

Decommissioning Funding Plan for Davy Crockett M101 Depleted Uranium Impact Areas at Schofield Barracks and Pohakuloa Training Area

1. Site-specific cost estimates for decommissioning the Davy Crockett M101 depleted uranium (DU) impact areas at Schofield Barracks (Encl 1) and Pohakuloa Training Area (Encl 2) were prepared following regulatory guidance provided in Section A.3.1 of NUREG-1757, *Consolidated Decommissioning Guidance*, Vol. 3, "Financial Assurance, Recordkeeping, and Timeliness," September 2003 (NUREG-1757, Vol. 3).

a. Key assumptions are on the last page of each site-specific cost estimate.

b. The cost estimates do not take credit for any salvage value that the Army might realize from the sale of potential assets (for example, recovered materials or decontaminated equipment) during or after decommissioning.

2. The description of the means the Army will use to adjust the site-specific cost estimates and associated funding levels periodically over the life of the facilities follows regulatory guidance in Section A.3.2 of NUREG-1757, Vol. 3.

a. The Army will make adjustments to site-specific cost estimates for decommissioning that account for inflation, for other changes in the prices of goods and services (for example, disposal cost increases), for changes in facility conditions or operations, and for changes in expected decommissioning procedures.

b. The Army has no current plans to change facility conditions or operations at the radiation controlled areas (RCAs) in a way that would require a license amendment application.

3. The certification of financial assurance is in the form of a statement of intent (Encl 3). The statement of intent is the Army's commitment to request and obtain decommissioning funds from its funding body when necessary.

4. A facility description summary, prepared using the guidance in Section A.3.1.1 of NUREG-1757, Vol. 3, follows.

a. *NRC license number and type*: SUC-1593, source material (10 CFR 40)

b. *Types and quantities of materials authorized under the license listed above*: No more than 125 kilograms (kg) of DU are on the Schofield Barracks and Pohakuloa Training Area ranges, combined.

c. *Description of how licensed materials are used*: possession only. The licensed material is residual DU remaining from Atomic Energy Commission authorized firing in the 1960s.

d. *Description of facility, including buildings, rooms, grounds, and description of where particular types of materials are used:* active firing and training ranges

(1) Enclosure 4 and Encl 5 show the RCAs at Schofield Barracks and Pohakuloa Training Area, respectively.

(2) Ranges are open areas with no habitable structures but may contain training materials, such as targets and associated supporting materials. None of these structures and materials is likely to be DU-contaminated.

(3) Conventional unexploded ordnance (UXO) is present in the RCAs at both installations. Chemical UXO is present in portions of the RCA at Schofield Barracks. Because of the presence of UXO, ordnance and explosives safety staff support is required for activities within the RCAs, except for UXO-cleared areas.

(4) The UXO safety requirements significantly reduce radiological survey and remediation productivity. Portions of the RCAs at both installations are within "firing fans" of active ranges.

(5) A considerable portion of the RCA at Schofield Barracks consists of deep ravines with steep walls. Other portions are relatively flat with more gentle slopes.

(6) Virtually all surfaces of the Pohakuloa Training Area RCAs, except for roads, consist of inactive lava flows with rugged, and sometimes sharp, surfaces that are very difficult to traverse safely.

e. *Quantities of materials or waste accumulated before shipping or disposal:* generally none or no more than a few M101 rounds (less than 1 kg of DU).

(1) In accordance with license conditions, DU accumulates for waste shipping and disposal only when the Army detects it by happenstance and retrieves it.

(2) The Department of Defense (DOD) Executive Agent for Low-Level Radioactive Waste (LLRW) Disposal has primary responsibility for disposal of DOD LLRW. To support this, the Executive Agent conducts periodic waste removals from installations worldwide. If the Army collects any DU, the Army will secure and hold it for the next scheduled Executive Agent pick up. The Executive Agent will properly dispose of it in accordance with all applicable Federal and DOD regulations and with all disposal site conditions.

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Enclosures

1. Site-specific cost estimate for decommissioning at Schofield Barracks
2. Site-specific cost estimate for decommissioning at Pohakuloa Training Area
3. Statement of intent
4. Schofield Barracks RCA
5. Pohakuloa Training Area RCA