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

May 17, 2005

Docket No. 03012894 License No. 37-02006-09
Control No. 136617

Clare LumKong
Environmental Safety and Health Manager
Lockheed Martin Commercial Space Systems
100 Campus Drive
Newtown, PA 18940

SUBJECT: LOCKHEED MARTIN COMMERCIAL SPACE SYSTEMS, REQUEST FOR ADDITIONAL INFORMATION CONCERNING APPLICATION FOR AMENDMENT TO LICENSE, CONTROL NO. 136617

Dear Ms. LumKong:

This is in reference to your letter dated March 1, 2005, responding to our August 18, 2004 request for additional information about your "Proposed MARSSIM Closeout Survey for Rooms 179G and 158A at the Lockheed Martin Commercial Space Systems, Newtown, PA Facility" (Proposed Closeout Survey) listed on Nuclear Regulatory Commission License No. 37-02006-09. In order to continue our review, we need the following additional information:

1. Based on your letters dated June 1, 2004 and March 1, 2005, we understand the following:

   a. You believe your facility does not require additional remediation, and a closeout survey will be done to demonstrate compliance with the Subpart E of 10 CFR Part 20 criteria using the NRC screening level of six disintegrations per minute (dpm) per 100 centimeters-squared (cm^2) for total residual thorium contamination, and the final status survey methods described in the Multi-Agency Radiological Surveys and Site Investigation Manual (MARSSIM).

   b. You plan to perform static surveys at a minimum of 13 fixed locations to determine the total residual radioactivity due to thorium, and that these surveys will be performed using alpha scintillation detectors.

   c. Wipe surveys will be performed at the same 13 fixed locations to determine the levels of removable contamination, which may not exceed 10% of the screening level.

   If any of our understandings are incorrect, please inform us in writing.

2. In addition to static surveys for total residual contamination and wipe surveys for removable contamination at fixed locations to meet the statistical tests for release, MARRSIM also requires that scanning surveys be performed to identify areas of elevated measurements. You propose an alternate method of identifying areas of

elevated measurements, described on pages 3 through 6 of your March 1, 2005, letter. Your proposed alternate method evaluates removable contamination at a level of 6 dpm/100 cm^2, assuming the contamination is uniform. This proposed procedure does not meet the intent of identifying areas of elevated measurements for the following reasons:

a. You stated that you expect contamination, if any, to be in the form of chips or shaving, not a uniform distribution. This proposed survey would not identify chips or shavings caught in cracks or crevices or embedded in surfaces, leading to areas of elevated measurements.

b. The proposed survey only identifies removable contamination, not total residual radioactivity leading to elevated measurements.

c. You estimated the investigation level for total contamination in areas of elevated measurement to be 41 dpm/100 cm^2, therefore the limit for removable contamination in areas of elevated measurement could not exceed 4 dpm/100 cm^2.

Provide a revised procedure for identifying areas of elevated measurements.

Current NRC regulations and guidance are available at the NRC web site at http://www.nrc.gov/materials/miau/mat-toolkits.html and http://www.nrc.gov/who-we-are/governing-laws.html or by contacting the Government Printing Office (GPO) toll-free at 1-888-293-6498. The GPO is open from 7:00 a.m. to 9:00 p.m. EST, Monday through Friday (except Federal holidays).

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5040. Based on the time required to revise your procedure, we are voiding the action assigned as Mail Control No. 136617. Although a new Mail Control Number will be issued when you submit the additional information, please refer to Mail Control Nos. 135096 and 136617 in your response to this letter.

Sincerely,

Original signed by Elizabeth Ullrich

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

cc:
Charlene McIntyre, Radiation Safety Officer

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