

READ AHEAD TO SUPPORT

TECHNICAL PROJECT PLANNING

WALTER REED ARMY MEDICAL CENTER

The TPP Process is a comprehensive and systematic process that involves four phases of planning activities. The TPP Process was developed for identifying project objectives and designing data collection programs for hazardous, toxic, and radioactive waste (HTRW) sites. Use of the TPP Process is consistent with the philosophy of taking a graded approach to planning that will produce the type and quality of results needed for site-specific decision making.

- Phase I – Identify Current Project
- Phase II – Determine Data Needs
- Phase III – Develop Data Collect Options
- Phase IV – Finalize Data Collection Program

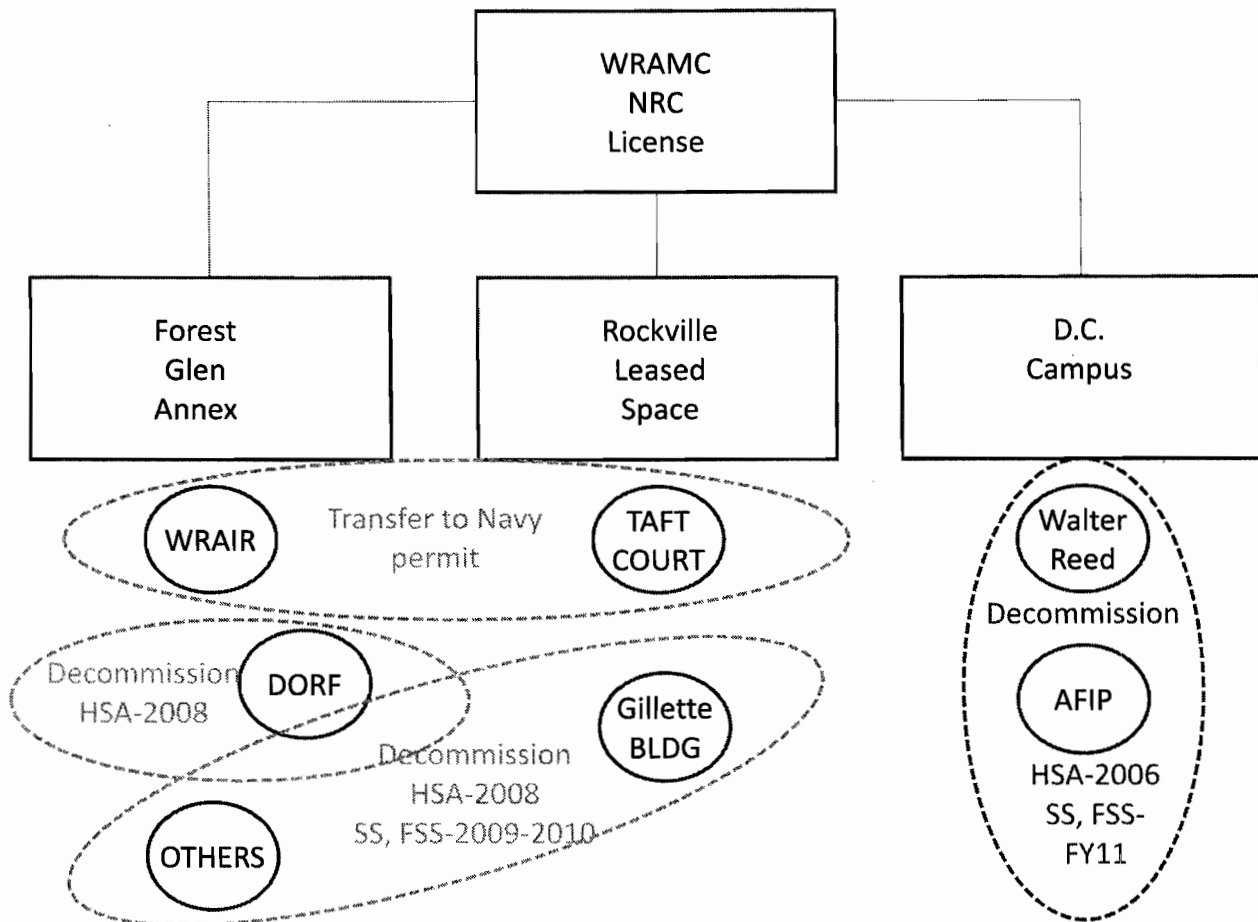


Figure 1 - WRAMC NRC License - Places of use and planned activities

Short Summary/Background

The WRAMC NRC license has covered numerous locations over the license period. Figure 1 provides a general summary of locations of use and planned activities prior to the request for license termination. The WRAMC has been preparing for closure for numerous years and has conducted several Historical Site Assessments, Scoping Surveys, and Characterization Surveys all with the goal of supporting the Final Status Surveys required for decommissioning of the NRC license. The WRAMC team has conducted these scoping and characterization surveys following guidance from NUREG 1757 and NUREG 1575 with the goal of incorporating these surveys into the license termination request as Final Status Surveys.

As the WRAMC days of operation near closure, the WRAMC team is planning to conduct surveys of the main facilities located on the Washington DC Campus. The Team would like to discuss the path forward and data quality objectives for the Washington DC Campus as well as the previous activities conducted at other places of use. The goal of the meeting is to share lessons learned from previous activities, discuss data quality objectives for upcoming surveys, and discuss open items as we proceed toward license closure.

WRAMC – WASHINGTON DC CAMPUS – MAIN POST

Overview:

1. WRAMC is conducting building radiological characterization surveys, designed in accordance with MARSSIM to demonstrate that impacted areas are suitable for release for unrestricted use from NRC License 08-01738-2.
2. It is anticipated that Decommissioning Planning will not be necessary and that the Characterization Surveys will comply with the Final Status Survey requirements which will ultimately be submitted to the NRC to support termination of WRAMC's NRC license. This license termination will facilitate transfer of the facility under the Base Realignment and Closure (BRAC) initiative for WRAMC facilities.
3. We are currently in the planning stages to conduct surveys for buildings on the Main Post Site and are attempting to ensure that we have sufficient understanding of NRC protocol regarding our planned methods.

Questions:

1. Building/Room Classification – Class 1/2/3? Uncertainty associated with long term uses within buildings and the WRAMC Health Physics Office Surveys/Records?
2. WRAMC would like to understand NRC requirements regarding surveying building materials? For example;

- a) laboratories where lab benches are attached to walls?
 - b) floor tiles in a laboratory?
 - c) vent hoods in a radiological laboratory?
 - d) radiological use areas that have been renovated?
3. any specific lessons learned from other long term research and development facilities license termination?
 4. Inaccessible areas?
 5. Low energy beta detection? Tritium?

DIAMOND ORDNANCE RADIATION FACILITY – FOREST GLEN ANNEX OF WALTER REED

Overview:

1. The DORF Facility is currently under the regulatory authority of both the Army Reactor Office (ARO) by permit, and the NRC by License 08-01738-2.
2. DORF falls under the NRC License because licensed radioactive waste was stored within the facility subsequent to the initial reactor decommissioning. The ARO permit was implemented due to elevated exposure rates identified in the Exposure Room within Bldg 516 (also subsequent to the initial reactor decommissioning).
3. Characterization Surveys were conducted with the intent of meeting Final Status Surveys release requirements across the entire DORF Facility. The data was to support termination of the ARO Permit and NRC License. Residual contamination on surfaces and within surface soils were shown to be below appropriate NRC screening levels. However, residual volumetric contamination in the form of activated structural materials could not utilize screening levels to show compliance with 25 mrem/yr dose criterion. Therefore, the Army is in the process Decommissioning Planning (D-Planning) in order to achieve release of the DORF facility from ARO permit.
4. Potential and known residual contamination at DORF is assumed to exist solely due to former Army reactor operations, including the activated structural materials and the materials within the walls of the filled-in former fuel pool.
5. Army Regulations, AR 50-7, and the DORF Reactor Permit require compliance with the appropriate NRC regulations and guidance. The guidance in NUREG 1757 is being used in the decommissioning of the DORF.
 - a) Army Regulation 50-7: The Army's reactor policy is to follow NRC guidelines, as well as the recommendations of the National Council on Radiation Protection and Measurements, and American National Standards Institute (ANSI).
 - b) Army Reactor Permit for the DORF: All activities involving the residual reactor radioactivity at the DORF must be in compliance with applicable sections of Titles 10 and 40 of the Code of Federal Regulations, AR 50-7 and AR 385-11.
 - c) Attachment 1 provides additional information on the Army's regulatory authorities for certain radioactive materials.

6. Army is currently generating the Environmental Assessment (EA) document for public review, to be followed by the Alternatives Analysis document and then upon selection of a Decommissioning Alternative for implementation, the Decommissioning Plan will be completed.
7. Army has established five Decommissioning Alternatives within the EA as follows:
 - a) Alt 1- No Action
 - b) Alt 2- Release Using Site-Specific DCGLs
 - c) Alt 3- Focused Remediation by Encasement of Activated Material and Subsequent Release,
 - d) Alt 4- Focused Remediation by Removal of Activated Material and Subsequent Release
 - e) Alt 5- Total Remediation and Complete Demolition and Subsequent Release

Questions:

1. What potential options are available to the Army to release the WRAMC license while dealing with the residual radiological materials at the DORF?
 - a) Partial release of facilities that are to be transferred under BRAC and retention of the DORF under NRC license?
 - b) Radioactive materials used at Army Reactors were used under the DOD's 91.b and 110.b authorities as well as AEC/NRC authorities. As the Army decommissions these remaining facilities what level of coordination is required with the NRC and will the NRC seek to maintain regulatory control over the remaining activated residual contamination from Army Reactor Permitted operations? or will the NRC defer to the ARO to provide regulatory oversight of the Decommissioning process for the Army Reactor generated residual radioactive materials that do not currently meet the release criteria?

GENERAL QUESTIONS:

1. How does the NRC prefer to receive deliverables for review (electronic/hardcopy)?
2. To facilitate scheduling and for planning purposes, what can the Army assume the NRC review times will be for specific documents? This information is requested to insert as a place holder for schedule development.