



DEPARTMENT OF THE NAVY
OFFICE OF THE CHIEF OF NAVAL OPERATIONS
2000 NAVY PENTAGON
WASHINGTON, DC 20350-2000

6-7

5104
Ser N45/13U139729
9 August 2013

Mr. Shawn W. Seeley
U.S. Nuclear Regulatory Commission, Region I
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406-2713

Dear Mr. Seeley:

Subj: REQUEST FOR ALTERNATE SCHEDULE OF DECOMMISSIONING AT
NAVAL POSTGRADUATE SCHOOL

03029462

REC RG 1 08 23 13 AM 07:11

The Navy's radioactive materials program is licensed with the Nuclear Regulatory Commission (NRC) under Master Materials License (MML) No. 45-23645-01NA. As per 10 CFR 30.36(f) and 30.36(g)(2), the Navy is requesting an extension to the time periods in 10 CFR 30.36(d) and an alternate schedule for submission of a decommissioning plan for Naval Radioactive Material Permit (NRMP) No. 04-62271-D1NP at Naval Postgraduate School, Monterey, CA.

As of December 2009, the permittee has ceased principal activities of a type A broad scope permit under NRMP No. 04-62271-E1NP. Per 10 CFR 30.36(d), a decommissioning plan is required to be submitted within 12 months, if no principal activities under the license have been conducted for a period of 24 months. In accordance with 10 CFR 30.36(g)(2) and 30.36(f), and based upon the timeline listed in enclosure (1), we request an extension to the time periods in 30.36(d) and an alternate schedule for submission of a decommissioning plan. Enclosure (2) discusses the extension of initiation of decommissioning activities and submits that it is not technically feasible to complete within 24 months, will not be detrimental to public health and safety, and is otherwise in the best interest of the U.S. Navy and the public.

The Naval Radiation Safety Committee (NRSC) will forward a formal decommissioning plan and a final recommended decommissioning group once the historical radiological assessment (HRA) has been received, evaluated and approved.

REC'D IN LAT 9/3/13

581663
NMSS/RG/N MATERIAL 0002

If you have additional questions, please do not hesitate to contact me via telephone at (703) 695-5259 or through electronic mail at donna.davis-urgo@navy.mil.

Sincerely,



D. L. DAVIS-URGO
Captain, Medical Service Corps,
United States Navy
Executive Secretary
Naval Radiation Safety Committee

- Enclosure: 1. Alternate Schedule for Submittal of
a Decommissioning Plan
2. Evidence that the Extension of the Initiation of
Decommissioning Activities Will Not Be Detrimental
to Public Health and Safety

Copy to: Naval Sea Systems Command (04N) (jerry.n.sanders@navy.mil)
Naval Sea Systems Command Detachment, Radiological
Affairs Support Office (NAVSEA DET RASO)
(nsscnavsearasoadmin@navy.mil)

ALTERNATE SCHEDULE FOR SUBMITTAL OF A DECOMMISSIONING PLAN

1. Completed Milestones

a. In December 2009, the permittee provided notification that they had ceased all principal activities under the type A broad scope permit, No. 04-62271-E1NP. On 17 September 2010, NRMP 04-62271-E1NP was converted to 04-62271-D1NP, that only authorizes storage of radioactive materials pending decommissioning.

b. On 21 September 2012, a two year contract was awarded to Aleut World Solutions (AWS) to research and write an HRA. The contractor commenced research in December 2012.

2. Projected Milestones

a. Radiological Affairs Support Office (RASO) completes the review of the contractor supplied HRA by January 2015.

b. RASO forwards the HRA and a recommended final decommissioning group to Naval Radiation Safety Committee (NRSC) by February 2015.

c. NRSC forwards HRA and recommended decommissioning group to the NRC for approval by May 2015.

d. Subsequent planning for a decommissioning plan and any necessary remediation will depend upon the NRC's approval of the HRA. An update of new projected milestones will be provided to the NRC upon approval of the HRA.

EVIDENCE THAT THE EXTENSION OF THE INITIATION OF DECOMMISSIONING
ACTIVITIES WILL NOT BE DETRIMENTAL TO PUBLIC HEALTH AND SAFETY

To demonstrate that delaying the initiation of decommissioning will not be detrimental to public health and safety, the following amplifying information is provided:

1. RASP program inspections of NRMP No. 04-62271-D1NP, for storage of radioactive materials only, indicate that Naval Postgraduate School, Monterey, CA, has complied with U.S. Navy's regulatory requirements. Ongoing compliance inspections (on an annual basis) and continued permitting actions during the decommissioning process will ensure continued compliance.

2. The permittee has developed, documented, and implemented a radiation safety protection program commensurate with the scope and extent of permitted activities and sufficient to ensure compliance with the provisions of 10 CFR 20.1101. This will ensure that public health and safety will be protected during the extension period. The following health and safety plan elements will be in effect during the standby period:

a. Operations for the use of any of the permitted radioactive materials are prohibited. Previously permitted radioactive material is in storage awaiting disposal. Emergency procedures have been developed covering potential casualty scenarios (e.g., fire, contamination spread, theft, loss of material, etc.).

b. Naval Postgraduate School, Monterey, CA, is a military facility with controlled access and active federal security limiting unescorted public access. The radiation safety staff has physical custody and control of areas known to have been used for licensed operations and for the storage of radioactive materials pending disposal. The permittee has developed and implemented command procedures for the security, inventory, and accountability of permitted radioactive materials.

c. The permittee has committed to performing annual compliance audits of the radiation safety program content and implementation until the NRMP is terminated.

d. The permittee uses procedures and engineering controls based upon sound radiation protection principles to achieve occupational doses and doses to members of the public that are as low as is reasonably achievable (ALARA). Area dosimetry and radiation survey monitoring of offices and spaces adjacent to radioactive material storage areas are performed to ensure compliance with public dose limits.

EVIDENCE THAT THE EXTENSION OF THE INITIATION OF DECOMMISSIONING ACTIVITIES WILL NOT BE DETRIMENTAL TO PUBLIC HEALTH AND SAFETY

e. The permittee performs periodic radiation and contamination surveys to assess any changes in the radiological conditions of radioactive material storage areas. Leak tests of sealed sources will be performed and verified prior to the transfer of any permitted material to an authorized recipient. The permittee has sufficient monitoring in place to ensure that any residual contamination and exposure from stored radioactive material does not become a public or a worker health and safety issue.

3. The command has a long history of use and experimenting with a wide variety of radioactive materials. The decommissioning will encompass both Navy permitted activities from the 1980s to the present and Atomic Energy Commission/Nuclear Regulatory Commission licensed activities prior to the establishment of the Master Materials License. Due to the large volume of work with sealed and unsealed radioactive materials at numerous locations, it has been determined that it will take approximately one additional year to complete the historical radiological assessment (HRA) for this command, and it is therefore not technically feasible to complete the decommissioning within the 24 month period. The Navy follows the 1980 Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process, which requires the development of a detailed HRA and subsequently a carefully executed decommissioning plan. This planning necessarily falls outside of the 24 month window, but will help reduce overall decommissioning costs and increase the efficiency of decommissioning, thus reducing anticipated occupational dose. Upon completion of the HRA, funding will be required for the decommissioning plan, the remediation and the final status survey report. As financial programming occurs three years in advance (via the budgeting submission to Congress) of execution; this funding, although assured, will take time to receive, and this will also contribute to the inability to complete the decommissioning within the 24 month period.

4. Facilities used for past permitted operations and the storage of radioactive materials are not abandoned and will not significantly deteriorate during a standby period. These facilities are sufficiently maintained such that decommissioning will not be significantly more complex at a later date.

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

8/7/13 & 8/9/13 ^(cs) and to inform you that the initial processing which includes an administrative review has been performed.

Amendments (45-23645-01NA)
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 581661, 581662,
When calling to inquire about this action, please refer to this control number.
You may call us on (610) 337-5398, or 337-5260.

581663