

Official Use Only - Security-Related Information

NRC FORM 591M PART 1

(10-2003)
10 CFR 2.201

U.S. NUCLEAR REGULATORY COMMISSION

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE/LOCATION INSPECTED:

Cabrera Services, Inc./Lake City Army Ammunition
Plant Area 31, Independence, Missouri

2. NRC/REGIONAL OFFICE

**U.S. Nuclear Regulatory Commission
Region III, 2443 Warrenville Road
Suite 210
Lisle Illinois, 60532-4352**

REPORT 03035316/06-001

3. DOCKET NUMBER(S)

030-35316

4. LICENSE NUMBER(S)

06-30556-01

5. DATE(S) OF INSPECTION

11/8-9/2006

LICENSEE: Cabrera Services, Inc.

The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Nuclear Regulatory Commission (NRC) rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector. The inspection findings are as follows:


- ☒ 1. Based on the inspection findings, no violations were identified.
- ☐ 2. Previous violation(s) closed.
- ☐ 3. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, and corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy, NUREG-1600, to exercise discretion, were satisfied.

☐ Non-Cited Violation(s) was/were discussed involving the following requirement(s) and Corrective Action(s):

- ☐ 4. During this inspection certain of your activities, as described below and/or attached, were in violation of NRC requirements and are being cited. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11.

Licensee's Statement of Corrective Actions for Item 4, above.

I hereby state that, within 30 days, the actions described by me to the inspector will be taken to correct the violations identified. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201 (corrective steps already taken, corrective steps which will be taken, date when full compliance will be achieved). I understand that no further written response to NRC will be required, unless specifically requested.

Title	Printed Name	Signature	Date
LICENSEE'S REPRESENTATIVE			
NRC INSPECTOR	Eugenio A. Bonano		11/09/2006

44

(10-2003)
10 CFR 2.201

**SAFETY INSPECTION REPORT
AND COMPLIANCE INSPECTION**

1. LICENSEE Cabrera Services, Inc. REPORT NUMBER(S) 030-35316/06-001		2. NRC/REGIONAL OFFICE Region III 2443 Warrenville Road Lisle, Illinois 60532	
3. DOCKET NUMBER(S) 030-35316	4. LICENSE NUMBER(S) 06-30556-01	5. DATE(S) OF INSPECTION November 8-9, 2006	
(Continued)			

Docket File Information

SAFETY INSPECTION REPORT AND COMPLIANCE INSPECTION

1. LICENSEE Cabrera Services, Inc.		2. NRC/REGIONAL OFFICE Region III 2443 Warrenville Road, Suite 210 Lisle, IL 60532	
REPORT NUMBER(S) 030-35316/06-001			
3. DOCKET NUMBER(S) 030-35316	4. LICENSE NUMBER(S) 06-30556-01	5. DATE(S) OF INSPECTION November 8-9, 2006	
6. INSPECTION PROCEDURES USED 88005, 83822, 87104	7. INSPECTION FOCUS AREAS 03.01-03.07		
SUPPLEMENTAL INSPECTION INFORMATION			
1. PROGRAM CODE(S) 03219	2. PRIORITY 3	3. LICENSEE CONTACT Joe Voegtli, Construction Supervisor	4. TELEPHONE NUMBER 410-332-8177
<input type="checkbox"/> Main Office Inspection <input type="checkbox"/> Field Office <input checked="" type="checkbox"/> Temporary Job Site		Next Inspection Date: _____ <u>Lake City Army Ammunition Plant, Area 31, Independence, MO</u>	

PROGRAM SCOPE

Cabrera Services, Inc., is a service licensee, whose license authorizes receipt, storage, use, and/or possession of byproduct, source and special nuclear materials incident to the following activities: (1) Decontamination, decommissioning, and remediation of facilities and grounds, equipment, and containers; (2) Site characterization; (3) Solidification and treatment of wastes; (4) Packaging for transport; (5) Transport in packages or containers approved for use under the provisions of 10 CFR Part 71, for transfer to licensees authorized to receive the materials, in accordance with the terms and conditions of licenses issued by the NRC or an Agreement States; and (6) As calibration sources and reference standards for operational testing of radiation detection equipment.

During July 2006, a site contractor was performing remediation activities in a general rubbish land-fill located in Area 31 of the Lake City Army Ammunition Plant (LCAAP), which is in Independence, Missouri. The Army facilities were used for the production and testing of munitions containing depleted uranium (DU), until the licensee ceased these activities during the 1990s and subsequently started decommissioning of the former production and testing areas. The land-fill clean-up activities were not part of the decommissioning project.

During these activities the contractor found 4 DU targeting rounds. The Army contracted with Cabrera to conduct surveys on the soil excavated from the land-fill to ensure that the soil was free of any additional penetrators prior to disposal of the soil and general rubbish. This inspection focused on the safety aspects related to and the conduct of survey activities described in the "AREA 31 FINAL STATUS SURVEY WORK PLAN," which was incorporated into the Army's License No. SUC-1380, Docket No. 040-08767 amendment No. 45.

Performance Observations

The NRC inspectors observed and evaluated the licensee's performance related to radiological posting and labeling, placarding, and the conduct of radiation surveys conducted in work areas and soils being remediated. The contractor's use of radiological instruments and their calibration was determined to be appropriate and according to the survey plan. The inspectors determined that the service licensee had complied with provisions for notification of the NRC and the implementation of administrative controls to insure appropriate and separate license oversight controls; that is, Army license control versus service licensee control and responsibility, while work was being performed in Area 31. The inspectors determined that appropriate certified and trained personnel, as required by license commitment, were conducting the radiological surveys and sampling activities.

The NRC inspectors performed independent radiation surveys, as well as conducting side-by-side instrument measurements with the contractor for purposes of determining consistency of measurements. The inspectors survey readings were determined to be consistent with the service contractors field measurements. The NRC inspector interviewed licensee personnel during the inspection to evaluate personnel knowledge of contractor procedures and general knowledge of NRC regulations..

The licensee committed to forwarding soil samples from their contract laboratory for confirmatory analyses by the NRC's contract laboratory: Oak Ridge Institute for Science and Education. The sample findings from this analysis will be forwarded to the licensee and the Army under separate covers.