

Responses to “U.S. Nuclear Regulatory Commission Staff Comments on Army Radiation Safety Plan for U.S. Army Garrison Hawaii Ranges Affected by Depleted Uranium in M101 Davy Crockett Spotting Rounds, Dated 2/9/2011”

General Comments:

Nuclear Regulatory Commission Comment	Army Installation Management Command (IMCOM) Response
<p>1. The map in Section 23, showing the boundaries of the Radiation Control Area (RCA) for the Schofield Barracks is not consistent with those provided to the U.S. Nuclear Regulatory Commission (NRC) in the past. Specifically, the map in the Radiation Safety Plan (RSP) appears to exclude a portion of the area designated as the “Residual Impact Area” on the map entitled “Schofield DU Map 5Jan10” and the map provided to NRC staff during the October 30, 2010, briefing by the U.S. Army Corps of Engineers. This may be due to the completion of more detailed characterization of the Schofield Barracks or additional information being gleaned during the Archival Search activities. However, please provide the reasons for this apparent revision to the RCA and provide justification for the new RCA boundaries.</p>	<p>1. First of all, IMCOM did not provide the “original RCA” boundaries at any time as a formal part of IMCOM’s application to possess Davy Crockett M101 spotting round depleted uranium (DU) on its ranges. The Nuclear Regulatory Commission (NRC) should consider the maps in Section 23 of the Radiation Safety Plan (RSP) as the definitive RCAs for the purposes of the pending license.</p> <p>As discussed at the Predecisional Enforcement Conference at the NRC’s Region IV offices in Arlington, Texas, the “original RCA” was set up as an administrative control at a time when the Army had poor knowledge of the extent of DU contamination on the Schofield Barracks range. Right or wrong, for the sake of convenience, a large part of the rationale for setting the “original RCA” boundaries was to control access to the “original RCA” at the same points that range access is controlled.</p> <p>However, the pending License Radiation Safety Officer (LRSO) followed the same principles in setting up the license RCAs for the Schofield Barracks and Pohakuloa Training Area ranges as he intends to follow for DU-affected ranges on the 15 other IMCOM installations as follows:</p> <ul style="list-style-type: none"> • RCAs will be no smaller than the 1-kilometer (km) square impact areas that the Archive Search Reports (ASRs) depict. • An RCA will be enlarged or newly created if and when DU is discovered outside an existing RCA. (A newly created RCA could be smaller than a 1-km square.) • The LRSO will notify the NRC of any proposed changes to RCAs in a RSP after the NRC has approved that RSP.

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	<p>The Army had found DU outside the ASR 1-km squares at Schofield Barracks and so the LRSO made the RCA larger than the ASR depictions. However, Schofield Barracks personnel asked the LRSO to set the boundaries larger still to correspond to some of the boundaries of the Battle Area Complex (BAX) construction areas for purposes of administrative simplification. After receiving their acknowledgement that this might cause increased decommissioning costs at some future time, the LRSO agreed to set the proposed boundaries as shown in Section 23 of the RSP.</p>
<p>2. (a) The discussion of the Administrative Dose Control Levels (ADCLs) program indicates that the ADCL will be 1% of the NRC’s occupational dose limits. However, the RSP indicates that dosimetry will not be issued to individuals entering the RCS. Therefore, it is not clear how the applicant will demonstrate compliance with the ADCL program. NRC staff agrees that the potential for an individual receiving a dose in excess of the public dose limit is unlikely given the configuration of the depleted uranium (DU) on the RCA/ranges. Thus, it may be more appropriate for the Army to demonstrate that the individuals entering the RCA will not receive a dose in excess of 10% of the public dose limit using the guidance in NUREG-1556, volume 7. The Army may also wish to evaluate the information provided previously to NRC (November 6, 2009, license application, April 2008 Baseline Risk Assessment, et. al.) in making this demonstration.</p> <p>(b) Also, please note that Section 6.3 indicates that the Garrison Radiation Safety Officer (GRSO) will perform a retrospective review of doses to the Declared Pregnant Worker and provide increased radiation safety surveillance during the gestation period. However, it is not clear how these activities will be completed if dosimetry is not provided to workers entering the RCA.</p>	<p>2. (a) The LRSO included ADCLs in the RSP based on his previous experience on licenses that included ADCLs. He intended to demonstrate compliance with ADCLs by using hand-held instruments to measure ambient exposure rates. Instead, he will make changes in the RSP that follow the NRC’s suggestions to apply the guidance in NUREG-1556, volume 7, section 8.10.5 and Appendix O and to reference the previously provided April 2008 Baseline Risk Assessment. This will negate the need for ADCLs and personnel dosimetry in the RSP.</p> <p>(b) A footnote was added to describe how the Garrison RSO should perform the retrospective review: “The Garrison RSO will review records of all environmental exposure rates measured in RCAs that the DPW visited during the period of gestation for indications of exposure rates above background. He will document this review along with the DPW’s occupancy time in RCAs. He will forward a copy of this documentation to the License RSO for final review and entry into license records.”</p>

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<p>3. While the RSP indicates that a site-specific Environmental Radiation Monitoring Program will be developed for the Hawaiian installations, the applicant should describe any environmental monitoring activities they will undertake to support the activities listed in Section 4.3 that may be permitted prior to the NRC issuing a license. Specifically, if the Army will perform air monitoring during range burns, they should state this in the RSP or explain why air monitoring is not necessary.</p>	<p>3. All air monitoring to date in Hawaii, including during range burns, has not detected DU in air above NRC effluent and). All results have been well below the NRC’s derived air concentrations for the uranium isotopes in DU, 2×10^{-11} $\mu\text{Ci/mL}$. The following is from <i>Technical Memorandum: Schofield Barracks Firing Range Monitoring of Air Quality During Burning of Vegetation Wahiawa, Hawaii</i> (Cabrera Services, April 2008).</p> <p>A total of 56 air filters were collected to evaluate the potential release of particulates containing uranium during prescribed burns at Schofield Barracks. All reported activity concentrations of uranium isotopes (^{234}U, ^{235}U, and ^{238}U) in air were below the action level of 5×10^{-15} microcuries (<i>sic</i>) per milliliter ($\mu\text{Ci/mL}$) established in the Effluent Sampling Plan. The action level is equal to 10% of the air effluent limit for ^{234}U (5×10^{-14} $\mu\text{Ci/mL}$) found in 10 CFR 20 which is the most conservative air effluent limit for the uranium isotopes present in DU (NRC 10 CFR 20).</p> <p>We intend to continue air sampling in Hawaii during range burns for another season or two in order to accumulate more data. We expect these data together with previous air sampling results will support a request that the NRC not require air sampling during range burns at any of our installations. Similarly, we will perform air sampling during any “blow in place” activities for unexploded ordnance in M101 impact areas until we have enough data to present to the NRC to justify discontinuing such air sampling. We have make changes to the RSP corresponding to the above.</p>
<p>4. In several sections of the RSP (see Sections 2.6, 11.3, or 19) the duties of the GRSO appear to devolve to “his or her designee”. It is not clear from the discussion in the RSP what, or if, this individual will be qualified to perform the duties that will be expected of them. Please provide the qualifications and training that is contemplated for the GRSO “designees”.</p>	<p>4. We have removed references to Garrison RSO “designees.”</p>

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5. Section 14.4.2, bullet 3 indicates that the Army is requesting an exemption from the requirements of 10 CFR, Part 21. However, no information is provided in the RSP or elsewhere indicating why the Army is requesting this exemption.	5. We have deleted that sentence.
6. While the RSP contains several examples of the types of survey instrumentation that may be available for use on U.S. Army Installation Management Command (Army/IMCOM) installations, it is not clear if all of the instruments will be available at each installation or which ones will be available at individual installations. Army/IMCOM will need to ensure that the survey instruments provided at the various installations are appropriate for DU and this will be evaluated during inspections of the installations.	6. We added a new Section 17.1 that lists the essential instruments that the Garrison RSO must possess.
7. The RSP discusses several forms and log sheets that will be used to demonstrate compliance with the RSP. It is not clear if these forms and log have been developed.	7. We intend to produce standard operating procedures (SOPs) that provide specific instructions to Garrison RSOs about how to perform tasks that the RSP requires. Examples of the “forms and log sheets” will be in the SOPs. The SOPs will be available to NRC inspectors for review.

Specific Comments

Nuclear Regulatory Commission (NRC) Comment	Army Installation Management Command (IMCOM) Response
1. The RSP states in Section 1.1 that it is for the purpose of a NRC-approved RSP, however in the introduction (Section 1) it states that the Radiation Safety Officer will change the RSP and only submit the changes to the NRC, not get them approved. Further, the RSP indicates in Section 1.5 that procedures established to respond to unexpected safety situations will be developed by the GRSO, communicated to the License Radiation Safety Officer (LRSO), and be incorporated into the RSP. It does not address how these revisions will be reviewed and approved by NRC. Please	1. We have added a sentence to Section 1 that reads, “Changes to this RSP will be made only with prior approval of the NRC.” We rewrote Section 1.5 to delete reference to potential changes to the RSP and to emphasize 10 CFR 20, Subpart M reporting requirements.

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<p>include a commitment to communicate changes and unexpected safety situations to NRC in accordance with 10 CFR 20, Subpart M, if necessary, or within a proposed timeframe.</p>	
<p>2. RSP indicates that the Garrison Commander (GC) will select the GRSO. However, it is not clear if the LRSO will concur in the GC’s selection. In that the LRSO is responsible for ensuring compliance with the conditions of the license and commitments made in the RSP, the LRSO will need to ensure that the GRSO has the prerequisite training and experience to perform the GRSO duties as discussed in the RSP. Please confirm that the LRSO will be appropriately involved in the selection of the GRSO.</p>	<p>2. We added subparagraph headings to Section 2.4, so that the RSP could include in Section 2.2, “The NRC allows no activities within any RCAs until the License RSO has determined that the Garrison RSO meets the training qualifications in Section 2.4.1. The License RSO will maintain documentation that demonstrates Garrison RSO compliance with these training qualifications.”</p>
<p>3. The duties of the LRSO discussed in Section 2.3 appear to be consistent with those outlined in Appendix I of NUREG-1556, volume 7. However, some of the LRSO’s duties described in the RSP may be more appropriate for the GRSO. For example bullet 11 indicates that the LRSO (stationed in Texas) will distribute and collect personnel radiation monitoring devices, a duty more applicable to the GRSO (stationed in Hawaii). Please review the specific duties of the LRSO and GRSO and revise to describe those that will be overseen by the LRSO and those that will be performed by the GRSO.</p>	<p>3. We reviewed the specific duties of the License RSO and Garrison RSO and made a few changes.</p>
<p>4. The RSP indicates in Section 2.4, that the Hawaiian installation GRSO will receive training in the duties and responsibilities associated related to the M101 spotting round. However, it is not clear what level of training this will involve. The GRSO will be responsible for providing the training described in Section 20.2.2 to troops and other individuals entering the RCA. Please confirm that the training associated with the M101 spotting round will be sufficient for</p>	<p>4. The License RSO will require the Garrison RSO to view the Army’s DU awareness training video for soldiers, TVT 3-120 Tier I Depleted Uranium (DU) General Awareness Training (http://tinyurl.com/3nmz2tt) and will provide additional license-specific training. Garrison RSOs generally are experienced qualified Safety personnel with additional training and experience in radiation safety. For example, the NRC already allows the Army to rely its Garrison RSOs to support the Army Materiel Command’s numerous</p>

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<p>the GRSO to perform all duties assigned to the GRSO in this RSP.</p>	<p>radioactive commodity licenses. The License RSO is an experienced, trained health physicist who, in effect, works with the Garrison RSOs as if they were mid-level health physics technicians. As such, the Garrison RSOs will receive license-specific training, guidance, and instructions from the License RSO about how to maintain compliance with NRC regulations and license conditions. However, with this in mind, they are qualified to work independently without the day-to-day direct supervision of the License RSO. They are also qualified to provide the DU awareness training to those who enter the RCA. As qualified Safety professionals, they are accustomed to providing worker training.</p>
<p>5. The RSP states in Section 3.4 that the LRSO will inform NRC of the changes to the size, number and locations of RCAs, although it is not stated that LRSO will inform NRC if heretofore unknown radioactive material is discovered on an RCA or when the notification will occur. Please revise the RSP to state when the NRC will be informed of changes to the RCAs and if heretofore unknown radioactive material is discovered.</p>	<p>5. We changed the last paragraph in Section 3 to read, “The Garrison RSO and License RSO will be notified when M101 spotting round debris (or any other heretofore unknown radioactive material) is found on US Army Garrison Hawaii ranges. The sizes and locations of the RCAs will be adjusted accordingly. The License RSO will notify the NRC of any changes to the size, number, and locations of RCAs in writing within 30 days.”</p>
<p>6. The RSP describes the activities that explosive ordnance disposal personnel and the GRSO will undertake if a Blow-in-Place (BIP) is contemplated for unexploded ordnance. However, the RSP does not discuss air monitoring during a BIP or any post BIP soil monitoring of the blast area. As DU could be dislodged or fractured and further dispersed during a BIP additional monitoring may be necessary. Please describe the activities envisioned for BIP, either in Section 4 or in Section 12.</p>	<p>6. We changed Section 4.2 as discussed above to add greater emphasis on air monitoring. We gave additional thought to soil monitoring after a blow-in-place detonation and concluded that it was unnecessary and unproductive. The location of the blow-in-place is within an RCA that the NRC and we presume to be DU-contaminated. Surveying the soil will not allow us to remove the area from radiation safety controls. We will monitor EOD personnel and their equipment for DU when they exit the RCA. As the RSP says in (revised) Section 14.2, “Deliberate searches for and removal of DU are not authorized within an RCA except for EOD UXO blow-in-place activities (see Section 4.2).” We believe that this should apply after detonation.</p>
<p>7. Section 4.3 of the RSP lists the activities the Army wants</p>	<p>7. We add the following at the end of Section 4.3: “The Garrison</p>

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<p>authorization to perform. Several of the activities, if authorized, would require the presence of the GRSO (e.g. controlled burning). However, the RSP appears to indicate that the GRSO will not be present and only the range personnel will be present. In addition, Section 4.3 does not discuss range reclamation work; emergency response (ambulance, firefighting); environmental monitoring; radiological surveys; or quality assurance, quality control, and audits to support the listed activities. These activities may be necessary to ensure that the ranges are managed safely. Please provide a revised discussion of the requested authorized activities and indicate which ones will necessitate direct oversight by the GRSO.</p>	<p>RSO will be present and operate access control points whenever personnel enter an RCA (see Section 11.1).” We added the following bullets as routine range activities</p> <ul style="list-style-type: none"> • Environmental Radiation Monitoring Plan (see Section 12) activities • Radiological surveys and quality assurance, quality control, and audits to support the other listed activities <p>Emergency response (ambulance, firefighting) are not routine range activities; see our response to Comment 19 below.</p>
<p>8. Section 6.2 of the RSP indicates that Regulatory Guide 1.86 surface contamination levels are, and apparently will be considered, as low as reasonably achievable (ALARA) for purposes of the RSP. Regulatory Guide 1.86 levels are not unilaterally considered ALARA by NRC and should not be considered as such for the decontamination of equipment leaving the RCA. Please revise the discussion to state that decontamination efforts should result in surface contamination levels that do not exceed the Regulatory Guide 1.86 criteria PLUS ALARA.</p>	<p>8. That was not our intent, of course. We modified the text in Section 6.2 to read, “Table 1 in NRC Regulatory Guide 1.86 provides NRC acceptable surface contamination levels. Table 6 1 is an extract relevant for DU from that table. Decontamination will always be to surface contamination levels that are below those in Table 6 1 and that are also ALARA.”</p>
<p>9. Section 10 states that respiratory protection is not required for entry into the RCA. Please confirm if respiratory protection would be required for certain activities within the RCA, such as burning or mowing. If not, explain what monitoring will be performed to ensure that individuals performing activities that may generate airborne contaminants, would not have an intake of DU.</p>	<p>9. Our response to general comment #3 above discusses air monitoring and the numerous existing data that show our proposed routine activities are unlikely to produce DU air concentrations that would require the donning of respiratory protection. The RSP specifies that air monitoring will occur during range burns and blow-in-place EOD activities. We do not believe that air monitoring is necessary for other routine activities in general. However, we added the following to Section 4.3: “The License RSO will evaluate other activities expected to produce large dust clouds and may require air</p>

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<p>10. Section 11 of the RSP discusses decontamination surveys, etc., but does not appear to include a commitment to develop and maintain a procedure for monitoring and decontaminating personnel, equipment, and vehicles. Please revise RSP to state that a procedure will be developed for the monitoring and, if necessary decontaminating personnel, equipment and vehicles. The GRISO must be trained in the procedure and it should be available for review during NRC inspections. Also, it should be available at the entry/exit points to the RCA when personnel are working on the RCA.</p>	<p>sampling during those activities.”</p> <p>10. We have numerous radiation safety SOPS that we can adapt for use in implementing the RSP. We have inserted a new Section 23 that lists the RSP-supporting SOPs that the License RSO will produce and maintain.</p>
<p>11. Section 11.2 of the RSP indicates that only instances where contamination is detected on personnel, equipment, or vehicles will be documented. Exit survey documentation should be maintained for all personnel, etc. leaving the RCA, not only when contamination is detected. Please revise the RSP to state that the results of all surveys of personnel, equipment, and vehicles will be maintained or state how the results of surveys will be documented.</p>	<p>11. We revised the first sentence to read: The Garrison RSO will document all contamination surveys of personnel, equipment, and vehicles to include: We made minor changes to the bullets.</p>
<p>12. Section 11.3 of the RSP states that swipe tests MAY be conducted if scanning detects contamination. As the criteria in Regulatory Guide 1.86 include removable contamination limits, it is not clear how this will be demonstrated if swipes are not done. Please revise the RSP to state that swipes will be taken any time scanning detects contamination and after decontamination efforts are completed.</p>	<p>12. We changed Section 11.3 to read: Swipe tests generally are not necessary. However, if instrument scanning detects contamination, the Garrison RSO will take swipe tests to verify that subsequent decontamination efforts were adequate.</p>
<p>13. The RP indicates that signage is not necessary for the RCA. 10 CFR Part 20, Subpart J (20.1902(e)) requires cautionary signs for any area containing radioactive material in excess of 10 times the Part 20 Appendix C values. Ten times the DU (U234, U235, and U238) values in Appendix C are 0.01, 0.01 and 1000 microcuries, respectively. Based on</p>	<p>13. We have changed Section 14.1 to read: the RCA will be posted with “CAUTION, RADIOACTIVE MATERIAL” signs. As a minimum, the Garrison RSO, in coordination with range operations and training personnel and, as required, EOD personnel, will conspicuously post these signs as a minimum:</p>

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<p>the information provided in the application dated November 6, 2008, each Davy Crockett round contained approximately 190 grams of uranium. The concentration of uranium in the projectile is about 0.4 microcurie per gram (RSP pp.16-1). Assuming half the 714 rounds delivered to Hawaii were fired at the Schofield Barracks, 27,132 microcuries of uranium may be present. Therefore, the RCA will need to be posted with appropriate cautionary signs. Please revise the RSP to indicate that signage will be established around the RCA.</p>	<ul style="list-style-type: none"> • At each corner of the RCA • At 200-m intervals on the perimeter of the RCA <p>The signs will be weather-resistant.</p>
<p>14. The information on instrument types seems to be acceptable, though very general. Several different instrument possibilities are listed, and there are statements that the GRSO will assure that appropriate instruments are available for use (Sections 11.1 and 17). Thus, it becomes imperative that the GRSO has the appropriate level of training and expertise to determine the appropriate instrumentation. Please confirm that the GRSO will have this training.</p>	<p>14. We have added requirements that the Garrison RSO receive instrument training from the License RSO. The training course that the Garrison RSO is required to attend includes “radiation detection and measurement.”</p>
<p>15. Some additional clarification is needed on survey instruments that are repaired. In Section 17.1, it is indicated that “if survey equipment requires repair during a workday, it shall be repaired and its proper function verified before it is returned to use.” NRC guidance documents on materials and uranium recovery surveys (Regulatory Guides 8.21 and 8.30) have stated that instruments should be re-calibrated after repair, and this would be the expected practice in the Army’s case as well. Please revise the RSP to better describe post instrument repair procedures.</p>	<p>15. We added the following clarification to Section 17.2: If survey equipment requires routine maintenance (such as battery replacement, spot painting of Mylar® window, etc.) during a workday, its proper function will be verified before it is returned to use. Instruments that require other than routine maintenance will be re-calibrated after repair before being returned to use.</p>
<p>16. Both the static and scan Minimum Detectable Concentration (MDC) calculations indicate that there is a “final factor, which equals 1” that helps put the units into dpm per 100 cm². It is not clear if that portion of the equation listed as “100 cm²/100 cm²” is actually considered to be numerically</p>	<p>16. Multiplying any number by 1 does not change its value. The equation without the factor 100 cm²/100 cm² ends up with units of dpm/cm². Conventionally, one then multiplies the result by 100 and inserts 100 in front of the “cm².” Although that method appears to be arbitrary, it is correct. However, it is equivalent to multiplying the</p>

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<p>1 for the purpose of the calculation (and essentially ignored). If that is the case, the final result would be off by a factor of 100. An example calculation that clarifies this is found in Section 9.2 of “Decommissioning Health Physics” by Eric Abelquist. Please clarify this point about the calculation and the statement about the final factor equal to 1. Also, an example calculation and example calculations to be 5 provided in any survey procedures would be helpful. The static MDC equation also assumes that a one minute count will always be used. Note that point would need to be clear in all survey procedures as well or else a time factor needs to be added to the equation.</p>	<p>result by the factor 100/100 and retaining only the 100 in the denominator. Including the units in the factor $100 \text{ cm}^2/100 \text{ cm}^2$ forces one to properly account for units and so see exactly why one has to multiply the original number by 100. Our intention is to include examples in the SOP. However, MARSSIM shows a sample calculation at the bottom of page 6-36 that is directly relevant for our RSP. In the MARSSIM example, the use of a GM pancake probe for ^{238}U with a one-minute static count produces an MDC of 1800 Bq/m^2, which is equivalent to $1,080 \text{ dpm}/100 \text{ cm}^2$. This shows that the pancake probe is adequate for total contamination static surveys (standard is $5,000 \text{ dpm}/100 \text{ cm}^2$) but, for a one-minute static count, is inadequate for counting swipes (standard is $1,000 \text{ dpm}/100 \text{ cm}^2$) unless the count time is extended to at least two-minutes. MARRSIM Table 6.4 provides other examples of calculating MDCs for ^{238}U using various instruments. The License RSO will perform all MDC calculations for the first time for the Garrison RSO onsite as part of the license-specific training. He will provide spreadsheets to the Garrison RSO as a future guide and will check the Garrison RSO’s work. Any hypothetical examples we provide in the RSP may not match the instruments and conditions the Garrison RSOs will encounter at the RCAs and might cause confusion. We request instead that this topic be an item for NRC inspectors.</p>
<p>17. The source efficiency (ϵ_s) for the static MDC calculation is stated to be 0.5. Depending on the type of instrument and radionuclide actually being measured, this will not arbitrarily be 0.5. Considering the general nature in which the Army lists the various instruments, this value should not always be specified as 0.5. For example the ISO-7503-1 standard on the evaluation of surface contamination for beta-emitters and alpha emitters recommends an ϵ_s value of 0.5 for betas ($E_{\beta\text{max}} > 0.4 \text{ MeV}$) and an ϵ_s value of 0.25 for alpha and betas ($0.15 \text{ MeV} < E_{\beta\text{max}} < 0.4 \text{ MeV}$).</p>	<p>17. We removed the statement that ϵ_s is 0.5 and instead added a footnote that says, “The ISO-7503-1 standard on the evaluation of surface contamination for beta-emitters and alpha emitters recommends an ϵ_s value of 0.5 for betas (maximum beta energy greater than 0.4 megaelectron volts (MeV)) and an ϵ_s value of 0.25 for alpha and betas (maximum beta energy between 0.15 MeV and 0.4 MeV).</p>

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<p>18. In Section 19.2, the sixth bullet discusses radiological surveys and compliance with 10 CFR 20.2130. However, how compliance with 10 CFR 20.1301 will be demonstrated is not discussed. The eighth bullet discusses the use of dosimetry and states that doses are not expected to exceed 10 percent of NRC’s limits. It is not clear how will they conduct this audit requirement (verification that dose limits will not exceed 10 percent of limits). Please provide clarification on the Army’s demonstration of compliance with 10 CFR 20.2130.</p>	<p>18. Presumably, the commenter means “20.2103” rather than “20.2130.” The sixth bullet refers to 10 CFR 20.2103, which is entitled “Records of surveys.” It seems obvious to us that the auditor would verify compliance with 10 CFR 20.2103 by determining whether the “records of survey” mentioned in 10 CFR 20.2103 are present. We addressed dosimetry and dose limits in our response to general comment 2a. How we will comply with relevant NRC requirements is the purpose of the RSP. Section 19.2 describes what documentation an auditor will look for to verify compliance with the RSP and NRC requirements.</p>
<p>19. Section 22.1 discusses radiological emergencies without any pertinent details. The RSP should discuss contact lists and equipment for emergencies and should specify that this information will be available at the locations where DU will be possessed.</p>	<p>19. We added a new Section 22.1, General, that includes added contact information.</p>