

Docket No. 040-08177
License No. STB-1168

Evans, Robert

From: Marks, Andrew J Mr CIV USA AMC [andrew.j.marks@us.army.mil]
Sent: Thursday, May 13, 2010 2:28 PM
To: Evans, Robert
Subject: FW: CCAD Building 132 Wipe Test Analysis Results (UNCLASSIFIED)
Attachments: Model_29.pdf; Sample Memo.doc

Control No. 472387

Classification: UNCLASSIFIED
Caveats: FOUO

Mr. Evans, here are the swipe sample results for building 132.

v/r,

AJ
ANDREW J. MARKS, GS-11
CCAD Industrial Hygienist
Safety & Occupational Health Div., L2000
308 Crecy St., MS 23
Corpus Christi, Tx 78419
361-961-6921
DSN: 861-6921
FAX: 361-961-6486

-----Original Message-----

From: Hart, Joe Mr CIV USA AMC
Sent: Thursday, May 13, 2010 2:11 PM
To: Marks, Andrew J Mr CIV USA AMC
Subject: CCAD Building 132 Wipe Test Analysis Results

AJ,
Please find attached the sample results for the Building 132 survey.
I've also attached the TMDE calibration report for the counting
equipment, which includes the counting efficiency for alpha and
beta/gamma. If you need any additional information please let me know.

Thanks,

Joe Hart
HQ, JMC
ATTN: Safety/Rad Waste Directorate
AMSJM-SF
1 Rock Island Arsenal
Rock Island, IL 61299-6000
Comm (309)782-1124, DSN 793-1124
FAX (309) 782-2289, DSN 793-2289

Classification: UNCLASSIFIED
Caveats: FOUO



DEPARTMENT OF THE ARMY
ROCK ISLAND ARSENAL CONSOLIDATION FACILITY
AMSTA-RI-SEM BUILDING 170, BECK LANE
ROCK ISLAND, IL 61299-5000

AMSTA-RI-SEM

5-13-2009

MEMORANDUM FOR JMC Project Manager, Army Joint Munitions Command
Safety/Rad Waste Directorate, AMSJM-SF, RIA.

SUBJECT: CCAD Confirmation Survey Sample Results

AUTHORIZATION #: N/A

RECEIVED ON: 05/13/09

JMC PROJECT CODE: USA 2008-030

Used Ludlum Model 2929 Dual-Channel Scaler with Model 43-10-1
Alpha-Beta Sample Counter (See attached Report of Calibration)

Sample No.	Description	ALPHA	BETA- GAMMA	Counting Time
1.	Bldg132RAD10109001	1	69	1 Min
2.	Bldg132RAD10109002	3	84	1 Min
3.	Bldg132RAD10109003	0	65	1 Min
4.	Bldg132RAD10109004	2	61	1 Min
5.	Bldg132RAD10109005	2	80	1 Min
6.	Bldg132RAD10109006	2	75	1 Min
7.	Bldg132RAD10109007	2	82	1 Min
8.	Bldg132RAD10109008	3	85	1 Min
9.	Bldg132RAD10109009	2	82	1 Min
10.	Bldg132RAD10109010	1	87	1 Min
11.	Bldg132RAD10109011	1	80	1 Min
12.	Bldg132RAD10109012	0	71	1 Min
13.	Bldg132RAD10109013	1	74	1 Min
14.	Bldg132RAD10109014	2	91	1 Min
15.	Bldg132RAD10109015	1	75	1 Min
16.	Bldg132RAD10109016	3	71	1 Min
17.	Bldg132RAD10109017	2	67	1 Min
18.	Bldg132RAD10109018	1	75	1 Min
19.	Bldg132RAD10109019	1	74	1 Min
20.	Bldg132RAD10109020	2	80	1 Min
21.	Bldg132RAD10109021	1	78	1 Min
22.	Bldg132RAD10109022	2	75	1 Min
23.	Bldg132RAD10109023	3	80	1 Min
24.	Bldg132RAD10109024	3	95	1 Min
25.	Bldg132RAD10109025	0	76	1 Min
N/A	10 min background count	6	733	10 Min

Analyst:

E. Joseph Hart
Health Physicist
HQ, JMC
ATTN: Safety/Rad Waste Directorate
AMSJM-SF
1 Rock Island Arsenal
Rock Island, IL 61299-6000
Comm (309) 782-1124, DSN 793-1124
FAX (309) 782-2289, DSN 793-2289



DEPARTMENT OF THE ARMY
UNITED STATES ARMY TMDE SUPPORT CENTER
RICHMOND KENTUCKY 40475-5103

REPLY TO
ATTENTION OF AMSAM-TMD-B-L

U.S. Army Test, Measurement, and Diagnostic Equipment Activity
U.S. Army Secondary Standards Laboratories
Richmond Radiation Laboratory
Building 52 Richmond, KY. 40475-5103

REPORT OF CALIBRATION

Model: 2929 RADIAC Meter

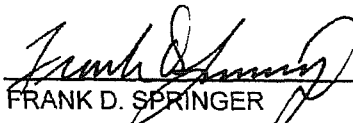
Serial No.: 91243

OUC: W0DAA9

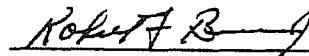
This instrument was calibrated in accordance with Calibration Procedure for RADIAC Set Ludlum 2929 using Ludlum Pulser Model 500 SN# 198075, Isotope source set 188318 SN# 005. This calibration is traceable to the National Institute of Standards and Technology. Supporting documentation relative to traceability is on file and is available for examination upon request. Calibration accuracy is +/- 10 % Per User Manual. Calibration interval for this instrument is 360 days.

This report shall not be reproduced, except in full, without written permission of the Secondary Radiation Standards Laboratory.

Calibrated By:


FRANK D. SPRINGER
RSO, TMDE RICHMOND
DSN 745-6724/6722 /Comm(859)625-6724/6722

Reviewed By:


ROBERT G. BEESE JR.
CHIEF, TMDE RICHMOND
DSN 745-6724/6722

Calibration report number: 91243

Cal Date: 16-Jul-09

Due Date: 11-Jul-10

Page 1 of 3

Survey Instrument Calibration Report

SUIC: W4L6XR

OUIC: W0DAA9

PUIC: W4L6XN

Meter manufacturer: LUDLUM

Model: 2929

Serial No.: 91243

Probe model: 43-10-1

Serial No.: PR 086195

Detector type: NaI(Tl)

Calibration source model: 188318

Serial No.: 005

Isotope/Energy: CS-137/AM-2

Pulser model: 500

Serial No.: 198075

Chk source indicates: 0

Battery Check: Yes

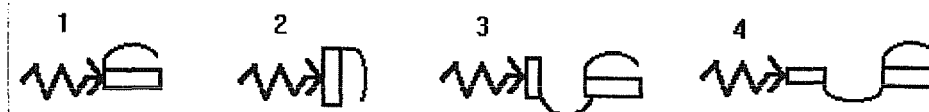
Leakage test: No

Flush against detector: No

Distance: 0

Calibration geometry:

Chk source geometry: 1



Meter Range	Applied exposure rate (CPM)	Initial Meter Reading	Adjust? (Y/N)	Final Meter Reading (CPM)	Correction Factor	Avg. Corr Factor
Range1:	800 <i>k</i>			797.6 <i>k</i>	1.00	
	200 <i>k</i>			199.8 <i>k</i>	1.00	1.00
Range2:	80 <i>k</i>			80.2 <i>k</i>	1.00	
	20 <i>k</i>			19.23 <i>k</i>	1.04	1.02
Range3:	8 <i>k</i>			7.77 <i>k</i>	1.03	
	2 <i>k</i>			1.994 <i>k</i>	1.00	1.02
Range4:	800			798.6	1.00	
	200			199.6	1.00	1.00
Range5:	80			80.02	1.00	
	20			19.58	1.02	1.01

Remarks:

ALL Readings col'D on Ludlum Pulser model 50 SN# 198075 Set
 This calibration is traceable to the National Institute of Standards and Technology. *To 15 mV pulse Height*
for Beta/Gamma Readings

Calibration report number: 91243

Date: 16-Jul-09

Page 2 of 3

Survey Instrument Calibration Report

SUIC: W4L6XR

OUIIC: W0DAA9

PUIC: W4L6XN

Meter manufacturer: LUDLUM

Model: 2929

Serial No.: 91243

Probe model: 43-10-1

Serial No.: PR 086195

Detector type: NaI(Tl)

Calibration source model: 188318

Serial No.: 005

Isotope/Energy: CS137/AM24

Pulser model: 500

Serial No.: 198075

Chk source indicates: 0

Battery Check: Yes

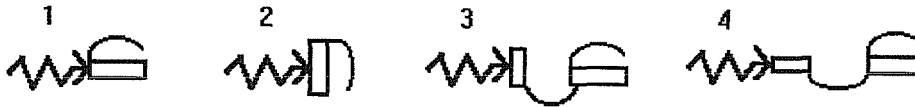
Leakage test: No

Flush against detector: No

Distance: 0

Calibration geometry:

Chk source geometry: 1



Meter Range	Applied exposure rate (CPM)	Initial Meter Reading	Adjust? (Y/N)	Final Meter Reading (CPM)	Correction Factor	Avg. Corr Factor
* Range1: ALPHA	81114			64182	1.26	79.1
* Range2: Beta/Gamma	55512			26738	2.08	48.2
Range3:						
Range4:						
Range5:						

Remarks:

This calibration is traceable to the National Institute of Standards and Technology.

Calibration report number: 91243

Date: 16-Jul-09

Page 3 of 3

Evans, Robert

From: Marks, Andrew J Mr CIV USA AMC [andrew.j.marks@us.army.mil]
Sent: Thursday, April 29, 2010 7:17 AM
To: Evans, Robert
Cc: Browder, Rachel; Whitten, Jack
Subject: RE: Questions about Corpus Christi Army Depot final status survey report (UNCLASSIFIED)
Attachments: Response to NRC Comments on the FSS.doc; signed NRC form 314.pdf

Classification: UNCLASSIFIED
Caveats: FOUO

Mr. Evans,

Attached are two (2) files in response to your questions below, 1) is a signed NRC Form 314 and 2) is a word document in table format addressing each of your questions. I hope this is sufficient and if it is not, please let me know what additional information you may need.

There were two areas you did not seem to have any further questions/concerns with, what we call the Mag-Thor room and a welding booth in building 8, can I take that means I can release these areas for production use?

v/r,

ANDREW J. MARKS, GS-11
CCAD Industrial Hygienist
Safety & Occupational Health Div., L2000
308 Crecy St., MS 23
Corpus Christi, Tx 78419
361-961-6921
DSN: 861-6921
FAX: 361-961-6486

-----Original Message-----

From: Evans, Robert [mailto:Robert.Evans@nrc.gov]
Sent: Friday, February 05, 2010 2:30 PM
To: Marks, Andrew J Mr CIV USA AMC
Cc: Browder, Rachel; Whitten, Jack
Subject: Questions about Corpus Christi Army Depot final status survey report

Andrew-

Provided below are my questions about the termination request letter dated August 12, 2009, and the final status survey report that was attached to the letter. According to Rachel Browder, your response has to be in writing, so you can respond by email, but we need you to also send a response as a signed letter. Next week, I'll be in the office on Monday morning, and Thursday afternoon, if you have any questions.

Request for Additional Information

Amendment 25 to the license dated 11/07/08 approved the radiological survey plan, with one exception. The NRC license reviewer rejected Section 6.5 because it was based on an unapproved ANSI/HPS standard. (The values for thorium were acceptable, but the NRC couldn't accept that particular reference). The docket file records suggest that CCAD didn't request equipment release criteria. However, the CCAD radiological survey report and final status survey evaluation, page D-3, in the table footnotes, briefly discusses equipment releases as being beyond the scope of the survey report. What criteria did CCAD use to release the equipment, what was the criteria based on (e.g., such as Regulatory Guide 1.86), and what types of equipment were released? It may be beneficial to include the equipment surveys as a supplement to the radiological survey report and final status survey evaluation.

The August 12, 2009, letter included an NRC Form 314 that was not signed. Could you sign and resubmit the form since it's a certification signature?

In the electronic submittal for the August 12, 2009, letter, there was a 2-page email immediately behind the Form 314. What was the significance of the email? Should we remove it from the file?

Three intermodal survey reports were attached to the August 12, 2009, letter. One minor question...there were no general area dose rate measurements for the 3 intermodals that were shipped to the disposal site during June-July 2009. Although you were not the shipper, are you aware of any reason why the dose rates were not recorded?

Page 7 of the radiological survey report and final status survey evaluation discusses a hot spot (30,000-40,000 cpm). What was the conclusion of this finding, if any, since it appears that the source of the radioactivity was not thorium? Was the soil disposed or left in place?

Minor typo, Page 11 of the radiological survey report: Th-227 for CCAD-023 was listed as 0.0 but there was no analysis conducted on this radionuclide. See Appendix A, last entry.

Table 3.4, page 15, lists the MDC values. However, the values for some, but not all, meters are different from the values provided in Appendix B, pages B-3, B-4. Why the discrepancy?

Page 32 states that "the west wall has been removed since the scoping survey." What happened to the wall? Did the scoping survey identify any contamination, or was the wall found to be contamination-free?

Page 37, top paragraph appears to have a typo...the paragraph is talking about Bldg. 332, but a statement about Building 8 appears at the end of the paragraph.

What is the current status of Building 132? The CCAD radiological survey report and final status survey evaluation, page 40, states that "the structure will be subjected to confirmatory resurvey by the RSO concurrent with license termination." During the April 2009 NRC inspection, a number of radioactive materials were still in storage in the building. Are the materials still there, or have they been removed? Did you perform a final survey of this area?

Finally, I had a post-it note reminder to ensure that the lab was surveyed. My recollection is fuzzy, but I recall that CCAD used a room, in the office area, as a lab and storage of sources. Does this sound familiar to you? Did you verify that the room was free of radioactivity?

Classification: UNCLASSIFIED
Caveats: FOUO

Response to NRC Comments Corpus Christi Army Depot Final Status Survey Report

#	Comment	Response
1	<p>Amendment 25 to the license dated 11/07/08 approved the radiological survey plan, with one exception. The NRC license reviewer rejected Section 6.5 because it was based on an unapproved ANSI/HPS standard.</p> <p>(The values for thorium were acceptable, but the NRC couldn't accept that particular reference). The docket file records suggest that CCAD didn't request equipment release criteria. However, the CCAD radiological survey report and final status survey evaluation, page D-3, in the table footnotes, briefly discusses equipment releases as being beyond the scope of the survey report. What criteria did CCAD use to release the equipment, what was the criteria based on (e.g., such as Regulatory Guide 1.86), and what types of equipment were released? It may be beneficial to include the equipment surveys as a supplement to the radiological survey report and final status survey evaluation.</p>	<p>Per Section 6.5 of the Corpus Christi Army Depot Radiological Survey Plan: "Contamination Criteria for Equipment." Contamination levels for equipment to be released without radiological restrictions must not exceed those specified in NRC Source Material License STB-1168. Contamination criteria stated in Table 5-2, Department of the Army Pamphlet 385-24 apply. The stated limits for thorium-232 are 600 and 60 dpm/100 cm² for total and removable activity, respectively. These limits were derived in ANSI N13.12-1999 and "were protective of 10μSv/y (1.0 mrem/y)" (ANSI 1999). The Army Radiation Safety Program (385-24) was established by the Dept. of Army for radiation safety guidance and direction to implement the safety requirements of AR 385-10 (Army Safety Program) and other federal regulations and laws.</p> <p>Types of Equipment released: Magnesium Thorium Machines (drill press, lathes, cutting, etc.); Haas Mill, Bead Blast Booths, tool cabinets, bins, hand tools, machined metal pieces, ductwork, and floor tiles.</p>
2	<p>The August 12, 2009, letter included an NRC Form 314 that was not signed. Could you sign and resubmit the form since it's a certification signature?</p>	<p>Sorry, accidental oversight. See attached signed copy.</p>

3	In the electronic submittal for the August 12, 2009, letter, there was a 2-page email immediately behind the Form 314. What was the significance of the email? Should we remove it from the file?	The 2-page email was informational data associated with item # 4, Three intermodal survey reports.
4	Three intermodal survey reports were attached to the August 12, 2009, letter. One minor question...there were no general area dose rate measurements for the 3 intermodals that were shipped to the disposal site during June-July 2009. Although you were not the shipper, are you aware of any reason why the dose rates were not recorded?	The dose rates were recorded in the field note book and that information was provided to the shipper. Dose rates were recorded continuously around the roll off boxes near Building 132 and no anomalous (greater than background) dose rates were measured in and around the roll offs.
5	Page 7 of the radiological survey report and final status survey evaluation discusses a hot spot (30,000-40,000 cpm). What was the conclusion of this finding, if any, since it appears that the source of the radioactivity was not thorium? Was the soil disposed or left in place?	The hotspot was measured at the surface of the concrete and no transferable contamination was found to present. Removal of the surface contamination was attempted by using an impact small amount of concrete was chipped using a impact driver and was disposed of as rad waste. The final "decontamination" of the hotspot had reduced the contamination level down to 630 cpm or 774 dpm/100cm2
6	Minor typo, Page 11 of the radiological survey report: Th-227 for CCAD-023 was listed as 0.0 but there was no analysis conducted on this radionuclide. See Appendix A, last entry.	This is a typographical error and will be changed in the report.
7	Table 3.4, page 15, lists the MDC values. However, the values for some, but not all, meters are different from the values provided in Appendix B, pages B-3, B-4. Why the discrepancy?	The discrepancy in the difference between the actual instrument response and background response data vs the predicted (estimated) instrument and background responses written in the Radiological Survey Plan prior to initiating the field work.
8	Page 32 states that "the west wall has been removed since the scoping survey." What happened to the wall? Did the scoping survey identify any contamination, or was the wall found to be contamination-free?	The west wall was removed after the scoping survey. The wall was found to be contamination-free.

9	Page 37, top paragraph appears to have a typo...the paragraph is talking about Bldg. 332, but a statement about Building 8 appears at the end of the paragraph.	This is a typographical error the sentence will be changed to read: <i>As such WRS tests were not performed for all SUs in Building 339.</i>
10	What is the current status of Building 132? The CCAD radiological survey report and final status survey evaluation, page 40, states that "the structure will be subjected to confirmatory resurvey by the RSO concurrent with license termination." During the April 2009 NRC inspection, a number of radioactive materials were still in storage in the building. Are the materials still there, or have they been removed? Did you perform a final survey of this area?	A confirmatory survey was conducted on 19 Apr 10 by the CCAD RSO, Andrew Marks. 25 swipe samples were taken and sent to AMSJM-SF, 1 Rock Island Arsenal for analysis. Surface readings ranged from 5 to 18 microR/hr using a Ludlum Model 19 instrument. Background readings were 6-8 microR/hr. All materials, especially three T-55 engines, have been turned into DLA for disposal through the T55 Engine Division Cargo Directorate, POC: Judy Porter, Comm 256-313-3393. Only LLRW items such as T-3 Exits signs remain.
11	Finally, I had a post-it note reminder to ensure that the lab was surveyed. My recollection is fuzzy, but I recall that CCAD used a room, in the office area, as a lab and storage of sources. Does this sound familiar to you? Did you verify that the room was free of radioactivity?	Yes the radiological calibration and source check RSO laboratory, Building 1727 Room B101 was surveyed and found to be less than release criteria.

NRC FORM 314

(4-2008)
10 CFR 30.38(j)(1); 40.42(j)(1);
70.38(j)(1); and 72.54(k)(5)(1)(i)

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0028

EXPIRES: 08/31/2010

CERTIFICATE OF DISPOSITION OF MATERIALS

Estimated burden per response to comply with this mandatory collection request: 30 minutes. This submittal is used by NRC as part of the basis for its determination that the facility is released for unrestricted use. Send comments regarding burden estimate to the Records and FOIA/Privacy Services Branch (T-5 F52), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by Internet e-mail to infocollect@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOD-10202, (3150-0028), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

LICENSEE NAME AND ADDRESS

COMMANDER, Corpus Christi Army Depot
ATTN: AMSAM-DS-SE
308 Crecy Street, Stop 23, Corpus Christi, Texas 78419-5260

LICENSE NUMBER

STB-1168

DOCKET NUMBER

040-08177

LICENSE EXPIRATION DATE

02/28/2011

- ☐ This license has expired. ☒ **A. LICENSE STATUS (Check the appropriate box)**
This license has not yet expired; please terminate it.

B. DISPOSAL OF RADIOACTIVE MATERIAL

(Check the appropriate boxes and complete as necessary. If additional space is needed, provide attachments)

The licensee, or any individual executing this certificate on behalf of the licensee, certifies that:

- ☐ 1. No radioactive materials have ever been procured or possessed by the licensee under this license.
- ☒ 2. All activities authorized by this license have ceased, and all radioactive materials procured and/or possessed by the licensee under this license number cited above have been disposed of in the following manner:
- ☐ a. Transfer of radioactive materials to the licensee listed below:
- ☒ b. Disposal of radioactive materials:
- ☐ 1. Directly by the licensee:
- ☐ 2. By licensed disposal site:
- ☒ 3. By waste contractor:
Environmental Dimensions, Inc.
710 S. Illinois Avenue, Suite F-105; Oak Ridge, TN 37830-9107
- ☒ c. All radioactive materials have been removed such that any remaining residual radioactivity is within the limits of 10 CFR Part 20, Subpart E, and is ALARA.

C. SURVEYS PERFORMED AND REPORTED

- ☐ 1. A radiation survey was conducted by the licensee. The survey confirms:
- ☐ a. the absence of licensed radioactive materials
- ☐ b. that any remaining residual radioactivity is within the limits of 10 CFR 20, Subpart E, and is ALARA.
- ☒ 2. A copy of the radiation survey results:
- ☒ a. is attached; or ☐ b. is not attached (Provide explanation); or ☐ c. was forwarded to NRC on: _____ Date _____
- ☐ 3. A radiation survey is not required as only sealed sources were ever possessed under this license, and
- ☐ a. The results of the latest leak test are attached; and/or ☐ b. No leaking sources have ever been identified.

The person to be contacted regarding the information provided on this form:

NAME	TITLE	TELEPHONE (Include Area Code)	E-MAIL ADDRESS
Andrew J. Marks	Radiation Safety Officer (RSO)	(361) 961-6921	

Mail all future correspondence regarding this license to:

Corpus Christi Army Depot, AMSAM-CC-BC-H, 308 Crecy St., MS 23, Corpus Christi, TX 78419

C. CERTIFYING OFFICIAL

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT

PRINTED NAME AND TITLE

Andrew J. Marks, Industrial Hygienist/RSO

SIGNATURE



DATE

April 27, 2010

WARNING: FALSE STATEMENTS IN THIS CERTIFICATE MAY BE SUBJECT TO CIVIL AND/OR CRIMINAL PENALTIES. NRC REGULATIONS REQUIRE THAT SUBMISSIONS TO THE NRC BE COMPLETE AND ACCURATE IN ALL MATERIAL RESPECT. 18 U.S.C. SECTION 1001 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

Evans, Robert

From: Eduardo.Perez@asab.afcent.af.mil
Sent: Friday, December 18, 2009 12:32 PM
To: andrew.j.marks@us.army.mil; Evans, Robert
Subject: RE: Please provide response

AJ/ROB,

QUESTION: What happened to the radioactive material previously located in Building 252, including storage drums? Are the records for the disposal of this material in the CCAD response email dated 8/17/09?

RESPONSE: DLA took custody and made arrangements for the transport/disposal of said engines. They were merely in BLDG 258 for the draining of all fluids, e.g. hydraulic, oils. Once drained, the engines were re-containerized and shipped out by DLA. These engines never made their way into BLDG 8. They were obsolete engines.

QUESTION: Did the Navy take possession of the Sr-90 IBIS sources previously stored in Bldg. 252?

RESPONSE: Yes, all IBIS units were containerized and shipped out by the NAVY via FEDEX.

R/
Eduardo Perez
DSN 318.442.0634

-----Original Message-----

From: Marks, Andrew J Mr CIV USA AMC [mailto:andrew.j.marks@us.army.mil]

Sent: Friday, December 18, 2009 8:25 PM
To: Perez, Eduardo ENS USN NAVCENT LSA/NMCB 22
Subject: FW: Please provide response

Eduardo,

I hate to do this to you, but can you help me with some CCAD RSO stuff?

Could you look at Mr. Evans questions below and help me fill in the blanks, especially concerning the engines? I know about the IBIS and that is not an issue, but the other stuff I'm not to sure about.

AJ

-----Original Message-----

From: Evans, Robert [mailto:Robert.Evans@nrc.gov]
Sent: Thursday, December 10, 2009 5:24 PM
To: Marks, Andrew J Mr CIV USA AMC
Cc: Torres, RobertoJ; Browder, Rachel; Whitten, Jack
Subject: RE: Please provide response

Dear Mr. Marks

Please accept my apologies for the delay in your project. A number of pressing issues have come up during the last few months that forced us to put this project on the "back burner". We plan to complete this project during January, if all goes well.

I have not looked at the docket file records in the last few weeks, but I had several questions that I don't recall receiving answers from Eduardo Perez:

CCAD has a number (hundreds) of spare/obsolete engines onsite, in and around Building 258. Which agency has responsibility for the radioactive mag-thor parts? Is it the Army or Defense Logistics Agency? What will the disassembly of the engines entail? Will there be any drilling or other work on the radioactive parts? What will happen to these parts (reuse, disposal)? If the DLA is responsible for the engines, who is the RSO for the DLA?

What happened to the radioactive material previously located in Building 252, including storage drums? Are the records for the disposal of this material in the CCAD response email dated 8/17/09?

Did the Navy take possession of the Sr-90 IBIS sources previously stored in Bldg. 252?

Thanks for your time, and I look forward to working with you in the near future

Rob Evans

Senior Health Physicist

Region IV

From: Torres, RobertoJ
Sent: Thursday, December 10, 2009 7:24 AM
To: Evans, Robert; Browder, Rachel
Subject: Please provide response

Rob or Rachel;

Please provide Mr. Andrew Marks, RSO, with a status of the Corpus Christi license termination request. Please email him today even if the response is that we have not started the review yet. He has called several times asking for a status of the license termination for STB-1168. His email address is andrew.j.marks@us.army.mil. Please cc Jack and me on the outgoing email. Thank you.

Evans, Robert

From: Marks, Andrew J Mr CIV USA AMC [andrew.j.marks@us.army.mil]
Sent: Friday, December 11, 2009 9:19 AM
To: Evans, Robert
Cc: Torres, RobertoJ; Browder, Rachel; Whitten, Jack
Subject: RE: Please provide response

Thanks Mr. Evans for responding,

I was starting think I was intentionally being ignored and was wondering what I did wrong. :) I understand the "pressing issues" situation. I will try to answer your questions as best I can, but I will be forwarding this email to Eduardo Perez for more specific answers to some of your questions.

1. Obsolete engines: My understanding there was about 150 engines located in building 258, Packing & Crating, which is under the control of Defense Logistics Agency (DLA) and 3 engines in building 132, Radiation Storage building. According to Department of Defense (DOD) practices, the owning agency is ultimately responsible for all items from "cradle-to-grave". Thus, until the obsolete engines reach their final destination, CCAD would be responsible for the mag-thor parts. My understanding in a verbal conversation with Eduardo Perez that the 150 engines were shipped out in May 09 before he left for his deployment; however, I cannot find any documentation to support that. There are still 3 engines in our Radiation Storage area, building 132, that I need to process for disposal. I am not sure what happens to these items once DLA ships them out. The head Alternate RSO for DLA is David Collins and his phone number is (717) 770-5623. I will check with DLA here and email Eduardo Perez to find specific answers to your question.

2. Radioactive material: I believe you meant building 132 and not 252.
Yes, these drums were shipped out for disposal. I will check to see if I included the shipping documents in email 8/17/09 and if not, I will send them to you next week in a separate email.

3. Sr-90 IBIS: Yes, the Navy came in May 09 and conducted some swipe tests, packaged the sources, monitored the packages and shipped them out. I have email traffic that I can forward to you if needed.

v/r,

Andrew J. Marks
CCAD Industrial Hygienist/RSO
L2000 Safety & Occupational Health Division Directorate, Security & Industrial Risk Management Corps
Christi Army Depot
308 Crecy Street, Mail Stop 23
Corpus Christi, Tx 78419
(361) 961-6921

-----Original Message-----

From: Evans, Robert [mailto:Robert.Evans@nrc.gov]
Sent: Thursday, December 10, 2009 5:24 PM
To: Marks, Andrew J Mr CIV USA AMC
Cc: Torres, RobertoJ; Browder, Rachel; Whitten, Jack
Subject: RE: Please provide response

Dear Mr. Marks

Please accept my apologies for the delay in your project. A number of pressing issues have come up during the last few months that forced us to put this project on the "back burner". We plan to complete this project during January, if all goes well.

I have not looked at the docket file records in the last few weeks, but I had several questions that I don't recall receiving answers from Eduardo Perez:

CCAD has a number (hundreds) of spare/obsolete engines onsite, in and around Building 258. Which agency has responsibility for the radioactive mag-thor parts? Is it the Army or Defense Logistics Agency? What will the disassembly of the engines entail? Will there be any drilling or other work on the radioactive parts? What will happen to these parts (reuse, disposal)? If the DLA is responsible for the engines, who is the RSO for the DLA?

What happened to the radioactive material previously located in Building 252, including storage drums? Are the records for the disposal of this material in the CCAD response email dated 8/17/09?

Did the Navy take possession of the Sr-90 IBIS sources previously stored in Bldg. 252?

Thanks for your time, and I look forward to working with you in the near future

Rob Evans

Senior Health Physicist

Region IV

From: Torres, RobertoJ
Sent: Thursday, December 10, 2009 7:24 AM
To: Evans, Robert; Browder, Rachel
Subject: Please provide response

Rob or Rachel;

Please provide Mr. Andrew Marks, RSO, with a status of the Corpus Christi license termination request. Please email him today even if the response is that we have not started the review yet. He has called several times

asking for a status of the license termination for STB-1168. His email address is andrew.j.marks@us.army.mil. Please cc Jack and me on the outgoing email. Thank you.

Marks, Andrew J Mr CIV USA AMC

From: Tim Lee [TLee@edi-nm.com]
Sent: Tuesday, August 11, 2009 2:00 PM
To: Marks, Andrew J Mr CIV USA AMC
Cc: Mike Marable
Subject: Impact informal waste approval & status

Hi AJ:

I hope all is well there at CCAD. It's probably too hot to even talk about. Below is the email we discussed. Sherry is with Impact and basically the waste was scheduled to go as of last Wednesday. I'm waiting for the cert of disposal. FYI - I just poked her to see if they're available yet and will get you copies asap. Thanks and take care, Tim

From: Sherry Fleming [mailto:sherry.fleming@impactservicesinc.com]
Sent: Wednesday, August 05, 2009 12:01 PM
To: Tim Lee
Subject: RE: reminder

Hey Tim!

The lathe is going this week. I'm not sure exactly which day, but it has already been scheduled with the landfill. The computer parts, etc. are shipping at Noon tomorrow to TOXCO. I'll get you a COD for both as soon as I can.

Sherry

From: Tim Lee [mailto:TLee@edi-nm.com]
Sent: Tuesday, July 28, 2009 12:27 PM
To: Sherry Fleming
Subject: RE: reminder

No problem. Thanks for the update.

From: Sherry Fleming [mailto:sherry.fleming@impactservicesinc.com]
Sent: Tuesday, July 28, 2009 11:27 AM
To: Tim Lee
Subject: RE: reminder
Importance: High

Tim -

I am so sorry for the delay. I've been working to get accurate answers for you all day.

Part of the lathe is still here. We have had an equipment malfunction problem for a couple of weeks now. We have had several contractors on site all yesterday and today working on getting it fixed. One guy is on his way from Knoxville right now with parts that are supposed to fix everything so that we will be back up this afternoon. I will make certain that the lathe project is first on the list to be finished, and if everything goes as it should, it will be out of here by the end of this week.

The purchase order has just been completed for our contractor to take the computer parts, etc. The only thing that is left is actually scheduling the shipment, which I will be doing within the hour. I will be scheduling it for this Thursday, and since they will be taking title and possession, I will ask them for the Certificate of Disposal upon receipt.

I am really sorry this has drug on and on. We have just had some unusual and unfortunate delays.

I'll keep you informed.

Thanks -

Sherry