

CABRERA SERVICES
RADIOLOGICAL • ENGINEERING • REMEDIATION

Br. 4

September 18, 2012

Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713
ATTN: Director, Division of Nuclear Materials Safety

REC'D 1 SEP 19 12 PM 10:11

03035316
RE: Activities at Temporary Job Site Utilizing U.S. NRC Radioactive Material
License #06-30556-01 Amendment 04

Temporary Location: Former McClellan Air Force Base, Area CS-10,
Sacramento, CA

Cabrera Services Inc. (CABRERA) is providing this written notification of its intent to utilize CABRERA Material License #06-30556-01 at a temporary job site. The attached information is provided as required by license condition 18A.

We trust that this information is sufficient to grant our use of CABRERA material license #06-30556-01 Amendment 04 at the temporary job site. This license or reciprocity is currently in use at 4 other sites (HI, ME, NY, PA). 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

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

579176
NMSS/RGN1 MATERIALS-002

ATTACHMENT

Former McClellan Air Force Base, Area CS-10 Former McClellan Air Force Base, Sacramento, California (September 2012)

Cabrera Services, Inc (CABRERA) has prepared this request to support work at the former McClellan Air Force Base Area CS-10. CABRERA intends to provide activities utilizing the controls set forth in the CABRERA NRC Materials License, number 06-30556-01 Amendment 04 at a temporary job site. The work is expected to be performed beginning September 2012. CABRERA is providing planning, reporting, radiological surveys, soil analysis, and support of operations at the temporary job site.

BACKGROUND

The client, URS Corporation is providing remediation support services to the Air Force Real Property Agency (AFRPA) with respect to future use of the property located at the former McClellan Air Force Base Area CS-10 (Site). A copy of a Memorandum of Understanding between URS, AFRPA, and CABRERA is enclosed with this notification.

RADIOLOGICAL WORK DETAILS

The scope of work for the Site includes decontamination and decommissioning work associated with removal of diffuse radium 226 in soils. Discrete sources are not expected. Removed soils will vary in overall activity but are expected to average up to several pCi/g of Ra-226. A conservative estimate assuming the entire stockpile of soil is uniformly contaminated provides for radium values estimated at 10-100 mCi of diffuse radium in soil.

Soil screening, sampling, excavation, and packaging of removed radioactive materials for transport to an Air Force permitted temporary staging area or disposal at the U.S. Ecology facility in Grand View, Idaho will be provided.

CABRERA is providing radiological protection, training, and radiological coverage for site remediation workers and contamination controls associated with work evolutions at the site and the site laboratory. These controls will be in accordance with Cabrera's NRC License and the enclosed AFRPA Memo of Understanding. CABRERA will not take permanent possession of any material derived from the site.

Onsite radiological work will include:

- Providing radiological coverage for the removal of previously excavated soils currently stockpiled at the Site.
- Providing radiological coverage for the transfer and stockpiling of 25,000 cu yd of CS-10 Site soil to the Air Force permitted temporary staging area.
- Use of an NRC licensed sealed 3 uCi button source to provide efficiency calibrations on gamma spectroscopy equipment located in the Cabrera Sacramento Office. The button source contains Am-241, Cs-137 and Co-60. The office is considered part of the Site by the approved Radiological Protection Plan (RPP).
- Providing gamma spectroscopy and scanning of routine work evolution soils and FSS soils in sealed containers brought to the Site Laboratory for analysis.

- Providing radiological controls associated with the laboratory soils and return of all samples to the CS-10 site upon completion of gamma analysis.
- Providing remediation of floor and walls of the current excavation pit at the Site.
- Providing radiological support for the segregation of incompatible wastes from the 25,000 cu yd soil stockpile.
- Providing for off-site disposal of soil contaminated with RCOCs above the consolidation unit acceptance criteria.

Daily QC of portable radiological instrumentation will be performed utilizing NRC exempt button and plated sources. NRC licensed sources, may be utilized for calibration of gamma spectroscopy systems as described above. All sources used onsite will be maintained and controlled by CABRERA personnel.

Personnel radiation dosimetry is not expected to be utilized at the Site due to low expected doses resulting in only a small fraction of 10 CFR Part 20 limits. The onsite work associated with this temporary jobsite is expected to begin on or about September 19, 2012 with the gamma spectroscopy laboratory calibration (licensed source) expected on or about October 3, 2012. The onsite work duration is expected to extend up to December 31, 2012.

Key individuals providing onsite remediation activities under the CABRERA NRC License include but are not limited to:

Jim Reese, CHP, CABRERA Program Manager
 Clif Gray, CABRERA Project Manager
 Katharine Sarmast, Senior Health Physicist

These individuals meet the requirements set forth in Cabrera's NRC License with respect to Authorized Users. Others may provide coverage without prejudice as long as they meet NRC License Criteria as provided for in License condition 11. At least one of the listed authorized users meeting the described requirements will always be present onsite during ongoing radiological work activities within radiologically controlled areas.

The primary CABRERA representative and the named Authorized User is:

Jim Reese, CHP
 CABRERA Program Manager
 Site Authorized User
 3355 Myrtle Ave Suite 210
 Sacramento, CA 95660
 (916) 334-3740 (office)
 (916) 833-2945 (cell)

The RSO named on the CABRERA License is:
 Henry Siegrist, P.E. CHP,
 473 Silver Lane
 East Hartford, CT 06118
 (860) 569-0095 ext 18
 (860) 416-0196 cell (24/7)
 (860) 569-0277 fax

Please contact Henry Siegrist (CABRERA) at (860) 569-0095 should you have any questions regarding this CABRERA notification of intent to use the NRC Materials License, number 06-30556-01 Amendment No. 4 at the former McClellan Air Force Base Area CS-10, Sacramento, California.

MEMORANDUM OF UNDERSTANDING

Among

U.S. Air Force Real Property Agency, URS, and Cabrera.

RE: US NRC License Use for Radiological the Construction of the Consolidation Unit at CS 10 and the Remediation of CS-024, CS-022, and PRL-008, at the Former McClellan Air Force Base, Sacramento, CA;

1. Background

- a. The former McClellan Air Force Base (McClellan) was an air logistics depot from 1939 through 2000. Various activities conducted at McClellan during that period resulted in the release of radium-226 into soil. Since McClellan has been closed, the Air Force is required to transfer ownership of the property at the former base to new owners who can be put the property to uses that will benefit the surrounding community. Sites CS-10, CS-024, -CS-022, and PRL-008 have been identified as having radium-226 contamination in soil that presents an unacceptable risk to human health or the environment. The radium-226 contamination at these sites must be remediated before the property can be transferred.
- b. These radiological sites are owned by the Air Force, and are under exclusive Federal jurisdiction.
- c. McClellan property is managed by the Air Force Real Property Agency.
- d. URS is implementing removal actions at CS-10, CS-024, CS-022, and PRL-008 under a contract between the Air Force Real Property Agency (AFRPA) and URS. This will entail excavation of radium-contaminated soil from each site and disposal of the soil at the newly constructed consolidation unit and at the off-site disposal at the U.S. Ecology facility in Grand View, Idaho. The objective of the action is to reduce radioactivity due to radium-226 in soil at each site to levels that will allow the Air Force Radioisotope Committee (RIC) and the California Department of Public Health (CDPH) to release the sites for unrestricted use.
- e. URS has contracted with Cabrera Services (Cabrera) to provide radiological services in support of remediation, and transportation of radium-226 contaminated material removed from the these sites. These services are being performed under a contract between AFRPA and URS.
- f. For the purposes of this Memorandum of Understanding (MOU), Cabrera will provide radiological services in accordance with the Nuclear Regulatory Commission (NRC) License 06-03556-01 for characterization surveys, health and safety monitoring, and associated final status surveys, including radioactive material management, removal, and storage. This agreement is related to Cabrera License condition 9, which authorizes the "decontamination, decommissioning, and remediation of facilities and grounds, equipment, and containers."
- g. The Intent of this MOU is to outline the general applicability and responsibilities of each organization as it applies to their scope of work and license implementation. The MOU is provided pursuant to the requirement that licensee responsibilities must be clearly delineated to reflect the responsible party. Such responsibilities will consist of the performance of radiological remediation activities, temporary storage of radioactive waste, and performance of radiological surveys at CS-10, CS-024, CS-022, and PRL-008 under NRC License 06-03556-01.

2. Organizational Responsibilities. Each organization has distinct areas of responsibility as defined by their respective functions. In performing the work, Cabrera will maintain control over the following items or activities as applicable to their scope of work or license requirements.

a. Cabrera shall:

- 1) Perform work using radiologically sound work practices following standard operating procedures (SOPs) approved under their NRC license; approved work practices; the project specific removal action work plan (RAWP), health and safety plan, and radiation health plan; the McClellan Quality Assurance Project Plan (QAPP); the performance work statement (PWS); Air Force Instruction (AFI) 40-201; the versions of Air Force Radioactive Materials Permits CA-00605-02 and CA-00366-00 in effect at the time the work is performed; and NRC License 06-03556-01.
- 2) Provide training and dose record maintenance for employees of Cabrera and its subcontractors.
- 3) Maintain control of radioactive materials used for operational checks of radiation detection and for their laboratory equipment.
- 4) Maintain control of access to individual work areas contractually designated under Cabrera control for activities where radioactive materials are known or suspected of being present.
- 5) Maintain contamination control of waste materials in areas designated by the Air Force as work or storage areas. The contaminated material will be transported from each site to either the newly constructed consolidation unit on the Former McClellan AFB or the U.S. Ecology facility in Grand View, Idaho.
- 6) Conduct surveillance to issue and maintain Radiation Work Permits for work controlled by Cabrera.
- 7) Maintain and provide inventories of radioactive materials, including waste, under Cabrera's control.

b. AFRPA Sacramento shall: Ensure Cabrera performs work using radiologically sound work practices following SOPs approved under their NRC license; approved work practices; the project specific RAWP, health and safety plan, and radiation health plan; the McClellan QAPP; the PWS; AFI 40-201; the versions of Air Force Radioactive Materials Permits CA-00605-02 and CA-00366-00 in effect at the time the work is performed; and NRC License 06-03556-01. Sign waste manifests and/or other appropriate shipping documents for disposal of removed soil and debris as necessary.

c. URS shall: Provide necessary contracting services to ensure Cabrera performs radiologically sound work practices following SOPs approved under their NRC license; approved work practices; the project specific RAWP, health and safety plan, and radiation health plan; the McClellan QAPP; the PWS; AFI 40-201; the versions of Air Force Radioactive Materials Permits CA-00605-02 and CA-00366-00 in effect at the time the work is performed; and NRC License 06-03556-01. URS will prepare the RAWP, which will address excavation, site control, transportation, emergency response, and off-site disposal, maintenance and monitoring requirements during remediation. Prepare reports and permits concerning the work, including but not limited to AFRPA encroachment permits, and daily reports to AFRPA, AFCBE, and the regulatory agencies.

3. Responsibilities for Performance of Site Work

- a.** Cabrera is contracted to URS to provide the radiological support to remediate radioactive contaminated soil at CS-10, CS-024, CS-022, and PRL-008 sites to unrestricted use levels.

Cabrera shall:

- Provide the radioactive materials license under which all work will be performed.
- Provide radiological training for all site workers as required by License and site conditions.
- Provide a full time Radiation Safety Officer with proven experience performing similar work.
- Provide the necessary radiological monitoring equipment and technicians to determine the presence of radium-226 greater than 2 pCi/g during excavation and final status survey.
- Provide radiological oversight of field work, including screening during operations (e.g. excavation, sampling, transportation, decontamination).
- Provide radiological guidance regarding all related work and activities with adherence to regulations, and materials handling, and control.
- Submit daily reports detailing site activities, compliance with radiation regulations, radiological survey results and any corrective actions, recommendations, and measures to be implemented.
- Perform the decontamination and decommissioning work required for the removal actions in accordance with SOPs approved under their NRC license; approved work practices; the project specific RAWP, health and safety plan, and radiation health plan; the McClellan QAPP; the PWS; AFI 40-201; the versions of Air Force Radioactive Materials Permits CA-00605-02 and CA-00366-00 in effect at the time the work is performed; and NRC License 06-03556-01.
- Establish and maintain excavation zone boundaries, access control, radiological job coverage and area monitoring protective of occupational workers, the public, and the environment.
- Establish a radiological decontamination area and documentation/monitoring of decontamination as necessary. Perform radiological decontamination and provide direct supervision and management of decontamination as necessary.
- Provide storage and transportation surveys for radioactively contaminated waste.
- Provide final field screening to verify that excavation goals have been met and that the site is ready for its final status survey.
- Perform a final status survey following the excavation at each site to demonstrate that radiological standards for unrestricted use have been met.
- Point of contact for Cabrera is Jim Reese.

b. AFRPA shall:

- Work with the contractor to address any unexpected contamination or radiological control issues.
- Monitor site work by performing on-site visits, tracking daily on-site reports and/or participating in conference calls
- Communicate directly with the AF RIC on the project.
- Point of contact for the Air Force is Steve Mayer

c. URS shall:

- Monitor site work by performing on-site visits, tracking daily on-site reports and/or participating in conference calls.
- Work with Air Force and Cabrera to contractually address any unexpected contamination issues.
- Point of contact for URS is Rich Beyak

4. Jurisdictional Issues and Changes. Jurisdictional issues or specific situations not covered under this agreement will be discussed among the Air Force, URS, and Cabrera for resolution, and documented by amendment of this MOU.

5. Effective Period: This MOU is effective upon signature by all parties and will expire in 36 months. Any party may terminate this agreement by giving 90 days advance written notice of the effective date of termination, or upon the written agreement of all parties at a mutually agreeable date.


6. Approval:


Steve Mayer, AFRPA RSO

9/14/2012
Date


Rich Beyak, URS Project Manager

9/10/12
Date


Jim Reese, CHP, Cabrera Project Radiation Safety Officer

9.10.12
Date

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

9/18/12, and to inform you that the initial processing which includes an administrative review has been performed.

☒ Notification (06-30556-01)
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** 579176.
When calling to inquire about this action, please refer to this control number.
You may call us on (610) 337-5398, or 337-5260.