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January 16, 2013

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

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

Temporary Location: U.S. Army, Pohakuloa Training Area, Hawaii

Cabrera Services Inc. (CABRERA) is providing this written notification of its intent to continue to utilize CABRERA Material License #06-30556-01 at a temporary job site. The attached information is an amendment to notification information previously transmitted to the NRC and replaces that information in its entirety.

We trust that this information is sufficient to continue use of CABRERA material license #06-30556-01 Amendment 04 at the temporary job site. This license or reciprocity is currently in use at 2 other sites (CA, NY). 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, P.E., CHP RSO, Corporate Health Physicist

Attachment

579818 NMS3/RGN1 MATERIALS-002

## ATTACHMENT U.S. ARMY POHAKULOA TRAINING AREA, HAWAII (January 2013)

Cabrera Services, Inc. (CABRERA) will provide radiological decontamination, remediation, site characterization, solidification and treatment of wastes, and packaging for transport of radioactive materials associated with activities at the Pohakuloa Training Area on the island of Hawaii. The "Site" is the Radiological Control Area within the Pohakuloa Training on the Island of Hawaii. The anticipated work entails but is not limited to analysis associated with gamma walkover surveys, the collection of soil samples, and soil remediation associated with depleted uranium (DU) fragments at the Site. In addition, environmental sampling of air effluents/vegetation associated with Army field operation activities will be provided as required. CABRERA will provide radiological support in the form of DU awareness training, personnel and equipment frisking, and radiation safety coverage where radiological contaminants of concern are present.

This information is being transmitted to you as required by condition 18A of the CABRERA Materials License.

## **BACKGROUND**

The Site has been used by the DoD as a live fire range. Depleted uranium (DU) spotting rounds were frequently utilized at the site. The DU involved is limited to the Radiological Control Area (RCA) previously identified by past submittals of the U.S. Army Pohakuloa Training Area and has not changed in dimensions. Work activities at the site are transitioning from building/construction activities to maintenance/operations activities within the RCA. These work activities require the same radiological monitoring of exiting personnel, vehicles and equipment from the RCA as during building/construction phase activities.

The project work scope also continues to include soil and air effluent sampling with possible onsite gamma spectroscopic analysis of samples. Remediation, packaging, and shipping of DU fragments found during routine surveys, monitoring of equipment and vehicles exiting the RCA, and gamma walkover activities will be provided. Dosimetry will not be required or provided due to the low level of contamination, low dose rates associated with DU, and low individual occupancy rates associated with this RCA.

## RADIOLOGICAL WORK DETAILS

CABRERA has prepared this notification to the NRC with respect to CABRERA'S intent to utilize the CABRERA Materials License, number 06-30556-01 Amendment 04, at the Pohakuloa Training Area, Hawaii temporary job site. As required by condition 18A of the CABRERA Materials License, the following information is provided:

- The licensed material of concern is depleted uranium (DU) present as metal and metal oxides in the soil and equipment/materials that may have come in contact with these soils.
- The site location is the Radiological Control Area (RCA) previously identified by past submittals of the U.S. Army Pohakuloa Training Area on the island of Hawaii.

- General radiological safety training will be provided to personnel who enter and frequent the RCA to ensure their ability to work within the RCA in accordance with the Cabrera Materials License. Awareness training will be provided to visitors and infrequent RCA entrants.
- Routine exit frisking of Army personnel, Army contractors, vehicles, and equipment and articles coming in contact with potentially contaminated soil from the RCA will be provided.
- Air effluents originating from areas within the RCA will be measured if they are associated with potential airborne generating activities such as, large vehicle movement over roadways that are not newly constructed.
- Samples may be analyzed onsite utilizing portable gamma spectroscopy equipment.
  The gamma spectroscopy equipment will be calibrated using a sealed solid source
  maintained under CABRERA control at the Site during the work evolution. The source will
  also be utilized for daily QC of the gamma spectroscopy system. After analysis the
  samples may be packaged and shipped to an approved offsite laboratory for further
  analysis.
- Routine operation and maintenance of damaged targets may require removal from the RCA. Release of equipment and targets from the RCA associated with this work effort will follow Cabrera approved procedures and will ensure the absence of radioactive contamination. Equipment and target release values are consistent with NRC Regulatory Guide 1.86.
- Investigation derived wastes (IDW) and packaged remediation soil waste with DU fragments will be handled in accordance with federal and state regulations. These materials include onsite soil and air samples, small amounts of contaminated PPE and equipment (gloves, smears, etc.) and DU fragments packaged in steel drums. These materials will be inventoried under the Cabrera License and stored in Army controlled areas during onsite work activities. The IDW and packaged remediation soil waste will be shipped to an authorized site. The waste shipment will occur under the guidance of Cabrera's certified waste broker.
- Standard exempt electroplated-metal and button-type sources will be used during the
  work evolution for daily quality control (QC) checks of radiation detection equipment.
  The sources will be controlled under CABRERA NRC Materials License No. 06-30556-01,
  as described in CABRERA Radiation Safety Procedure No. OP-009, Use and Control of
  Radioactive Check Sources. No NRC licensed radioactive sources are expected to be
  used.

CABRERA NRC Materials License (No. 06-30556-01) requirements, including previously submitted procedures, will be adhered to for the duration of this work evolution. No licensed material will be removed from the site by CABRERA.

Work within the scope of this notification is expected to begin January 31 and continue through December 31, 2013.

Key project personnel and supporting information is available from:

Mr. Bachir Badaoui – CABRERA Field Site Manger Cabrera Services, Inc. 3355 Myrtle Avenue Sacramento, CA 95660 Office: (916) 334-3740

Mobile: (765) 532-2674

Mr. Clif Gray – CABRERA Project Manager Cabrera Services, Inc. 3355 Myrtle Avenue Sacramento, CA 95660 Office: (916) 334-3740

Mobile: (916) 833-2945

Mr. Henry Siegrist, P.E., CHP – RSO, CABRERA Corporate Health Physicist Cabrera Services, Inc. 473 Silver Lane East Hartford, CT 06118

Office: (860) 569-0095 ext 18 Mobile: (860) 416-0196

Please contact Henry Siegrist (CABRERA) at (860) 569-0095 should you have any questions regarding this CABRERA notification of intent to utilize NRC Materials License, number 06-30556-01 Amendment No. 04.

This is to acknowledge the receipt of your letter application dated	
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 <b>Mail Control Number</b> When calling to inquire about this action, please refer to this control number. You may call us on (610) 337-5398, or 337-5260.	
NRC FORM 532 (RI) (6-96)	Sincerely, Licensing Assistance Team Leader