TETRA TECH EC, INC.

September 20, 2010

Regional Administrator,
U.S. Nuclear Regulatory Commission, Region I
Attention: Director, Division of Nuclear Materials Safety
475 Allendale Rd.
King of Prussia, PA 19406-1415

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RECEIVED
REGION 1
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SUBJECT: TETRA TECH EC, INC.
NOTIFICATION OF LICENSE USE AT TEMPORARY JOBSITE
MATERIALS LICENSE NO. 29-31396-01
DOCKET NUMBER 03038199

Dear Director:

The purpose of this letter is to notify you of our intention to initiate activities at a temporary jobsite per Condition 18 of our U.S. Nuclear Regulatory Commission (NRC) license 29-31396-01.

The work will be conducted in Building 44 at the former Naval Air Station Alameda in California. The former Naval Air Station Alameda trailer site is located at:

Naval Air Station
451 W. Atlantic Avenue
Alameda, CA 94501

Tetra Tech has been contracted by the Department of the Navy to perform a radiological survey to ensure that no radiation contamination remains in Building 44. The potential radioisotopes of concern include Co-60, Cs-137, H-3, Pu-239, Ra-226, Th-232, U-235 and U-238. No significant radioactive contamination is expected. A total of less than 1 millicurie total for Ra-226 and U-238 is a realistic conservative estimate for total activity based on previous building uses.

Note than Tetra Tech has only been contracted to perform radiological surveys. Any radioactive contamination/materials will be identified and properly posted and controlled during the project. At the completion of the project, the Department of the Navy will resume control of the radioactive contamination/materials, as identified. The copy of the delineation of license responsibilities between Tetra Tech and the Department of the Navy required by Condition 13 is included as Attachment (1).

The expected start date for the project is October 13, 2010, with an anticipated completion date of January 31, 2011.

TWIN OAKS I, SUITE 309, 5700 LAKE WRIGHT DRIVE,
NORFOLK, VA 23502
TEL 757.461.3768 FAX 757.461.4148
WWW.TTECI.COM

573601
NMSS/RGN1 MATERIALS-002

Key onsite personnel include the Project Manager, Dick Dubiel, at (678)296-4813 and the Radiation Safety Officer Representative, Nathan Smith at (614)332-5838.

Should you have any questions concerning this activity, please contact me at (757)944-0921.

Sincerely,

Erik J. Abkemeier
Corporate Health Physics Manager
Tetra Tech EC, Inc.
Twin Oaks I, Suite 309
5700 Lake Wright Drive
Norfolk, VA 23505

TETRA TECH EC, INC.

MEMORANDUM OF UNDERSTANDING

Date: August 6, 2010

RE: TetraTech EC US NRC License Use at Navy Sites

Background

TetraTech EC, Incorporated (TtEC) performs radiological remediation and decontamination operations at a number of Navy owned sites, including the former Hunters Point Shipyard, San Francisco and the former Naval Air Station, Alameda. The intent of this MOU is to delineate roles and responsibilities regarding radiation safety for radioactive materials as required by license condition 13 of TtEC's U. S. Nuclear Regulatory Commission (NRC) License 29-31396-01.

Radiological operations involving licensed radioactive materials at the former Hunters Point Naval Shipyard were previously authorized by Atomic Energy Commission (AEC) licenses as appropriate for the time of operation. Radiological operations involving licensed radioactive materials at the former Naval Air Station, Alameda were previously authorized by AEC and NRC licenses or Naval Radioactive Materials Permits (NRMPs). All previous licenses and NRMPs have been terminated. Additionally, previous radiological operations at both sites involved the use of 91b materials, radioluminescent materials, technically enhanced naturally occurring radioactive materials (TENORM), and naturally occurring and accelerator-produced radioactive materials (NARM). Currently, the Navy is authorized use of NRC licensed radioactive materials through the Navy's NRC Master Materials License and is recognized as owner of the all radioactive materials at both sites. The Naval Sea Systems Command Detachment, Radiological Affairs Support Office (NAVSEADET RASO), as technical support center to the Naval Radiation Safety Committee, oversees radiological work performed by TtEC for the Navy.

Note that additional site specific Memoranda of Understanding govern NRC license activities, including radioactive disposal, among other NRC licensed contractors following the transfer of radioactive material from the Navy to the TtEC NRC license. This MOU defines only lines of responsibility between TtEC and the Navy.

General Use of Individual Licenses

The clear dividing line of organization reponsibilities is the point at which the radioactive material transfers ownership from the Navy to TtEC, or from TtEC back to the Navy.

Because the radioactive material controlled under radiological remediation is not known or adequately quantified, both organizations realize that an exact inventory of radioactive material is not feasible. However, a conservatively high estimate based on professional judgment and best available technology will be used. The following contains a natural progression of the radiological remediation and decontamination process, and the organization specific responsibilities:

Prior to TtEC mobilization for radiological remediation and/or decontamination work, the Navy is responsible for inventorying radioactive material, posting radiological areas in accordance with 10 CFR 20, and providing radiation awareness training to individuals with access to the radiologically impacted site/area. The Navy shall provide TtEC with information on:

(1) An estimate of the type, quantity and physical/chemical forms of radioactive material expected
(2) The site locations where the radioactive material is located

This information is necessary to ensure that the radioactive material quantities will not exceed the limits listed in the TtEC NRC license, and to ensure that an accurate 14-day notification is made to the NRC as required by TtEC NRC License 29-31396-01 condition 18.A.

Upon TtEC mobilization to perform radiological remediation and decontamination work, TtEC is responsible for posting radiological areas in accordance with 10 CFR 20, and providing radiation awareness training to individuals with access to the radiologically impacted site/area. At the point that any radioactive material is removed from a surface or soil, that radioactive material becomes the responsibility of TtEC for radioactive material inventory. The inventory estimation may be based on radioanalytical measurement and/or thumb rules based on instrument measurement. Note that these measurements may be conducted by contractors on a site specific MOU with TtEC. Any radioactive material not physically removed from soil or a surface remains in possession of the Navy, although TtEC will identify the location(s) and maintain control of the location of the radioactive material until the end of the contract. In the event of any radiological emergency, such as a spill of radioactive material, TtEC will provide initial emergency response, and stabilization of the situation, and inform the Navy for concurrence on final resolution prior to re-initiating work. Unless specifically stipulated in a site specific contract, TtEC is not obligated to engage in any radiological clean up as the result of an accident not caused by a TtEC employee.

Upon completion of TtEC radiological and remediation work and/or termination of the contract, the Navy is responsible for posting radiological areas in accordance with 10 CFR 20, and providing radiation awareness training to individuals with access to radiologically-impacted sites/areas (if the sites have not been free-released for general public use). TtEC shall return any remediated radioactive material that has no means of disposal to the Navy or other entity that possesses an appropriate NRC license, as directed by the Navy, and shall provide a written listing of current areas containing radioactive material identified during radiation survey operations. The Navy, or another entity possessing an appropriate NRC license as identified by the Navy, shall be responsible for maintaining control of this radioactive material.

Occurrence Reporting

In all events during TtEC radiological remediation operations under a contract between TtEC and the Navy, the TtEC RSO (or designated representative) will notify NAVSEADET RASO as soon as practical, of any of the following occurrences that may affect personnel from other organization(s):

- Contamination events that require decontamination (personnel or equipment)
- Contamination levels including airborne contamination or dose rates that stop operations
- Any regulatory reporting event
- Any noncompliance with the requirements of this MOU

The TtEC RSO or designated representative shall be responsible for reporting non-compliance issues to the applicable regulatory and/or oversight agencies

Jurisdictional Issues and Changes

Jurisdictional issues or specific situations not covered under this agreement will be discussed between the Navy and TtEC for resolution and documented by amendment of this memorandum of understanding. Signatures placed within this MOU by the Radiation Safety Officer (or designated NRC license representative) will indicate approval of the contents within this document, and concurrence with the resultant agreement.

Erik Abkemeier, TtEC Radiation Safety Officer — Date: 8/6/10

Laurie Lowman, Lead Environmental Program Manager, NAVSEADET RASO — Date: 8/6/2010

This is to acknowledge the receipt of your letter/application dated

9/20/10, and to inform you that the initial processing which includes an administrative review has been performed.

(Notification C29-31396-01)

☒ There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

☐ Please provide to this office within 30 days of your receipt of this card

_____.

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned **Mail Control Number** 573601.
When calling to inquire about this action, please refer to this control number.
You may call us on (610) 337-5398, or 337-5260.

NRC FORM 532 (RI)
(6-96)

Sincerely,
Licensing Assistance Team Leader