

November 25, 2013

CCN 231908

Blake Welling, Branch Chief
Materials Security and Industrial Branch
United States Nuclear Regulatory Commission, Region I
2100 Renaissance Boulevard
King of Prussia, PA 19403

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

Dear Mr. Wellington:

Battelle Energy Alliance LLC, the prime contractor for the Department of Energy's (DOE) Idaho National Laboratory (INL), has been requested by the DOE Stabilization Program to support a training exercise in Valhalla, NY. The planned training will occur January 6-10, 2014. The training will involve personnel from INL, Federal Bureau of Investigation (FBI), New York City Police Department (NYPD), New York City Fire Department (FDNY), New York field office of the Federal Bureau of Investigation, Westchester County Sheriff's Office, and other local law-enforcement bomb squads. The objective of the training is to practice, refine, and validate 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.

Explosives will be used during this training, but only after radioactive sources are secured in the designated storage containers and removed from the area.

The training using radioactive sources will be conducted at:

Westchester County Police Department Academy
2 Dana Road
Valhalla, NY 10595

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 DOE has a separate interpretation of the requirements for such activities.

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The training facility has a fenced locked 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.

INL plans to ship the sources on January 2, 2014 with anticipated arrival at the training location on January 6, 2014. INL personnel will be present to take custody of the shipment when it arrives. INL plans to return the sources to INL on January 10, 2014. 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 Delta 880 and Gammatron 100A devices not will 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 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 case of an 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. INL Procedure 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. Certificates of special form certification for applicable sources
5. A Memorandum of Agreement (MOA) between DOE and the Westchester County Police Department acknowledging the use and storage of radioactive sources at the training facility

Thank you for your consideration of this exemption request.

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

Sincerely,



Chere D. Morgan, Director
INL Radiological Controls

JOT:CFW

cc: J. Alvarez, INL, MS 3695
P. K. Bowers, DOE-ID, MS 1226
R. R. Chase, INL, MS 3695
R. L. Dickson, DOE-ID, MS 1216
S. D. Dossett, INL, MS 3405
J. J. Grossenbacher, INL, MS 3695
M. A. Hall, DOE-ID, MS 1216
L. A. Montgomery, INL, MS 3899
J. C. Oliver, DOE-ID, MS 1240
S. M. Olson, DOE-ID, MS 1221
D. M. Storms, INL, MS 3898