

**CABRERA SERVICES**  
RADIOLOGICAL • ENGINEERING • REMEDIATION

May 3, 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

B. 4  
03035316

REC PG 1 05 06 13 AM 1022

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

Temporary Location: Hunters Point Naval Shipyard, San Francisco, 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 in three states (CT, HI, 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

580641

NMSS/RGN1 MATERIALS-002

## **ATTACHMENT**

### **Former Hunters Point Naval Shipyard, Parcel E, San Francisco, California (May 2013)**

Cabrera Services, Inc (CABRERA) has prepared this request to support work at the former Hunters Point Naval Shipyard, Parcel E. CABRERA intends to provide radiological control activities utilizing CABRERA NRC Materials License, number 06-30556-01 Amendment 04 at this temporary job site. The work is expected to be performed beginning May 2013. CABRERA is providing radiological controls associated with the movement and analysis of soil present within a radiologically impacted area.

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

#### **BACKGROUND**

Cabrera-Insight Joint Venture (CIJV) is partnered with CDM Smith (CIJV/CDM Smith) to provide certain field pilot tests within radiologically impacted areas. These tests are to evaluate the effectiveness of several technologies investigating stabilization and treatment performance monitoring of areas affected by subsurface petroleum. A copy of a Memorandum of Understanding between Naval Sea Systems Command Detachment, Radiological Affairs Support Office, BRAC PMO West and CIJV is enclosed with this notification.

The site is located at the Cabrera-Insight Joint Venture (CIJV), Parcel E, Site IR 03, Hunters Point Naval Shipyard, San Francisco, CA 94188.

#### **RADIOLOGICAL WORK DETAILS**

The scope of work for the Site includes field pilot tests associated with the evaluation of various technologies investigating treatment of soils and associated treatment performance monitoring. The treatment investigation will include soils and sediments present within radiologically impacted areas. These materials are potentially impacted with cesium-137, radium-226, and strontium-90 as diffuse low level contamination associated with the disposal of assorted shipyard wastes.

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

Onsite radiological work will include but not be limited to:

- Screening of soil borings for radiological constituents.
- Providing for offsite analysis of detected elevated activity.
- Radiological training of workers.
- Providing controls associated with personnel, materials, and equipment entering and exiting the Radiological Control Area.
- Providing for storage of IDW into approved onsite containers.

Daily QC of portable radiological instrumentation will be performed utilizing NRC exempt button and plated sources. 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 May 20, 2013. Site equipment setup without invasive work may occur prior to May 20. The onsite work duration is expected to continue until approximately May 2, 2014.

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

Nicholas Berliner, NRRPT, Site Radiation Safety Lead  
(860) 916-6091

The named individual meets 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.

Other Key personnel:

Mitra Fattahipour, PG,  
Insight Environmental, Engineering, and Construction, Inc. Project Manager  
501 W. Broadway, Suite 800  
San Diego, CA 92101  
(858) 342-5585 (office)  
(619) 400-4868 (fax)

Danielle Janda  
NAVFAC Southwest  
BRAC Project Management Office  
1455 Frazee Rd, Suite 900  
San Diego, CA 92108  
(619) 532-0796

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 Hunters Point Naval Shipyard, San Francisco, California.

# MEMORANDUM OF UNDERSTANDING

Between

Naval Sea Systems Command Detachment, Radiological Affairs Support Office,  
BRAC PMO West and Cabrera-Insight Joint Venture (CIJV)

**RE: PERFORMANCE OF RADIOLOGICAL SERVICES BY CIJV AT SITE IR03  
LOCATED AT THE FORMER HUNTERS POINT SHIPYARD (HPS), SAN  
FRANCISCO, CALIFORNIA.**

## 1. Background

a. The Navy Base Realignment and Closure Program Management Office West (BRAC PMO West), using the Naval Facilities Engineering Command, South West Division contracting services (NAVFAC SW), has entered into Contract No. N62473-10-D-0811 (Delivery Order No. 0004) with Cabrera-Insight Joint Venture (CIJV). Under this contract, CIJV will provide radiological services at Site IR03 located at the former Hunters Point Shipyard (HPS), San Francisco, California. CIJV will perform radiological services under Cabrera Services, Inc.'s Nuclear Regulatory Commission (NRC) License No. 06-03556-01 (expiration date: September 30, 2020) and apply for reciprocity granted by the State of California Department of Public Health (CDPH) as needed. This MOU is being established as a requirement of Cabrera Services, Inc.'s license conditions.

b. Some radiological operations involving use of licensed radioactive material at HPS were previously authorized by Atomic Energy Commission (AEC) and NRC licenses. All previous licenses were appropriately terminated at the time of termination. Previous radiological operations at HPS involved the use of radioactive materials. Currently, the Navy is authorized to use NRC licensed radioactive materials through a NRC Master Materials License. However, while the Navy is recognized as owner of the radioactive materials at HPS, the materials are not currently permitted under the Master Materials License as the materials are considered residual contamination from previous operations which were appropriately decommissioned at the time of termination or not considered licensed radioactive materials by the NRC at the time of use.

**2. Organizational Responsibilities.** The intent of this section of the MOU is to outline the general applicability and responsibilities of each organization as it applies to their approved performance work statement, field work documents, health and safety plan, radiation protection plan, license standard operating procedures and license implementation. Each organization has distinct areas of responsibility as defined by their respective contracted functions.

**a. In accordance with the contract specific in paragraph 1.a above, CIJV shall:**

- (1) Ensure access is controlled to individual work areas under CIJV's control for activities where radioactive materials are known or suspected of being present.
- (2) Control radioactive materials used for operational check of radiation detection and laboratory equipment.
- (3) Perform work using radiologically sound work practices following standard operating procedures approved under Cabrera Services, Inc.'s NRC license, and field work documents approved by the Navy and federal or state regulators, as appropriate.

(4) Maintain training and dose records for CIJV's employees and subcontractors, as appropriate.

(5) Prepare, issue and maintain Radiation Work Permits for work controlled by CIJV.

(6) Maintain custody of Navy radioactive materials, including low-level radioactive waste, found during investigations, prior to transfer to the on-site Low-Level Radioactive Waste (LLRW) contractor or return to Navy possession.

(7) Characterize and inventory radioactive waste discovered during the performance of field work.

(8) Submit reports and other administrative requirements concerning the work, including daily progress reports, to BRAC PMO WEST, NAVFAC SW, NAVSEADET RASO, and additional Navy offices as requested. Information will be provided regarding the radiological conditions of all work areas, radioactive contamination found, and status of any identified waste.

(9) Assess contamination levels on outdoor areas and materials and equipment.

(10) Radiologically free release all materials and equipment used during the performance of site work.

(11) Coordinate public health and safety assurance issues with the Navy.

**b. The Navy shall:**

(1) Provide technical oversight of CIJV field work.

(2) Allow CIJV to perform work using radiologically sound work practices following standard operating procedures approved under Cabrera Services, Inc.'s NRC license, and Navy and regulator approved field work documents, health and safety plan, radiation protection plan, and performance work statement.

(3) Monitor site work by performing on-site visits, tracking on daily site reports and/or participating in conference calls.

(4) Review all site investigation data.

(5) Provide information about former radiological operations or possible Navy radioactive materials that could be encountered during site work.

(6) Coordinate with the Army LLRW contractor to provide containers for and disposal of radioactive contaminated materials or mixed waste found as a result of conduct of site work.

(7) Work with the contractor to address any unexpected contamination or radiological control issues.

(8) Provide assistance with public health and safety assurance issues.

(9) Issue public statements regarding radiological issues.

(10) Approve clearance of areas prior to turnover of the areas for unrestricted use.

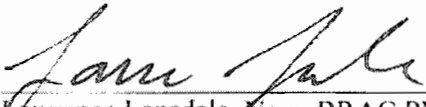
(11) Coordinate regulatory agency approval of clearance of areas prior to turnover of the areas for unrestricted use.

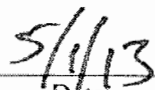
**3. Jurisdictional Issues and Changes.** Jurisdictional issues or specific situations not covered under this agreement will be discussed between the Navy and CIJV for resolution and documented by amendment of this memorandum of understanding.

**4. Effective Period:** This MOU is effective upon signatures by all parties and will expire at the end of the contract awarded to CIJV. Either party may terminate this agreement by giving 30 days advance written notice of the effective date of termination, or upon the written agreement of

both parties at a mutually agreeable date.

**5. Approval:**

  
\_\_\_\_\_  
Lawrence Lansdale, Navy BRAC PMO  
Environmental Program Manager

  
\_\_\_\_\_  
Date

**Craig-Alan C. Bias**

Digitally signed by Craig Alan C. Bias  
DN: cn=Craig-Alan C. Bias, o=Cabrera Services, Inc.,  
ou=Health Physics, email=cbias@cabreraservices.com, c=US  
Date: 2013.04.26 10:13:00 -05'00'

Henry Siegrist, Cabrera Services, Inc.  
Radiation Safety Officer

Craig Bias, for  
Henry Siegrist

\_\_\_\_\_  
Date

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68751380**

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DN: c=US, o=U.S. Government, ou=DoD, ou=PKI,  
ou=USN, cn=EDWARDS.ZACHARY.L.1368751380  
Date: 2013.04.24 15:26:11 -04'00'

Zachary Edwards, for Laurie Lowman, NAVSEADET RASO  
Lead Environmental Program Manager

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Date