



DEPARTMENT OF THE ARMY
OFFICE OF THE CHIEF OF STAFF
200 ARMY PENTAGON
WASHINGTON, DC 20310-0200

May 11, 2009

Army Safety Office

Director, Office of Federal and State Materials and Environmental Management Programs
U.S. Nuclear Regulatory Commission
ATTN: Ms. Angela McIntosh
Mail Stop T8-E24
Washington, DC 20555

Dear Ms. McIntosh:

This letter is in response to the Nuclear Regulatory Commission (NRC) Demand for Information (DFI) issued on January 16, 2009, regarding tritium possessed in the form of exit signs. This report does not include tritium signs outside the Continental United States, or in National Guard or Army Reserve installations. In accordance with the DFI, the U.S. Army conducted a complete inventory of the tritium signs in its possession. While a few instances were found where items were not properly maintained on inventories, or where reports went to State Offices of Radiation Control instead of the NRC, overall accountability of these items meets the requirements of 10CFR 31.5. As requested in the DFI, the following answers are provided.

Question 1. Explain how you ensure compliance with the NRC requirements applying to the possession, transfer, and disposal of tritium exit signs you have acquired. Identify and provide contact information for the individual you have appointed for ensuring day to day compliance with these requirements.

The U.S. Army has a strong program for accounting and disposal of items containing radioactive material. We require all radioactive materials be listed on an inventory which is verified annually. This is a decentralized program requiring each installation to maintain an inventory. This inventory is reviewed during inspections and audits by higher headquarters. The overall policy is centrally managed by the Army Radiation Safety Officer. His contact information is: Gregory R. Komp, 703-601-2405, greg.komp@us.army.mil. In addition to centralized policy management, the U.S. Army disposes of radioactive material through a central office. This office is also responsible for disposing of radioactive materials for the Department of Defense (DOD). Excess or damaged radioactive materials are stored at a specified location on each installation and an inventory forwarded to the Joint Munitions Command (JMC) in Illinois. JMC then either picks up the material or has it sent to a consolidation site. This is then transferred to a licensed burial site or a licensed recipient. In the case of tritium exit signs, the signs are collected and transferred to the Air Force for recycling. The Air Force submits periodic reports to the NRC as required by 10 CFR 31.5.

Question 2. State the number of tritium exit signs you currently possess and the number of signs that according to your records should be in your possession.

The U.S. Army is currently in possession of 3053 items, 200 of which are in storage and awaiting disposal action. The number of signs purchased for U.S. Army use is not adequately known for this reply.

Question 3. Explain the reasons for any discrepancy between the number of tritium exit signs you currently possess and the number that should be in your possession.

The primary reason that the U.S. Army is unable to identify the number of tritium exit signs is because of the variety of methods used to purchase these signs. The signs can be locally purchased by an installation, purchased through a joint procurement action from the Defense Logistics Agency, or by a U.S. Corps of Engineers contractor when building or remodeling a new facility. The tritium exit sign would be recorded on the installation inventory upon delivery, but a record of the purchase may not have been maintained.

Question 4. Describe any actions you have taken, or plan to take, to locate tritium exit signs that should be, but are not in your possession.

Upon receipt of the DFI, the US Army conducted a 100 percent inventory of installations. This included over 100 installations and over 116,000 separate buildings. In most cases, this was as simple as reporting the inventory to the Army Safety Office. In a few cases, a full walk through was done to ensure we were able to account for all the signs.

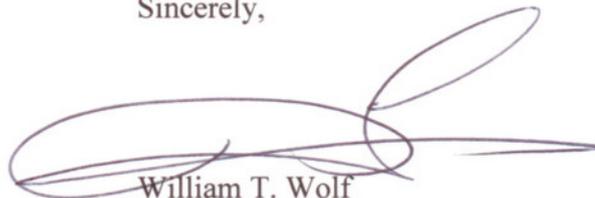
Question 5. Describe any actions you have taken, or plan to take, to prevent future losses of tritium exit signs.

The DOD has issued a Unified Facilities Criteria (UFC), UFC 3-600-01 which prohibits the use of radio luminescent signs in DOD buildings unless there is a specific reason that a radioluminescent sign must be used. The Army is in the process of complying with that requirement and will eventually remove most of the tritium exit signs from the Army inventory. The Army Radiation Safety Officer will monitor the progress of this action. In addition the Army will consider a change to its policy concerning generally licensed material at the next

Army Radiation Safety Council meeting. This DFI and the expanded acquisition of generally licensed material for force protection have demonstrated the need for additional centralized control of generally license material.

Point of contact for this action is Mr. Gregory R. Komp, 703-601-2405,
greg.komp@us.army.mil.

Sincerely,

A handwritten signature in dark ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

William T. Wolf
Brigadier General, US Army
Director of Army Safety