



DEPARTMENT OF THE ARMY
CRANE ARMY AMMUNITION ACTIVITY
300 HIGHWAY 361
CRANE IN 47522-5099

11 SEP 2008

Safety Office

MEMORANDUM FOR United States Nuclear Regulatory Commission, Region III, Kenneth Lambert, Senior Health Physicist, 2443 Warrenville Road, Suite 210, Lisle, IL 60532-4352

SUBJECT: Response to Apparent Violations in Inspection Report No. 040-09045/2008-001; EA-08-222

1. Reference memorandum, Nuclear Regulatory Commission (EA-08-222) 20 Aug 07, subject: NRC Reactive Inspection Report NO. 040-09045/2008-001(DNMS)-Department of the Army-Crane Army Ammunition Activity

2. Responses to apparent violations in reference above are as follows:

a. Violation # 1: Failure to control radioactive material not in storage in accordance with Nuclear Regulatory Commission requirements in 10 CFR 20.1802

(1) The reason for the apparent violation: Failure of the licensee's procedure for demilitarizing the rounds to include marking the cardboard boxes to identify between the DU and high explosive (HE) rounds.

(2) The corrective steps that have been taken and the results achieved:

(a) Corrective steps: The Licensee has revised the demilitarization procedures to include adding a radioactive Yellow II label to the top of the cardboard boxes containing the DU rounds, and revising the licensee's procedure by adding a note, "all depleted uranium rounds will be packed into a separate box and labeled accordingly". All containers packed between June and November 2007 will be inspected for mixed rounds. The separate box identified is the inner packaging containing 65 DU rounds that is packed in a metal box with a second cardboard box of DU rounds.

(b) Results achieved: Between June and November 2007 the

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licensee produced an inventory of recovered 30mm HE rounds and an inventory of 30mm AP rounds. The inventory of HE rounds was shipped to Radford Army Ammunition Plant. The HE rounds were inspected by Radford AAP personnel. A total of 195 DU rounds were identified and returned to Crane Army Ammunition Activity (CAAA). The inventory of DU rounds were inspected by CAAA personnel, between 14 July and 26 August 2008. A total of 459 HE rounds were identified and removed from the DU inventory.

(c) The corrective steps that will be taken to avoid further violations: The Licensee will label the cardboard boxes containing DU projectiles with a radioactive Yellow II label to the top of the cardboard boxes containing the DU projectiles. The Standard Operation Procedure (SOP) change implementing the corrective step is enclosed.

(d) The date that full compliance will be achieved: Full compliance was achieved 26 August 2008.

b. Violation #2: Shipment of packages containing depleted Uranium, a hazardous material, and the failure to properly describe the material on shipping papers and properly mark and label the packages in accordance with Nuclear Regulatory Commission requirements in 10 CFR 71.5 and Department of Transportation requirements in 49 CFR 171.2.

(1) The reason for the apparent violation: Failure of the licensee's procedure for demilitarizing the rounds to include marking the cardboard boxes to identify between the DU and HE rounds. The cardboard boxes identified are the inner packaging containing 65 DU rounds that is packed in a metal box with a second cardboard box of DU rounds.

(2) The corrective steps that have been taken and the results achieved:

(a) Corrective Steps: The licensee has revised the demilitarization procedures to include adding a radioactive Yellow II label to the top of the cardboard boxes containing the DU rounds.

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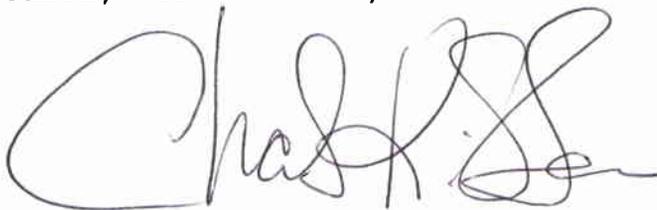
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(b) Results achieved: Since November 2007 the licensee has not demilitarized 30mm linked rounds containing DU and HE projectiles. The licensee believes the corrective step will insure DU rounds are not mixed with and shipped as HE rounds.

(c) The corrective steps that will be taken to avoid further violations: See 2.A. above.

(d) The date that full compliance will be achieved: Full compliance was achieved with the SOP change on 23 July 2008.

3. The POC is Walter F. Shearin, 812-854-1246,
walt.shearin@us.army.mil.

A handwritten signature in black ink, appearing to read "Charles W. Kibben". The signature is stylized and cursive, with a large initial "C" and "K".

Encl

CHARLES W. KIBBEN
COL, OD
Commanding

SOP NO: CN-0000-J-018 DATE MAY 07
REV NO: N/A DATE _____
CHG NO: 4 DATE JUN 08

OPERATION NUMBER 5 CONTINUED

3. Place inspected projectiles fuze end first into the egg crated cardboard inner pack. Ensure to separate projectiles by lot number. Only one lot number will be placed in containers and palletized. Separate packing stations may be required to maintain lot integrity. Each inner box will hold 65 projectiles. Once 65 projectiles with same lot numbers have been placed in the inner box close the top and secure the top with tape.

NOTE: All Depleted Uranium (DU) rounds will be packed into a separate box and labeled accordingly. Place radioactive label on top of box.



4. Place full inner pack into the pre stenciled M548 ammunition container with projectile fuze end up.
5. Repeat Steps 1-4 and place the second packed inner pack containing 65 projectiles into the M548 ammo container. Each M548 holds 2 inner cardboard boxes for a total of 130 projectiles per M548 ammunition container.
6. Apply metallic security seal in accordance locally approved job order and place the ammunition container on pallet to be palletized.
7. Palletize full pallet in accordance with locally approved job order and transfer pallet to designated holding area to await pick up.

PROTECTIVE EQUIPMENT:

Face shield (A/R)
Leather or leather palmed gloves with arm protection (A/R)
Hearing protection (A/R)
Conductive floor matting (A/R)
Phosphorous gloves (A/R)
Conductive sole steel toe safety shoes (A/R)
Safety eye wear with side shields (A/R)
Nitrile rubber gloves (A/R)
Butyl rubber gloves (A/R)

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