



CABRERA SERVICES
RADIOLOGICAL • ENVIRONMENTAL • REMEDIATION

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October 17, 2006

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Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406
ATTN: Director, Division of Nuclear Materials Safety

RE: Activities at temporary job site utilizing U.S. NRC Radioactive Material
License #06-30556-01 Amendment 01 03035316

Dear Sir or Madam:

Cabrera Services Inc. (CABRERA) is providing this written notification of its intent to utilize CABRERA Material License #06-30556-01 Amendment 01 at a temporary job site. The attached information is provided as required by license condition 17A.

We trust that this information is sufficient to grant our use of CABRERA material license # 06-30556-01 Amendment 01 at the temporary job site. This license is currently in use at several other sites (MD, NM, NJ). CABRERA will notify the Regional Administrator, U.S. Nuclear Regulatory Commission, within 30 days of termination of activities at this job site in keeping with license condition 17B.

If you should have any questions regarding this notification, please contact either Henry W. Siegrist or David J. Watters at CABRERA (860) 569-0095.

Sincerely,

Henry W. Siegrist, P.E., CHP
Corporate Health Physicist

attachment

139598
NMSS/RGN1 MATERIALS-002

**ATTACHMENT
LAKE CITY ARMY AMMUNITION PLANT
AREA 31
INDEPENDENCE, MISSOURI**

Cabrera Services, Inc. (CABRERA) is providing radiological remediation, soil sampling, and final status survey (FSS) at the Lake City Army Ammunition Plant Area 31 Site (Site) located in Independence, Missouri. The site contains soil that was segregated for disposal and was found to contain small amounts of depleted uranium (DU) munitions. The work set forth by this notification entails gamma walkover surveys, removal and containerization of DU fragments, and soil sampling analysis associated with FSS activities at the Site.

This work is being performed under Subcontract No. RN06-0017 with ARCADIS G&M, Inc. (ARCADIS), the prime contractor to the U.S. Army for remediation of the installation-wide operable unit (IWOU) at LCAAP.

This information is being transmitted to you as required by condition 17A of the CABRERA Materials License.

BACKGROUND

Removal action activities were initiated at Area 31 in July 2005, in accordance with a work plan by ARCADIS G&M Inc. to remediate waste materials and impacted soils. In the course of conducting planned activities, ARCADIS unexpectedly encountered munitions and explosives of concern (MEC) in the form of 81-millimeter (mm) mortar casings. Removal action activities were temporarily suspended, and an MEC removal specialty subcontractor was brought onsite to physically screen the waste pile material and segregate the mortar casings from the rest of the waste.

The MEC screening process entailed passing the entire volume of waste pile material through a vibratory power screen with 3-inch openings. During the screening process, four 20-mm projectile bodies containing DU were discovered in the waste. The projectiles were identified through visual observations of the material that passed through the 3-inch screen, and radioactivity was confirmed using a Geiger-Mueller detector. The four projectiles were intact, and did not appear to have been fired. No fragmented DU was observed. Upon identification, the DU projectiles were manually removed from the waste and set aside to await final disposition.

Historical records do not indicate any reported use or disposal of DU at Area 31. Since only a limited number of projectile bodies were identified during the previous waste screening activities, it is assumed that only a small number of projectile bodies remain in the waste. It is also assumed that a slight potential for soil contamination exists in the immediate vicinity of the projectile bodies due to weathering and oxidation.

Cabrera is providing remediation, sampling, and FSS support to ensure that any potential additional radioactive material in the screened waste does not exceed the U.S. Nuclear Regulatory Commission (NRC) requirements for unrestricted release, as described in the Code of Federal Regulations (CFR), Title 10, Part 20.1402. The radiological contaminant of concern is DU. The work evolution is associated with outside soils.

RADIOLOGICAL WORK DETAILS

CABRERA has prepared this notification to the NRC with respect to CABRERA's intent to utilize the CABRERA Materials License, number 06-30556-01 Amendment 01, at the Lake City Army Ammunition Plant Area 31, Independence, Missouri temporary jobsite. As required by condition 17A of the CABRERA Materials License, the following information is provided:

Radiological survey and sampling activities are planned for LCAAP Area 31 to remove the DU projectile bodies and contaminated soil. These activities include gamma walkover surveys using a field instrument for the detection of low-energy radiation (FIDLER) probe and the collection of soil samples for off-site analysis. Approximately 100 samples will be collected for gamma spectroscopy analysis at a licensed off-site laboratory. Radionuclides of concern include isotopes comprising DU and their daughter products. Less than 15 pounds of DU as solid projectiles is expected to be segregated from the soil.

Investigation derived waste (IDW) will be handled in accordance with Federal and State regulations. This includes small amounts of contaminated personal protective equipment (PPE) and miscellaneous waste such as smears and paper towels. CABRERA will not take possession of any radioactive materials derived from the site.

Standard exempt calibration sources will be used during the work evolution for quality control (QC) checks of radiation detection equipment. The sources will be controlled under CABRERA NRC Materials License No. 06-30556-01, as described in CABRERA Radiation Safety Procedure No. OP-009, *Use and Control of Radioactive Check Sources*.

CABRERA NRC Materials License (No. 06-30556-01) requirements, including previously submitted procedures, will be adhered to with respect to the duration of this work evolution. Radiological surveys of affected work areas, and decontamination of equipment used for the work effort will be conducted after completion of remediation investigation activities to ensure the absence of radioactive contamination. These values are consistent with NRC Regulatory Guide 1.86.

Work activities at the site, including the receipt and use of exempt QC sources, are expected to commence on or about November 6, 2006. Site work is expected to be completed prior to November 17, 2006.

Key project personnel and supporting information is available from:

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Please contact Henry Siegrist (CABRERA) at (860) 569-0095 should you have any questions regarding this CABRERA notification of intent to utilize NRC Materials License, number 06-30556-01 Amendment No. 1.

This is to acknowledge the receipt of your letter/application dated

10/17/2006, and to inform you that the initial processing which includes an administrative review has been performed.

Notification 06-30556-01 There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

Please provide to this office within 30 days of your receipt of this card

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned Mail Control Number 139598.
When calling to inquire about this action, please refer to this control number.
You may call us on (610) 337-5398, or 337-5260.