

August 12, 2013

CCN 231153

Blake Welling, Branch Chief  
Materials Security and Industrial Branch  
United States Nuclear Regulatory Commission, Region I  
2100 Renaissance Boulevard  
King of Prussia, PA 19406

**SUBJECT:** Contract No. DE-AC07-05ID14517 – Idaho National Laboratory Support of Radiological Dispersion Device Training in Annapolis, MD

Dear Mr. Welling:

Battelle Energy Alliance LLC, the prime contractor for the Department of Energy's (DOE) Idaho National Laboratory (INL), has been requested by the U.S Department of the Army to support a training exercise in Annapolis, MD. The planned training will occur September 3-6, 2013. The training will involve personnel from INL, US Army and the Annapolis Police Department. The objective of the training is to practice, refine, and validate search and package interrogation techniques.

This training will involve the use of sealed radioactive sources. All sources used in the training are certified DOT special form sources, with the exception of three (3) lower activity sources that are used for health physics instrumentation response checks.

The training using radioactive sources will be conducted at a former landfill owned by the City of Annapolis and in a vacant office building located in Annapolis, MD. The Department of the Army has an agreement with the responsible parties to use these facilities.

This training involving the use of radioactive sources will be conducted by a DOE prime-contractor on non-federally owned property. The NRC has requested that INL ask for an exemption from NRC licensing requirements to conduct this training activity. INL is complying with the request as a matter of comity; given the Department of Energy has a separate interpretation of the requirements for such activities.

The sources will be stored at:

Annapolis Police Department  
199 Taylor Avenue  
Annapolis, MD 21401

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This facility is manned continuously and has a fenced compound in which a storage unit will be placed to store the sources. The storage unit will be locked and access controlled by INL. INL will also install an intrusion monitoring device in the storage unit. None of the sources will be of sufficient activity to require increased controls during storage.

INL plans to ship the sources on August 29, 2013 with anticipated arrival at the training location on September 2, 2013. INL personnel will be present to take custody of the shipment when it arrives. INL plans to return the sources to INL on September 6, 2013. INL will perform pre-shipment leak checks of the sources being used for this training.

INL will perform the work using INL procedure LI-344. This procedure addresses the use of radioactive sources in off-site training venues. It includes instructions for exposing graded sources and the use of the sources installed in the Delta 880 and Gammatron 100A devices; however, the Gammatron 100A and Delta 880 devices will not be used in the training.

INL will control the work area and the source handling activities by the use of an INL Radiation Work Permit (RWP). All personnel entering an area of 2 mrem/hr or greater will be required to comply with the terms of the RWP. INL will issue Optically Stimulated Luminescent (OSL) dosimeters and electronic dosimeters to all personnel working on the RWP.

Radiological controls will be provided by two (2) INL Health Physics Technicians (HPT) who have specific training and qualifications to perform these duties. All other INL personnel maintain DOE Radiological Worker II (RW-II) training qualifications, allowing them to work in High Radiation Areas and to handle radioactive sources. Qualification as an HPT requires more rigorous and specialized training than DOE RW-II training.

LWP-15015 addresses response to abnormal radiological conditions, including a spill of radioactive material. In the unlikely event of an abnormal radiological condition, LWP-15015 will be followed. LI-344 also addresses actions to be taken in the event of an exposed source that cannot be retracted into the shielded storage container using normal procedures.

INL carries in their supplies 10 sets of personnel protective equipment, contamination swipes, and monitoring instrumentation in the event of a damaged or leaking radioactive source.

INL has previously provided the following supporting documents still in effect:

1. INL Procedure LI-344, *RDD Material Training Activities and Evaluations Using Radiation Emitting Sources and/or Devices.*
2. INL Procedure LWP-15006 *Radioactive Source Control.*
3. LWP-15015 *Response to Abnormal Radiological Situations.*
4. The operating contract between DOE and Battelle Energy Alliance, LLC.

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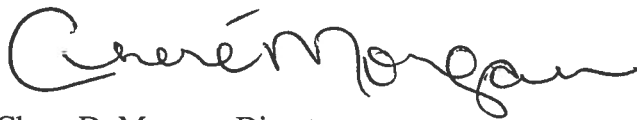
INL will provide the following supporting documents:

1. Pre-shipment source leak check results.
2. List of sources to be used for the training.
3. The draft INL RWP for this training.
4. A Memorandum of Agreement (MOA) between the Department of the Army and the Annapolis Police Department acknowledging the use and storage of radioactive sources at the police facility.

Thank you for your consideration of this exemption request.

If you have questions or need further information, please contact either me (208-526-8048) or Jim Thalgott (208-680-8670).

Sincerely,



Chere D. Morgan, Director  
INL Radiological Control

JOT:CFW

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