DATE: January 16, 2013

FROM: Dominick Orlando, Senior Project Manager
Special Projects Branch
Decommissioning and Uranium Recovery
Licensing Directorate
Division of Waste Management
and Environmental Protection

SUBJECT: NOTE TO FILE REGARDING ARMY REQUEST TO PERFORM TRAINING AT THE SCHOFIELD BARRACKS INSTALLATION IN OAHU HAWAII (Docket No.: 040-09083)

By emails on January 15, 2013 the U.S. Army submitted a request to the U.S. Nuclear Regulatory Commission to perform training at its Battle Area Complex on the Schofield Barracks installation on Oahu, Hawaii. On January 15, 2013, NRC staff verbally requested additional information from the Army demonstrating that the areas on the BAX where dismounted troops would conduct training had been cleared of depleted uranium during the BAX construction. The Army provided this demonstration via email on January 15, 2013.

Several of the emails contain a "for official use only" (FOUO) classification. The NRC staff asked the Army staff if the request and supporting information could be made publically available. The Army staff stated that the information could be made publically available.

Orlando, Dominick

From: Cherry, Robert N (Bob) JR CIV USARMY IMCOM HQ (US) [robert.n.cherry.civ@mail.mil]
Sent: Tuesday, January 15, 2013 9:20 AM
To: Orlando, Dominick
Subject: Request for Training Waiver (UNCLASSIFIED)
Attachments: 20130114 NRC License Waiver Request.pdf; 20130114 Letter encl Schofield BAX RCA Map.pdf
Signed By: robert.cherry@us.army.mil

Classification: UNCLASSIFIED
Caveats: NONE

Mr. Orlando,

Attached is our request to commence training at the Schofield Barracks Battle Area Complex (BAX) in Hawaii on or after January 20, 2013. The Nuclear Regulatory Commission is not likely to issue a source material license before that date that will allow this training. As you know, portions of the BAX overlap the Davy Crockett M101 depleted uranium (DU) spotting round radiation controlled area (RCA). As you also know, an Army contractor cleared that overlap of DU prior to BAX construction.

Thank you for your expedited response to our request. I will place a printed version of the request in the mail today. Please acknowledge your receipt of this email with a short response.

Bob

Bob Cherry

IMCOM Radiation Safety Staff Officer

210-466-0368

Cell 210-313-0952 (weak or no signal in office)

robert.n.cherry.civ@mail.mil

US Army Installation Management Command

ATTN: IMSO/301

Building 2261

2405 Gun Shed Road

Fort Sam Houston, Texas 78234-1223

Attachment Classification: UNCLASSIFIED
Attachment Caveats: FOUO

Classification: UNCLASSIFIED
Caveats: NONE

DEPARTMENT OF THE ARMY
U.S. ARMY INSTALLATION MANAGEMENT COMMAND
2405 GUN SHED ROAD
FORT SAM HOUSTON, TEXAS 78234-1223

REPLY TO
ATTENTION OF

IMCG

Mr. Larry Camper
Director, Division of Waste Management and Environmental Protection
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Camper:

On behalf of the Commanding General, Installation Management Command, the Army respectfully requests a waiver from the current NRC training and use restrictions at the Schofield Battle Area Complex (BAX), for planned essential training operations to be conducted beginning on or after January 20, 2013, prior to issuance of a NRC license to the Army for the residual depleted uranium (DU) located within certain areas on the operational ranges at the Schofield BAX. As discussed previously, the focus of the NRC with regard to the license conditions is for the Army to demonstrate that the effects of certain ground disturbing activities will not create conditions that may lead to migration of DU outside of the radiological control area (RCA). The planned training operations do not involve any of the activities defined as "ground disturbing" in our December 12, 2012 meeting within the RCA. The following description outlines the planned upcoming training at the Schofield BAX.

Two separate training events will be conducted within the Schofield BAX in the near future. The first will occur from January 22 through 25, 2013. This training will involve a platoon-sized element consisting of approximately fifty (50) personnel. The second training event will take place between January 30 and February 20, 2013. This training event will focus on a company-sized element of approximately 150 personnel.

Operations during both events will include training on the following types of tactical operations: Conduct Attack, Conduct Security Operations, Integration of Enablers, Company Intel Support Team Operations, Re-supply Operations, Movement Techniques, React to Contact, Fire Support Planning, Clearance of Fires, Dismounted CIED Operations, Conduct Care under Fire, and Evacuate Casualties.

These activities will require soldiers, working in teams, to detect, engage, and defeat stationary and moving targets in open and urban terrain. These units will maneuver on foot and in wheeled vehicles (including Strykers) through designated training lanes on the BAX. All vehicle travel will be restricted to designated roadways that have been cleared of all radiological material. They will establish secure positions, engage targets, and conduct re-supply operations that consist of driving convoys of vehicles to specified locations to support operations and evacuate casualties.

Ammunition planned for use includes: 5.56mm (ball and link), 7.62 mm ball, 40mm TPT (link and single), 105mm TPT (Stryker), .50 cal ball, and in the impact area (see attached graphic) 155mm HE, 60mm, 81mm and 120mm mortar HE. Note that TPT ammunition is inert training rounds. All HE will be fired into the designated impact area outside of the RCA.

As indicated above, no ground disturbing activity that may impact the RCA or any residual DU on the BAX is expected during any of the training operations. Dismounted troops moving on the ground in the RCA does not constitute a "ground disturbing activity". Vehicles will be restricted to course roads that were cleared of any DU fragments during the BAX construction by the contractor working under its NRC license. Planned HE impacts will take place in the portion of the impact area identified on the graphic. The HE impact area is outside of the RCA, but still remains within the larger range impact area. Army range management and safety personnel will oversee the training events to ensure all appropriate radiation safety protocols are followed under the limited circumstances of this training. Enclosed is a graphic which depicts in colored markings the Schofield Barracks BAX where this training will take place, including the RCA and the HE impact area off the RCA.

We request this waiver of NRC restrictions in order to conduct training operations as described above during the period before the final license and/or exemption is established. For planning purposes and finalization of scheduled training timetables, we respectfully request your concurrence no later than January 16, 2013. Thank you in advance for your attention to this important matter. If you require any clarifications or additional information, please contact Dr. Robert Cherry at (210) 466-0368 or by email at robert.cherry@us.army.mil.

Sincerely,

Al Aycock
Major General, U.S. Army

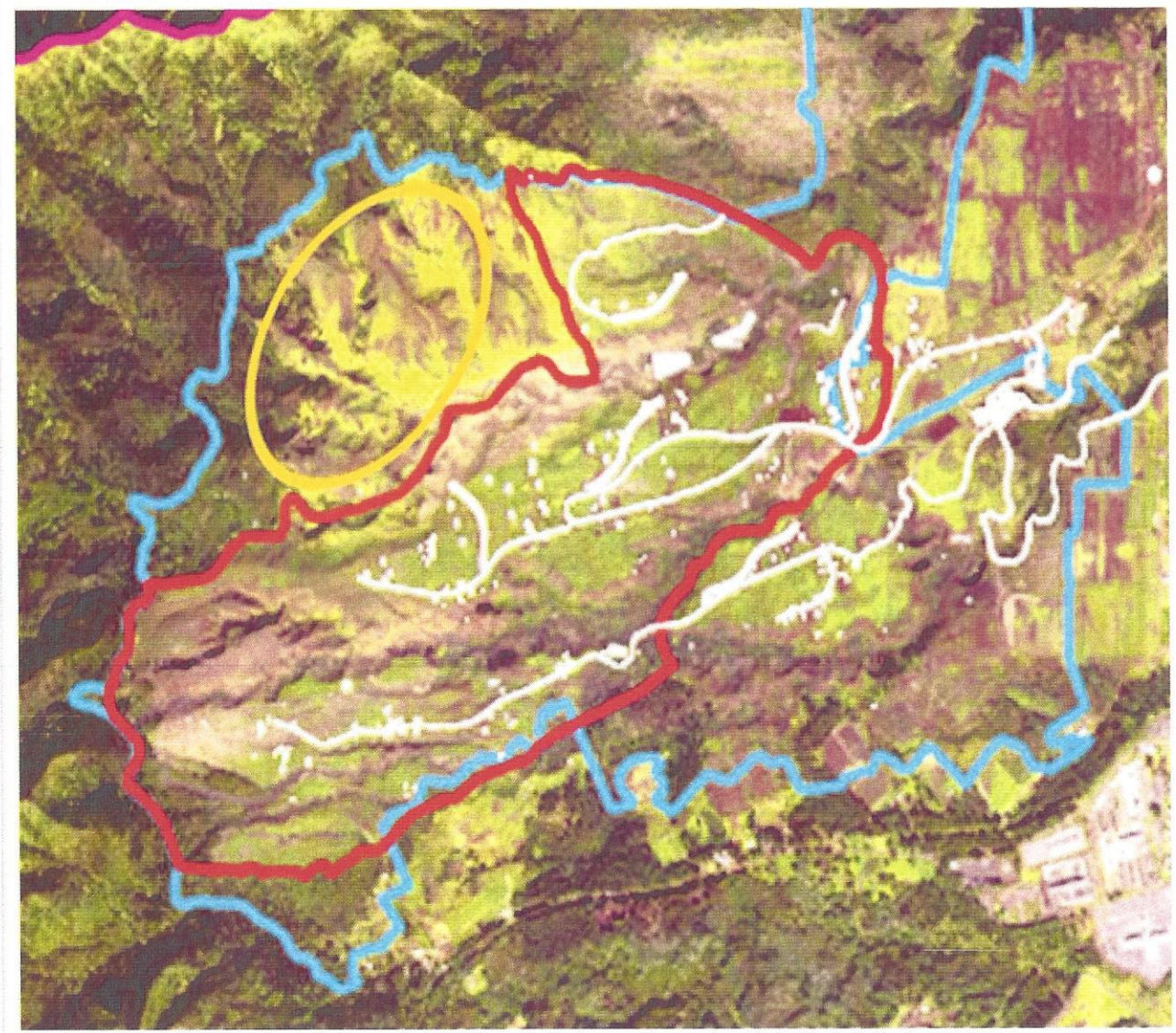
CC
Headquarters, Department of the Army (DACS-SF), Army Safety Office, 9351 Hall Road, Building 1456, Fort Belvoir, Virginia 22060-5860
U.S. Army Institute of Public Health (MCHB-TS-OHP), 5158 Blackhawk Road, Aberdeen Proving Ground, Maryland 21010-5403

Encl
Graphic – Schofield Battle Area Complex (BAX)

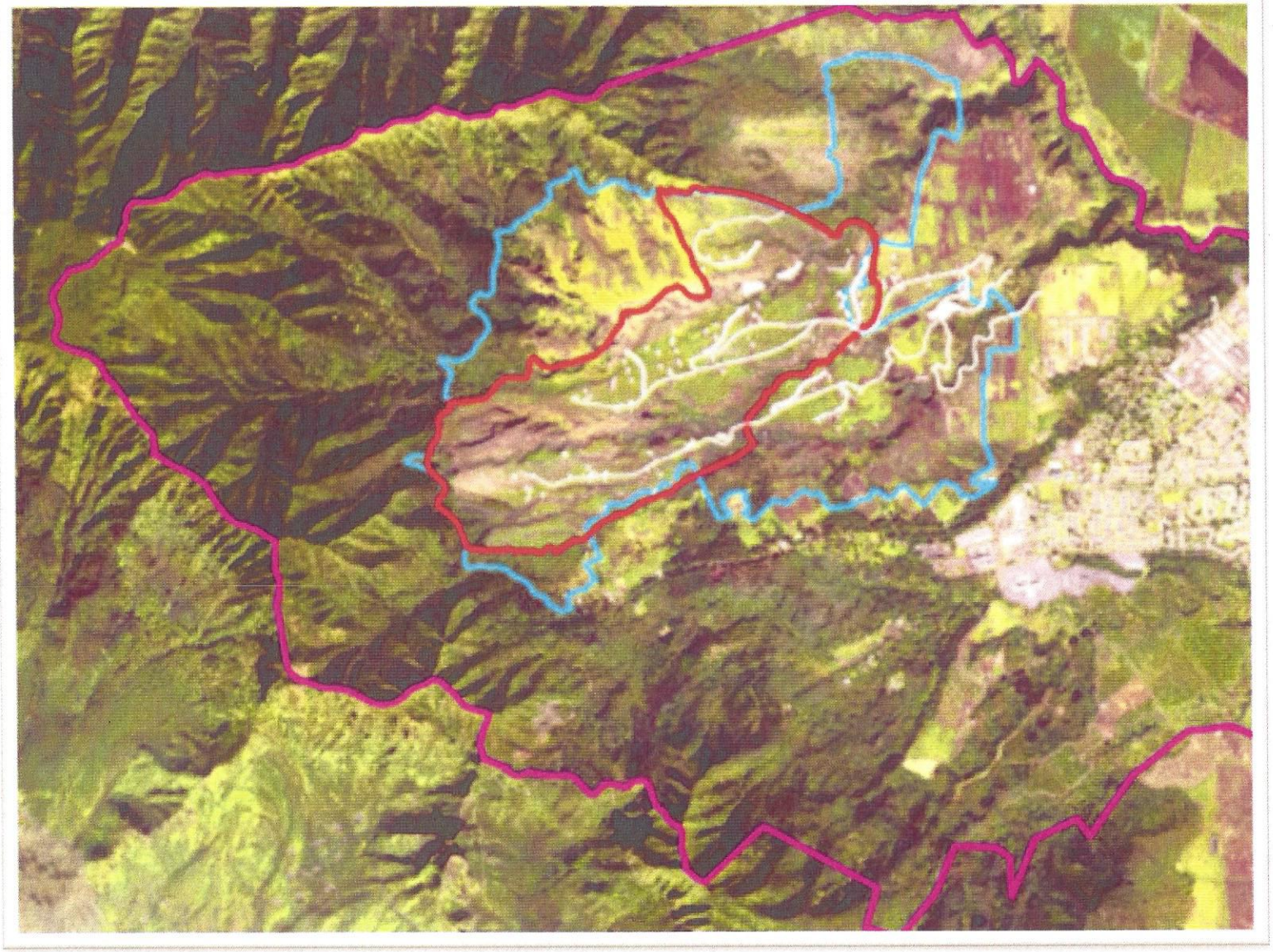
SCHOFIELD BARRACKS BATTLE AREA COMPLEX (BAX)

Orientation

- BAX Maneuver and targetry oriented from East to West
- White lines represent course roads and target clusters
- Two training lanes are used along cleared course roads; one North and one South



As of 4 JAN 13


Legend
Installation Boundary
Impact Area Boundary
RCA Boundary
Course Roads/Target Clusters
HE Impact Area

As of 4 JAN 13

Orlando, Dominick

From: Cherry, Robert N (Bob) JR CIV USARMY IMCOM HQ (US) [robert.n.cherry.civ@mail.mil]
Sent: Tuesday, January 15, 2013 11:35 AM
To: Orlando, Dominick
Subject: Radiation Surveys of BAX Construction Footprint (UNCLASSIFIED)
Attachments: Rad Survey of BAX footprint.pdf
Signed By: robert.cherry@us.army.mil

Classification: UNCLASSIFIED
Caveats: NONE

Mr. Orlando,

For your convenience, I am sending a summary of subject surveys. The Army provided this information to the NRC previously on October 29, 2010 at a public technical meeting.

Bob

Bob Cherry
IMCOM Radiation Safety Staff Officer
210-466-0368
Cell 210-313-0952 (weak or no signal in office)
robert.n.cherry.civ@mail.mil

US Army Installation Management Command
ATTN: IMSO/301
Building 2261
2405 Gun Shed Road
Fort Sam Houston, Texas 78234-1223

Attachment Classification: UNCLASSIFIED
Attachment Caveats: FOUO

Classification: UNCLASSIFIED
Caveats: NONE

EXCERPTS FROM "USACE SUPPORT TO CONSTRUCTION ACTIVITIES AT SCHOFIELD BARRACKS, OAHU, HI"*

PRESENTED BY HANS HONERLAH, HEALTH PHYSICIST, US ARMY CORPS OF ENGINEERS (USACE), BALTIMORE DISTRICT, AT NRC PUBLIC TECHNICAL MEETING ON OCTOBER 29, 2010

USACE DEPLETED URANIUM (DU) CONSTRUCTION SUPPORT

- 100 percent gamma walkover surveys (GWS) of construction footprint (150 acres)
- Spot remediation of DU with post removal confirmation GWS
- Over 150 ft^3 of DU contaminated soils removed and packaged for disposal
- All construction soils sampled and analyzed using onsite gamma spectroscopy laboratory
- Soils screened for DU and released for reuse as backfill
- Visual inspection of spoils for Davy Crockett spotter rounds

DU SURVEYS IN SUPPORT OF BATTLE AREA COMPLEX CONSTRUCTION

- MARSSIM Surveys
  - 2000 m^2 Class 1 Survey Units
  - 100 percent GWS using field instruments to detect low energy radiation (FIDLERs)
  - Systematic Sampling
- Action/screening levels derived from NUREG 1757 for depleted uranium = 13 pCi/g
- If identified, DU was be removed using shovel/bucket
- GWS confirmed removal of DU

* Minor style edits

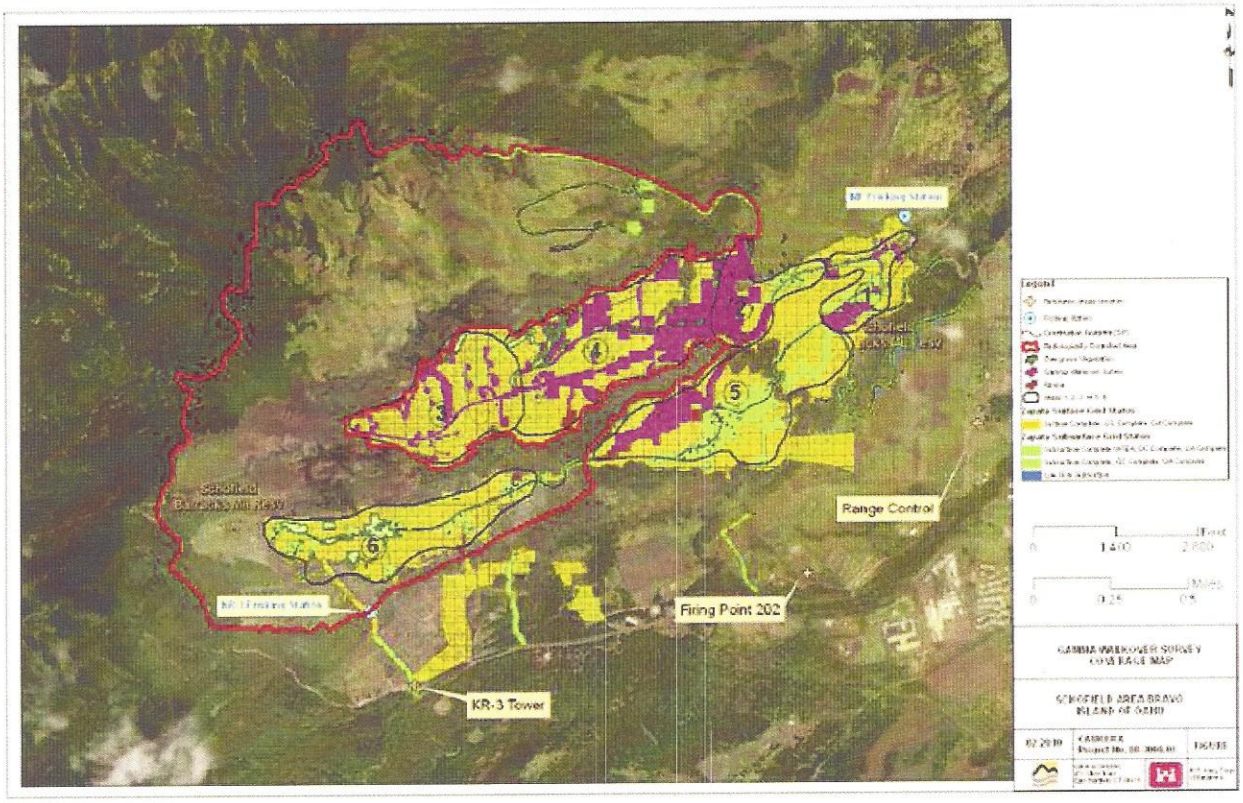


FIGURE 1 GAMMA WALKOVER SURVEY COVERAGE MAP PROVIDED ON OCTOBER 29, 2010

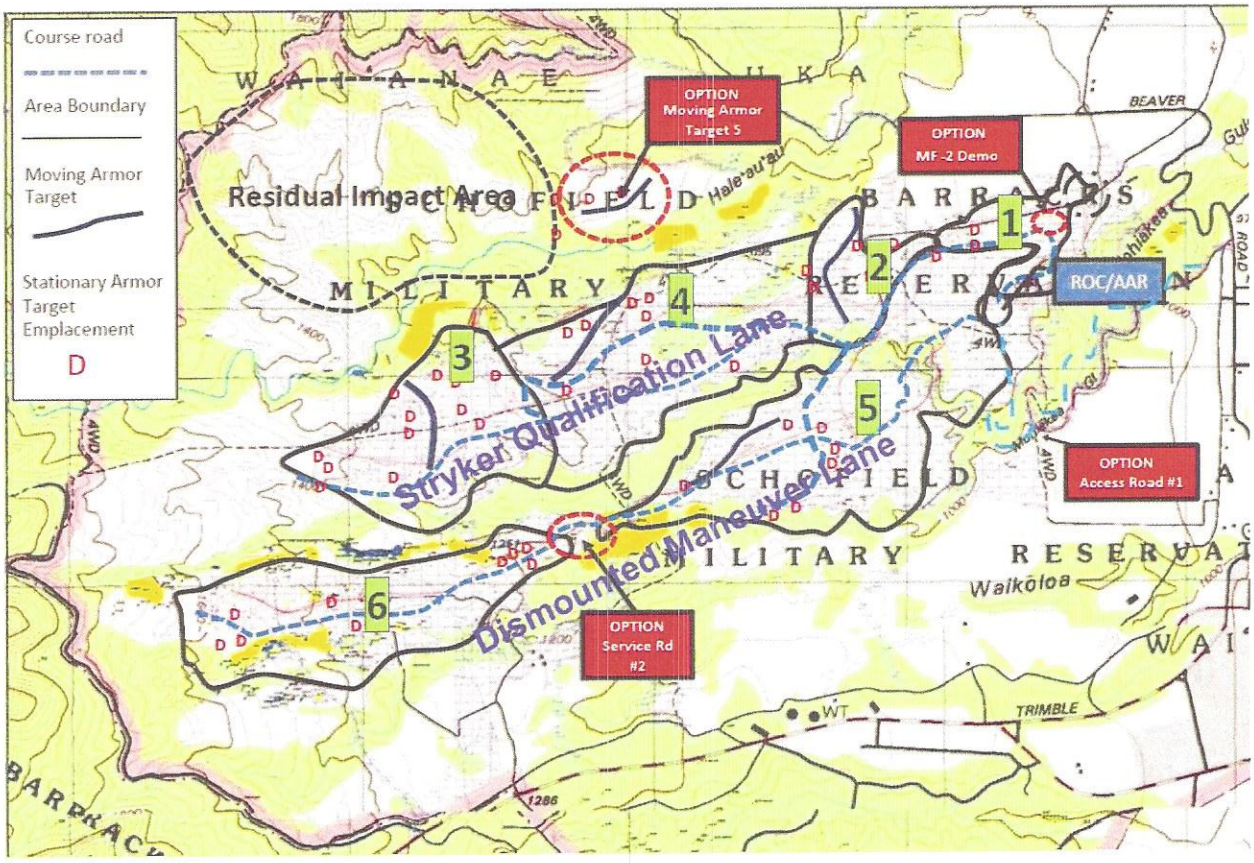


FIGURE 2 BAX MAP PROVIDED ON OCTOBER 29, 2010 ("RESIDUAL IMPACT AREA" SINCE MOVED TO OUTSIDE OF RADIATION CONTROLLED AREA)