

August 22, 2012

Mr. Thomas Gizicki, Radiation Safety Officer
Department of the Army
TACOM Life Cycle Management Command
AMSTA-CSC-Z
6501 East 11 Mile Road
Warren, MI 48397-5000

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING DEPARTMENT
OF THE ARMY DECOMMISSIONING REQUEST TO REMOVE CERTAIN
LICENSED ACTIVITIES AT ROCK ISLAND ARSENAL FROM NRC LICENSE
(MAIL CONTROL NO. 576576)

Dear Mr. Gizicki:

This refers to your letter dated September 9, 2011 (ML112580361) regarding Rock Island Arsenal. In that letter, you requested U.S. Nuclear Regulatory Commission (NRC) approval to remove certain licensed activities at Rock Island Arsenal from your NRC Byproduct Material License License No. 21-32838-01, Amendment No. 1 (ML12122A610). That license was formerly License No. 12-00722-06; Amendment No. 51 (ML113360223) which has been terminated. Specifically, you requested a license amendment to remove Rock Island Arsenal from license conditions 11.A, 11.C, 11.D, and 11.E because you have terminated licensed operations authorized by those conditions at the location.

Based on a review of the documents submitted with your letter, the NRC staff has determined that additional information is required to complete a license amendment. Among other items, the NRC staff needs additional information relating to the facility's history, current status of the facility, decommissioning activities performed at the facility, and surveys performed to decommission the facility. The enclosure to this letter contains a detailed list of the requests for additional information necessary to evaluate the removal of the Rock Island Arsenal from the license conditions stated above.

The NRC staff requests that the Department of the Army provide a response to this request for additional information within 30 days of the date of this letter, so that the license amendment request can be completed. Please note that failure to provide this information within 30 days may result in further delays of our review of the information.

If you have any questions concerning the enclosed information, please contact Lionel Rodriguez of my staff at 630-829-9609.

In accordance with Title 10 of the Code of Federal Regulations 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,

/RA/

Christine A. Lipa, Chief
Materials Control, ISFSI,
and Decommissioning Branch
Division of Nuclear Materials Safety

Docket No. 030-38500
License No. 21-32838-01

Enclosure:
As stated

T. Gizicki

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Docket No. 030-38500
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Enclosure:
As stated

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**REQUESTS FOR ADDITIONAL INFORMATION FOR LICENSE AMENDMENT
REVIEW TO REMOVE CERTAIN LICENSED ACTIVITIES AT THE DEPARTMENT
OF THE ARMY ROCK ISLAND ARSENAL FROM LICENSE NO. 21-32838-01**

1. The Historical Site Assessment in Enclosure 2 of the letter dated September 9, 2011, provides an Accidents/Incidents subsection for each area you are planning to decommission (sections titled Areas 1-6) stating that no radiological incident/occurrence at the locations resulted in contamination of work surfaces or equipment. However, it does not mention if there were any sealed sources that leaked in the areas. A review of the Nuclear Materials Events Database (NMED) suggests at least three instances where the licensee submitted event reports due to breaches of sealed sources in Illinois, possibly at the Rock Island Arsenal facility. NMED item numbers 920726, 940927, and 950250.

Title 10 of the Code of Federal Regulations (CFR) 30.35(g) requires that records important to the decommissioning of a facility be maintained until the license is terminated. Important records as described in that regulation include records of spills or other unusual occurrences involving the spread of contamination, which includes leakage of sealed sources.

Please provide a historical record of any incident in which a sealed source was breached in Areas 1-6 (areas you are planning to decommission). If there were such incidents, please provide details of the incident such as the type or radionuclide, activity of the source, location where the incident occurred, and other information pertaining to the incident. In addition, please provide information regarding the locations of the incidents described in NMED item numbers 920726, 940927, and 950250.

2. The Historical Site Assessment in Enclosure 2 of the letter dated September 9, 2011, mentions leak test results for sealed sources in sections titled Areas 1-6, areas that you are requesting to remove from the license. Additionally, under the section titled Area 5, it mentions that there were a few instances where broken Th-232 covered lenses were received by the facility.

License Condition 13 of your current license requires leak tests to be performed for sealed sources in your possession.

Please provide the results of the leak tests for the past two years for Areas 1-6. Please include the most recent leak test results for sources no longer in the areas. Also, please provide the most recent leak test performed in Area 5 for receipt of a broken Th-232 covered lens.

3. The Historical Site Assessment in Enclosure 2 of the letter dated September 9, 2011, under the section titled Area 3, describes a fume hood that was used to perform depot level maintenance on tritium fire control devices (TFCD). The fume hood was removed from Area 3 and moved to TACOM Warren, MI.

According to 10 CFR 30.36(g)(1) a decommissioning plan would be required to be submitted if decommissioning activities would involve techniques not applied routinely during cleanup or maintenance operations, such as the removal of a contaminated

piece of equipment using aggressive remediation techniques.

Please provide a brief description of the historical uses of the fume hood described in section titled Area 3, including the types of radionuclides used in it if it was ever used for the handling and/or storage of any radioactive materials. Also, please provide the survey results of the release survey for the fume hood and the method of removal. Please describe the free release criteria used for the removal of the fume hood from the facility.

4. The Historical Site Assessment in Enclosure 2 of the letter dated September 9, 2011, under sections titled Areas 1-6 does not mention any cleanup or maintenance operations involving techniques not applied routinely that had to be performed for the purposes of performing closeout contamination surveys.

According to 10 CFR 30.36(g)(1), a decommissioning plan would be required to be submitted if decommissioning activities would involve techniques not applied routinely during cleanup or maintenance operations.

For areas where closeout contamination surveys were performed, please indicate whether any cleanup or maintenance activities involving techniques not routinely applied had to be performed. If such activities were performed, please provide the procedures used to perform them.

5. The Historical Site Assessment in Enclosure 2 of the letter dated September 9, 2011, under sections titled Area 1 and Area 5 mentions the use of Th-232 sources handled at the facility.

Title 10 CFR 40 requires that source material be licensed unless the material meets the exemption criteria described in 10 CFR 40.11 through 40.14 or the general license criteria described in 10 CFR 40.20 through 40.28.

Please provide information describing the provision in 10 CFR 40 for handling Th-232 sources at the facility.

6. Section 4 of the letter dated January 14, 2011, part of Enclosure 2 of the letter dated September 9, 2011, states that there will continue to be TACOM LCMC licensed missions on the Rock Island Arsenal. However, you are requesting to remove the Rock Island Arsenal as a storage and depot level repair facility from the license.

Your current license authorizes the storage and depot level maintenance of certain radioactive materials devices at the Rock Island Arsenal facility.

Please provide a description of what licensed operations you will continue to perform at the Rock Island Arsenal facility. Also provide a description of locations of the facility that will need to be decommissioned at a future date. For the areas at the Rock Island Arsenal that you are requesting to be removed from the license, please provide a description of the radiation protection controls currently in place for them (i.e. postings, access controls, etc.).

7. The Historical Site Assessment in Enclosure 2 of the letter dated September 9, 2011, under section titled Area 1 describes a section in the east room used to store low level

radioactive waste (LLRW). The Historical Site Assessment states that the LLRW was disposed of through "JMC" periodically.

Licensees are required to dispose of licensed material according to 10 CFR 20.2001.

Please provide a description of the low level radioactive waste that was stored in this area, including the radionuclides that it contained. Also, please identify what "JMC" stands for and how disposal through "JMC" complies with 10 CFR 20.2001.

8. The cover page to Enclosure 2 of the September 9, 2011 letter states that certain licensed activities are no longer being performed at TACOM LCMC Rock Island, IL.

Title 10 CFR 30.36(d) requires licensees to submit a 60 day notification to the NRC if any of the criteria in 10 CFR 30.36(d)(1) through 30.36(d)(4) are met.

If a 60 day notification was required to be provided per 10 CFR 30.36(d), please specify the date in which the notification was provided to the NRC. If no notification was provided, please provide a justification why one was not needed and/or why it was not submitted.

9. The Historical Site Assessment document provided refers to Area 5 and Area 6 closeout contamination surveys in Enclosure 5 and Enclosure 6, respectively. However, Enclosure 5 and Enclosure 6 were not a part of the license amendment submittal to the NRC.

10 CFR 30.36(j) and 30.36(i) requires licensee's to conduct radiation surveys where licensed activities were carried out and submit a report of the results of the surveys, or to demonstrate in some other manner that the premises are suitable for release in accordance with the criteria for decommissioning in 10 CFR part 20, subpart E.

Although the Historical Site Assessment refers to closeout contamination survey results in Enclosure 5 and Enclosure 6, the two enclosures were not a part of the license amendment request received by the NRC. Please provide the missing enclosures from the submittal which contain the closeout contamination surveys for Area 5 and Area 6.

10. The cover page to Enclosure 2 of the September 9, 2011 letter requests that the Rock Island Arsenal be removed from license conditions 11.A., 11.C., 11.D., and 11.E. from the Department of the Army license.

Title 10 CFR 30.35(g) and 30.51 have recordkeeping requirements to ensure that licensees maintain records important to the decommissioning of a licensed facility.

Please provide a copy of records important to the decommissioning of the Rock Island Arsenal facility that have been kept by you pursuant to 10 CFR 30.35(g) and 30.51.

11. The Historical Site Assessment in Enclosure 2 of the letter dated September 9, 2011, contained closeout contamination surveys for Areas 1-4. It was also intended to contain closeout contamination surveys for Areas 5-6, which were requested above in item no. 9 of this document.

Title 10 CFR 30.36(j) requires licensees to conduct radiation surveys where licensed activities were carried out and submit a report of the results of the surveys, or to demonstrate in some other manner that the premises are suitable for release in accordance with the criteria for decommissioning in 10 CFR Part 20, Subpart E. Title 10 CFR 30.36(i) has requirements for how the survey results should be reported.

For each area where you chose to perform a closeout contamination survey to meet the requirements of 10 CFR 30.36(j), please provide the following:

- A list of the individual radionuclides used and/or stored in the areas
- A description of how the survey techniques implemented for the closeout contamination surveys were adequate to detect they types of radiation emitted by the radionuclides in each area
- A description of the process for ensuring that both fixed and removable contamination were accounted for in the areas
- A justification for the number of samples taken in each area
- A justification for the sample locations chosen and why they are representative of the potential contamination in the areas, if such potential exists
- The threshold you utilized for declaring the areas are suitable for unrestricted use

Also, please provide the following information related to the performance of the closeout contamination surveys:

- A copy of the procedure(s) used to perform the closeout contamination surveys
- For the collection of swipes, a description of the approximate area over which the swipe was taken in centimeters squared
- The levels of radioactivity from the closeout contamination surveys in units of disintegrations per minute per 100 square centimeters
- The raw analytical results of swipes taken
- A description of the instrument(s) used for the surveys
- Certification demonstrating that each instrument used for the surveys was properly calibrated and tested