

FY 2009 Annual Report on the U.S. Nuclear Regulatory Commission's Involvement with Military Remediation

April 2010
U.S. Nuclear Regulatory Commission

Enclosure

1.0 Introduction

The U.S. Nuclear Regulatory Commission (NRC) has started its involvement with the ongoing military remediation of licensable radioactive material at the Navy's Hunters Point Shipyard (HPS) site and the Air Force's McClellan site. One purpose of this annual report is to keep NRC management informed about the staff's activities, plans, and observations regarding the Navy and Air Force remediation at the HPS site and McClellan site. A second purpose is to form the documentary record of the staff's continued involvement at these sites and the basis for our continued reliance on the approach the Commission approved.

Section 2.0 of this report provides background on NRC's Limited Involvement Approach to Stay Informed with the remediation of licensable radioactive material at the HPS site and McClellan site. Sections 3 and 4 summarize NRC's ongoing involvement including the activities conducted, observations, and conclusions. Section 5 provides the staff's evaluation of the effectiveness and efficiency of implementing NRC's approach for annual site visits. Attachment 1 provides NRC's Military Remediation Monitoring Plan for both sites. Attachment 2 gives a chronology of key activities completed and links to key references. Attachment 3 is the *Federal Register* notice describing NRC's involvement with the Navy's remediation of the HPS site.

2.0 Background

In July 2007 the Navy requested clarification about NRC's jurisdiction and potential involvement with the Navy's ongoing remediation of radioactive material at the HPS site. The NRC staff evaluated NRC's jurisdiction for the radioactive materials at the HPS site and evaluated options for NRC's involvement. On May 30, 2008, these options and the staff's recommendations were provided to the Commission in SECY-08-0077. The Commission provided its direction to the staff on June 26, 2008, in SRM-SECY-08-0077.

The Commission directed the staff to rely on the ongoing Navy remediation under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process and the U.S. Environmental Protection Agency's (EPA) regulatory oversight for the licensable radioactive material assumed to be present at the HPS site. NRC would not exercise its regulatory authority and would not require compliance with its decommissioning regulations. NRC would not conduct any formal regulatory reviews or participate in the ongoing CERCLA comment process for the Navy's remediation. Instead, the NRC staff would take a limited involvement approach to stay informed about the Navy's remediation. The basis for this approach is that NRC can reasonably rely on the CERCLA process and EPA's oversight of this site that is listed on the National Priorities List (NPL) (i.e., Superfund site) because the process should result in a level of protection of public health and safety and the environment that is generally equivalent to what would be provided if the NRC's decommissioning process was used.

NRC believes that the approach described above is reasonable because: (1) the licensable materials are inextricably commingled with the atomic weapons testing material over which NRC has not jurisdiction; (2) over-laying NRC requirements and oversight on the CERCLA process overseen by EPA provides no clear public health and safety benefit; (3) dual NRC-EPA regulation is avoided; (4) remediation can proceed under CERCLA; and (5) NRC would be in a position to respond to stakeholder questions in a timely and effective manner.

NRC anticipates that it would stay informed throughout the remediation process by reading selected documents and conducting an annual site visit and progress meetings with the Navy, EPA, State agencies, and the City of San Francisco. These meetings are expected to provide NRC with input about the ongoing remediation activities, issues, and regulatory oversight and involvement of each agency. NRC would also reserve the option of commenting to EPA if necessary to justify its continued reliance on the CERCLA process.

3.0 Hunters Point Shipyard Site

3.1 Activities Conducted

During Fiscal Year (FY) 2009 the staff conducted the following activities:

- Established written agreements with the Navy and EPA Region 9 on NRC's approach (NRC letters and Navy/EPA responses);
- Published a *Federal Register* notice (Attachment 3) to inform stakeholders of the Commission's decision regarding NRC's approach and agreements with Navy and EPA;
- Conducted a second site visit and stakeholder meetings in March 2009. The purpose of this site visit was to obtain an update of remediation progress and meet with EPA, State agencies, and the City of San Francisco to further understand their roles, activities, and issues;
- Prepared a Military Remediation Monitoring Plan (Attachment 1) that describes the staff's general plan for implementing its Limited Involvement Approach to Stay Informed as well as specific activities that might be conducted during FY 2009 and FY 2010 as resources permit;
- Reviewed selected documents on the Navy's remediation including:
 - Parcel B Revised Proposed Plan, June 2008
 - Draft Final Parcel B IR Sites 7 and 18 Design Basis Report, May 2009
 - Draft Final Parcel E-2 IR/FS report presentation
 - Navy's May 2009 letter disbanding the Restoration Advisory Board

3.2 Observations

The staff's site visit, meetings, and document reviews have kept the staff informed about the progress, plans, and key issues regarding the Navy's remediation of the radioactive material at the HPS site. Highlights based on what the staff has learned are given below for selected topics that the staff considers important for understanding how the CERCLA process, EPA oversight, and involvement by other parties is being implemented at the HPS site.

The Navy and the other parties involved with the remediation of the HPS site all told the staff that significant progress had been made on several parcels over the past year at the HPS site. It was evident from discussions that this progress was the result of all the parties working together to resolve many challenging issues some of which were necessary to achieve approvals of remedies. Of particular importance, was the approval and completion of the Record of Decision (ROD) for Parcel B. Although unrestricted release is planned for most of Parcel B, the approval of the remedies for the restricted release of the fill areas IR 7/18 was very challenging. The remedy for this area involves both a layered system of institutional controls to restrict future land use and relatively simple engineered barriers to further limit access to the fill areas below the surface. The engineered barrier includes, from bottom to top: two feet of clean soil over the existing surface; a demarcation layer of orange synthetic material with messages and metal strips that would be detected by a magnetometer; and two more feet of clean soil. Although approval of this general approach represents a major effort by all parties, much work is ongoing and planned to prepare the specific implementation documents.

One of the key implementation documents, the Risk Management Plan, is being prepared by the City of San Francisco with involvement by many of the parties. This plan describes how the restrictions on the land would be implemented, the roles of various parties, and future monitoring.

The State of California Department of Public Health (CDPH), as part of its support for the Parcel B ROD, required the City of San Francisco to prepare a request for a license exemption for the Parcel B restricted area IR 7/18. This exemption request is not part of the formal CERCLA process but is necessary to avoid the CDPH licensing the restricted area when this area is transferred from the Navy's federal ownership to the City of San Francisco's ownership. Work has already started on the license exemption request. CDPH has provided general guidance for the request, but specifics need to be identified. Generally, the staff understands that the request would include an estimate of the radioactive material that might be present in the fill areas based on the available information and some type of dose assessment. The Navy is assisting the City of San Francisco in preparing the request and might include the Navy's Closure Report. CDPH told the staff that NRC's letter to the Navy that documents NRC's reliance on the CERCLA process and EPA oversight as providing an equivalent level of protection to NRC's process is an important factor that CDPH would use in its decision regarding the exemption request. CDPH considers the remedy as protective and that the five-year review required by CERCLA would identify new information that could indicate a problem.

Significant progress has also been achieved for remedy approvals and remediation of sewer lines and buildings for unrestricted release of Parcels B, D, and G (potential stadium location). This work could support transfer of these parcels during 2010 to the City of San Francisco for redevelopment. The ongoing trenching for sewer line remediation and the associated Final Status Surveys (FSS) is progressing smoothly. The Navy completed a new laboratory procedure for radium to address the longer counting times needed because of the low cleanup levels are close to detection limits. The new procedure should result in faster sample analysis and improved remediation schedules.

The Navy completed the five-year review for Parcel B. This is the first five-year review for the HPS site. Although this is a useful example of a five-year review required by CERCLA, EPA explained that its new policy for future five-year reviews would involve evaluating the whole site rather than separate parcels or remedies.

The Navy is conducting the Feasibility Study phase of the CERCLA process for Parcel E-2 that includes the existing covered landfill that primarily contains hazardous chemicals such as PCBs and cadmium along with radium. This phase evaluates alternative remedies, such as excavation and offsite disposal or restricted release with the use of institutional controls and engineered barriers. The engineered barrier would be more complex than the simple soil cover for Parcel B IR 7/18. The engineered barriers being evaluated include a slurry wall, leachate collection system, and a multilayer cover. Many parties expressed the view that the remedy for this parcel would be more challenging to resolve than Parcel B IR 7/18 soil cover. Although the IR 7/18 restricted release approach appears to set a foundation for the institutional controls and the CDPH license exemption process, the engineered barriers and contents of the landfill are more complex than the IR 7/18 fill area.

Regarding public involvement at the HPS site, the Navy stopped the Restoration Advisory Board (RAB) process because it was not fulfilling the need for effective community involvement. For example, formal written comments had not been received from the RAB on many Navy documents, the RAB meetings often focused on matters unrelated to the Navy's cleanup, and complaints were received about the hostile tone of the RAB meetings. The Navy and EPA are evaluating alternative approaches to resume effective public involvement.

Meetings with the EPA Region 9 staff provided an understanding of EPA's role, specific oversight activities at the HPS site, and views on key issues. For example, EPA conducts many document reviews including RODs for approval of remedies and FSS reports and Completion Reports for concurrence before parcel transfer. Although EPA does not conduct its own confirmatory surveys after the FSS, EPA is involved with the confirmatory surveys conducted by CDPH. EPA is not involved with the CDPH license exemption process because it is not part of the CERCLA process.

3.3 Summary and Conclusions

- The NRC staff has completed the external documents and internal plans and process needed to implement the Commission's direction for the Limited Involvement Approach to Stay Informed at the HPS site.
- Staff began implementing the Limited Involvement Approach to stay informed about the Navy's remediation under the CERCLA process and the oversight provided by EPA, State agencies, and the City of San Francisco by conducting a site visit, meetings with regulatory agencies and reviewing documents.
- The Navy and the other parties involved with the remediation of the HPS site all told the staff that significant remediation progress had been made on several parcels over the past year at the HPS site.
- In its March 2009 stakeholder meetings, the staff described its Limited Involvement Approach to Stay Informed.

- The staff from EPA Region 9, State DTSC, CDPH, and the City of San Francisco are very knowledgeable about the remediation activities and issues. They also are significantly involved with the oversight of the remediation activities and appear to be addressing and resolving key issues important to achieving protective remediation.
- Challenging issues lie ahead that the staff will continue to focus on such as: (1) implementing the restricted release remedy for Parcel B, IR 7/18, including the City's Risk Management Plan and the State DPH License Exemption process; and (2) preparing the ROD for the E-2 landfill restricted area.
- Based on the Navy's ongoing remediation under the CERCLA process and EPA's continued oversight at the site, the staff can continue to rely on the approach the Commission approved.

4.0 McClellan Site

4.1 Activities Conducted

- Completed a review to determine NRC's jurisdiction for the radiological materials at McClellan and how NRC should be involved with the Air Force's ongoing remediation.
- Conducted a second site visit and stakeholder meetings in March 2009. The purpose of this site visit was to obtain an update of remediation progress and meet with EPA, State agencies, Sacramento County, and the developer, McClellan Business Park to further understand roles, activities, and issues
- Prepared a Military Remediation Monitoring Plan (Attachment 1) that describes the staff's general plan for implementing its Limited Involvement Approach as well as specific activities that might be conducted during FY 2009 and FY 2010 as resources permit.
- Conducted a conference call with the Air Force for NRC to understand the scope of the Air Force's approach to privatized remediation at McClellan (see discussion below)
- Reviewed selected documents on the Air Force's remediation including:
 - Air Force's Draft Final Proposed Plan for the Strategic Sites (burials), September 22, 2006
 - Final Conceptual Design Focused Strategic Sites Technical Memorandum, Final Copy, December 15, 2006
 - California DTSC comments on Strategic Sites Proposed Plan, February 8, 2007
 - EPA's Final Proposed Plan for Parcel C-6 (explains privatized cleanup and example of a proposed plan), October 2008
 - EPA's Summary of McClellan Air Force Base

4.2 Observations

The Air Force is required to conduct its remediation under the CERCLA process. At McClellan, two remediation approaches are being used: traditional Air Force remediation and privatized remediation by the developer. McClellan is the first NPL site in the country to transfer land for non-military remediation with military dollars, which is called privatized remediation. One 62-acre parcel with only hazardous chemical contamination has already been transferred to the County/developer for remediation and redevelopment. A second privatized remediation of a 600-acre parcel is being planned. Two areas with radium-226 contamination will be remediated by the Air Force to unrestricted use levels before transfer to the developer for remediation of the hazardous chemical contamination.

The Air Forces' proposed plans for the disposal pits are to leave the pits on-site with institutional controls and engineered controls. The institutional controls would be similar to the Navy's at the HPS site and consistent with the Air Force Memorandum of Agreement with the State on use of institutional controls. The local government, who will be the new owner, would be required to sign and record a State Land Use Covenant (SLUC) at property transfer and would be responsible for complying with the deed and SLUC. The State would be responsible for verifying compliance with the SLUC. The Air Force, EPA, and State would review and inspect the effectiveness of the selected remedial action, including the institutional controls. The Air Force would conduct five-year reviews as required by CERCLA, and EPA would review the results. The Air Force's proposed remedy for most of the disposal pits is to cap the sites in place with an engineered cap consisting of a low-permeability geomembrane layer, low permeability clay layer, and soil cover. The proposed remedy for the excavated CS-010 is to consolidate the material currently stored at CS-010 and material from another disposal pit, CS-024, into CS-010. This consolidation unit would also have an engineered cap plus a clay liner and leachate collection system. All the sites would include landfill monitoring pursuant to California Code of Regulation Title 27, including groundwater monitoring for radionuclides. Finally, NRC regulations are candidates for applicable or relevant and appropriate requirements (ARARS).

The Air Force plans on finishing the characterization survey for soils at Building 252, the Radium Plant Facility. The building has been decontaminated, but the soils beneath the building and the sewer line soil area need to be analyzed and remediated as necessary after removal of the building.

The primary regulatory agencies overseeing the McClellan remediation are EPA and the State of California Environmental Protection Agency, represented by the Department of Toxic Substances Control (DTSC) and the Central Valley Regional Water Quality Control Board. EPA is the lead regulatory agency. The CDPH provides technical assistance to DTSC on radiological matters.

For the Air Force's remediation of the McClellan site, at the time of the staff's site visit in March 2009, the majority of attention was being given to completing the transfer of the 600-acre parcel to Sacramento County and the developer, McClellan Business Park. As a result, little attention had been given to the draft ROD for the Strategic Sites, which contains all the disposal pits with plans for composite covers and institutional controls. The Air Force expects the attention to

shift to these areas during the next year. The State's license exemption would likely be required at this site also. The Air Force, however, is not yet at the stage of discussing this approach with the State as the City of San Francisco and the Navy has done at the HPS site as part of the review and approval of the ROD for Parcel B.

4.3 Summary and Conclusions

- Based on the staff reviews and site visits, the staff decided that it could rely on the Air Force remediation under the CERCLA process and EPA regulatory oversight at the McClellan site and begin its Limited Involvement Approach to Stay Informed, similar to the HPS site that was approved by the Commission.
- The NRC staff is in the process of preparing the letters to the Air Force and EPA Region 9 and the *Federal Register* notice needed to formally implement the Limited Involvement Approach to Stay Informed at the McClellan site.
- Staff began implementing the Limited Involvement Approach to Stay Informed about the Air Force's remediation under the CERCLA process and the oversight provided by EPA.
- Challenging issues lie ahead that the staff will continue to focus on such as: (1) the ROD for the Focused Strategic Sites, including regulator comments and resolution; (2) proposed designs for engineered barriers such as engineered covers and liners; (3) potential consolidation of contamination into disposal site CS-010; and (4) the potential for use of the CDPH license exemption process similar to that being developed for the HPS site.

5.0 Observations about Implementing NRC's Annual Site Visit

The staff's approach for the FY 2009 annual site visits was effective for a number of reasons. First, separate meetings with each of the parties involved with the remediation and with both sites resulted in a good collective sense of what the key issues and priorities are at both sites. Separate meetings with each group resulted in meetings with fewer people, more informal communication, and a more effective understanding of each group's activities and issues. This approach also provided an opportunity for the staff to compare the approaches being taken at both sites for similar issues as well as to compare the views of each group about each site. Annual site visits appear to be the right frequency for the NRC to remain informed of the progress at each site. There has been much progress at both sites since last years' site visits, and some major revisions have been made to the remedies and the State/DPH process for license exemption. Finally, the annual site visits were an efficient and effective way for all parties to interact to keep the NRC staff informed. The information obtained about key issues, documents, and activities should help the staff focus its activities for the remainder of the year.

MILITARY REMEDIATION MONITORING PLAN FOR IMPLEMENTING THE U.S. NUCLEAR REGULATORY COMMISSION'S LIMITED INVOLVEMENT APPROACH TO STAY INFORMED ABOUT THE MILITARY'S REMEDIATION OF THE HUNTERS POINT AND MCCLELLAN SITES

Purpose of the Military Remediation Monitoring Plan

The Military Remediation Monitoring Plan describes a program for implementing the U.S. Nuclear Regulatory Commission's (NRC's) Limited Involvement Approach to Stay Informed about the military's ongoing remediation of the Hunters Point Shipyard (HPS) site and the former McClellan Air Force Base site (referred to as the McClellan site) under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and U.S. Environmental Protection Agency (EPA) oversight. The purpose of this Monitoring Plan is to focus NRC's activities by identifying the objectives, approach, general activities, products, and schedules. Specific plans are also given for the Fiscal Year (FY) 2009 and FY 2010 activities at the HPS and McClellan sites.

Background

In response to a request from the Navy, the NRC staff evaluated its jurisdiction and options for involvement with the ongoing Navy remediation of radioactive materials at the HPS site. The Commission paper, SECY-08-0077, gives the staff's evaluations and recommendations to the Commission. The Commission directed the staff in a Staff Requirement Memorandum, SRM-SECY-08-0077, to take a Limited Involvement Approach to Stay Informed and rely on the ongoing CERCLA process and EPA oversight. Additional background on this approach is described the August 6, 2009, *Federal Register* notice (74FR39348) (Enclosure 3).

Objectives of NRC's Limited Involvement Approach to Stay Informed

The staff has the following two objectives:

- Stay informed about the military's ongoing remediation activities at Hunters Point site and the McClellan site.
- Determine if the staff should continue to rely on the approach the Commission approved.

Approach

The staff plans on taking the following general approach:

- Conduct an annual site visit and stakeholder meetings to obtain the current status, key activities, and key issues from principle parties involved with the remediation. These meetings would inform the staff and help identify the staff's annual focus (see below).
- Conduct quarterly and periodic telephone calls to stay informed about activities, check availability of documents, and follow-up on action items from site visits.

- Focus the staff's limited involvement by selecting topics. Consider:
 - Topics most important to protection
 - Activities that are either ongoing or being planned for the next year
 - Key issues raised by EPA, State, or local governments formally involved with the remediation process and how the Navy or Air Force are resolving these issues
 - Examples of EPA's oversight activities and products
- Examples of annual topics
 - Institutional control plans and documents
 - Engineered barrier designs
 - Groundwater monitoring plans
 - Dose modeling results
 - Final status survey and confirmatory survey reports
 - Example documents that illustrate each phase of the CERCLA process (e.g., Proposed Plans, Record of Decisions, Five-Year Review Reports)
 - EPA comments on a draft Record of Decision
- Develop site-specific monitoring plans based on site visits
 - Monitoring Plans for FY 2009-FY 2010 are given below for the HPS site and the McClellan site
 - The activities and selected topics would be addressed by the staff to the extent that resources are available and depending on the availability of documents.
- Document NRC staff activities and observations in the Annual Report on NRC's Involvement with Military Remediation for the program and with sections for each site.

General Activities and Schedule for Typical Annual Cycle

The staff's typical annual cycle consists of the following seven general activities and associated schedules:

- December-January: prepare for annual site visits
- February-March: Conduct annual site visits and stakeholder meetings
- April-May: Prepare site visit trip notes and update Monitoring Plan
- January-September: Review selected documents
- September: Prepare summary input for Annual Status of the Decommissioning Program
- October-November: Prepare Annual Report
- Conduct quarterly and periodic telephone calls to obtain current status, answer questions, and plan site visits

NRC Products

The following products will be prepared:

- Formal report to NRC management and staff that is publically available
 - Annual Military Report
 - Summary of NRC staff annual activities at each site
 - Observations on military remediation activities; EPA oversight; State and local government oversight
 - Conclusions regarding NRC's continued reliance on the approach the Commission approved
 - Enclose the Annual Monitoring Plan
- Informal, internal documents
 - Meeting agendas and questions as appropriate
 - Notes from site visits and stakeholder meetings
 - Document review summaries
 - EDO Daily Report item for each site visit and annual report

Document Availability

- All documents received from the military would be documents that the military has already made publically available. As a result, NRC will not place the documents in the docket files. However, the transmittal letter from the military will be placed in the docket file as a record of what documents NRC has received. The transmittal letter will include where the military has made the document publically available. All NRC formal reports will also be placed in the docket files for the appropriate site.
- The following docket files are established:
 - HPS site
 - McClellan site
- If site related information is provided to NRC using email, the email and attached information will be an agency record and also placed in the docket file for the appropriate site. Planning and coordination emails would not be placed in the docket file.

Specific Monitoring Plan for the HPS Site

This Monitoring Plan for the HPS site gives the staff's selection of activities that a planned for FY 2009 and FY 2010 within the limits of staff resources and the availability of Navy documents.

- General focus
 - Establish document access
 - Review key CERCLA process and documents
 - Review key issues related to restricted areas Parcel B IR 7/18 and Parcel E-2
 - Review EPA oversight and State/City activities and documents

- Site visit follow up actions
 - City/State DPH/Navy clarify content of license exemption request for IR 7/18 restricted area
 - Navy provide NRC with list of key documents
 - NRC request key documents and establish electronic access
- Navy remediation review topics
 - Parcel B
 - IR 7/18 restricted area: license exemption process and content, institutional control implementation documents, cover design concepts, monitoring plans (as described in Record of Decision)
 - Proposed Plan example
 - Record of Decision including comment resolution example
 - Five-Year Review Report example
 - Parcel E-2 Landfill
 - Feasibility Study example, including engineered barrier design concepts
 - Parcel D-2
 - Completion Report example
 - Final Status Survey Report example
- EPA oversight review topics
 - Approval of Parcel B ROD
 - Review/approval of Parcel D-2 Completion Report and Final Status Survey Report
- State involvement topics
 - Approval of Parcel B ROD
 - Review/approval of Parcel D-2 Completion Report and Final Status Survey Report
- City of San Francisco topics
 - Content of Request for License Exemption for IR 7/18
 - Draft Risk Management Plan for IR 7/18
- General topics
 - Federal Facilities Agreement annual schedule update

Specific Monitoring Plan for the McClellan Site

This Monitoring Plan for the McClellan site gives the staff's selection of activities that are planned for FY 2009 and FY 2010 within the limits of staff resources and the availability of Air Force documents.

- General focus
 - Establish document access
 - Review key CERCLA process and documents
 - Review key issues related to restricted areas CS-10 and CS-24
 - Review EPA oversight and State/County activities and documents

- Site visit followup actions
 - Air Force clarify if Part 61 is an ARAR
 - Air Force clarify if CS-24 would be consolidated into CS-10
 - Air Force identify key documents for NRC
 - NRC request key documents and establish electronic access
- Air Force remediation review topics
 - Privitization 1: 600 acre parcel
 - Final Status Survey Reports for radium remediation areas
 - Finding of Suitability for Early Transfer (FOSET)
 - Privitization 3: Strategic Sites/Burials
 - Proposed Plan
 - Draft Record of Decision
 - Potential for strontium-90, depleted uranium, and other licensable radiological contamination based on lessons learned from NRC's site visit to the Navy's Alameda site
- EPA oversight review topics
 - Comments on transfer documents for Privitization 1 FOSET
 - Comments on the draft Record of Decision for the Strategic Sites
- State involvement topics
 - Comments on transfer documents for Privitization 1
 - Comments on the draft Record of Decision for the Strategic Sites

CHRONOLOGY OF KEY EVENTS AND RELATED KEY DOCUMENTS

FY 2008

- October 16-17, 2007 NRC initial site visit to the Hunters Point Shipyard site and stakeholder meetings
- May 30, 2008 Commission paper, SECY-08-0077, on NRC's jurisdiction and involvement with the Hunters Point Shipyard site (<http://www.nrc.gov/reading-rm/doc-collections/commission/secys/2008/secy2008-0077/2008-0077scy.pdf>)
- June 26, 2008 Commission decision, SRM-SECY-08-0077, regarding NRC's involvement with Hunters Point Shipyard site (<http://www.nrc.gov/reading-rm/doc-collections/commission/srm/2008/2008-0077srm.pdf>).

FY 2009

- January 16, 2009 NRC letters to EPA Region 9 (ML083430426) and the Navy (ML083440652)
- March 10, 2009 NRC first annual site visit to the Hunters Point Shipyard site and stakeholder meetings
- March 12, 2009 NRC initial site visit to the McClellan site and stakeholder meetings
- April 1, 2009 Navy's letter agreeing with NRC's limited involvement approach (ML091120805)
- May 6, 2009 EPA Region 9 letter agreeing with NRC's limited involvement approach (ML091460102)
- August 6, 2009 NRC *Federal Register* notice describing NRC's limited involvement approach (74FR39348) (see Attachment 3)

FY 2010

- November 2009 Completion of the staff review and decision to take the Limited Involvement Approach at the McClellan site (ML093170165)
- March 1-4, 2010 NRC second annual site visit to the Hunters Point Shipyard site, McClellan site, and stakeholder meetings
- April 2010 NRC's first Annual Military Remediation Monitoring Report for FY 2009 (ML100620103)

NOTE: The ML numbers above are accession numbers where these documents are available from the NRC's Agencywide Document Access and Management System.