27 May 04, provides detailed guidance and instruction for the implementation of centralized management of Marine Corps NBCDE.</p> <p>f. In conclusion, the CLS CSF initiative does not constitute a separate unit command allowance for CAMs, ACADAs, or other NBCDE. Allowance accountability remains with the unit commanders and the CSFs do not require separate allowances, in accordance with the documents cited above.</p> <p>2. <u>Corrective steps taken and the results achieved:</u> The Marine Corps Systems Command (SYSCOM), PM CESS/NBC, provided the information above.</p> <p>3. <u>Corrective steps to be taken to avoid further violations:</u> In future actions such as this, we will request confirmation in writing from NAVSEADET RASO.</p> <p>4. <u>Date when full compliance was or will be achieved:</u> In accordance with the information provided by SYSCOM, the U.S. Marine Corps is operating according to Amendment 5, Enclosure (2), Item 10.H.1.c(1). The CAMs and ACADAs transferred to the CSF are under the approved allowance for each MEF as indicated in the ALMAR 070/03, signed by the Commandant of the Marine Corps on 24 Sep 2003.</p>
I.3	<p>REQUIREMENT: NRMP 10-67004-T1NP, Amendment no. 5, Condition 15 requires COMMARLOGBASES to maintain records sufficient to document operational compliance with the conditions of the permit.</p> <p>FINDING: Contrary to the above requirement inventory reconciliation records, training records and records of corrective actions were not available for review.</p> <p>This is a Severity Level IV finding.</p> <p><u>CORRECTIVE ACTION:</u></p> <p>1. <u>Reason for the violations:</u> The inventory reconciliation records, training records, and records of corrective actions were available for review, but were not organized to facilitate the review by inspectors.</p> <p>2. <u>Corrective steps taken and the results achieved:</u> Records will be reorganized to allow easier review by inspectors.</p> <p>3. <u>Corrective steps to be taken to avoid further violations:</u> The web based inventory program will clarify reconciliation records. Meticulous detail will be taken to assure all records are organized for review.</p> <p>4. <u>Date when full compliance was or will be achieved:</u></p> <ul style="list-style-type: none"> • All records, with the exception of the web-based inventory, will be organized for review by 30 Apr 2005. • 1 Jul 2005 for web-based inventory.
I.4	<p>REQUIREMENTS: OPNAVINST 6470.3 requires Commanding Officers to comply with the conditions of specific NRMPs and comply with instructions concerning the safe receipt, possession, distribution, use, transportation, transfer and disposal of radioactive material. \</p> <p>NAVSEA SO420-AA-RAD-010, and conditions of specific NRMPs.</p>

	<p>FINDING: MARCORLOGBASES management has not executed oversight responsibilities for No. 10-67004-T1NP. The result has been a series of violations that collectively represent a significant carelessness toward responsibility for licensed radioactive material. Adequate measures have not been taken to ensure radioactive commodity operations are being conducted in accordance with Marine Corps, Navy and NRC regulations as well as the command's established operating and emergency procedures. This is demonstrated by the large number of repeat findings:</p> <p>Failure to provide the LRSO direct access to COMMARCORLOGBASES in writing.</p> <p>Failure to ensure inventories were conducted and reconciled properly.</p> <p>Failure to ensure program audits were conducted and deficiencies tracked to completion</p> <p>Failure to ensure reporting of lost material is made in a timely and appropriate manner. A letter from COMMARLGCOM Chief of Staff, reference (e) to Supply Chain Management Center (Code 55) states that "The CAM discrepancies, older than September 2002, must be resolved by 30 March 2004, so the command can notify the Navy (sic) Radiation Safety Committee that the devices are either missing or lost." The fact that the assets have not been located and that no report had been made as of the date of the inspection indicates a careless disregard by Senior management for the requirement of the permit.</p> <p>This is a Severity Level III Finding. This is also repeat finding that was identified during the 24-25 October 2000 and 16-19 April 2001 inspections.</p> <p><u>CORRECTIVE ACTION:</u></p> <ol style="list-style-type: none"> 1. <u>Reason for the violations:</u> There was a loss due to the death of the Commanding General, there was a change in the Chief of Staff, and a change in the Executive Deputy. 2. <u>Corrective steps taken and the results achieved:</u> There is new Commanding General, the new Chief of Staff is cognizant of requirements, and the new Executive Deputy has extensive knowledge in the Navy supply system. 3. <u>Corrective steps to be taken to avoid further violations:</u> The turn-over process and gap in the billet have been closely evaluated to ensure that there is not lack of oversight from upper management. 4. <u>Date when full compliance was or will be achieved:</u> The corrective actions were completed during Jan 2005.
I.5	<p>REQUIREMENT: Reference (d), Enclosure (2), Item 7 states that the LRSO is responsible for radioactive commodities and devices that are distributed for use throughout the entire Marine Corps, and controlled and managed centrally by the Marine Corps RADCON Office at MARCORLOGBASES, Albany, Georgia. This individual has responsibility for accountability and management for radioactive commodities used throughout the Marine Corps.</p> <p>FINDING: COMMARCORLOGBASES LRSO has not executed his responsibilities for radioactive commodity operations as evidenced by the number and severity of findings identified during the inspection and the careless disregard shown toward management of the permit. The LRSO demonstrated careless disregard toward his responsibilities by:</p> <p>Failure to follow-up and ensure the Supply Chain Management Center took actions to find the</p>

RESPONSE TO FINDINGS OF RASP INSPECTION
CONDUCTED ON 24-28 JANUARY 2005

missing CAMs, after having references (e) issued and then failing to report the 86 missing CAM as required.

Failing to conduct inventories and internal audits using the procedures committed to by the command reference (d).

Failing to perform internal audits to verify compliance with the NRMP.

Failing to conduct a physical inventory every six months to account for all sources and/or devices received and possessed under this permit. The process for inventorying and accounting for lost/missing assets is passive at best and resulted in 934 CAMs that were not inventoried during the September 2004 inventory cycle. The failure to complete an accurate inventory that would account for all assets held under this NRMP has been identified in each of the previous five inspection.

Failing to conduct leak tests of the CAMs at the required intervals. This finding has been made in four of the last five inspections.

Failing to ensure individuals had received proper training prior to allowing them access to licensed material.

Failing to ensure the proper allowances had been established before allowing the CAMs and ACADAs to be shipped to the CSFs for storage.

Failing to maintain records sufficient to document operational compliance with the conditions of the permit.

This is a Severity Level III finding.

CORRECTIVE ACTION:

1. **Reason for the violations:** The LRSO conducted business according to guidance provided by unofficial correspondence with NAVSEADET RASO.
2. **Corrective steps taken and the results achieved:** A JAGMAN is presently being conducted on the RADCON Office, which includes a review of the LRSO actions of oversight.
3. **Corrective steps to be taken to avoid further violations:** The LRSO will only conduct business provided by official correspondence, and upper management will review his actions.
4. **Date when full compliance was or will be achieved:** The JAGMAN is presently due to be completed by 11 Apr 2005.



UNITED STATES MARINE CORPS
MARINE CORPS LOGISTICS COMMAND
514 RADFORD BOULEVARD
ALBANY, GEORGIA 31704-0301

IN REPLY REFER TO:
5104

L14(x5511)

FEB 14 2005

From: Commanding General
To: Lawrence S. Davis, GS-14

Subj: APPOINTMENT OF LOGISTICS RADIATION SAFETY OFFICER
(LRSO)

Ref: (a) NAVSEA S0420-AA-RAD-010
(b) MCC 5104.3A

1. In accordance with the references, you are appointed as LRSO for the Marine Corps Logistics Command Albany, Georgia.
2. You are responsible for ensuring the safe use of radioactive material, have full responsibility for inventory, inventory reconciliation, leak test records and will have direct access to the Commanding General. The LRSO is responsible for managing the radiation safety program; identifying radiation safety problems, initiating, recommending, or providing corrective actions; verifying implementations for the use of radioactive material. The LRSO is hereby delegated the authority necessary to meet these responsibilities.
3. The LRSO has the authority to immediately stop any operations involving the use of radioactive material in which health and safety may be compromised, or may result in noncompliance with the Nuclear Regulatory Commission, Naval Radiological Affairs Support Program, or Naval Radiological Material Permit requirements.

E. G. PAYNE

Copy to
CMC (SD) Attn: LCDR Hill

ENCLOSURE (2)

Gray GS13 Michael S

From: Cornette, Derek O. GS (RASO) [cornettedo@raso.navy.mil]
Sent: Thursday, December 23, 2004 11:09 AM
To: 'HillVT@hqmc.usmc.mil'
Cc: 'Lino.Fragoso@navy.mil'; 'FarrandDE@NAVSEA.NAVY.MIL';
'NaquinTD@NAVSEA.NAVY.MIL'; 'Gray GS13 Michael S'
Subject: "lost" items

LCDR Hill,

I have discussed this with Mr. Gray at MCLB. I believe that these "lost" items were reported in the inventory submitted to RASO in Oct, 04. These items were identified as "under investigation". If these items were lost overseas, they do not need to be reported to the NRC. We will pass this information up to the NRSC so they will be aware of the situation. The inventories that MCLB submitted in April had about 400 items under investigation, the Oct. inventory had about 950 items under investigation. I have requested that MCLB tell RASO how many of the 400 were reconciled, how many ended up in the 950 of Oct. and how many could be attributed to the Marines deployed overseas. Per the permit issued to MCLB Albany if items can not be reconciled within two inventory cycles they are to be reported as lost through an OPREP 3 Navy Blue. Have these 153 items been on the inventory as under investigation for the last two inventory cycles? I think that further investigation is needed to truly identify if these items are lost or just deployed. Have a great holiday season.



UNITED STATES MARINE CORPS
MARINE CORPS LOGISTICS COMMAND
814 RADFORD BOULEVARD
ALBANY, GEORGIA 31704-0301

IN REPLY REFER TO:
5104
L14
12 Mar 2004

From: Chief of Staff
To: Director, Supply Chain Management Center, (Code 55)

Subj: RADIOACTIVE MATERIAL INVENTORY MANAGEMENT REQUIREMENTS
FOR THE CHEMICAL AGENT MONITOR (CAM), ALARM, CHEMICAL AGENT
DETECTOR, AUTOMATIC (ACADA), AN/PDR 56 (RADIAC), AND TRITIUM
CONTAINING EQUIPMENT

Encl: (1) September 2003 CAM History Inventory
(2) September 2003 ACADA History Inventory
(3) January 2004 AN/PDR 56 Inventory

1. The use of radioactive materials in the Marine Corps demands extreme action for inventory and inventory reconciliation. The CAM and ACADA physical inventories, for example, are collected every six months, while the RADIAC and tritium inventories are collected annually and reported during January; each must be 100% reconciled to the previous inventory, or to the original purchase records. All devices are uniquely identified by its serial number, which includes SAC-1 devices up to SAC-3, and the PEI if necessary. The most recent inventories are found in enclosures (1), (2), and (3).

2. There are several matters of concern in managing commodities containing radioactive materials.

a. The inventories in enclosures (1), (2), and (3) have many discrepancies that require considerable effort to resolve, each outlined by color marker. The CAM inventory has 811 discrepancies, the ACADA has 215 discrepancies, and the AN/PDR 56 inventory has 15 discrepancies. Some of these discrepancies go back three years, and will require immediate action.

b. The attention and support for material management, provided by SCMC in the past, was superior and greatly appreciated. Unfortunately, for some reason there is a void in radioactive device management, and the inventory collection and reconciliation process. As an interim fix, material managers were temporarily assigned to handle a specific inventory action. In this solution, there was no long-term process management, and without adequate and permanent controls, we are uncertain about the accuracy of our radioactive material inventories, i.e., the large number of discrepancies.

Subj: RADIOACTIVE MATERIAL INVENTORY MANAGEMENT REQUIREMENTS
FOR THE CHEMICAL AGENT MONITOR (CAM), ALARM, CHEMICAL AGENT
DETECTOR, AUTOMATIC (ACADA), AN/PDR 56 () RADIAC, AND TRITIUM
CONTAINING EQUIPMENT

c. The tritium inventory (primarily fire controls for artillery and mortar systems) is also of concern, because the inventory requires visibility of all uniquely identified devices from the PEI down to SAC-1 devices.

3. Request your immediate support as follows:

a. Identify to the Logistics Radiation Safety Officer a permanent material manager for the CAM, ACADA, AN/PDR 56 RADIAC, and tritium containing equipment.

b. Resume total control of radioactive material inventory management and the reconciliation process.

c. Take appropriate and immediate action to resolve the inventory discrepancies identified in enclosures (1), (2), and (3). The CAM discrepancies, older than September 2002, must be resolved by 30 March 2004, so the Command can notify the Navy Radiation Safety Committee that the devices are either missing or lost. Provide a Plan of Action & Milestones to the Logistics Radiation Safety Officer no later than 17 March 2004, for actions concerning the remaining discrepancies.

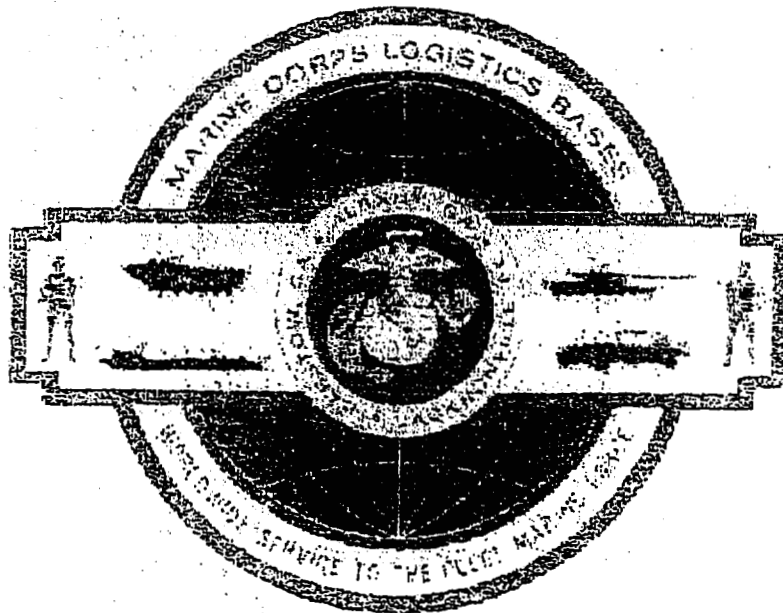
4. Due to the NMCI crossover, the former database established by the collaboration between your organization and the Radiological Controls (RADCON) Office is no longer functional. The support contractor to the RADCON Office has established a temporary fix by placing the radioactive material inventory on their website as an Excel spreadsheet. The permanent fix is to establish the inventory as a web-based system. This action is currently being performed by the same contractor, and should be ready for beta testing by June 2004. The C-4 Directorate is now responsible for this IT function, and has committed to acquire the web based system on their server at the beginning of FY 05.

5. Considering the level of attention required for radioactive material inventory management, and the importance of our commitment to comply with federal and Navy regulatory requirements, recommend that your organization and the Radiological Controls Office regularly meet to review our program requirements and commitments.

6. The point of contact is Mr. Larry Davis, DSN 567-5511.


A. H. SASS

United States Marine Corps
Radiological Controls Office
Logistics Radiation Safety Officer
Internal Audit Checklist



Completed by:

LRSO or ALRSO

Date

Reviewed/Approved by:

Commander, MARCORLOGBASES

Date

I. Radiological Controls Program Documents

Y N N/O N/A

- A. A formal RCP has been implemented that ensures Marine Corps compliance with applicable requirements in RAD-010, current NRMPs, and federal regulations.

Ref: 10 CFR 20.1101(a); NAVSEA S0420-AA-RAD-010, sec 1.3.9 & 1.3.2; MCO 5104.3, para 6a(3)

Title/Date: MCO 5104.3

COMMENTS:

- A.1 Required reference documents are available and maintained current in accordance with the requirements of RAD-010.

Ref: NAVSEA S0420-AA-RAD-010, sec 1.4.1

NRMP 10-67004-T1NP

10-67004-T2NP

10-67004-T3NP

NAVMED P-5055

NAVSEA S0420-AA-RAD-010

NAVSEAINST 5100.18A

NAVMEDCOMINST 6470.10

OPNAVINST 3100.6

OPNAVINST 5100.8G

OPNAVINST 6470.3

10 CFR Parts 19, 20, 21, 30, and 71

49 CFR Parts 171-180

COMMENTS:

II. Audits

Y N N/O N/A

- A. Have the LRSO and/or ALRSO(s) conducted and documented internal audits of applicable program elements as required by RAD-010 and current NRMPs.

1. Were corrective actions and milestones established for each finding?

2. Were corrective actions completed; if not, when will they be completed?

3. Are audits reported to the Commander and corrective actions tracked as appropriate?

Ref: NAVSEA S0420-AA-RAD-010, sec 2.6.12.1

COMMENTS:

- B. Are external audits conducted and documented at appropriate frequencies (at least one per six-month period) in accordance with RAD-010, the current NRMPs, and the Audit Manual?

1. Were corrective actions and milestones established for each finding?

2. Were corrective actions completed; if not, when will they be completed?

Y N N/O N/A

3. Are audits reported to the Commander and corrective actions tracked as appropriate?

4. Are audit records maintained for three (3) years?

Ref: NAVSEA 50420-AA-RAD-010, sec 2.6.1.1, 10 CFR 10.2101c

COMMENTS:

III. Program Elements (Review Frequency)

Y N N/O N/A

A. RASP Related Training. (Annual)

1. Have all Marine Corps IRSOs and CRSOs attended the RASP RSO school? Identify bases, MEFs and MSCs without CRSOs in the Comments section.

2. Is RPA and user training reviewed during external audits?

3. Is RADCON staff training up to date?

Ref: NAVSEA 50420-AA-RAD-010, sec 2.3.1; MCO 5104.3, para 6.d (1)

COMMENTS:

B. Were all devices leak tested in accordance with the requirements of NRMPs. (Annual)

1. If not, list how many and explain why.

2. Were timely actions taken to correct the leak test deficiency?

a. Were messages (and supplies if necessary) sent to deficient units via their higher headquarters?

b. Did the units reply within two weeks of receipt of the message?

3. Were corrective actions established and implemented to correct future deficiencies?

4. Are leak test dates updated in the inventories?

Ref: NAVSEA 50420-AA-RAD-010, sec 2.6.2, NRMP 15-67004-T1NP, T2NP, and T3NP

COMMENTS:

C. Review quality assurance program of all leak test processes and data. (Annual)

1. Were samples received, logged and processed, and data sheets properly reviewed for accuracy according to local procedures?

2. If not, list how many and explain why.

3. Did reporting units provide all required information on the sample envelopes?

4. If not, list how many and explain actions taken to acquire information.

5. Were corrective actions established and implemented to correct future deficiencies?

6. If not, explain why and provide the action to be taken to correct the deficiencies?

Ref: NAVSEA 50420-AA-RAD-010, sec 2.6.3

COMMENTS:

D. Occupational Radiation Exposure. (Semi-annual)

Ref: NAVSEA 50420-AA-RAD-010, sec. 2.1.2 & 2.1.4; NAVMED P-5055, Chaps. 4 & 5

COMMENTS:

E. Receipt, Transfer, and Disposal of RAM. (Semi-annual)

1. Are records for the receipt, transfer, and disposal of radioactive material maintained?

2. Are inventories adjusted for the gains, losses, and disposal of radioactive material?

Ref: NAVSEA 50420-AA-RAD-010, sec 2.6.2 & 2.6.3

COMMENTS:

F. Were physical inventories of permitted radioactive materials conducted and reconciled every six months? (Semi-annual)

1. Were all devices accounted for?

2. If not, were the missing devices investigated and documented, and corrective actions established and completed?

3. Were radioactive material gains and losses verified by reviewing MRO and WIR disposition instructions?

4. If not, list actions to be taken to verify gains and losses in the Comments section.

5. Did any devices receive replacement drift tubes?

6. If so, were exchanges authorized in writing by the EM and LRSO?

7. If not, was the exchange investigated and resolved, and corrective actions established and completed?

Ref: 10 CFR 20.2103; NAVSEA 50420-AA-RAD-010, sec 2.6.2.2 & 2.6.2.3

COMMENTS:

H. Radiological Control Procedures and Practices. (Semi-annual)

1. Do all appropriate documents for example, SI, TMs, Tis, Naval Messages, ULSS, SOPs, match the NRMP requirements?

Y N N/O N/A

2. If not, list the document(s) and discrepancies.
3. Were corrective actions established and implemented to correct the discrepancies?
4. If not, explain why and provide the action to be taken to correct the discrepancies?

Ref: NAVSEA 50420-AA-RAD-010, sec 2.6

COMMENTS:

I. Transportation. (Semi-annual)

1. Are transportation records maintained and up to date at LOGBASES?
2. If not, list the discrepancies and provide the action to correct them.
3. Are transportation records inspected and up to date in the field?
4. If not, list the discrepancies and provide the action to correct them.

Ref: NAVSEA 50420-AA-RAD-010, sec 2.6.1.3

COMMENTS:

IV. Emergency Response

Y N N/O N/A

- A. Has an emergency response plan been implemented in accordance with the requirements of RAD-010? (Semi-annual)

Ref: NAVSEA 50420-AA-RAD-010, sec 2.9
SI 6665-15/1C Procedures for Specific Equipment Containing Radioactive Material

COMMENTS:

- B. Are procedures implemented for reporting radiation accidents and incidents involving licensed materials, including the submission of OPREP-3 NAVYBLUE reports when required? (Semi-annual)

Ref: NAVSEA 50420-AA-RAD-010, sec 2.10
SI 6665-15/1C Procedures for Specific Equipment Containing Radioactive Material

COMMENTS:

- C. Were accidents and significant events properly reported and investigated?

COMMENTS:

- D. Were corrective actions established and implemented accordingly?

COMMENTS:

V. Findings.

VI. Corrective actions/POA&M

I. Radiological Controls Program Documents

- A. A formal RCP has been implemented that ensures Marine Corps compliance with applicable requirements in RAD-010, current NRMPs, and federal regulations.

Y N N/O N/A

Ref: 10 CFR 20.1101(s); NAVSEA S0420-AA-RAD-010, sec 1.3.9 & 7.2.2; MCO 5104.3, para 5d(5)

Title/Date: MCO 5104.3 13 June 2003

- A.1 Required reference documents are available and maintained current in accordance with the requirements of RAD-010.

Ref: NAVSEA S0420-AA-RAD-010, sec 1.4.1

II. Internal Audits

- A. The LRSO and ALRSO(s) have conducted and documented internal audits of applicable program elements as required by RAD-010 and current NRMP's.

Y N N/O N/A

Ref: NAVSEA S0420-AA-RAD-010, sec 2.6.12.1

This audit is two months late. LRSO also had to reschedule audit of MARFORPAC.

- A.1 Audits are conducted at appropriate frequencies in accordance with RAD-010 and current NRMP's.

Ref: NAVSEA S0420-AA-RAD-010, sec 2.6.12.2

LRSO Audit is two months late.

- A.2 Internal review findings are identified and corrective actions established and completed.

Ref: 10 CFR 20.1101; NAVSEA S0420-AA-RAD-010, sec 2.6.1.1

Found the corrective actions incomplete for the response to RASP inspection dated 28 Feb 2003. The completed corrections were not added to the database.

III. Program Elements (Review Frequency)

- A. Radiation Medical Examinations. (Semi-annual)

Y N N/O N/A

Ref: NAVSEA S0420-AA-RAD-010, sec 2.1.3; NAVMED P-5055, Chap. 2

- B. Occupational Radiation Exposure and Personnel Dosimetry. (Semi-annual)

Ref: NAVSEA S0420-AA-RAD-010, sec 2.1.2 & 2.1.4; NAVMED P-5055, Chaps. 4 & 5

- C. RASP Related Training. (Annual)

Ref: NAVSEA S0420-AA-RAD-010, sec 2.2.1; MCO 5104.3, para 5d(1)

I could not find Barbara Harry's training on file.

- D. Radiological Controls Procedures and Practices. (Quarterly)

Ref: NAVSEA S0420-AA-RAD-010, sec 2.6

Policy Statements ~~are~~ should be revised to reflect the new command and updated as appropriate. Desk top for Supply is completed.

- D.1 Annual leak tests of sealed sources are conducted in accordance with the requirements of RAD-010 and current NRMP's.

Ref: NAVSEA S0420-AA-RAD-010, sec 2.6.9

- E. NRMP Compliance. (Quarterly)

Ref: NAVSEA S0420-AA-RAD-010, sec 2.3

Y N N/O N/A

F. Receipt, Transfer, and Disposal of RAM. (Semi-annual)

I will need to go through the MRO books at the next opportunity.

X

Ref: NAVSEA S0420-AA-RAD-010, sec 2.6.2 & 2.6.3

F.1 Semi-annual physical inventories of permitted radioactive materials have been conducted and reconciled.

X

Ref: 10 CFR 20.2105; NAVSEA S0420-AA-RAD-010, sec 2.6.2.2 & 2.6.2.3

G. Records and Reports. (Semi-annual)

X

Ref: NAVSEA S0420-AA-RAD-010, sec 2.6.10

G.1 Program records are maintained in accordance with the requirements of applicable NRMPs and RAD-010.

Y

Ref: NAVSEA S0420-AA-RAD-010, sec 2.6.10

H. Transportation. (Quarterly)

I need to have Mike Gray gather

X

Ref: NAVSEA S0420-AA-RAD-010, sec 2.6.1.1

SSgt Rogers files to recheck his transport file for last quarter in CY 03

IV. Emergency Response

Y N N/O N/A

A. An emergency response plan has been implemented in accordance with the requirements of RAD-010.

Y

Ref: NAVSEA S0420-AA-RAD-010, sec 2.9

A.1 Procedures have been implemented for reporting radiation accidents and incidents involving licensed materials, including the submission of OPREP-3 NAVYBLUE reports when required.

Y

Ref: NAVSEA S0420-AA-RAD-010, sec 2.10

(1) Audits of program need to be consistent with NRMP & RASP manual

V. Findings (See attached). *(2) Need to ensure the database is corrected to reflect changes from 28 Feb 2003.*

VI. Corrective actions/POA&M (See attached).

- Tasked Rob Turner to initiate changes to database. Changes to Battelle due by 26 Feb 2004.

- Inform staff of need for diligence on conducting audits and completing them in conformance to the NRMP and RASP. Will place on team matrix. Completed 18 Feb 04

- Ask Barbara to complete her annual awareness training given by Lon King. 25 Feb 04 Barbara worked training today but did not complete.

RADCON MATRIX ACTIVE TASKS

#	Priority	Ref #	Item	Description	Date Rec'd	Assigned To	Date Assigned	Destination	Deadline Date	Response	Status
6	<input checked="" type="checkbox"/> Top	03-0722-03	Conference	Audit	7/22/2003	Mike G.	7/22/2003	RADCON	7-Nov-2003	Mike will complete nlt 19 Aug	Trip rep complete... review and <input checked="" type="checkbox"/> Completed
7	<input checked="" type="checkbox"/> Top	03-0702-04	IIMEF Asst.	IIMEF	7/2/2003	Barbara & SSgt Rogers	7/2/2003	RADCON	21-26 Aug		Trip rep complete... review and <input checked="" type="checkbox"/> Completed
8	<input type="checkbox"/> Top	03-0702-10	CAM Leak Tests	All MEFs get tested for leaks	7/2/2003	Barbara	7/2/2003	RADCON	15-Sep-2003	Lost CAMs. Naval msg to go out this week.	Barb will leak test sl cob on we <input type="checkbox"/> Complete
9	<input checked="" type="checkbox"/> Top	03-0702-11	Amend Permit	Permit to reflect the Rad Source	7/2/2003	Barbara	7/2/2003	RADCON	25-Jul-2003		All is compl and Vicki will coordinate distribution. <input checked="" type="checkbox"/> Completed
	<input type="checkbox"/> Top	03-0702-12	Transportation Audits	Audit of Transportation as a part of Program Elements	7/2/2003	SSgt Rogers	7/2/2003	RADCON	Dec 1/ Mar 1/ Jun 1/ Sept 1		Aug is comp Sept is pen <input type="checkbox"/> Completed
11	<input type="checkbox"/> Top	03-0702-13	Technical Guide	Tech Guide for MGO on how to complete mission	7/2/2003	Mike T., Larry & Mike G.	11/6/2003	RADCON	10-Nov-2003	Larry's research in Kuwait	Larry will do POA&M LS purchase result. (In p <input checked="" type="checkbox"/> Completed

ENCLOSURE 17

75

2/18/2004: 9:09 AM

RADCON Matrix



5104/67004
L140CX55110
FEB 06 2003

From: Commander
To: Officer in Charge, Naval Sea Systems Detachment, Radiological Affairs Support Office,
NWS, P. O. Drawer 260, Yorktown, VA 23691-0260

Subj: RADIOACTIVE MATERIALS TRANSPORT AND INVENTORY REQUIREMENTS
DURING A NATIONAL EMERGENCY OR CONTINGENCY

Ref: (a) Naval Sea S0420-AA-RAD-010 Radiological Affairs Support Program Manual
(b) Naval Supply (NAVSUP) Instruction 4030.55 (A)/Marine Corps Order (MCO) 4030.40
(A) Packaging of Hazardous Material
(c) NAVSUP Publication (PUB) 505/MCO P4030.19 (H) Preparing Hazardous Materials for
Military Air Shipments
(d) NAVSUP PUB 573/MCO 4450-12 Storage and Handling of Hazardous Materials
(e) Naval Radioactive Material Permit 10-67004-T1NP
(f) Naval Radioactive Material Permit 10-67004-T2NP
(g) Naval Radioactive Material Permit 08-00024-T1NP
(h) U.S. Title 10 Code of Federal Regulations (10 CFR), Energy
(i) U.S. Title 49 Code of Federal Regulations (49 CFR), Transportation
(j) Title 10 United States Code 101 (a) (13)
(k) Department of Transportation - Exemption 3498 (Tenth Revision)

1. The policies in references (a) through (i), relate to the control of hazardous materials, which include limited quantities of Class 7 (radioactive) materials, during normal transportation and shipments in commerce. However, references (a) through (h) do not address the transport of hazardous materials during a declared national emergency, or during contingencies that require the expeditious movement of U.S. forces, as defined in reference (j).

2. In reference (k), the DOT authorized an exemption for *"the transportation in commerce of fueled combat and other military vehicles loaded with ammunition basic load, accessory ammunition, and other hazardous materials in periods of a declared national emergency."* This exemption, which expires 30 Nov 2003, affected 49 CFR, Parts 106, 107, and 171-180, but did not exempt Part 173. Accordingly, we found the exemption ambiguous and insufficient in its coverage of other dangerous articles possibly attached to, carried in, or towed by the same vehicles containing fuel and ammunition. This would include equipment with limited quantities of Class 7 (radioactive) materials, which we believe is a lower hazard to ship than fuel and ammunition.

3. In reference (i), we found U.S. Government materials were exempted from transport requirements for reasons of national security. According to 49 CFR Part 173, paragraph 173.7 (b), shipments are not subject to the requirements of the subchapter, if *"shipments of hazardous materials [are] made*

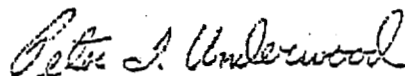
ENCLOSURE (8)

by or under the direction or supervision of the U.S. Department of Energy or the Department of Defense, for the purpose of national security." We believe this exemption applies to any hazardous materials shipped by the Department of Defense, although one can assume that it may refer only to the transport of special nuclear material (reactor fuel and weapons material). Nevertheless, we could not verify support for either view. Request your guidance on the use of this exemption, and its application for use during hazardous material shipments.

4. The rapid movement of equipment during national emergencies and contingencies is important for the success of operations by U.S. forces. These movements will likely contain hazardous materials that include limited quantities of Class 7 (radioactive) materials. Since current policy is vague on the movement of hazardous materials during emergency deployments, request your assistance to help identify the proper directives to support rapid transport of Class 7 materials. If policy does not exist, request your support to seek the appropriate waiver(s), and to help us institute a suitable Marine Corps policy.

5. References (a), (e), (f), and (g) directs the collection of physical inventories, and the leak testing of equipment with radioactive sources. During a declared national emergency or contingency, these requirements are extremely difficult to implement, since much of the equipment is staged for loading, stowed in vehicles or shipping containers onboard ships, or is located in a country somewhere in the theater of operations. Because of the difficulty in performing leak tests and reconciling physical inventories during emergency deployments, we recommend that we limit these activities to the on-hand stores of equipment. Accordingly, we can direct units involved in such operations, to report their inventories and to provide the appropriate leak test upon return of the equipment to its home station. Request your consideration and approval in this matter.

6. For further information, please call Mr. Larry Davis at DSN 567-5511 or commercial (229) 639-5511.


PETER T. UNDERWOOD
By direction

Copy to:

Deputy Commanding General, U.S. Army Materiel Command, Attn: AMC-DCG, 5001 Eisenhower Avenue, Alexandria, VA 22333-001

Commander, Naval Sea Systems Command, Attn: 04LR, 2531 Jefferson Davis Highway, Arlington, VA 22242-5160

COMMARCOMATCOM (M01)

Dir, SCMC

CMC (SD) Attn: CDR Gaiter

CMC (LPD) Attn: Ms. Feagans