



DEFENSE LOGISTICS AGENCY
DEFENSE NATIONAL STOCKPILE CENTER
8725 JOHN J. KINGMAN ROAD, SUITE 3229
FT. BELVOIR, VIRGINIA 22060-6223

IN REPLY
REFER DN-SC-E

DEC 08 2005

U.S. Nuclear Regulatory Commission
Region 1, Nuclear Materials Safety Branch 2
Division of Nuclear Materials Safety
475 Allendale Road
King of Prussia, PA 19406-1415
ATTN: Betsy Ullrich

Dear Ms. Ullrich:

Re: License STC-133

SUBJECT: License Termination

As you are aware, the Defense National Stockpile Center (DNSC) of the Defense Logistics Agency (DLA) is in the process of closing out its depots across the country and seeking to terminate its U.S. Nuclear Regulatory Commission (NRC) license for those facilities. One of these facilities is the Hammond Depot, located at 3200 Sheffield Avenue in Hammond, Indiana. The purpose of this letter is to remind you of the results of prior Hammond Depot decommissioning activities, as they pertain to a warehouse that is no longer part of the depot property, in the context of Historical Site Assessment (HSA) data (Attachment 1) for a depot warehouse with a somewhat similar inventory storage history. Some background follows:

Warehouse 2, as it was referred to formerly, is located on private property adjacent to the north boundary of the Hammond Depot, as depicted on the annotated aerial layout (photo) labeled Figure 1. The property was formerly a part of the Hammond Depot, having been sold as excess property in the 1970s. The building dimensions are 201 ft by 1,006 ft (see middle building).

The Oak Ridge Institute for Science and Education (ORISE) noted in their HSA report (copy attached) that in 1968, all thorium nitrate drums on hand (2,472) were moved from Warehouse 2 to Warehouse 200E (currently on the Hammond Depot property). Early site documents indicate that more than 500 drums had leaked in Warehouse 2. Contamination was found on the floor and also on small areas outside the exterior doors on both sides of the building. Site personnel decontaminated the exterior areas and a contract was placed for decontaminating the floor by chipping, followed by disposal. In 1970, the floor area of Warehouse 2 was monitored and reported to not exceed 5,000 dpm/100 cm² fixed alpha contamination and 1,000 dpm/100 cm² removable alpha. The documentation reviewed during the HSA suggests that Warehouse 2 was surveyed and released according to the standards in effect at that time.

Thus, documentation reviewed during the HSA indicated that decontamination and surveys were performed in Warehouse 2 section D in 1970, and survey results at that time indicated that thorium levels were less than those specified in NRC guidelines.

In late 1993 the NRC requested information about several properties formerly managed by DNSC, including Warehouse 2 (see Attachment 2). In 1994 DNSC delivered a formal response that included details of the decontamination of Warehouse 2 (see Attachment 3). No further communications have been identified.

We look forward to meeting with you and your Headquarters group to discuss a proposed Derived Concentration Guideline Level (DCGL) technical basis for our future Final Status Surveys at Hammond, IN and Curtis Bay, MD, and, of course, any other issues that may be of concern to you regarding our our planned actions. Michael Pecullan, of my staff, will be contacting you soon to set up this meeting for some time in January 2006.

Thanks for your assistance. Should you have any questions please feel free to contact me at 703-767-7620.



F/ KEVIN REILLY
Director, Directorate of Environmental
Management

Attachments

Figure 1- Hammond Depot - annotated aerial layout photo North view bottom to top



Attachment 1: Historical Site Assessment of the Hammond Depot, Hammond, Indiana

September 7, 2005

Mr. Mike Pecullan
Defense Logistics Agency
Defense National Stockpile Center
8725 John J. Kingman Road, Suite 3229
Ft. Belvoir, VA 22060

**SUBJECT: FINAL REPORT—HISTORICAL SITE ASSESSMENT OF THE
HAMMOND DEPOT, HAMMOND, INDIANA**

Dear Mr. Pecullan:

The Environmental Survey and Site Assessment Program (ESSAP) of the Oak Ridge Institute for Science and Education (ORISE) performed a historical site assessment (HSA) of the Defense Logistics Agency's (DLA) Defense National Stockpile Center's (DNSC) Hammond Depot in Hammond, Indiana on April 12 and 13, 2005. Enclosed are two copies of the final HSA report. Comments provided on the draft report have been incorporated into the final report.

Please direct any questions you may have to me at (865) 576-5073 or Eric Abelquist at (865) 576-3740.

Sincerely,

Timothy J. Vitkus
Senior Project Leader
Environmental Survey and
Site Assessment Program

TJV:ar

Enclosures

cc: B. Hermes, ORNL
E. Abelquist, ORISE/ESSAP
A. Boerner, ORISE/ESSAP
File/0432

**HISTORICAL SITE ASSESSMENT
OF THE HAMMOND DEPOT
HAMMOND, INDIANA**

T. J. BAUER and T. J. VITKUS

Prepared for the
Defense National Stockpile Center
Defense Logistics Agency

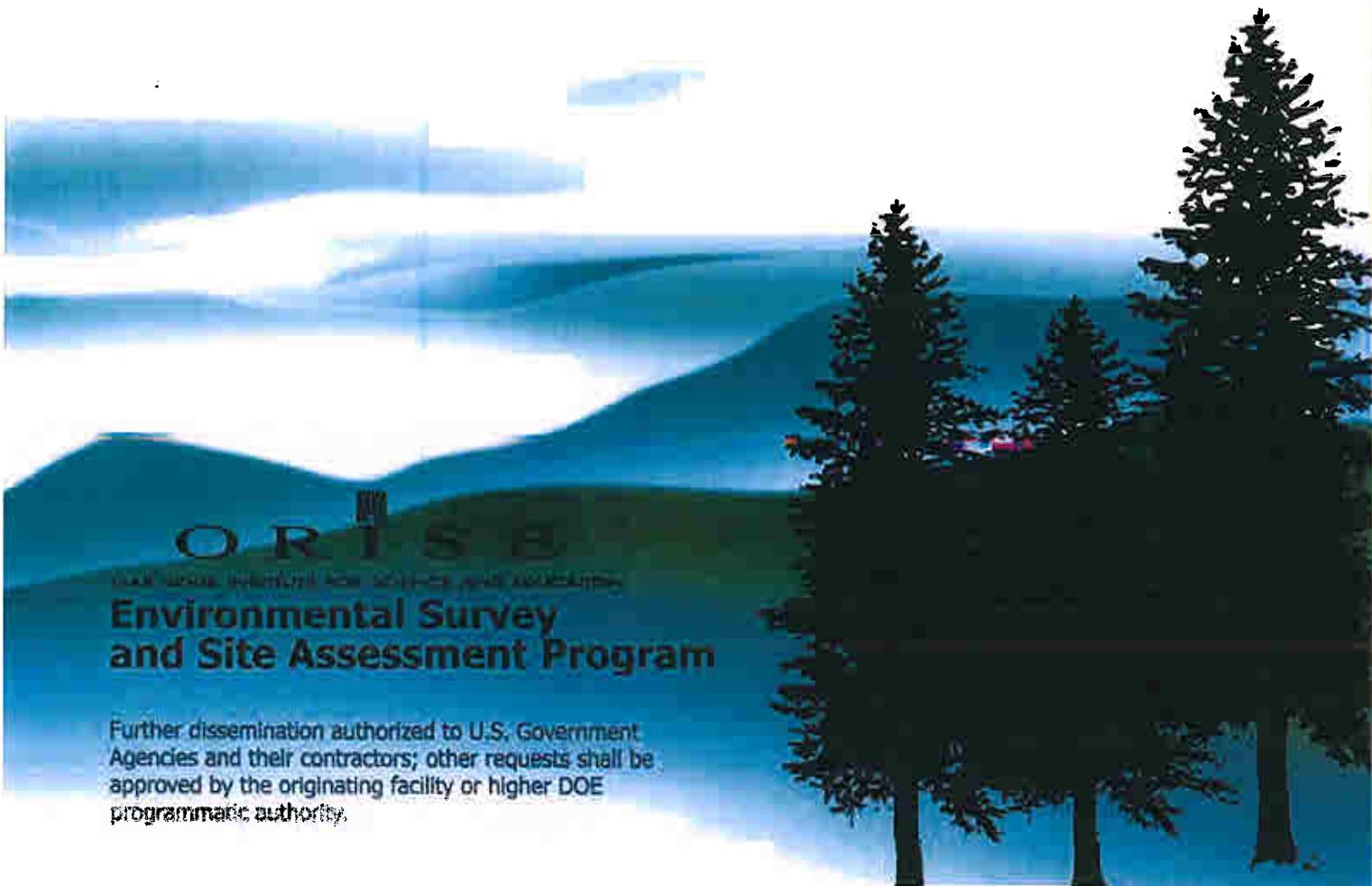
The logo for the Office of Research and Information Systems in Environmental Sciences (ORISE) is displayed in a large, bold, serif font. The letters are white and stand out against the dark background of the cover image.

ORISE

OFFICE OF RESEARCH AND INFORMATION SYSTEMS IN ENVIRONMENTAL SCIENCES

**Environmental Survey
and Site Assessment Program**

Further dissemination authorized to U.S. Government
Agencies and their contractors; other requests shall be
approved by the originating facility or higher DOE
programmatic authority.



**HISTORICAL SITE ASSESSMENT
OF THE HAMMOND DEPOT
HAMMOND, INDIANA**

Prepared by

T. J. Bauer and T. J. Vitkus
Environmental Survey and Site Assessment Program
Oak Ridge Institute for Science and Education
Oak Ridge, Tennessee 37831-0117

Prepared for the

Defense National Stockpile Center
Defense Logistics Agency

FINAL REPORT

AUGUST 2005

**HISTORICAL SITE ASSESSMENT
OF THE HAMMOND DEPOT
HAMMOND, INDIANA**

Prepared by: Timothy P. Bauer
T. J. Bauer, Health Physicist
Environmental Survey and Site Assessment Program

Date: 8/25/2005

Prepared by: Timothy Vitkus
T. J. Vitkus, CHP, Senior Project Leader
Environmental Survey and Site Assessment Program

Date: 8/26/2005

Reviewed by: Ann T. Payne
A. T. Payne, Quality Manager
Environmental Survey and Site Assessment Program

Date: 8/30/05

Reviewed by: Alex J. Boerner
A. J. Boerner, CHP, Health Physics Manager
Environmental Survey and Site Assessment Program

Date: 8/29/05

Reviewed by: E. W. Abelquist
E. W. Abelquist, CHP, Program Director
Environmental Survey and Site Assessment Program

Date: 8/30/05

**HISTORICAL SITE ASSESSMENT
OF THE HAMMOND DEPOT
HAMMOND, INDIANA**

TABLE OF CONTENTS

1.0	GLOSSARY OF TERMS, ACRONYMS, AND ABBREVIATIONS.....	1
2.0	EXECUTIVE SUMMARY	2
3.0	PURPOSE OF THE HISTORICAL SITE ASSESSMENT	3
4.0	PROPERTY IDENTIFICATION	4
4.1	Physical Characteristics	4
4.1.1	Licensee Information	4
4.1.2	Site Information	4
4.2	Environmental Setting	4
4.2.1	Geology.....	4
4.2.2	Hydrogeology	5
4.2.3	Hydrology	5
4.2.4	Meteorology.....	5
5.0	HISTORICAL SITE ASSESSMENT METHODOLOGY	7
5.1	Approach and Rationale.....	7
5.2	Boundaries of Site.....	7
5.3	Documents Reviewed	7
5.3.1	Existing Radiation Data	7
5.3.2	NRC Licenses	8
5.3.3	Operating Records	8
5.4	Property Inspections	8
5.5	Personal Interviews.....	9
6.0	HISTORY AND CURRENT USAGE.....	10
6.1	History	10
6.1.1	Land Areas.....	10
6.1.2	Stockpiles/Stockpile Pads	10
6.1.3	Warehouses	10
6.2	Current Usage	15
6.3	Adjacent Land Usage.....	15
7.0	FINDINGS.....	16
7.1	Potential Contaminants	16
7.2	Potential Contaminated Areas	17
7.2.1	Impacted Areas	18
7.2.2	Non-impacted Areas	18
7.3	Potential Contaminated Media.....	18
7.3.1	Surface Soil.....	19
7.3.2	Subsurface Soil and Media	19
7.3.3	Surface Water.....	19

7.3.4	Groundwater	19
7.3.5	Structures	20
8.0	CONCLUSIONS AND CONCEPTUAL SITE MODEL	20
9.0	REFERENCES	22

APPENDIX

A. Questions Useful for the Preliminary HSA Investigation (from MARSSIM)

1.0 GLOSSARY OF TERMS, ACRONYMS, AND ABBREVIATIONS

AEC	Atomic Energy Commission
dpm	disintegrations per minute
dpm/100 cm ²	disintegrations per minute per 100 square centimeters
DLA	Defense Logistics Agency
DNSC	Defense National Stockpile Center
FSI	focused site investigation
GSA	General Services Administration
HSA	Historical Site Assessment – a detailed investigation to collect existing information, primarily historical, on a site and its surroundings.
HQ	headquarters
Impacted Area	Any area that is not classified as non-impacted; areas with a possibility of containing residual radioactivity in excess of natural background or fallout levels.
MARSSIM	Multi-Agency Radiation Survey and Site Investigation Manual
NTS	Nevada Test Site
Non-Impacted Area	Area where there is no reasonable possibility (extremely low probability) of residual contamination.
NRC	U.S. Nuclear Regulatory Commission
ORISE	Oak Ridge Institute for Science and Education
ORNL	Oak Ridge National Laboratory
QA/QC	Quality Assurance/Quality Control
RSO	radiation safety officer
RSSI	radiation survey and site investigation
ThN	thorium nitrate

2.0 EXECUTIVE SUMMARY

The Defense National Stockpile Center (DNSC) of the Defense Logistics Agency (DLA) is in the process of closing out its depots across the country and seeking to terminate its U.S. Nuclear Regulatory Commission (NRC) license for those facilities. Hammond Depot stores various stockpiled ores and metals such as chrome, ferrochrome, ferromanganese, lead, tin, among others, but no radioactive materials were stored on the outdoor pads. Some of the commodities stored at the Hammond Depot—thorium nitrate (ThN), monazite sands, columbium tantalum and sodium sulfate—are radioactive materials and are listed on the DNSC's NRC source material license STC-133 that permits the storage of uranium and thorium. The license was recently amended to conduct site cleanup activities [1].

According to the Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM [2]), radiological surveys in support of decommissioning follow a graded approach that starts with the Historical Site Assessment (HSA). The HSA is an investigation to collect existing information describing a site's complete history from the start of site activities to the present time to determine the potential for radiological contamination and to use the collected data to plan for future radiological surveys at the site.

Visits to review available documentation were performed on April 12 and 13, 2005 to the Hammond Depot and February 8 and 9, 2005 to the DNSC headquarters (HQ) in Fort Belvoir, VA. Documents reviewed included historical radiological survey reports, decontamination reports, the NRC license and associated letter, various internal memos, inventory record cards, and preliminary assessment reports of Hammond Depot. During the site visit to Hammond Depot, information concerning site conditions as it applies to conducting future survey work was noted. In particular, the issue of black-top covering the floor in Warehouse 200E was identified as a challenge for performing effective scoping surveys.

Two areas are considered to be potentially classified as Class 1 or Class 2 impacted areas. These areas are Warehouse 100W and Warehouse 200E. In addition, the existing roads, railroad lines, and the burn cage are also considered to be potentially contaminated and classified as Class 2. The remaining areas are considered to have little potential for contamination, and may be considered Class 3.

3.0 PURPOSE OF THE HISTORICAL SITE ASSESSMENT

The Defense National Stockpile Center (DNSC) of the Defense Logistics Agency (DLA) is in the process of closing out its depots across the country and seeking to terminate its U.S. Nuclear Regulatory Commission (NRC) license for those facilities. Hammond Depot stored five commodities listed on their NRC Source License STC-133 [1]. They are thorium nitrate (Th-232 Reactor Grade), tantalum natural minerals and concentrates, tantalum pentoxide (Ta_2O_5), rare earth sodium sulfate, and columbium tantalum source material, both columbium and tantalum natural minerals.

The DNSC contracted with Oak Ridge National Laboratory (ORNL) to assist them with the removal of the thorium nitrate stockpile from the Hammond Depot to its ultimate disposition at a disposal site. Three phases were identified to perform this task: Phase I was historical data assembly, Phase II was the stockpile characterization, and Phase III is stockpile disposition which is currently ongoing [3]. Once the last drum of the thorium nitrate stockpile leaves the Hammond Depot, scheduled for August 2005 for disposal at the Nevada Test Site (NTS), Phase III will be complete. Phase IV is the decommissioning of the Hammond Depot, including Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM [2]) surveys and necessary cleanup of buildings and land areas, to permit unrestricted use of the site.

According to the MARSSIM, surveys in support of decommissioning follow a graded approach that starts with the Historical Site Assessment (HSA) and is later followed by other surveys that lead to the final status survey. The HSA is an investigation to collect existing information describing a site's complete history from the start of site activities to the present time. The HSA is the first step in the MARSSIM process on the path to license termination.

The purpose of the HSA at Hammond Depot was to:

- identify potential, likely, or known sources of radioactive material and radioactive contamination based on existing or derived information
- provide an assessment of the likelihood of contaminant migration
- provide information useful to scoping and characterization surveys
- provide initial classification of the site or survey unit as impacted or non-impacted

4.0 PROPERTY IDENTIFICATION

4.1 Physical Characteristics

The Hammond Depot property consists of a 57.3-acre parcel of land located on the west side of Hammond, Indiana—about 490 feet east of the Indiana-Illinois state line, within the city limits of Chicago. The depot has eight buildings, mostly in good condition, including three warehouses that are used to store raw materials. Currently, approximately 120,000 ft² of the available 150,000 ft² of indoor storage space is occupied, as well as 60% of the outdoor storage space. Figure 1 indicates the location of buildings and warehouses at the Hammond Depot [4].

The Hammond Depot is connected to the municipal sanitary sewer. However, the site previously operated a septic system north of the storage warehouses. Storm water is discharged off-site through two outfalls to Wolf Lake via drainage ditches [4].

The Oak Ridge Institute for Science and Education (ORISE) performed a limited review of the buildings' conditions on April 12 and 13, 2005.

4.1.1 Licensee Information

The Hammond Depot is currently owned by the federal government, General Services Administration (GSA) and operated by the Defense National Stockpile Center (DNSC) of the Defense Logistics Agency (DLA). The DLA headquarters address is 8725 John J. Kingman Road, Suite 3229, Ft. Belvoir, VA 22060-6223.

4.1.2 Site Information

The Hammond Depot site is located just inside the Indiana state border with Illinois. The site address is Hammond Depot, 3200 S. Sheffield Avenue, Hammond, IN 46327-1002.

The geographic coordinates of the Hammond Depot are latitude N413936 and longitude W873140 on the 7.5-minute quadrangle U.S. Geological Survey topographical map [4].

4.2 Environmental Setting

In general, the Hammond Depot consists of eight buildings, a few railroad tracks and roads.

4.2.1 Geology

Soils underlying the depot are characterized as Urban Land. These soils are generally found in areas that have been disturbed and filled with earth, cinders, slag, or combinations of these materials. The soils have been disturbed to such a degree that native soils can no longer be identified [4].

4.2.2 Hydrogeology

Regional groundwater in the northwest Indiana area flows in a north-northeast direction toward Lake Michigan, which is approximately 2.5 miles northeast of the Hammond Depot. However, groundwater flow in the shallow aquifer beneath the Hammond Depot is expected to flow towards and discharge into Wolf Lake [4].

Groundwater is generally not used because water supplies are available from Lake Michigan; in fact, groundwater has not been used by the city of Hammond since 1920 [4].

4.2.3 Hydrology

Surface water drainage is via two outfalls that discharge runoff from the depot to Wolf Lake [4].

The west boundary is defined by Wolf Lake, and north/south drainage ditch. Ditch locations are on the north, south, and southwest boundaries, all discharge into Wolf Lake [4].

4.2.4 Meteorology

Precipitation for the area averages 36 inches per year. The site is reported to frequently flood during periods of heavy rainfall [4].

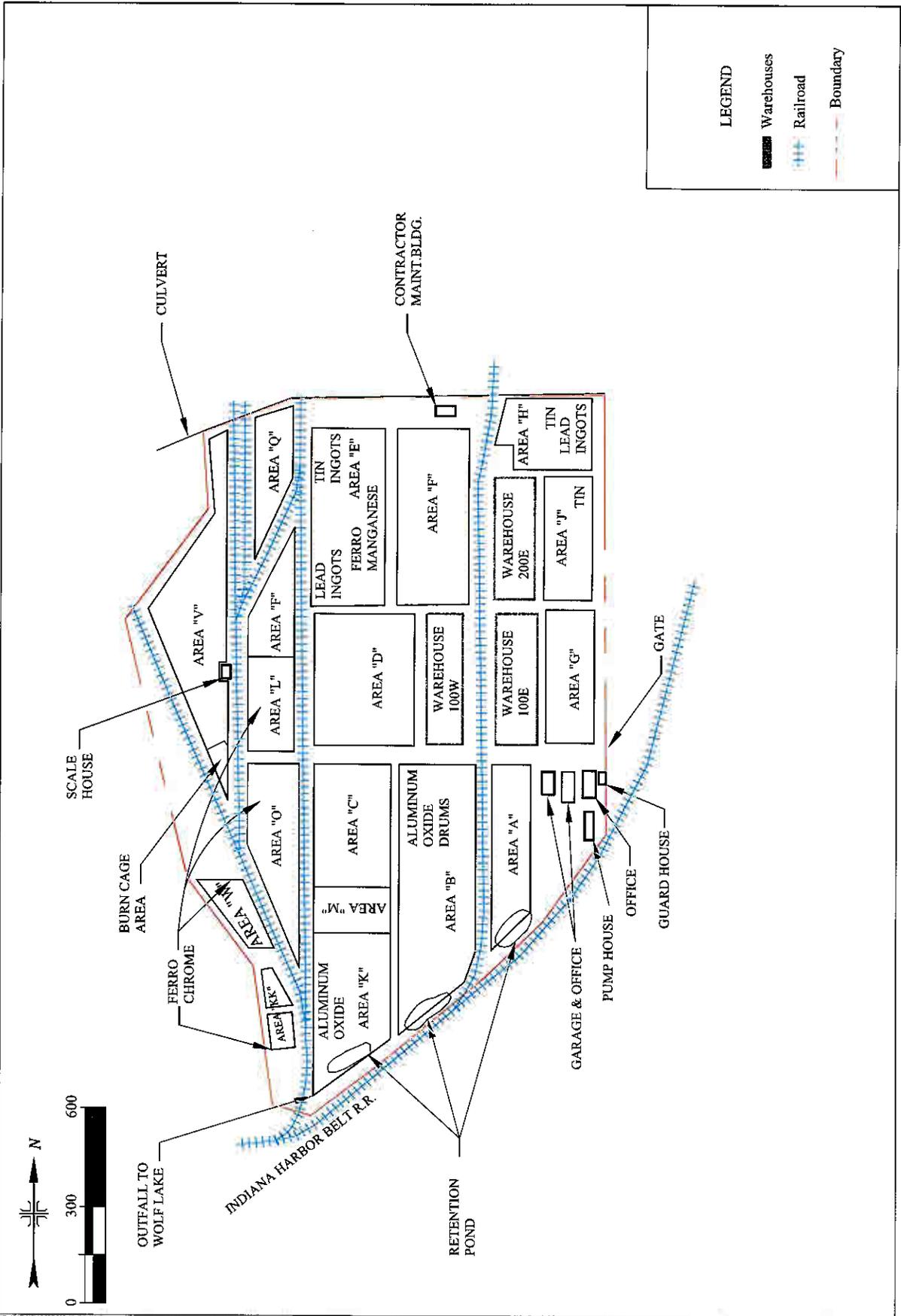
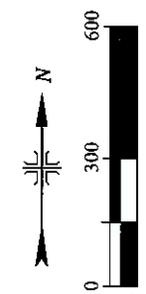


FIGURE 1: Hammond Depot, Hammond, Indiana - Plot Plan

5.0 HISTORICAL SITE ASSESSMENT METHODOLOGY

The following was the approach used to conduct the Historical Site Assessment (HSA).

5.1 Approach and Rationale

This limited scope investigation serves to collect readily available information concerning the Hammond Depot. Visits to review available documentation were performed on April 12 and 13, 2005 at the Hammond Depot and February 8 and 9, 2005 at Fort Belvoir, VA. The investigation is designed to obtain sufficient information to provide initial classification of the site or survey unit as impacted or non-impacted. Information on the potential distribution of radioactive contamination may be used for classifying each part of the site or survey unit as Class 1, 2, or 3 and is useful for planning scoping and characterization surveys.

Appendix A provides a set of questions that was used to assist in the preliminary HSA investigation (adapted from MARSSIM Table 3.1). This table focuses on characteristics that may help to identify a previously unrecognized source of potential contamination. Furthermore, these questions may identify confounding factors for selecting reference sites.

5.2 Boundaries of Site

The property consists of 57.3 acres bounded on the east and southeast by the Indiana Harbor Belt railway, the Wolf Lake Industrial Center access road on the east, the Wolf Lake industrial/commercial complex on the north, Wolf Lake on the northern one-third of the western property boundary, and a drainage ditch on the west and southwest property boundary. Security of the facility is maintained by a chain-link fence with barbed wire on top [4].

5.3 Documents Reviewed

Documents reviewed included historical radiological survey reports, Focused Site Investigation Report (FSI), the U.S. Nuclear Regulatory Commission (NRC) license and associated letters, various internal memos, inventory record cards, and preliminary assessment reports. This section discusses some of the information identified in the reviewed documents. Refer to Section 9.0 for a specific listing of documents reviewed.

5.3.1 Existing Radiation Data

Existing site data may provide specific details about the identity, concentration, and areal distribution of contamination. A number of reports were reviewed that related to Warehouses 100W and 200E. These reports contained survey data. However, these data should be examined carefully because:

- Previous survey and sampling efforts may not be compatible with HSA objectives or may not be extensive enough to characterize the facility or site fully.
- Measurement protocols and standards may not be known or compatible with HSA objectives (*e.g.*, Quality Assurance/Quality Control (QA/QC) procedures, limited analysis rather than full-spectrum analysis) or may not be extensive enough to characterize the facility or site fully.
- Conditions may have changed since the site was last sampled (*i.e.*, substances may have been released, migration may have spread the contamination, additional waste disposal may have occurred, or decontamination may have been performed). An important point is the on going disposition of radiological material after a record was generated stating the building was released.

5.3.2 NRC Licenses

Amendment No. 22 of license number STC-133 (February 10, 2000) licenses uranium and thorium specifically as natural uranium and thorium mixtures as ores, concentrates, and solids [1]. The identified radioactive materials indicated in NRC correspondence include thorium nitrate, columbium, columbium tantalum materials—all radioactive materials that contain thorium, and to a lesser amount, uranium.

5.3.3 Operating Records

A number of records were reviewed that described onsite activities; current and past contamination control procedures; and past operations involving material storage, spills, release of facilities or equipment from radiological controls, and onsite or offsite radioactive and hazardous waste disposal. Of particular interest were the records describing that Warehouse 200E had a total of 611 leaking drums and a black-top covering of the previously contaminated floor [5].

Corporate contract files, especially those reviewed at the DNSC Fort Belvoir HQ, provided useful information about the potential contamination at Hammond Depot. Records were identified that provided information helpful to reconstruct the site's operational history.

5.4 Property Inspections

The objective of the April 12 to 13, 2005 site visit was to gather sufficient information to support a decision regarding further survey actions. The site visit offered an opportunity to record information concerning hazardous site conditions as they apply to conducting future survey work. In this regard, information describing physical hazards, structural integrity of buildings, accessibility issues, or other conditions, defined potential problems that may impede future survey work.

5.5 Personal Interviews

Interviews with current or previous employees were performed to collect first-hand information about the site and to verify or clarify information gathered from existing records. Interviews covered general topics, such as thorium nitrate handling and disposal procedures.

The following DNSC employees and former employee working with thorium nitrate were interviewed by the Oak Ridge Institute for Science and Education (ORISE) during the HSA visit to Hammond Depot.

Mike Pecullan

M. Pecullan (Radiation Safety Officer (RSO), Environmental Specialist, DNSC) provided historical information. The interview extensively discussed history of site operations and nature and locations of radioactive materials. M. Pecullan also assisted with a tour of the facility to review the site layout and buildings [6].

Eric Deal

E. Deal (General Supply Specialist, DNSC) provided historical documents and Hammond Depot history spanning back approximately 10 years [7].

Harry Szczepanski

H. Szczepanski (former radiation safety employee) provided more details on Warehouse 2 survey and repackaging of ThN from 200E to 100W, and the burn cage [8].

6.0 HISTORY AND CURRENT USAGE

6.1 History

The original Hammond Depot property consisted of approximately 130.5 acres of land leased from the Indiana Harbor Belt Railroad Company on June 24, 1948. On June 27, 1969 the General Services Administration (GSA) purchased the entire site. It has always been used to stockpile raw materials [4]. The original property consisted of six warehouses, support buildings, and 80 above ground storage tanks in a single tank farm.

The site formerly operated a septic system north of the storage warehouses.

Materials have been delivered to the depot via tractor trailer or rail car [4].

6.1.1 Land Areas

The 57.3 acres that comprise the current Hammond Depot site include stockpiled ores, warehouses, buildings, paved and dirt roads, and natural features such as grassy open areas, wet lands, and an adjacent lake. The next few sections provide additional details on the stockpiled ores and burn cage located on the site.

While radioactive materials were generally stored in strong containers, the potential for contamination of land and related infrastructure due to movement of materials throughout the site should be evaluated.

An interview with Harry Szczepanski states pallets were burned at a spot north of the burn cage under a rubble pile that is still present.

6.1.2 Stockpiles/Stockpile Pads

The ores at Hammond Depot are stored in piles, either on concrete pads or directly on the ground surface. Other materials are stored in warehouses in drums [4].

Ores and metals that are or were stored in piles outside (and not covered) include chrome, ferrochrome, ferromanganese, lead, tin, among others, but no radioactive materials (columbium tantalum) were stored on the pads [4].

6.1.3 Warehouses

Warehouse 1

This building is no longer part of the Depot and was sold as excess property in the 1970s [6]. According to a site map, the building dimensions were 201 ft by 1,006 ft.

Bastnesite was stored in drums in Bay A [9].

Warehouse 2

This building is no longer part of the Depot and was sold as excess property in the 1970s [6]. According to a site map, the building dimensions were 201 ft by 1,006 ft.

In 1968, all thorium nitrate drums on hand (2,472 [10]) were moved from this warehouse to Warehouse 200E. Contamination was found on the floor and also on small areas outside the exterior doors on both sides of the building. Site personnel decontaminated the exterior areas and a contract was placed for decontaminating the floor by chipping then disposal. Warehouse 2 was declared excess [11].

After removal of the leaking thorium nitrate drums, a material consisting of two layers of kraft paper, with a layer of asphalt in between, was removed from the floor and burned on site [8].

In 1970, a test was conducted to evaluate the effectiveness of using nitric acid to remediate hot spots. This method reduced surface contamination from 30,000 to 45,000 disintegrations per minute (dpm) to approximately 6,000 to 7,000 dpm. Further remediation reduced the contamination to approximately 2,000 dpm. The report further stated that a thorough survey would need to be made to mark all hot spots [12].

The floor area of Warehouse 2 was monitored and reported to not exceed 5,000 dpm/100 cm² fixed alpha contamination and 1,000 dpm/100 cm² removable alpha [12].

Bastnesite was stored in drums in Bays C, D, and E [9].

Warehouse 3

This building is no longer part of the Depot and was sold as excess property in the 1970s [6]. According to a site map, the building dimensions were 201 ft by 1,006 ft.

No history of radioactive materials storage was noted for this building.

Warehouse 100W

The warehouse is a concrete structure with dimensions of 401 ft by 126 ft. Exterior walls are cinder block with glass block windows, 14 overhead doors, and two personal doors on each end. The floor is concrete slab on grade and the structure is steel beams, columns, and roof joists. The roof deck is 3-ply gypsum board and the roofing is 3-ply built up asphalt with a smooth surface sloping to the perimeter gutters on the east and west elevations. Electrical conduits and light

fixtures hang from roof joists. A dry pipe sprinkler system is installed [4, 13]. Figure 2 shows Warehouse 100W.



Figure 2 – Warehouse 100W

Four commodities listed on the NRC Source License STC-133 (in October 1997) were stored in this warehouse: thorium nitrate in Bays 8 through 16 B, C, and D; tantalum natural minerals and concentrates (tantalum pentoxide (Ta_2O_5)) in Bays 15 D, 16 D, 17 A through D, and 18 A through D; columbium tantalum source material (tantalum natural minerals) in Bays 7 B, 8 A, and 8 B; and columbium tantalum source material (columbium natural minerals) in Bays 8 E and 9 E [14].

From the “Hammond Depot History of Radiological Material Storage”, Warehouse 100W currently is used to store ThN in Bays 8 through 16 B, C, and D. Past storage in this warehouse included tantalum pentoxide in Bays 15 and 16 D, 17 A through D, and 18 A through D. Columbium tantalum (columbium natural mineral) was formerly stored in Bays 8 and 9 E; columbium tantalum (tantalum natural minerals) was formerly stored in Bays 7 B, 8 A, and 8 B [15].

Monazite sand stored in 2,602 21-gallon drums was moved to this warehouse from Warehouse 200E [16].

Sodium sulfate was also stored in this warehouse [17].

Warehouse 100E

The warehouse is a concrete structure with dimensions of 401 ft by 126 ft. Exterior walls are cinder block with glass block windows, 14 overhead doors, and two personal doors on each end. The floor is concrete slab on grade and the structure is steel beams, columns, and roof joists. The roof deck is 3-ply gypsum board and the roofing is 3-ply built up asphalt with a smooth surface sloping to the perimeter gutters on the east and west elevations. Electrical conduits and light fixtures hang from roof joists. A dry pipe sprinkler system is installed [4, 13]. Figure 3 shows Warehouse 100E.



Figure 3 – Across the rail road tracks from Warehouse 100W (left) is Warehouse 100E (on the right).

No history of radioactive materials storage was noted for this building.

Warehouse 200E

The warehouse is a concrete structure with dimensions of 401 ft by 126 ft. Exterior walls are cinder block with glass block windows, 14 overhead doors, and two personal doors on each end. The interior is divided into north and south sections by a cinder block partition firewall. The floor is concrete slab on grade except that the south side was completely covered with black-top after the top surface was remediated. The structure is steel beams, columns, and roof joists. The roof deck is 3-ply gypsum board and the roofing is 3-ply built up asphalt with a smooth surface sloping to the perimeter gutters on the east and west elevations. Portions of the roof gypsum board decking were replaced with metal decking after wind tore off the original roof. Electrical conduits and light fixtures hang from roof joists. A sheet metal return air duct is also hung below the roof deck in a north-south direction but is not operational. A dry pipe sprinkler system is installed [4, 13]. Figure 4 shows Warehouse 200E.



Figure 4 – Warehouse 200E

From the “Hammond Depot History of Radiological Material Storage”, Warehouse 200E was used to store ThN in Bays 1 through 10 A, B, C, D and E

[15]. Alpha survey records indicate that ThN drums leaked in this warehouse with residual contamination ranging from 100 to 500 dpm [18].

Monazite sand stored in 2,602 21-gallon drums was moved from this warehouse to Warehouse 100W [16]. Other records indicate 5,898 drums were stored in this warehouse [19]. Monazite sand was stored in areas where ThN was not stored [20].



Figure 5 –Overpack Project



Figure 6 – Compromised Storage Drum

Thorium drums were overpacked from 55 to 85 gallon drums in an area west of and adjacent to the building [21]. Right after the overpackaging, the drums were moved to Warehouse 100W [6]. Figures 5 through 7 show the overpack project.



Figure 7 – ThN Packaging Shelter and Decontamination Trailer

Sodium sulfate was also stored in this warehouse in 20-gallon drums, specifically in areas where ThN was not stored [22].

Decontamination and survey services were completed by AWC Inc. from August 27, 1979 through September 25, 1979 and survey results indicated thorium levels were less than specified in NRC guidelines [23].

6.2 Current Usage

Hammond Depot is actively removing drums of thorium nitrate that are stored in the 100W warehouse buildings. The removal process is estimated to be completed by the end of August 2005. Hammond Depot also stores other strategic materials including bulk ores, minerals and metals.

6.3 Adjacent Land Usage

Warehouses 1, 2 and 3 described in Section 6.1.3 are presently being used by private industry. In addition to bastnesite having been stored in Warehouses 1 and 2, Warehouse 2 stored thorium nitrate and has a documented history of radiological contamination.

The last documented survey in Warehouse 2 states "...the contaminated floor area does not exceed the following at any location: 5,000 dpm/100 cm² fixed alpha, 1,000 dpm/100 cm² removable alpha..." [24].

7.0 FINDINGS

The main purpose of the Historical Site Assessment (HSA) was to determine the potential for radiological contamination currently existing at the Hammond Depot site and to use the collected data to plan for future surveys at the site. It is recognized that much of the data collected during HSA activities was qualitative or was analytical data of unknown quality; therefore, many decisions regarding the site are the result of professional judgment.

In general, there are three possible recommendations that follow the HSA:

- An emergency action is needed to reduce the risk to human health and the environment.
- The site is impacted and further investigation is needed before a decision regarding final disposition can be made. The area may be Class 1, Class 2, or Class 3, and a scoping survey or a characterization survey should be performed. Information collected during the HSA can be very useful in planning these subsequent survey activities.
- The site or area is non-impacted. There is no possibility or an extremely low probability of residual radioactive materials being present at the site. The site or area can be released.

Based on the Hammond Depot HSA, the general finding is that the site is impacted, and that scoping surveys should be planned to validate the HSA and better identify the general locations of contamination.

7.1 Potential Contaminants

The HSA gathered information sufficient to identify the radionuclides used at the site, including their chemical and physical form. The first step in evaluating HSA data was to estimate the potential for residual contamination posed by these radionuclides. Secondly, site operations were evaluated to assess the potential for residual contamination. The Hammond Depot operation was storage of strategic materials. Fortunately, the ores that were stockpiled outdoors are not considered radioactive materials. Rather, the materials that have radioactive constituents, which included thorium nitrate (ThN), were stored in drums. As such, the materials identified as being potential sources of radioactive contamination at the Hammond Depot are thorium nitrate, monazite sands, sodium sulfate, bastnesite, tantalum pentoxide, and columbium tantalum.

The thorium nitrate stockpile was produced to be nuclear grade material for the Atomic Energy Commission (AEC) from 1959 to 1964 [15]. The domestic inventories were produced by the Lindsay Chemical Company from monazite sands and brought to the Hammond Depot beginning in March 1962 [25]. Thorium nitrate is comprised of thorium dioxide (ThO₂) ranging from 46.0 to 47.15% by weight and was first brought onto the site in March 1962 [25]; the material still exists on the site as of April 2005. The

chemical formula for thorium nitrate is: $\text{Th}(\text{NO}_3)_4 \cdot 4\text{H}_2\text{O}$. According to the U.S. Nuclear Regulatory Commission (NRC) license it is 40.5% thorium. The thorium nitrate was originally delivered in 55-gallon drums, but was repackaged into 85-gallon drums.

Monazite sand was comprised of a range of thorium dioxide of 2.4 to 3.4% [26]. It was first brought onto the site prior to February 1958 and last stored in March 1980 [27, 28].

Sodium sulfate was comprised of a range of thorium dioxide of 0.12 to 0.15% [29, 30]. It was brought on site in August 1980 and last stored in December 1997 [31].

Bastnesite was comprised of a range of thorium dioxide of 0.01 to 0.11% [26]. It was brought on site prior to February 1958 and last stored in March 1986 [32].

Tantalum pentoxide was last stored on site as of February 1999 [33]

Columbium tantalum materials, noted as columbium natural minerals, tantalum natural minerals, and concentrates, were comprised of a range of thorium dioxide of <0.001 to 0.053% and a range of uranium oxide of 0.012 to 0.156% [34]. These materials were first brought on site in July 1980 and last stored in November 2000 [35, 36, 37].

The predominant radioactive material identified during the HSA was from the thorium series. The thorium series has Th-232 as the parent, followed by ten progeny radionuclides—expected to be in equilibrium with Th-232. The thorium series emits alpha, beta, and gamma radiations.

The uranium series radionuclides are also associated with these materials, but to a substantially lesser degree. Furthermore, the NRC license lists uranium, as well as thorium, as radioactive material licensed at the Hammond Depot.

7.2 Potential Contaminated Areas

Information gathered during the HSA was used to provide an initial classification of the site areas as impacted or non-impacted.

Impacted areas have a potential for radioactive contamination (based on historical data) or contain known radioactive contamination (based on past or preliminary radiological surveillance). This includes areas where 1) radioactive materials were used and stored; 2) records indicate spills, discharges, or other unusual occurrences that could result in the spread of contamination; and 3) radioactive materials were buried or disposed of. Areas immediately surrounding or adjacent to these locations are included in this classification because of the potential for inadvertent spread of contamination [2].

Non-impacted areas—identified through knowledge of site history or previous survey information—are those areas where there is no reasonable possibility for residual radioactive contamination. The criteria used for this segregation need not be as strict as those used to demonstrate final compliance with the regulations. However, the reasoning for classifying an area as non-impacted should be maintained as a written record. Note

that based on accumulated survey data an impacted area's classification may change as the radiation survey and site investigation (RSSI) process progresses [2].

The initial classification of the site involves developing a conceptual model based on the existing information collected during the preliminary investigation. Conceptual models describe a site and its environs and present hypotheses regarding the radionuclides for known and potential residual contamination. For this evaluation, the following qualitative classifications, consistent with MARSSIM, were used:

Class 1 Areas known to be contaminated or to likely be contaminated

Class 2 Areas that are possibly contaminated (including those previously remediated)

Class 3 Areas that have a slight potential for contamination.

7.2.1 Impacted Areas

Warehouse 100W, 200E, and the former repackaging area outside the southwest corner of Warehouse 200E are potentially Class 1 or Class 2 impacted areas. These include areas that were previously contaminated and remediated, and areas potentially contaminated.

Existing roads and railroad lines and the burn cage are also considered to be potentially contaminated (Class 2) because they served as transportation routes. Areas where railroad lines have been removed will also be considered potentially contaminated (Class 2).

The remaining land areas and Warehouse 100E, largely due to the inadvertent spread of contamination, are considered to have little potential for contamination, and may be considered Class 3.

7.2.2 Non-impacted Areas

No areas were identified as non-impacted, although many buildings and land areas could arguably be classified as either Class 3 or non-impacted.

7.3 Potential Contaminated Media

The next step in evaluating the data gathered during the HSA was to identify potentially contaminated media at the site. This section provides guidance on evaluating the likelihood for release of radioactivity into the following environmental media: surface soil, subsurface soil, sediment, surface water, groundwater, and buildings. While MARSSIM's scope is focused on surface soils and building surfaces, this section makes note of still other media to provide a starting place to identify and address all possible media.

7.3.1 Surface Soil

Surface soil is the top layer (15 cm) of soil on the site that is available for direct exposure, growing plants, resuspension of particles for inhalation, and mixing from human disturbances. Surface sources may include gravel fill, waste piles, concrete, or asphalt paving.

The Hammond Depot HSA identified that radioactive material overpacking operations were conducted outside of the existing buildings. Surface soils may have also become contaminated via the inadvertent spread of contamination during transportation. The pallet burn cage is also a potential source of surface soil contamination.

7.3.2 Subsurface Soil and Media

Subsurface soil and media are defined as any solid materials not considered to be surface soil. The purpose of these investigations is to locate and define the vertical extent of the potential contamination. Subsurface measurements can be expensive, especially for beta- or alpha-emitting radionuclides.

Additionally, surface soil contamination can migrate deeper into the soil. Surface soil sources should be evaluated based on radionuclide mobility, soil permeability, and infiltration rate to determine the potential for subsurface contamination. Some consideration for contaminants that may exist beneath parking lots, buildings, or other onsite structures may be warranted as part of the investigation. There may be underground piping, drains, sewers, or tanks that caused contamination.

7.3.3 Surface Water

At this time, surface water is not considered to be a potentially contaminated medium.

7.3.4 Groundwater

Groundwater contamination is not suspected because no significant radioactive source term is expected in the ground. Also, it is expected that thorium migrates slowly and is not likely to reach groundwater.

7.3.5 Structures

The following table shows the buildings and portions thereof that were identified as having been used for the storage of radioactive material.

Building	Location of Potential Contaminant
Warehouse 100W	Bays 8 through 18
Warehouse 200E	Bays 1 through 10

8.0 CONCLUSIONS AND CONCEPTUAL SITE MODEL

The conceptual site model is essentially a site diagram showing locations of known contamination, areas of suspected contamination, types and concentrations of radionuclides in impacted areas, and potentially contaminated media. The diagram includes the general layout of the site including buildings and property boundaries. The conceptual site model will be upgraded and modified as information becomes available throughout the radiation survey and site investigation (RSSI) process.

The model is used to assess the nature and the extent of contamination, to identify potential contaminant sources, release mechanisms, exposure pathways, human and/or environmental receptors, and to develop exposure scenarios. This information is detailed in Section 7.0. Perhaps more importantly, this model helps to identify data gaps, determine media to be sampled, and assists staff in developing strategies for data collection during the scoping and characterization surveys.

For example, the scoping survey will be performed to provide sufficient information for determining 1) whether present contamination warrants further evaluation and 2) initial estimates of the level of effort for decontamination and preparing a plan for a more detailed survey. The scoping survey allows the scope of the characterization survey to be streamlined.

The conceptual site model is shown in Figure 8. The list below summarizes the conceptual model.

- Class 1 and 2 areas include areas that were previously contaminated and remediated (Warehouses 100W, 200E and the repackaging area outside 200E).
- Additional Class 2 areas that are considered to be potentially contaminated include the burn cage, existing roads and railroad lines, including where railroad lines have been removed, because they served as transportation routes.
- Class 3 areas include Warehouse 100E and the remaining land areas that are considered to have little potential for contamination, due to inadvertent spread of contamination.

432-003 (4)

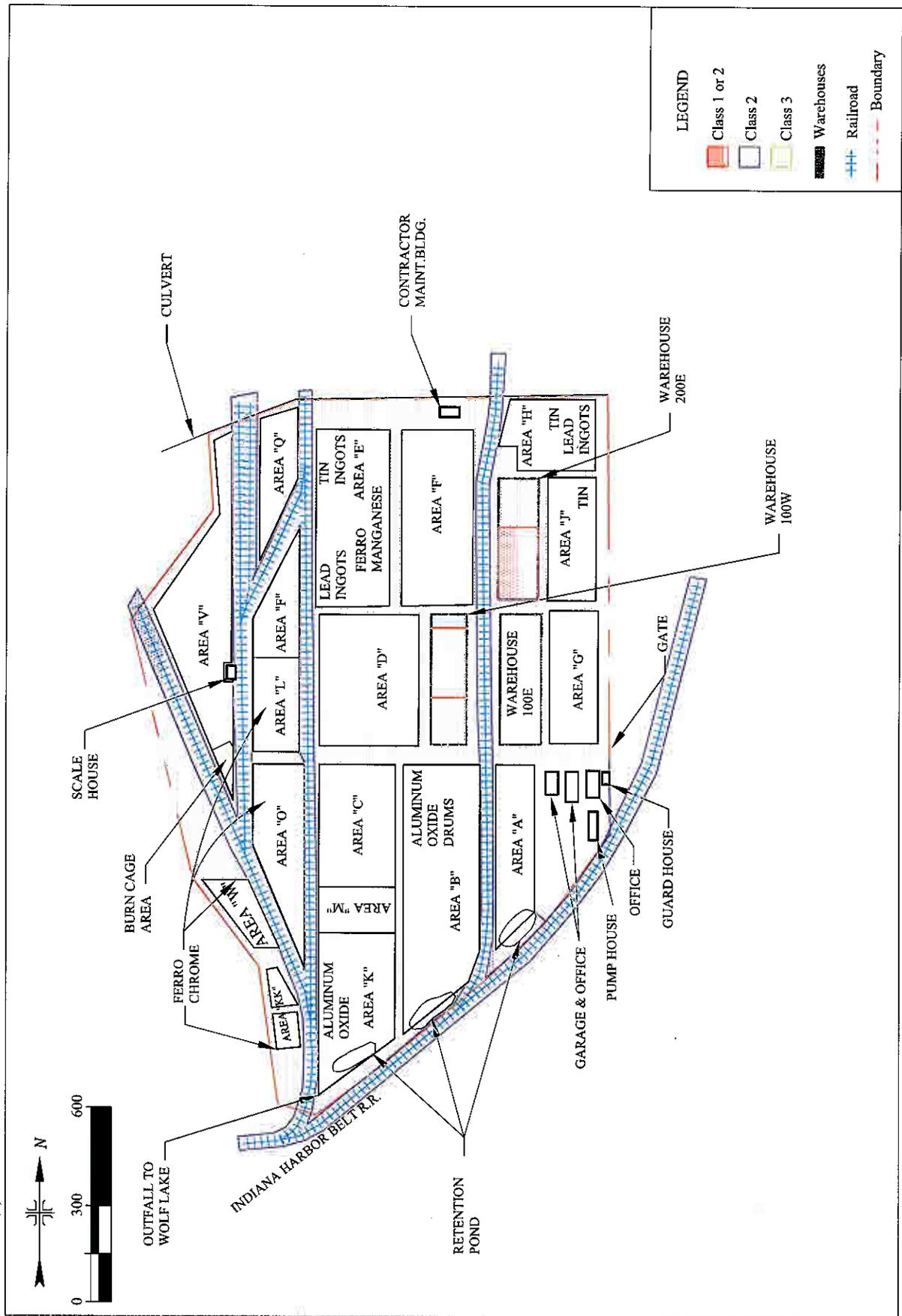


FIGURE 8: Hammond Depot - Conceptual Model

9.0 REFERENCES

1. U.S. Nuclear Regulatory Commission (NRC) license STC-133, Amendment No. 22; February 10, 2000.
2. Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM). U.S. Nuclear Regulatory Commission (NRC), NUREG-1575, Revision 1. Washington, D.C.; August 2000 including June 2001 updates.
3. Paper presented at WM '03 (Waste Management Conference, "Thorium Nitrate Stockpile—From Here to Eternity", February 2003.
4. Parsons Engineering Science, Inc. Preliminary Assessment Hammond Depot, Hammond, IN. Prepared for U.S. Army Corps of Engineers Huntsville Center. January 1999.
5. Notification of Stockpile Inspection Serial No. 33. September 6, 1972.
6. On-site discussion with Mike Pecullan, ThN Disposition Project Manager. April 12-13, 2005.
7. On-site discussion with Eric Deal, General Supply Specialist, DNSC. April 12-13, 2005.
8. On-site discussion with Harry Szczepanski, Former Employee. April 12-13, 2005.
9. Predisposal Inspection and Verification of Bastnesite at GSA-DMS, Hammond Depot, Hammond, Indiana. Undated.
10. Notification of Stockpile Inspection Serial No. 17. September 22, 1967.
11. Letter from Lester R. Myers, Jr. to Director, Inspection Division – DMI. Subject: Thorium Nitrate – PMDS Hammond Depot. November 18, 1971.
12. Report on use of nitric acid on cement floor having high concentrations of alpha radiation. June 5, 1970.
13. Continuation Sheet (DLAH 30), Radiological Survey, DNSZ-HMSA Hammond, IN. August 31, 1995.
14. Notification of Stockpile Inspection Serial No. 4C. October 8, 1997.
15. "Hammond Depot History of Radiological Material Storage" (a single sheet) Undated.
16. Handwritten note indicating bastnesite and monazite moved from 200E to 100W. Undated.

17. Monitoring Radiation Report. May 8, 1986.
18. Alpha survey records. January 26, 1978.
19. Monazite sand inventory record. Undated.
20. Monitoring Radiation Report. January 22, 1980.
21. Amendment of Solicitation/Modification of Contract. August 8, 1978.
22. Monitoring Radiation Report. Date unreadable.
23. Notification of Stockpile Inspection Serial No. 45A Special. September 26, 1979.
24. Letter from Donald G. Gammie, Gammie Nuclear Service Co., Inc to Marshall Bradley, General Services Administration (GSA). No subject. September 22, 1971.
25. Inventory Record Card for thorium nitrate; General Services Administration (GSA) Form 46.
26. Letter from E. L. Harper, Office of Property Management, to Ms. L. S. Dragonette, U.S. Nuclear Regulatory Commission (NRC). No Subject. January 27, 1976.
27. Inventory Record Card for monazite sand sweepings; General Services Administration (GSA) Form 46.
28. Inventory Record Card for monazite sand; General Services Administration (GSA) Form 46.
29. Letter from Chief Plant Chemist, American Potash & Chemical Corporation, to Services Administration (GSA). Analysis of Lot #8. June 17, 1960.
30. Letter from Chief Plant Chemist, American Potash & Chemical Corporation, to Services Administration (GSA). Analysis of Lot #11. June 17, 1960.
31. Inventory Record Card for sodium sulfate; General Services Administration (GSA) Form 46.
32. Inventory Record Card for bastnesite; General Services Administration (GSA) Form 46.
33. Material Locator Card for tantalum pentoxide; General Services Administration (GSA) Form 1661.
34. Tantalum Source Materials (Concentrates) Analyses. Attachment to E-mail from R. Foster to M. Pecullan. March 28, 2000.

35. Inventory Record Card for columbium/tantalum, columbium natural minerals, 8-gallon drums; General Services Administration (GSA) Form 46.
36. Inventory Record Card for columbium/tantalum, columbium natural minerals, 8-gallon drums, 30-gallon drums; General Services Administration (GSA) Form 46.
37. Inventory Record Card for tantalum natural mineral and concentrates; General Services Administration (GSA) Form 46.

APPENDIX A

Questions Useful for the Preliminary HSA Investigation (from MARSSIM)

1.	Was the site ever licensed for the manufacture, use, or distribution of radioactive materials under Agreement State Regulations, NRC licenses, or Armed Services permits, or for the use of 91B material?	Indicates a higher probability that the area is impacted.
2.	Did the site ever have permits to dispose of, or incinerate, radioactive material onsite? Is there evidence of such activities?	Evidence of radioactive material disposal indicates a higher probability that the area is impacted.
3.	Has the site ever had deep wells for injection or permits for such?	Indicates a higher probability that the area is impacted.
4.	Did the site ever have permits to perform research with radiation generating devices or radioactive materials except medical or dental x-ray machines?	Research that may have resulted in the release of radioactive materials indicates a higher probability that the area is impacted.
5.	As a part of the site's radioactive materials license were there ever any Soil Moisture Density Gauges (Americium-Beryllium or Plutonium-Beryllium sources), or Radioactive Thickness Monitoring Gauges stored or disposed of onsite?	Leak test records of sealed sources may indicate whether or not a storage area is impacted. Evidence of radioactive material disposal indicates a higher probability that the area is impacted.
6.	Was the site used to create radioactive material(s) by activation?	Indicates a higher probability that the area is impacted.
7.	Were radioactive sources stored at the site?	Leak test records of sealed sources may indicate whether or not a storage area is impacted.
8.	Is there evidence that the site was involved in the Manhattan Project or any Manhattan Engineering District (MED) activities (1942-1946)?	Indicates a higher probability that the area is impacted.
9.	Was the site ever involved in the support of nuclear weapons testing (1945-1962)?	Indicates a higher probability that the area is impacted.
10.	Were any facilities on the site used as a weapons storage area? Was weapons maintenance ever performed at the site?	Indicates a higher probability that the area is impacted.
11.	Was there ever any decontamination, maintenance, or storage of radioactively contaminated ships, vehicles, or planes performed onsite?	Indicates a higher probability that the area is impacted.

12.	Is there a record of any aircraft accident at or near the site (<i>e.g.</i> , depleted uranium counterbalances, thorium alloys, radium dials)?	May include other considerations such as evidence of radioactive materials that were not recovered.
13.	Was there ever any radiopharmaceutical manufacturing, storage, transfer, or disposal onsite?	Indicates a higher probability that the area is impacted.
14.	Was animal research ever performed at the site?	Evidence that radioactive materials were used for animal research indicates a higher probability that the area is impacted.
15.	Were uranium, thorium, or radium compounds (NORM) used in manufacturing, research, or testing at the site, or were these compounds stored at the site?	Indicates a higher probability that the area is impacted or results in a potential increase in background variability.
16.	Has the site ever been involved in the processing or production of Naturally Occurring Radioactive Material (<i>e.g.</i> , radium, fertilizers, phosphorus compounds, vanadium compounds, refractory materials, or precious metals) or mining, milling, processing, or production of uranium?	Indicates a higher probability that the area is impacted or results in a potential increase in background variability.
17.	Were coal or coal products used onsite? If yes, did combustion of these substances leave ash or ash residues onsite? If yes, are runoff or production ponds onsite?	May indicate other considerations such as a potential increase in background variability.
18.	Was there ever any onsite disposal of material known to be high in naturally occurring radioactive materials (<i>e.g.</i> , monazite sands used in sandblasting)?	May indicate other considerations such as a potential increase in background variability.
19.	Did the site process pipe from the oil and gas industries?	Indicates a higher probability that the area is impacted or results in a potential increase in background variability.
20.	Is there any reason to expect that the site may be contaminated with radioactive material (other than previously listed)?	See MARSSIM Section 3.6.3.

Attachment 2: Letter Dated December 22, 1993 from Nuclear Regulatory Commission to
Defense National Stockpile Center

NRC FORM 385
(8-1998)

U.S. NUCLEAR REGULATORY COMMISSION



DATE

10/20/05

TIME

TELECOPIER TRANSMITTAL

WARNING: If the image is produced on thermal paper, it is highly unstable and will deteriorate significantly in a few years. Reproduce copies onto plain paper prior to filing as a record.

TO

NAME

James Terry

TELEPHONE

NAME AND LOCATION OF COMPANY (if other than NRC)

TELECOPY NUMBER

865-574-2232

VERIFICATION NUMBER

FROM

NAME

Linda

TELEPHONE

MAIL STOP

PDR

TELECOPY DATA

NUMBER OF PAGES

THIS PAGE + 2 PAGES = 3 TOTAL

PRIORITY

- IMMEDIATE
- OTHER (Specify)

SPECIAL INSTRUCTIONS

12/22/93 Letter From NRC to DLA

PROBLEMS

If any problems occur or if you do not receive all the pages, call:

TELEPHONE

PROCESSED BY (INITIALS)

DISPOSITION OF ORIGINAL

After telecopy has been sent, process the original as requested below. (If none are checked, the original will be discarded.)

- RETURN TO SENDER
- CALL AND SENDER WILL PICK UP
- DISCARD

VERIFIED BY (INITIALS)

DEC 22 1993

P.02/03

Kevin Reilly
DLA/DNSC-O
1745 Jefferson Davis Highway
Suite 100, Crystal Square #4
Arlington, VA 22204
License No. STC-133
Docket No. 040-00341

Dear Mr. Reilly:

Per our recent phone conversation, the Nuclear Regulatory Commission staff is evaluating the radiological status of former Defense Logistics Agency/General Services Administration (DLA/GSA) properties that have been released for unrestricted use by NRC or are no longer listed as locations of use on source material license STC-133. NRC staff has examined the records in our possession and has determined that the current radiological status of several current and former DLA/GSA properties is uncertain in terms of whether radiological contamination may exist in excess of NRC's current criteria for unrestricted use. These criteria were identified in the Site Decommissioning Management Plan Action Plan (57 FR 13389, April 16, 1992) A list of these properties is enclosed. NRC is requesting your assistance in determining the radiological status of these properties at the time they were released from your license. To assist us in our review please provide all records you may have on any radiological termination or close-out surveys that were performed by DLA/GSA personnel in support of the removal of these properties from your license.

In addition, we would like to hold a conference call during the week of January 10, 1994 between NRC Headquarters, NRC Region I, and DLA staff to discuss the next steps in resolving the radiological status of these properties. Please contact me as soon as possible to arrange this call.

If you have any questions concerning this request, please contact me at (301) 504-2566.

Sincerely,

(Original Signed)

Dominick A. Orlando, Project Manager
Decommissioning and Regulatory
Issues Branch
Division of Low-Level Waste Management
and Decommissioning
Office of Nuclear Material Safety
and Safeguards

Enclosure: As stated

Ticket

DISTRIBUTION:

T. Johnson Central File NMSS r/f JHolonich MBell
L. Bell (Bell) LLWM r/f JAustin JKinneman, RI
D. Sullivanberger E. Reber, RI

SUBJECT: ABSTRACT: REQUEST FOR INFORMATION ON FORMER DLA SITES

OPC :	LLDR		LLDR	S						
NAME:	DOrlando		MWeber	JW						
DATE:	12/17/93		12/17/93	H						

Path & File Name:

PDR : YES NO
ACNW: YES NO
IC: YES NO

OFFICIAL RECORD COPY

Category: Proprietary or CF Only
Delete file after distribution Yes No

9401050570 931222
PDR ADOCK 04000341
C PDR

MAKE FILE CENTER COPY

delete: none

FORMER DLA/GSA PROPERTIES UNDER REVIEW BY NRC

1. GSA/FPPS-Buffalo, Buffalo, New York
2. Griffis Air Force Base, Rome, NY
3. Curtis Bay Depot Bldgs K611 to 616 and K410 to 415, JS21, J621, J405, J406, J410, F734, F735, 921
4. Naval Supply Depot, Great Lakes, IL
5. Hammond Warehouse #2, Section D, Hammond Depot, Hammond, Indiana
6. GSA-FSS Erie Depot
7. Granite City Army Depot, Granite City, Illinois

Enclosure

Attachment 3: Letter Dated January 14, 1994 from Defense National Stockpile Center to Nuclear
Regulatory Commission

NRC FORM 386
(9-1998)

U.S. NUCLEAR REGULATORY COMMISSION



DATE

10/18/05

TIME

TELECOPIER TRANSMITTAL

WARNING: If the image is produced on thermal paper, it is highly unstable and will deteriorate significantly in a few years. Reproduce copies onto plain paper prior to filing as a record.

TO

NAME

James Terry

TELEPHONE

NAME AND LOCATION OF COMPANY (if other than NRC)

TELECOPY NUMBER

865-574-2232

VERIFICATION NUMBER

FROM

NAME

Linda

TELEPHONE

800-397-4209

MAIL STOP

PDR

TELECOPY DATA

NUMBER OF PAGES

THIS PAGE + 9 PAGES = 10 TOTAL

PRIORITY

- IMMEDIATE
- OTHER (Specify)

SPECIAL INSTRUCTIONS

1/14/94 Letter from DLA to NRC with enclosure about Hammond

PROBLEMS

If any problems occur or if you do not receive all the pages, call:

TELEPHONE

DISPOSITION OF ORIGINAL

After telecopy has been sent, process the original as requested below. (If none are checked, the original will be discarded.)

- RETURN TO SENDER
- CALL AND SENDER WILL PICK UP
- DISCARD

PROCESSED BY (INITIALS)

VERIFIED BY (INITIALS)



DEFENSE LOGISTICS AGENCY
 DEFENSE NATIONAL STOCKPILE CENTER
 1745 JEFFERSON DAVIS HIGHWAY
 ARLINGTON, VIRGINIA 22202



4 12 15
 11 12 10

DNOSC-O (Kevin Reilly/703-607-3227/jnp)

14 JAN 1994

SUBJECT: Radiological Status of Former Defense Logistics Agency/Defense National Stockpile Center Properties that have been Released for Unrestricted Use

Dr. Dominick A. Orlando, Project Manager
 Decommissioning and Regulatory Issues Branch
 Division of Low-Level Waste Management and Decommissioning
 Office of Nuclear Material Safety and Safeguards
 U.S. Nuclear Regulatory Commission
 Mail Stop 0E4
 11555 Rockville pike
 Rockville, MD 20852

Dear Mr. Orlando:

As requested in your letter of December 22, 1993, enclosed is the information we could locate regarding our former released sites. As you are aware, all of these sites were released while the Defense National Stockpile Center (DNOSC) was part of the General Services Administration. As of July 1988, the DNOSC was transferred to the Defense Logistics Agency. In order to assist your review of these former sites I have enclosed all the documents we could locate and have provided a brief synopsis of the information contained in each enclosure.

1. GSA/PPRS Buffalo, Buffalo, NY - This location was used to store tungsten concentrates and columbite/tantalite natural minerals. These materials were stored outside in galvanized steel drums on the ground and asphalt pads. These materials were relocated to our Voorheesville, NY depot in May and June 1976. These materials were subsequently relocated to our Scotia depot in 1990 (see Letter Requesting the release of Voorheesville, dated April 24, 1992, in your possession). The drums were solid, in sound condition, with no leaks detected in either move and pose no radiological hazard to human health or the environment. The area at the GSA/FSS site in Buffalo where these materials were stored is now developed into a residential area.

2. Griffis Air Force Base, Rome, NY - See NRC close out survey dated 2 May 1988 enclosed.

3. Curtis Bay Depot, Curtis Bay, MD - See NRC close out survey dated 11 August 1988 enclosed.

DNOSC-O

PAGE 2

SUBJECT: Radiological Status of Former Defense Logistics Agency/
Defense National Stockpile Center Properties that have
been Released for Unrestricted Use

4. Naval Supply Depot, Great Lakes, IL - Several Tanks used to store monazite sand (2.5-3.5 percent ThO₂). The material was sold in 1974. Decontamination of tanks performed in May 1975. Consultants review indicates all "Diminimus Levies" (documentation provided). Tanks were subsequently removed and scraped. The area where tanks were is now a parking lot. Please

note that the same procedure was used to decontaminate the tanks at the Ravenna Depot, Ravenna, OH. These tanks have also been removed and scraped.

5. Hammond, Whse 2-Section D - Inventory of thorium nitrate relocated to another warehouse early 1971. Due to leakage of containers, the storage area was decontaminated as described in the documents enclosed. A portion of the property (Whse 2 and others) was subsequently sold in 1972-73. The entire inventory of thorium nitrate was repackaged and overpackaged in early 1980 and remains in secure storage at Hammond.

6. GSA/FSS Erie Depot, Port Clinton, OH - This location was the storage area of vanadium oxide. The material was stored in sound steel drums. It was relocated to the DNOSC Warren Depot, Warren, OH in 1982. In the Late 1980's analysis on the vanadium oxide showed this material was not licensable (less than .05% U and Th combined) and was subsequently removed from our license in total. All this material has been sold or upgraded over the last two years.

7. Granite City Army Depot, Granite City, IL - September 1977, all columbium/tantalum source material was relocated to the DNOSC New Haven Depot, New Haven, IN. The material is all in sound drums and no leaks or spills were encountered. Radiation report indicates negative findings.

Most of the items above were simple transfers of material from one licensed site to another licensed site. All of the materials (except the thorium nitrate) are naturally occurring radioactive ores and minerals that are generally just licensable. Why you (NRC) did not receive some of this information after these actions were completed is something I can not answer. I do not feel there is or was a radioactive hazard during any of these transfers or during the decontamination of the tanks or warehouse floors.

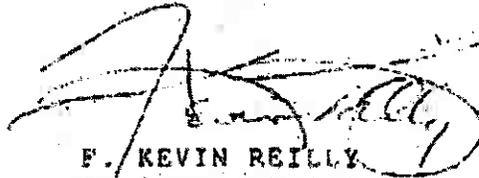
UNSC-0

PAGE 3

**SUBJECT: Radiological Status of Former Defense Logistics Agency/
Defense National Stockpile Center Properties that have
been Released for Unrestricted Use**

Please review the enclosed information and let me know if there is anything the DNSC can do to assist you in your review. Should you have any questions please feel free to contact me on 703-607-3227.

Enclosures (7)



F. KEVIN REILLY
Environmental Protection
Specialist

Hammond, Warehouse 2, Section D

Hammond

June 30, 1971

Mr. Donald G. Gammis, President
Gammis Nuclear Service Company, Incorporated
3757 Mt. Prospect Road
Franklin Park, Illinois 60131

Dear Mr. Gammis:

Purchase Order 5PN-B-89770-1 and Contract GS-05L-8136 for decontamination and survey services at OSA/PMDS Hammond Depot, Hammond, Indiana are attached.

In accordance with Part 1, paragraph 6, General Conditions and Specifications of this contract, a performance bond is required before work can be started. Receipt of this document at your earliest convenience will be appreciated. Blank copies of Standard Form 25, Performance Bond, are enclosed for your convenience.

Sincerely,

(Signed) Lester R. Myers, Jr.

LESTER R. MYERS, JR.
Regional Director, PMDS

Enclosures

cc:
J. Dobrzycki - 5DMP
Official file - 5DMI
Reading file - 5DMI
Contract file - 5DMI

5DMI:MPURADLEY:rj 6/30/71 ext. 3-5560

9402010207 940114
PDR ADDCK 04000341
C PDR



GAMMIE NUCLEAR SERVICE CO., INC.

PIPE LEAK FINDING • INDUSTRIAL PROCESS TRACING

3737 MT. PROSPECT RD. FRANKLIN PARK, ILL. 60131 PHONE (312) 766-6710

SEPTEMBER 22, 1971

MR. MARSHALL BRADLEY
CHIEF INSPECTION BRANCH
62ND FLOOR
RM 1232 FEDERAL BUILDING
215 SOUTH DEARBORN STREET
CHICAGO, ILLINOIS 60604

DEAR MR. BRADLEY:

WE HEREBY CERTIFY THAT WE HAVE MONITORED THE ENTIRE FLOOR AREA
IN WAREHOUSE 2, SECTION D, GSA PHS HAMMOND DEPOT, HAMMOND,
INDIANA, AND THAT THE CONTAMINATED FLOOR AREA DOES NOT EXCEED
THE FOLLOWING AT ANY LOCATIONS:

- 5,000 DPM/100 CM² FIXED ALPHA
- 1,000 DPM/100 CM² REMOVABLE ALPHA

RESPECTFULLY SUBMITTED,

GAMMIE NUCLEAR SERVICE CO., INC.

Ronald G. Gammie
RONALD G. GAMMIE, PRESIDENT

073:20



GAMMIE NUCLEAR SERVICE CO., INC.

PIPE LEAK FINDING • INDUSTRIAL PROCESS TRACING

3737 MT. PROSPECT RD., FRANKLIN PARK, ILL 60131 PHONE (312) 766-4773

FEBRUARY 25, 1971

MR. MARSHALL BRADLEY
CHIEF INSPECTION BRANCH
GSA - PMS
RM. 1252 FEDERAL BUILDING
219 So. DEARBORN ST.
CHICAGO, ILLINOIS 60604

RE: HAMMOND DEPOT
RADIOACTIVITY
DECONTAMINATION

DEAR MR. BRADLEY:

WE PROPOSE TO-

FURNISH LABOR AND MATERIAL NECESSARY TO DECONTAMINATE RADIOACTIVITY
DUE TO RADIOACTIVE THORIUM NITRATE SPILLAGE, WAREHOUSE 2, SECTION 7,
GSA - PMS, HAMMOND DEPOT.

DECONTAMINATION OF AFFECTED AREAS TO BE TO A LEVEL NO GREATER THAN
5000 DISINTEGRATION PER MINUTE PER 100 SQUARE CENTIMETERS FIXED ALPHA
(5000 DPM/100 CM² FIXED α) AND 1000 DPM/100 CM² REMOVABLE α .

THIS PROPOSAL TO INCLUDE ALL HEALTH-PHYSICS SERVICES, TOOLS, EQUIP-
MENT, DECONTAMINATION OR DISPOSAL OF TOOLS AND EQUIPMENT, INSTRUMENT-
TATION, REMOVAL AND FINAL DISPOSAL OF CONTAMINATION, AND PREPARATION
OF AFFECTED AREA FOR RESURFACING. FINAL RESURFACING IS NOT INCLUDED.

THIS WORK TO BE DONE FOR THE SUM OF - - - - - \$ 9,525.00.

RESPECTFULLY SUBMITTED,

GAMMIE NUCLEAR SERVICE CO., INC.


DONALD J. GAMMIE

12/18

THORIUM NITRATE - HAMMOND

GENERAL SERVICES ADMINISTRATION



Chief, Inspection Branch
GSA-PMDS
1276 Federal Office Bldg.
Chicago, Illinois 60604

5 June, 1970

PMDS Inspector, Hammond Depot

Report on use of Nitric Acid on cement floor having high concentrations of alpha radiation.

This report covers the use of Nitric Acid on radioactive hot spots in Whse 2 - Section D, former storage area of Thorium Nitrate drums. Leaks developed in drums produced a liquor which spilled and dropped to the concrete floor. A survey of these spots, which were dry, using a Gas Proportional PAC-2GA Alpha Counter indicated high concentrations of alpha radiation.

Initial action taken was sweeping and vacuuming the entire area that was used for storage of Thorium Nitrate. Survey of the area after clean up did not indicate any change in spots with high concentrations of alpha radioactivity.

Second phase of operation entailed scrubbing, using strong detergent and water, of the hot spots followed by a water rinse. This was mopped up and allowed to dry. After one week of thorough drying the area was surveyed using the alpha counter. The readings monitored indicated no change in the hot spots having high concentrations of alpha radiation.

It was suggested by this inspector that a dilute form of nitric acid be used on the hot spots. The Nitric Acid, diluted or full strength, would have no effect on the alpha radiation. However the reaction would be the acid with the lime in the cement floor which would dissolve and than can be removed. This procedure was used and Reagent Grade Nitric Acid- Assayed at 70.0 to 71.0% utilized.

A test spot was picked and the alpha count monitored, which was 30 to 45 thousand D/PH. A 35% Nitric Acid concentration was poured on the hot spot and allowed to remain for a period of 24 hours. After the 24 hour period the spot was neutralized using bicarbonate of soda and water solution. This was mopped up and followed with copious amounts of water. This was also mopped up and the test spot allowed to dry. After 3 days of drying a survey of the test spot was made using the alpha counter. The readings monitored indicated a reduction in alpha count to 6000/7000 D/PH.

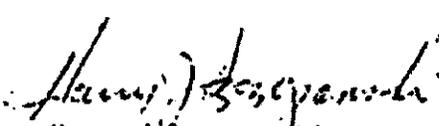
Second part of this operation was another application of 35% Nitric Acid concentration to the same spot. This action was taken to determine whether the alpha count could be further reduced on the test spot. After a period of 3 days the test spot was neutralized, water washed, mopped up and allowed to dry. After 1 day of drying a survey of the test spot indicated a further reduction in alpha radiation to 1800/2250 D/PH. Another survey was conducted 3 days later to confirm the 1st reading. The readings were in line with the first observation.

In conjunction with the first experiment another hot spot was chosen which had an alpha count of 120,000/150,000 D/PM. On this spot a 35% Nitric Acid concentration was poured and allowed to remain for a period of 24 hours. After which the test spot was neutralized, water washed, mopped up and allowed to dry. After 1 day of drying a survey was made of the test spot and the readings indicated a reduction in alpha radiation to 17,000/22,500 D/PM. As was done in the first experiment, a survey of the test spot was performed 3 days later. The readings were in line with the first observation.

Second part of this operation was another application of Nitric Acid to this spot to further reduce the alpha count. However this time full strength (70%) was used and allowed to remain for a period of 48 hours. After which the test spot was neutralized, water washed, mopped up and allowed to dry. After 2 days of drying a survey of the test spot indicated a further reduction of alpha radiation to 7500/9000 D/PM. It would appear that another application of Nitric Acid would be needed to further reduce the alpha radiation.

Since there are many spots with alpha radiation in each bay, a thorough survey will have to be made and all hot spots marked. Then one bay at a time could be worked and treated with Nitric Acid. After which it would be neutralized, water washed, mopped up and allowed to dry. After a period of drying time the bay would be surveyed again and determinations made whether the radiation counts are acceptable as per AEC regulations. Should some spots still have high readings another application of Nitric Acid would be applied. The same procedure would be followed as above.

In conclusion the use of Nitric Acid treating of the cement floor having hot spots of alpha radiation will work. However of prime importance is that all safety precautions be taken when handling the Nitric Acid. The use of rubber gear would be recommended.


Harry J. Szczepanski