



December 7, 2010

Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406
ATTN: Director, Division of Nuclear Materials Safety

RE: Activities at Temporary Job Site Utilizing U.S. NRC Radioactive Material
License #06-30556-01 Amendment 03

Temporary Location: U. S. Army, Pohakuloa Training Area, Hilo, HI

Cabrera Services Inc. (CABRERA) is providing this additional clarification information regarding its intent to utilize CABRERA Material License #06-30556-01 at a temporary job site. The NRC was provided with an original written notification on November 16, 2010. The NRC tracking number associated with the initial notification is Control number 573920. The attached information is provided as required by license condition 18A.

The information attached to this letter is based on a site visit Monday December 6, 2010 with a review of site conditions and extent of the CABRERA RCA. This was followed by a discussion with CABRERA, Army personnel, and involved Army contractor personnel. A second closeout/finalization meeting with the listed parties is expected on December 7, 2010.

No activity exceeding license limitations will be conducted. CABRERA will notify the Regional Administrator, U.S. Nuclear Regulatory Commission, within 30 days of termination of activities at this job site in keeping with license condition 18B.

If you should have any questions regarding this notification, please contact Henry W. Siegrist at CABRERA (860) 569-0095 (voice) or (860) 569-0277 (fax).

Sincerely,

Henry W. Siegrist, P.E., CHP *For*
RSO, Corporate Health Physicist
Attachment

**ATTACHMENT
POHAKULOA TRAINING AREA
THE BIG ISLAND, HAWAII (2010)
(ADDITIONAL INFORMATION)**

Cabrera Services, Inc. (CABRERA) is providing radiological characterization and scoping surveys, remediation, and exposure rate surveys at the Pohakuloa Training Area located on the Big Island, Hawaii. Several exempt radioactive source(s) will be utilized to provide daily quality control checks on radiation detection equipment. CABRERA is providing this additional information to supplement information previously submitted to the NRC on November 16, 2010 and tracked by NRC Control number 573920.

This information is being transmitted to you as required by condition 18A of the CABRERA Materials License.

ADDITIONAL RADIOLOGICAL WORK DETAILS

Army contractor personnel will provide removal of a soil berm located within the CABRERA RCA. These individuals are Cabrera radworker trained personnel. The training consists of radiation safety training and DU-awareness training. Certain workers may be provided with full radworker training. All contractor workers are escorted by CABRERA health physics personnel with 100 percent coverage during work in the CABRERA RCA. CABRERA provides for exit frisking of all non-CABRERA personnel and equipment entering the CABRERA RCA. Radiation Work Permits (RWPs) are used to cover all work.

The berm area, consisting of several hundred yards of fill, will be removed in lifts and scanned as it is removed. The fill was not in the area during DU use at the site and was originally clean fill brought in from offsite. However, as a conservative measure the soil is scanned for radiological components as well as unexploded ordnance (UXO). The soil will ultimately be released from the site for reuse.

An area referred to as the "village" is located within the CABRERA RCA. The area is approximately 5 acres. This area will be scanned by CABRERA using gamma walkover instrumentation at the sampling rate of 100 percent and characterized. Any DU fragments and surrounding contaminated surface soils will be remediated and collected based upon the data obtained from the Site gamma walkover surveys. The DU fragments and contaminated soil will be placed in Army approved containers during the initial phases of the work evolution.

Clean fill material will be spread over a portion of the scanned area and Army container boxes (Conex boxes) will be placed on top of the clean fill. Army Contractor personnel performing this task will be provided with Radiation safety training, DU-awareness training, and escorted 100 percent while in the CABRERA RCA.

The project work evolutions described was originally expected to begin on or about December 2, 2010 will now start on December 8, 2010. The license exempt sources and support equipment have been staged at the site on December 8 in accordance with the notification period described by the Cabrera NRC License. Work within the scope of this notification is expected to be completed prior to December 31, 2011.

UNCHANGED RADIOLOGICAL WORK DETAILS

Investigation derived wastes (IDW) and packaged remediation soil waste with DU fragments will be handled in accordance with federal and state regulations. These materials include small amounts of contaminated PPE and equipment (gloves, smears, used equipment containers, etc.). These materials will be inventoried under the Cabrera License and stored in Army controlled areas during onsite work activities. The IDW and packaged remediation soil waste will be shipped to an authorized disposal site for final disposal. The waste shipment will occur under the guidance of Cabrera's certified waste broker. Consolidation of these Pohakuloa wastes with similar DU fragments and waste soil at the Schofield Barracks temporary job site will be considered if cost effectiveness is determined.

CABRERA NRC Materials License (No. 06-30556-01) requirements, including previously submitted procedures, will be adhered to for the duration of this work evolution. Provisions for frisking of personnel and equipment leaving radiological controlled areas will be provided. Radiological surveys of affected work areas, soil remediation with packaging of retrieved DU fragments, and decontamination of equipment associated with the work effort will be conducted to ensure the absence of radioactive contamination. The equipment release values are consistent with NRC Regulatory Guide 1.86.

Key project personnel and other supporting information remain the same and are provided here again for convenience.

Mr. Bachir Badaoui – CABRERA Site Radiation Safety Lead
Mobile: (765) 532-2674

For USPS:

US Army Pohakuloa Training Area
ATTN: Safety/Bachir Badaoui
PO BOX 4607
Hilo, HI 96720

For FEDEX/UPS:

US Army Pohakuloa Training Area
ATTN: Safety/Bachir Badaoui
Mile Marker 36 Saddle Road
Hilo, HI 96720

Mr. Clif Gray – CABRERA Project Manager
Cabrera Services, Inc.
3355 Myrtle Ave
Sacramento, CA 95660
Office: (916) 334-3740
Mobile: (916) 833-2945

Mr. Henry Siegrist, P.E., CHP – RSO, CABRERA Corporate Health Physicist
Cabrera Services, Inc.
473 Silver Lane
East Hartford, CT 06118
Office: (860) 569-0095 ext 18
Mobile: (860) 416-0196

Please contact Henry Siegrist (CABRERA) at (860) 569-0095 should you have any questions regarding this CABRERA notification of intent to utilize NRC Materials License, number 06-30556-01 Amendment No. 03.