

ENCLOSURE 2

**U.S. ARMY NSC, LICENSE 20-0315-02, SUMMARY/STATUS OF
REQUIRED TERMINATION DOCUMENTATION RECORDS –
10 CFR 30.51 (d) AND 30.51(f)**

U.S. Army Natick Soldier Center, License 20-0315-02 Summary/Status of Required Termination Documentation - 10 CFR § 30.51 (d) and (f) Records:

Requirement	Action	Disposition
<p>(d) Prior to license termination, each licensee authorized to possess radioactive material with a half-life greater than 120 days, in an unsealed form, shall forward the following records to the appropriate NRC Regional Office:</p>		
<p>(1) Records of disposal of licensed material made under § 20.2002 (including burials authorized before January 28, 1981), 20.2003, 20.2004,</p>	<p>20.2002: NSC never requested or participated in alternative disposal procedures.</p> <p>20.2003: Yes, sanitary release information is in Enclosure 2-1.</p> <p>20.2004: NSC never requested or conducted treatment or disposal of licensed material by incineration only.</p>	<p>Complete</p>
<p>20.2005: (as follows)</p> <p>(a) A licensee may dispose of the following licensed material as if it were not radioactive:</p> <p>(1) 0.05 microcurie (1.85 kBq), or less, of hydrogen-3 or carbon-14 per gram of medium used for liquid scintillation counting; and</p>	<p>Scintillation cocktail used to be disposed of off-site through a contract, then at some point during 1987 through 1991 we disposed of it by incinerating it on-site (Building 30).</p> <p>We disposed of the scintillation cocktail into sanitary sewerage when the solution went to a soap base. See Enclosure 2-2.</p>	<p>Complete</p>
<p>(2) 0.05 microcurie (1.85 kBq), or less, of hydrogen-3 or carbon-14 per gram of animal tissue, averaged over</p>	<p>ARIEM personnel, who were part of our original license in 1983 through 1989 did use C14 and H3 on goats, pigs and rats. Carcasses</p>	<p>Complete</p>

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<p>the weight of the entire animal.</p>	<p>were incinerated in Building 42 (ARIEM building) under the radiation safety or radiation protection officer supervision where the RSO/RPO would calculate out the material to body mass ratio to make sure it was below 0.05µCi.</p> <p>The incinerator once located in Room 108 of Building #30 was used from 1973 to 1985 to burn animal waste. There are no reports indicating levels of radioactivity in incinerated animal carcasses. Room 108 (the location of the incinerator) was cleared for unrestricted use in December of 1993 and the current Cabrera survey of the incinerator chimney stack showed no residual radioactivity above background levels.</p>	
<p>(b) A licensee may not dispose of tissue under paragraph (a)(2) of this section in a manner that would permit its use either as food for humans or as animal feed.</p>	<p>N/A</p>	<p>Complete</p>
<p>(c) The licensee shall maintain records in accordance with § 20.2108 (Records of waste disposal).</p>	<p>NSC did and provided records to you as appropriate for 20.2002, 20.2003, 20.2004 and 20.2005 above. See enclosures 2-1, 2-2, and 2-3.</p>	<p>Complete</p>

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<p>and (2) records required by § 20.2103(b)(4) Records of Surveys.</p> <p>§ 20.2103(b)(4) Records of the results of measurements and calculations used to evaluate the release of radioactive effluents to the environment. This includes those records of the results of measurements and calculations used to evaluate the release of radioactive effluents to the environment required under the standards for protection against radiation in effect prior to January 1, 1994.</p>	<p>A review of our records and the Cabrera HRA report (enclosure 2-5) indicate there were no releases into the environment.</p>	<p>Complete</p>
<p>(f) Prior to license termination, each licensee shall forward the records required by § 30.35(g) to the appropriate NRC Regional Office.</p>		
<p>§ 30.35 Financial assurance and recordkeeping for decommissioning.</p>		

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<p>(g) Each person licensed under this part or parts 32 through 36 and 39 of this chapter shall keep records of information important to the decommissioning of a facility in an identified location until the site is released for unrestricted use. Before licensed activities are transferred or assigned in accordance with § 30.34(b), licensees shall transfer all records described in this paragraph to the new licensee. In this case, the new licensee will be responsible for maintaining these records until the license is terminated. If records important to the decommissioning of a facility are kept for other purposes, reference to these records and their locations may be used. Information the Commission considers important to decommissioning consists of—</p>		
<p>(1) Records of spills or other unusual occurrences involving the spread of contamination in and around the facility, equipment, or site. These records may be limited to instances when contamination remains after any cleanup procedures or when there is reasonable likelihood that contaminants may have spread to inaccessible areas as in the case of possible seepage into porous materials such as concrete. These records must include any known information on identification of involved nuclides, quantities, forms, and concentrations.</p>	<p>There were no spills or other unusual occurrences involving the spread of contamination in and around the facility, equipment or site. A summary of wipes and removable conditions is in enclosure 2-4. The Cabrera HRA (enclosure 2-5) from 2004 verified that there was no environmental contamination on pages 14 and 16.</p>	<p>Complete</p>
<p>(2) As-built drawings and modifications of</p>	<p>Drawings/diagrams of the affected areas for</p>	<p>Complete</p>

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<p>structures and equipment in restricted areas where radioactive materials are used and/or stored, and of locations of possible inaccessible contamination such as buried pipes which may be subject to contamination. If required drawings are referenced, each relevant document need not be indexed individually. If drawings are not available, the licensee shall substitute appropriate records of available information concerning these areas and locations.</p>	<p>decommissioning are in enclosures 1, 2-3, 2-4 and 2-5.</p>	
<p>(3) Except for areas containing only sealed sources (provided the sources have not leaked or no contamination remains after any leak) or byproduct materials having only half-lives of less than 65 days, a list contained in a single document and updated every 2 years, of the following:</p> <p>(i) All areas designated and formerly designated restricted areas as defined in 10 CFR 20.1003 (For requirements prior to January 1, 1994, see 10 CFR 20.3 as contained in the CFR edition revised as of January 1, 1993.);</p>	<p>Lists were not available prior to 1989. A U.S. Army Environmental Hygiene Agency survey report dated 20 January 1988 recommended that [we] "Ensure that fire prevention, military police and security personnel are informed of buildings and areas where radioactive materials exist [AR 40-5, paragraph 9-9b(5)]".</p> <p>From 1989 and beyond there were memos to our garrison Public Works Department (PWD) and Security from the Radiation Protection Officer (RPO) or Alternate RPO. (See enclosure 2-6)</p>	<p>Complete</p>
<p>(ii) All areas outside of restricted areas that require documentation</p>	<p>A review of our records and Cabrera HRA (enclosure 2-5) indicate that there was none.</p>	<p>Complete</p>

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under § 30.35(g)(1).		
(iii) All areas outside of restricted areas where current and previous wastes have been buried as documented under 10 CFR 20.2108; and	A review of our records and Cabrera HRA (enclosure 2-5) indicate that there was none.	Complete
(iv) All areas outside of restricted areas that contain material such that, if the license expired, the licensee would be required to either decontaminate the area to meet the criteria for decommissioning in 10 CFR part 20, subpart E, or apply for approval for disposal under 10 CFR 20.2002.	A review of our records and Cabrera HRA (enclosure 2-5) indicate that there was none.	Complete
(4) Records of the cost estimate performed for the decommissioning funding plan or of the amount certified for decommissioning, and records of the funding method used for assuring funds if either a funding plan or certification is used.	A Financial Assurance letter was sent to NRC, August 2005, Control No. 137168 based on the table in 10 CFR §30.35(d). (See enclosure 2-7)	Complete