



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
US ARMY CHEMICAL SCHOOL
FORT MCCLELLAN, ALABAMA 36205- 5020

August 10, 1995

Health Physics Office

U.S. Nuclear Regulatory Commission, Region II
Nuclear Materials Licensing Section (Jay Henson)
101 Marietta Street, N.W., Suite 2900
Atlanta, Georgia 30323-0199

Gentlemen:

The additional information requested by your office on the decommissioning plan for facilities under license number 01-02861-04 are in the attached memorandum.

The point of contact for this action is Mr. John May, (205) 848-5737.

Sincerely,

A handwritten signature in cursive script, reading "J. Harold Masheurn", is written over the typed name and title.

J. HAROLD MASHEURN
Colonel, U.S. Army
Assistant Commandant

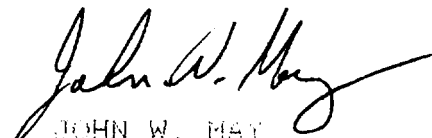
Encl

ATZN-CMA-HP(385-11)

MEMORANDUM FOR Assistant Commandant, U.S. Army Chemical School,
Fort McClellan, AL 36205-5020.

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION CONCERNING
DECOMMISSIONING PLAN FOR FACILITIES UNDER LICENSE
NO. 01-02861-04.

1. In a letter dated 27 July, 1995, the NRC, Region 2, requested additional information concerning the decommissioning plan for the hot cell, license No. 01-02861-04. The information in this memorandum addresses those parts of the plan the NRC requested additional information on.
2. Response to paragraph 1. All contamination above release limits will be removed. Disposal operations will be conducted by the Army Radioactive Waste Disposal Office. The point of contact for that office is Mike Styvaert, (309) 782-0880, FAX (309) 782-2988.
3. Response to paragraph 2. The site specific release criteria established for this site in letter dated 6 May 1987 will be used for release where applicable. The NRC's "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted use or Termination of Licenses for Byproduct, Source, or Special Nuclear Material" dated August 1987, will be used when and where site specific release criteria has not been established.
4. Response to paragraph 3. Samples from established ground water wells will be obtained to demonstrate site meets release criteria prior to final release.
5. Response to paragraph 4. For the purpose of this remediation, affected areas will include building 3192, paved areas inside the fence not previously surveyed, unpaved areas inside the fence not previously surveyed where radioactive material was used or stored. Affected areas include shaded areas on the attached diagram. All other areas are considered unaffected areas. Unaffected areas have no history of radioactive material use or storage and are not in the migration path for contamination. Affected areas will have a final survey conducted as described in NUREG/CR-5849. (see attached)
6. The point of contact is Mr. John W. May, Health Physics Manager, (205) 848-5737.



JOHN W. MAY
Health Physics Manager

Encl

AFFECTED AREA

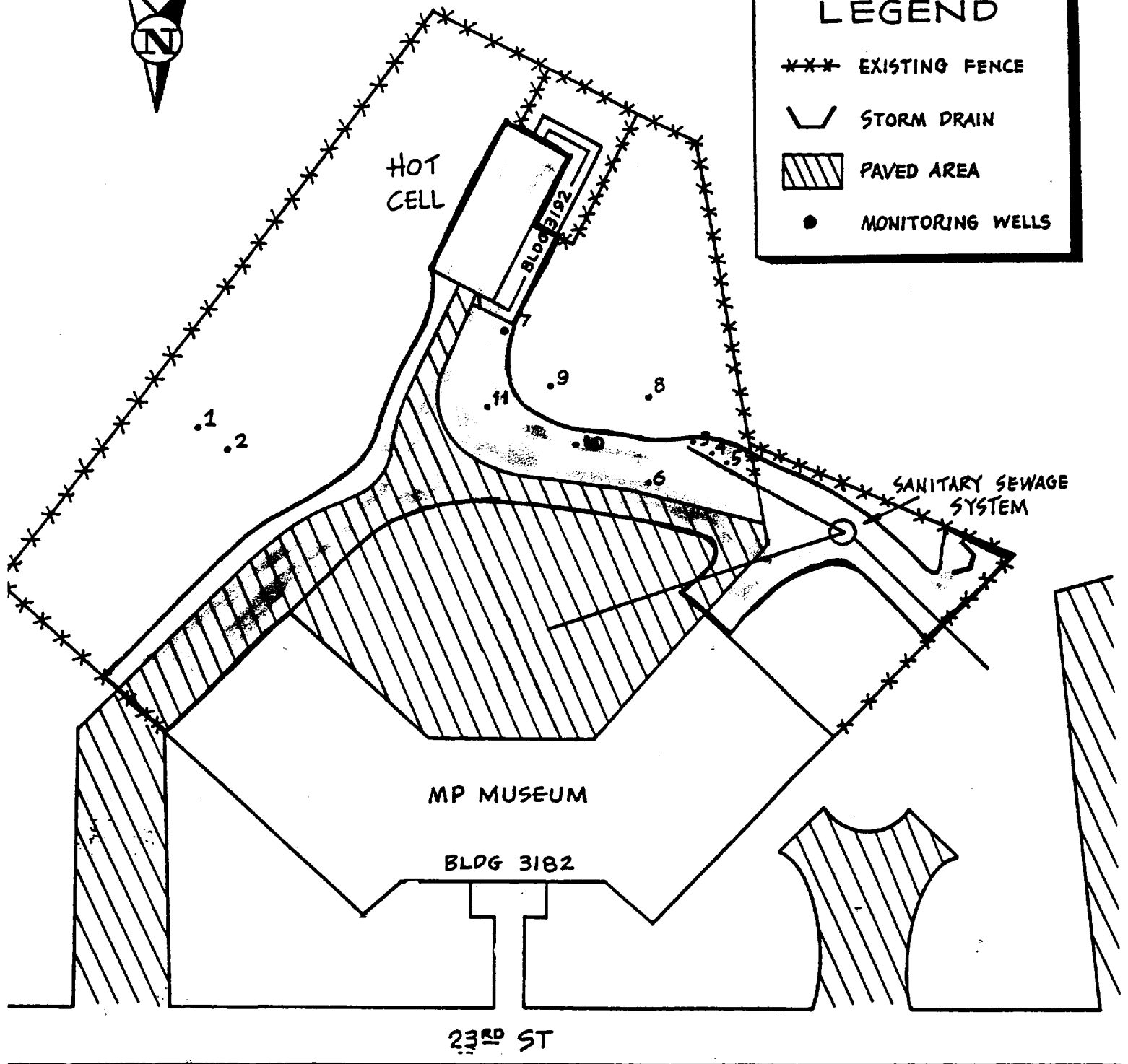
LEGEND

*** EXISTING FENCE

∩ STORM DRAIN

▨ PAVED AREA

● MONITORING WELLS



OFFICIAL RECORD COPY

July 27, 1995

Department of the Army
U.S. Army Chemical School
ATTN: ATZN-CMA-HP
Fort McClellan, AL 36205-5020

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION CONCERNING THE DECOMMISSIONING PLAN FOR THE FACILITIES COVERED UNDER LICENSE NO. 01-02861-04

Gentlemen:

This letter is in reference to your decommissioning plan for the decontamination and decommissioning of building materials, facility grounds and facility structures covered under License No. 01-02861-04. You forwarded this plan in a letter dated March 31, 1995, and provided additional information with a letter dated June 1, 1995. The following information is needed to continue our review of your decommissioning plan:

1. Allied Technology Group, Inc. (ATG) performed a characterization survey of the site in November, 1994. During this survey, ATG personnel identified some contaminated water and sludge in the bottom of a sewer manhole. They described this material in their January, 1995, Sample Analysis Report (Items 3.4 and 3.5 of report). Please describe the methods you will use to dispose of these materials.
2. The ATG work plan for the radiological remediation of the hot cell site and grounds, which you included as a part of your decommissioning plan forwarded to Region II in March, 1995, states on page 1 that the site and surrounding grounds will be remediated to meet the NRC criterion for unconditional release. On page 17, Item 7.11.7, ATG states that site release shall be based on soil sample results which indicate no radioactivity above natural background is present and micro-R radiation survey results indicating no radiation exceeding those of general area background are present. The radiation levels which must be reached for release of the site and grounds for unrestricted use are contained in the NRC's "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of Licenses for Byproduct, Source, or Special Nuclear Material" dated August, 1987 (enclosure 1). Site specific release criteria for soil contamination and ground surface dose rates were established for this site in a letter dated May 6, 1987 (enclosure 2).

Please clarify the specific release criteria (fixed and removable contamination and radiation levels) you intend to meet for the specific radionuclides of concern and the areas contaminated (building surfaces, soil, etc.) to demonstrate the facility and grounds are suitable for release for unrestricted use.

3. Previous radiological surveys performed at this site have included the analysis of samples obtained from groundwater wells established for the purpose of monitoring the migration of the radioactive contamination at the site. Please specify if samples from these wells will be obtained as a part of this current effort to demonstrate the site meets the criteria for release for unrestricted use. If you do not intend to obtain these samples please describe your reasoning for determining that this sampling is not required.
4. ATG illustrated the locations where they obtained soil samples in Figure 1 of their Sample Analysis Report dated January, 1995. Based upon their results and the sampling points as illustrated, it appears that soil contamination above NRC release criteria is present in areas near the fence perimeter at building 3182 (samples FM-043, -046 and -047) and along the sidewalk adjacent to building 3182 (samples FM-038 and -039).

Based upon the above, and the fact that this site has been the subject of previous remediation efforts, additional information regarding the final surveys is needed. Please describe (include diagrams) those areas within and around the facility that, for the purposes of this current decommissioning effort, are considered unaffected areas versus those that are considered affected areas as defined in NUREG/CR-5849, "Manual for Conducting Radiological Surveys in Support of License Termination" (enclosure 3). Also, please confirm that the final survey will be conducted as described in NUREG/CR-5849, or provide sufficient information to demonstrate that the final survey will provide the same level of assurance that the site meets the criteria for release for unrestricted use as provided by a final survey performed in accordance with the NUREG. Please note that the results of the final survey must be reported in the same units (i.e., dpm/100 cm², pCi/g, etc.) as those associated with the applicable release criteria.

Our review of your decommissioning plan will continue upon receipt of the above referenced information. Please forward two copies of your reply and refer to Control Number 256441. If you wish, replies may be transmitted via electronic facsimile (FAX) to (404) 331-7437. You should then mail the original copy of any electronically transmitted documents.

In order to continue prompt review of your plan, we request that you respond to this letter within 30 calendar days from the date of this letter.

If you have any questions, please call me at (404) 331-0344.

Sincerely,

Jay L. Henson
Materials License Reviewer
Nuclear Materials Licensing Section

Enclosures: 1 - Release Criteria
2 - Memorandum dated May 6, 1987
3 - Excerpts from NUREG/CR-5849

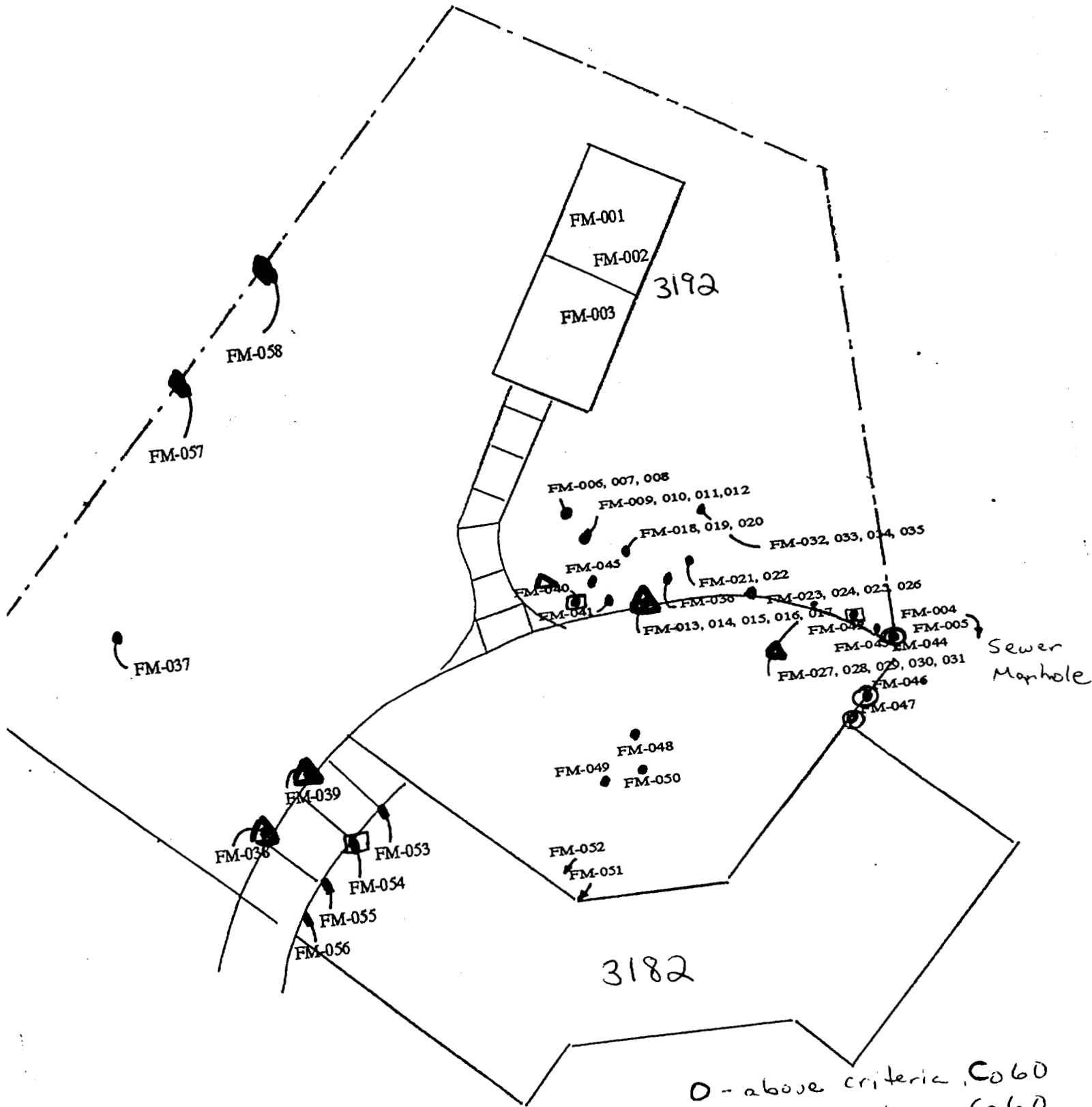
Fort McClellan

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			YES	NO			
OFFICE	RII:DRSS	RII:DRSS					
SIGNATURE	<i>JH</i>	<i>JH</i>					
NAME	Henson	Potter					
DATE	07/27/95	07/27/95	07/ /95	07/ /95	07/ /95	07/ /95	
COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	

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FIGURE
SAMPLE LOCATIONS



○ - above criteria, Co60
 □ - ≥ 1/2 criteria, Co60
 ▲ - above criteria, Cs137