



DEPARTMENT OF THE ARMY
HEADQUARTERS, U.S. ARMY INDUSTRIAL OPERATIONS COMMAND
ROCK ISLAND, ILLINOIS 61299-6000

October 8, 1999

REPLY TO
ATTENTION OF

Safety/Rad Waste Team

Ms. Orysia Masnyk Bailey, License Reviewer
U.S. Nuclear Regulatory Commission Region II
61 Forsyth Street, Southwest, Suite 23T85
Atlanta, Georgia 30303-3415

Dear Ms. Masnyk Bailey:

We have enclosed a copy of the draft Environmental Assessment for the proposed Fort McClellan Pelham Range burial mound decommissioning. We developed the document in accordance with the National Environmental Policy Act and will make the document available for public comment in the next few days.

Please review and direct comments or questions to Mr. Mike Styvaert, AMSIO-SF, (309) 782-0880, electronic mail address amsio-sf@ioc.army.mil.

Sincerely,

A handwritten signature in cursive script, appearing to read "Rosalene E. Graham".

Rosalene E. Graham
Chief, Safety/Rad Waste Team

Enclosure

**DRAFT ENVIRONMENTAL ASSESSMENT
FOR THE PROPOSED
DECOMMISSIONING OF THE FT. McCLELLAN PELHAM RANGE
BURIAL MOUND
FT. McCLELLAN, AL**

NRC LICENSE NUMBER: 01-02861-05
LICENSEE: DEPARTMENT OF THE ARMY

The Army's proposed decommissioning activities involve the removal of soil contaminated with cobalt (Co-60) and cesium (Cs-137) from the Fort McClellan, Pelham Range burial mound. The Army decommissioning contractor (the Allied Technology Group (ATG)) will package the excavated contaminated soil in accordance with Department of Transportation (DOT) regulations and they will transport the waste to an approved low-level radioactive waste disposal facility.

SUMMARY AND CONCLUSIONS:

Based on the Army's evaluation of the contractor prepared decommissioning plan, we have determined that the proposed plan complies with Nuclear Regulatory Commission's (NRC's) public and occupational dose and effluent limits. Executing the proposed decommissioning activities will not be a major Federal action significantly affecting the quality of the human environment.

The Army concludes that a finding of no significant impact is justified and appropriate, and that the proposed decommissioning action does not require an environmental impact statement.

1. INTRODUCTION

The Army has proposed decommissioning of the Pelham Range burial mound by surveying, excavating, and transporting (by a combination of truck and rail) Co-60 and Cs-137 contaminated soils from Ft. McClellan to an authorized and approved low-level radioactive waste disposal facility.

The proposed action is necessary to remove contaminated materials from Pelham Range. This action will facilitate the remediation of Pelham Range for release for unrestricted use and

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is one of the actions necessary for closure of Ft. McClellan's NRC license.

The NRC license of concern for this investigation is 01-02861-05. The radionuclides of concern are cesium, Cs-137 and cobalt, Co-60.

The purpose of this paper is to evaluate the environmental impact of a radioactive material remediation of the contaminated Pelham Range burial mound. The remediation activities will include the removal of soil containing Cs-137 and Co-60. The Army decommissioning contractor will decontaminate the range to meet the NRC's residential occupancy limit of 25 mrem/yr total effective dose equivalent (TEDE).

The general decommissioning outline is as follows:

1. Clear all brush from the burial mound area.
2. Reestablish the survey grid system.
3. Identify the contaminated areas within the remediation parameters.
4. Remove the soil/sand which contains the radioactivity.
5. Survey the area to ensure remediation was successful.
6. Remove any residual activity discovered after excavation.
7. Package and prepare radioactive materials for shipment.
8. Complete final survey of the remediated mound for release.
9. Ship radioactive materials for disposal.

2. FACILITY DESCRIPTION/OPERATING HISTORY

Fort McClellan is comprised of three parts, the Main Post, the Choccolocco Corridor and the Pelham Range. The installation occupies 45,679 acres adjacent to Anniston, Alabama. The Main Post encompasses 19,000 acres and contains the majority of the facilities. The Army leases the Choccolocco Corridor, approximately 4,500 acres, from the state of Alabama, and it connects the Main Post with the Talladega National Forest to the east. Pelham Range consists of approximately 22,000 acres west of the Main Post.

The Army Base Closure and Realignment Committee (BRAC) has identified Fort McClellan as an installation for closure. The Army must resolve several radiological issues before closing the

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installation. One of the most pressing items of concern is the "Burial Mound" previously used as a low-level radioactive waste disposal cell. The mound contaminates are cesium (Cs-137) and cobalt (Co-60). The Army is coordinating the decommissioning of this site with NRC Region II, the Environmental Protection Agency (EPA) and the Alabama Department of Public Health.

3. RADIOLOGICAL STATUS OF THE FACILITIES

The Army Base Closure and Realignment Committee (BRAC) has identified Fort McClellan as an installation for closure. There are several radiological issues the Army must resolve prior to closing the installation, and one of the most pressing items of concern is the 'Burial Mound' previously used as a low-level radioactive waste disposal cell. The mound contaminates are Cs-137 and Co-60.

The history of the base included training exercises for the Army Chemical Corps for simulated large area radioactive contamination (fallout) from the surface detonation of a small yield (less than 0.5 kiloton) nuclear weapon. The training concept involved the raising and lowering of sealed radioactive sources. Students would then perform ground and aerial surveys to map the radiological fallout pattern. The Army used the training facility to train Radiation Control Teams in support of nuclear weapons testing performed by the Atomic Energy Commission (AEC). The AEC issued a license to Ft. McClellan for use of the sealed sources.

Ft. McClellan used two radiological training areas during the operational period of the mid 1950's through May of 1973. The first field, referred to as "Old Rideout Field," contained approximately 600 source storage wells and was located north of Cane Creek, between West Perimeter Road and Centerline Road. The second field, referred to as "New Rideout Field", extended south of Cane Creek along Centerline Road.

The Army used locally fabricated Co-60 sources and higher activity commercially produced Cs-137 sources at Old Rideout Field. The Army used the Co-60 sources to simulate a uniform fallout pattern. They used the Cs-137 sources to simulate hot spots within the fallout pattern. The site would manually raise and lower the sources from their shielded storage positions, 6'

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below the ground surface. An excessive number of leaking locally fabricated Co-60 sources contributed to the formation of the onsite Pelham Range burial mound. The radioactive burial mound site is located at Rideout Field, Pelham Range, Area 24C.

The U.S. Army Center for Health Promotion and Preventive Medicine (CHPPM) performed a radiological characterization of the burial mound, (reference Industrial Radiation Study No. 27-MH-0987-R2-97, Pelham Range Burial Mound Site, Fort McClellan, Alabama, 29 August - 15 September 1995 and 14 - 28 January 1996).

The CHPPM survey followed much of the protocols of NUREG/CR-5849, including background determination, walkover surface scans, hole logging, and sample analysis. CHPPM collected 571 systematic random and select bias samples and analyzed them for radiological parameters. CHPPM observed elevated Co-60 and Cs-137 levels in surface soil samples; but, they only detected elevated Co-60 in the subsurface samples. The 571 surface and sub-surface soil samples were analyzed by gamma spectroscopy. The Co-60 concentration varies between 1.6 and 187 pCi/g for the surface samples and from 0 to 330 pCi/g for sub-surface samples. The Cs-137 samples varied from 0.2 to 179 pCi/g for the surface samples and from 0 to 12 pCi/g for the sub-surface. One sample contained an individual Co-60 spec with a mass of 0.0043 g and an activity of 243,000 pCi. We have provided a photo of the speck on the following page.¹

¹ U.S. Army Center for Health Promotion and Preventative Medicine (CHPPM) performed a radiological characterization of the burial mound, (reference Industrial Radiation Study No. 27-MH-0987-R2-97, Pelham Range Burial Mound Site, Fort McClellan, Alabama, 29 August - 15 September 1995 and 14 - 28 January 1996).

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Indust Radn Study No. 27-MH-0987-R2-97, Fort McClellan, AL,
29 Aug-15 Sep 95 and 14-28 Jan 96



Figure H-6. Soil Speck with Elevated Cobalt-60 Activity
Compared to the Eye of a Needle

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In May of 1998, ATG collected samples to determine suitability of the waste for disposal at Envirocare of Utah. ATG reviewed the CHPPM characterization data and collected samples for Toxicity Characteristic Leaching Procedure (TCLP) analysis. ATG performed an informal land survey to re-establish the original CHPPM 10m x 10m grid pattern. ATG collected TCLP samples in areas that were representative of the highest recorded radiological source term.

4. ALTERNATIVES TO THE PROPOSED ACTION

The Army considered the alternative actions of remediating to the NRC's "restricted release" criteria and the "no action" alternative.

The restricted release option under NRC guidelines would require the Army to implement institutional controls to limit the future land use for the decommissioned grounds. The intended future land use is for training of Army National Guard troops. However, instituting land deed restrictions is a United States General Services Administration (GSA) decision and that agency has not responded favorably to such requests in the past. GSA considers land use restrictions to constitute property disposal. The Army decided decommissioning the grounds to unrestricted release conditions would be a better and more cost effective overall approach.

The "no action" alternative could lead to the spread of contamination in the area and potentially into the groundwater. To date the radioactive contamination has not spread outside the burial mound area, however the removal of the radioactive source term would be a positive impact on the surrounding environment.

5. RADIATION PROTECTION PROGRAM

5.1 Organization and Responsibilities

The NRC will hold the Army accountable for the Pelham Range decommissioning/remediation activities under the Army's NRC license. However, the Army's contractor, ATG will perform the actual decommissioning work. ATG's site organization consists of the ATG Project Manager supported by the ATG Broker Operation, ATG Health and Safety Officer, ATG Quality Assurance Manager, and

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the ATG Site Supervisor. The Health Physics Technicians and labors will report to the Site Supervisor. The ATG Project Manager is responsible for overall safe progress of the project, oversight of the quality assurance aspects responsible for meeting environmental, health and safety, quality assurance, and technical requirements and handling of collected data. The ATG Project Manager will report to Army's Industrial Operations Command Project Manager.

5.2 Training

ATG will train and qualify all individuals assigned to this project as radiation workers. Radiation worker training will include, but is not limited, to the following subjects: Radiation Worker Rights; Sources of Radiation and Contamination; Types of Radiation and Radioactivity; Units of Radiation and Radioactivity; Prenatal Exposure (Regulatory Guide 8.13); Biological Effects of Radiation; Concepts of Radioactive Contamination Control; Use of Anti-contamination Clothing; As Low As Reasonably Achievable (ALARA) Concepts; Emergency Procedures; and Use of Radiation and Contamination Detection Instruments. In addition, all personnel for the Ft. McClellan project will complete a 40-hour Basic Hazardous Waste Training Program. ATG will keep all training records as part of the permanent project file.

5.3 Radiological Controls

ATG will implement radiological controls to include:

- (a) limiting the spread of contamination from the work site;
- (b) limiting airborne effluent releases to the environment;
- (c) and limiting radiation exposure to workers and the public.

ATG will perform all site remediation work under a Radiation Work Permit (RWP) system. For each specific work task, ATG will prepare an RWP that specifies the activities they will perform and the radiological safety requirements required for performance of that work. All personnel assigned to each individual task must understand the requirements and acknowledge their understanding by signing the RWP.

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ATG will limit the potential for the spread of contamination by surveying and decontaminating all personnel, equipment and vehicles before they leave the work site.

ATG will minimize the potential for airborne effluent releases by having a water truck available to suppress dust during activities that could generate significant quantities of dust. Activities that could generate significant quantities of dust include the excavation of the waste, processing and packaging of the waste, and during conveyor system screening and sampling operations. ATG will implement an environmental air monitoring program. Specifically, they will collect air samples in the breathing zone of workers during work that may produce airborne contamination, and they will position low volume air samplers downwind of the work area.

If airborne activities exceed 50-percent of the Derived Airborne Concentration (DAC) from Appendix B of the Code of Federal Regulations (CFR) Title 10, Part 20, ATG will:

- (a) implement dust-control measures;
- (b) cease all work activities;
- (c) investigate the cause for the airborne activity;
- (d) document all findings and measurements;
- (e) implement corrective actions before proceeding with decommissioning activities.

The maximum general area dose rate for the Pelham Range burial mound is 11.7 uR/hour at 1-meter above ground. All ATG site workers will wear personnel dosimetry devices. Based on ATG's calculations, the highest expected dose to an onsite worker is 30 uSv (3 mrem) (i.e., 11.7 uR/hour x 250 worker-hours). ATG will collect baseline and post decommissioning urine samples to monitor workers for internal exposures. The Army has determined that no immediate threat to public health and safety exists. ATG will monitor all potential exposure pathways, and exposure from each pathway will be kept as low as is reasonably achievable, during decommissioning activities.

We expect members of the public and non-radiation Pelham range workers to receive less than 10 uSv (1 mrem) from all exposure pathways as a result of decommissioning activities.

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6. ENVIRONMENTAL IMPACTS OF PROPOSED ACTION AND ALTERNATIVES

- (a) Air Quality: We do not expect any adverse impacts to air quality as a result of our planned decommissioning activities. There will be a slight increase in dust emissions during the removal of the contaminated sand/soil, however the burial mound is in a remote area of the installation and will not have an adverse impact on the ambient air quality. We do not expect to generate regulated air emission levels during the sampling and excavation of the burial mound. There is little likelihood that airborne radioactive material will be a problem on the range during any operation conducted for the remediation.
- (b) Water Quality/Quantity: The proposed decommissioning action will have a positive environmental impact on the water quality in the area since we are proposing to remove low-level radioactive contamination from the soil above the aquifer. We will collect all water used for washing tools and for other decontamination operations. We will handle and dispose of the collected water as radioactive waste. The Pelham Range burial mound is not located in the floodplain of any stream or river. There are no wetlands located in the project area. There will be no water bodies diverted in order to decontaminate the burial mound.
- (c) Land Use: This action will not have an adverse impact on future land use. Ft. McClellan has used the Pelham Range burial mound to store the radioactive contamination for several years. The removal of the radioactive contaminated soil will be a beneficial environmental impact.
- (d) Waste Disposal: The radioactive material will be packaged, handled and stored according to the appropriate health and safety procedures. Packaging contaminated soil shall conform to Department of Transportation (DOT) regulations and the disposal site requirements. The Army will ship the waste in accordance with all DOT, State and Low Level Radioactive Waste Compact Commission regulations. The Army shall manifest each shipment using the appropriate disposal site Waste Shipment Manifest and continuation pages or shipment records to another site approved to receive the material as directed by the IOC. The decommissioning Project Manager

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shall inspect and sign all shipping manifests. The radioactive contaminated material to be disposed off plant will include contaminated soil/sand, protective clothing and disposable tools.

- (e) Noise: There will be no significant/prolonged periods of increased noise levels. The decommissioning activities will generate some elevated sound levels for a 6-8 week period. The elevated noise will come from the operation of heavy machinery and electrical generators. The noise from these activities is not expected to significantly impact the wildlife or the general public.
- (f) Cultural Resources: There are no adverse impacts anticipated. The project will consist of the sampling and removal of radiologically contaminated materials that the Army placed there within the past few decades. The likelihood of encountering any artifacts in the area is remote.
- (g) Wildlife/Vegetation: As part of the scoping process for the Ft. McClellan Base Closure Environmental Impact Statement², the Alabama Department of Conservation and Natural Resources - Alabama Natural Heritage Program indicated there are 11 sensitive plant species and three sensitive animal species within the installation boundaries. We suspect the proposed decommissioning activities at the Pelham Range burial mound will not impact any of the sensitive fauna or flora. The decommissioning contractors excavation and soil handling activities will be confined to essentially a 25m x 15m, open land section of Pelham Range. The decommissioning activities will have no significant impact on any of the Ft. McClellan ecosystems.
- (h) Permits required: There are no environmental permits required for this action.

2. Environmental Impact Statement - BRAC 1995, Fort McClellan Disposal and Reuse, Final Environmental Impact Statement, August 1998.

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- (i) **Public Health and Safety:** This project involves the removal of a health and safety exposure risk (i.e., a low-level radiation source). The removal of this source term will have a positive environmental impact on the area. Individuals that perform sample collection and decommissioning work will follow the guidelines specified in the Pelham Range decommissioning plan. Efforts will not start until the NRC formally approves the decommissioning plan (Attachment A). The Army and the Army's contractors will handle all radiological contaminated materials with radiological controls in place.
- (j) **Unexploded Ordnance:** Over the years, many different types of experimental and production ammunition rounds may have been fired onto the range. As a result of this, no personnel will be authorized to do any excavation at the site with hand tools. No personnel will handle ordnance. A front-end loader will be used to excavate the radiologically contaminated soil.
- (k) **Public Access:** The proposed decommissioning activities will not create an inconvenience to the public. The project zone is a restricted area.
- (l) **Economic Benefits:** Any effects of this proposed project to the local economy are expected to be positive but minor.
- (m) **Construction Effects:** There should not be any alteration to the land surface in the area other than the change in the topography of the burial mound. We do not expect damage to the area from the decommissioning activities; therefore, no plans have been made for restoration of the project area upon project completion.
- (n) **Utilities:** The project activities will occur in a remote area of the installation. Thus, utilities are not available for use in the area. ATG will use gas powered portable generators for powering electrical equipment.
- (o) **Ionizing and Non-Ionizing Radiation.** Cobalt (Co-60) and cesium (Cs-137) are the only radioactive materials indicated to be present in the contaminated burial mound. Both radionuclides are strong gamma emitters and are easily

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discernable with portable field instrumentation. The environmental impact for this proposed project is positive since the radioactive waste source will be collected and transported off-installation to a licensed low-level radioactive disposal facility.

6.1 Army's Proposed Action

The Army is proposing to collect the radiologically contaminated materials from the Pelham Range burial mound. The Army intends to remediate the site to the NRC criteria for unrestricted use. The NRC criteria for unrestricted use is 25 mrem/year TEDE to the critical group. The Environmental Protection Agency (EPA) will require the post remediated site to present an excess lifetime cancer risk of between 10^{-4} and 10^{-6} . For the Pelham Range site, we determined the worst case exposure scenario is for a residential family (i.e., the critical group) which occupies the land and operates it as a self-sustaining farm.

The Army's decommissioning contractor modeled the future residential farm scenario using site specific environmental parameters to determine acceptable clean up levels. ATG modeled the site conditions and occupancy scenarios using the Residual Radioactivity (RESRAD) computer code. The model calculated acceptable cleanup levels of 2.3 pCi/g of Co-60 and 9.2 pCi/g of Cs-137. These represent the maximum average acceptable contaminant levels that will meet the NRC's release criteria. In addition, the Army will operate under the concept of As Low As Reasonable Achievable (ALARA). After reviewing the site characterization data and considering the sensitivity of available field instrumentation, by applying ALARA we predict the average concentrations after decommissioning will be approximately 0.1 pCi/g of Co-60 and approximately 0.1 pCi/g of Cs-137.

The Army will package and ship the radiologically contaminated material offsite to the Envirocare facility in Clive, UT. Envirocare is a licensed low-level waste disposal site. The Army will perform a 100-percent surface survey of the remaining soil in and around the Pelham Range burial mound.

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The Army expects to generate approximately 392 cubic meters (498 cubic yards) of low-level radioactive waste that we will ship offsite for disposal. The Army's contractor, ATG, plans to use roll-on, roll-off containers with hard covers for shipment to the disposal site. These containers will have six mil plastic liners. As ATG fills each container, they will ready it for shipment. They will survey the exterior surfaces of each container and verify that they are free of loose surface contamination. In addition, ATG will ensure that each container is covered and sealed before it leaves the site. These actions are necessary to prevent the spread of contaminated material during transport.

ATG plans to transport the sealed containers by truck to the nearby rail spur. At the rail spur, ATG will load the containers onto railcars for transport to the Envirocare disposal facility, in Clive, Utah. The Army and ATG are committed to shipments complying with NRC and DOT package and shipping requirements.

The Army estimates that the maximum expected exposure rate on the exterior surface of the waste shipping containers is 0.5 milliroentgen/hour (mR/hr). The Army estimates that the maximum dose to the onsite worker from this proposed activity will be 0.03 millisieverts (mSv) [3 millirem (mrem)]. The Army estimates that the maximum dose to a member of the public from the transportation of this material will be less than 0.01 mSv (1 mrem).

There are limited potential short-term environmental impacts associated with the proposed decommissioning activities. These include the potential release to the environment, of airborne and liquid effluents, which may contain low levels of radioactive contamination during certain activities such as excavation, packaging, and waste transportation. There are also potential long-term (post-disposal) impacts associated with the Army's proposed disposal alternative. NRC regulation 10 CFR Part 20 specifies the maximum allowable amounts of radioactive materials that a licensee can release from a site in the form of either airborne or liquid effluents. The NRC will require the Army to comply with these regulations. The Army has established action levels that will ensure that effluent releases during decommissioning activities are well below the levels allowed by Part 20.

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There is a potential long-term environmental impact as a result of the Army's planned disposal at the Envirocare site. This impact is based on the possibility of human intrusion into the material. However, the State of Utah regulates the Envirocare site in terms of land disposal of radioactive waste. The State regulations require long-term institutional control of the site, thus minimizing the potential for human intrusion. Envirocare will have restrictions in the property deed as a way to ensure that the waste remains undisturbed. In addition, Envirocare is a remote site in a relatively barren region of the country, which reduces the potential for human intrusion.

6.2 No-Action Alternative

The Army evaluated a no-action alternative as opposed to the suggested action of collecting and disposing of the radioactive contaminants. The no action alternative would mean that the Army would not remediate the Pelham Range burial mound. This conflicts with NRC's requirement, in 10 CFR 40.42, of timely remediation at sites that have ceased NRC licensed operations. Although there is no immediate threat to the public health and safety from this site, not undertaking remediation, at this time, does not resolve the regulatory and potential long-term health and safety problems involved in storing this waste. No action now would delay remediation until some time in the future, when costs could be much higher than they are today. It is even possible that no disposal option will be available in the future if the current low-level radioactive waste disposal facilities are closed and no new ones are opened.

7. CONCLUSIONS

For radiologically contaminated wastes, regardless of the disposition, potential hazards to the public and environment continue to exist because of the possibility of human intrusion into the material. Envirocare, a licensed disposal site, is eligible to receive the Army's radiologically contaminated Pelham range decommissioning waste. The State of Utah regulates Envirocare's operation for the land disposal of radioactive wastes. The State controls provide for long-term institutional control and minimize the potential for human intrusion.

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The Army believes that disposing of the Fort McClellan decommissioning waste at the Envirocare facility will not cause any significant impacts on the environment and is the most acceptable and responsible alternative. The conditions and restrictions placed on the Envirocare facility, combined with the facility design provisions and its location, provide a higher level of protection of human health and safety and the environment than other identified alternatives. During the scoping process for the Environmental Impact Statement² for the Ft. McClellan base closure action, the installation received several comments stressing the need to conduct contamination remediation efforts in a responsible manner.

The proposed action would result in the irreversible use of resources in the conduct of removal activities and the transportation of waste material for disposal. A portion of the Envirocare facility will be irreversibly committed for disposal of this Fort McClellan low-level radioactive waste.

8. AGENCIES AND INDIVIDUALS CONSULTED

The U.S. Army prepared this environmental assessment in its entirety. We used no other sources beyond those referenced in this environmental assessment. The Army will provide a draft of this environmental assessment to the U.S. Nuclear Regulatory Commission, U.S. Environmental Protection Agency and the State of Alabama Department of Public Health for their review.

9. FINDING OF NO SIGNIFICANT IMPACT

The U.S. Army has prepared an environmental assessment related to the decommissioning of the Fort McClellan, Pelham Range burial mound. Based on this environmental assessment, the Army has concluded that this decommissioning action will not adversely affect the environment and does not warrant the preparation of an environmental impact statement. Accordingly, we have determined that a Finding of No Significant Impact is appropriate.

2. Environmental Impact Statement - BRAC 1995, Fort McClellan Disposal and Reuse, Final Environmental Impact Statement, August 1998.