

March 11, 2015

Dr. Robert Cherry, Radiation Safety Staff Officer  
U.S. Army Installation Management Command  
ATTN: IMSO/301  
Building 2261  
2405 Gun Shed Road  
JBSA Fort Sam Houston, TX 78234-1223

SUBJECT: FEBRUARY 19, 2015 MEETING SUMMARY REGARDING THE PROGRAMMATIC APPROACH TO AMEND SOURCE MATERIALS LICENSE NO. SUC-1593 TO ADD THE REMAINING U.S. ARMY INSTALLATIONS POSSESSING DEPLETED URANIUM FROM THE DAVY CROCKETT WEAPON SYSTEM (DOCKET NO.: 040-09083)

Dear Dr. Cherry:

The U.S. Army (the Army) requested a pre-license amendment application submission meeting with the U.S. Nuclear Regulatory Commission (NRC) staff to discuss various topics related to the Army's approach to add the remaining sites subject to License Condition No. 12 containing depleted uranium (DU) from the Davy Crockett weapon system to Source Materials License No. SUC-1593. The NRC staff refers to these types of meetings as readiness reviews. This meeting occurred on February 19, 2015, at the NRC Headquarters office. At this meeting, you clarified that the Army intends to use the Programmatic Approach, in accordance with the guidance that the NRC provided at the meeting held on September 25, 2014, and as documented in the meeting summary [Agencywide Documents Access and Management System (ADAMS) Accession No. ML14293A129]. The scope of the Army's amendment application, among other topics as identified in the agenda (ADAMS Accession No. ML15041A767), was discussed at this meeting. Specifically, you stated that the Army intends to include all applicable sites that possess DU from the Davy Crockett Weapon System under the Programmatic Approach to licensing in the Army's amendment application. You clarified that the Army intends to include the two Hawaiian sites, which are already licensed, in its forthcoming license amendment using the Programmatic Approach and you explained that the Army may request that two sites [Fort Greeley (Alaska) and Fort Dix (New Jersey)] be removed from License Condition No. 12.

The enclosed meeting summary identifies the significant issues and information gaps between the draft application and the technical content that the NRC staff expects the Army to include in its final application. The NRC staff's expectation is that the Army will consider the NRC's observations from the readiness review while finalizing its application and re-evaluate the application submission date based on the NRC staff's evaluation and the time needed to address the readiness review observations.

R. Cherry

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In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's ADAMS. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions regarding the meeting summary, please contact me. I can be reached at (301) 415-6822 or by e-mail at [Amy.Snyder@nrc.gov](mailto:Amy.Snyder@nrc.gov).

Sincerely,

**/RA/**

Amy M. Snyder, Senior Project Manager  
Materials Decommissioning Branch  
Division of Decommissioning, Uranium Recovery,  
and Waste Programs  
Office of Nuclear Material Safety  
and Safeguards

Docket No.: 040-09083  
License No.: SUC-1593

Enclosure: As stated

R. Cherry

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If you have any questions regarding the meeting summary, please contact me. I can be reached at (301) 415-6822 or by e-mail at [Amy.Snyder@nrc.gov](mailto:Amy.Snyder@nrc.gov).

Sincerely,

**/RA/**

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Division of Decommissioning, Uranium Recovery,  
and Waste Programs  
Office of Nuclear Material Safety  
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**ML15065A361**

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<b>NAME</b>	ASnyder	CHolston	CMcKenney*	LChang*	RKellar*	EHouseman*	MNorato*
<b>DATE</b>	3/4/15	3/11/15	3/10/15	3/5/15	3/10/15	3/10/15	3/9/15

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**\*via email**

**NRC – ARMY**  
**Summary of February 19, 2015**  
**Pre-License Amendment Application Meeting**  
**(Readiness Review)**  
**Source Materials License No. SUC-1593**

**Background:**

On October 23, 2013, the U.S. Nuclear Regulatory Commission (NRC) issued Source Materials License No. SUC-1593 to the U.S. Army Installation Management Command (the Army) to allow the possession of depleted uranium (DU) from the Davy Crockett M101 spotting round [Agency Document Access and Management System (ADAMS) Accession No. ML13259A062] at two sites located in Hawaii. License Condition No. 12 of Source Materials License No. SUC-1593 states: “The licensee will provide the [NRC] with license amendment requests to incorporate the following list of sites: Forts Benning and Gordon (Georgia); Fort Campbell (Kentucky); Fort Carson (Colorado); Fort Hood (Texas); Fort Knox (Kentucky); Joint Base Lewis-McChord and the Yakima Training Center (Washington); Fort Bragg (North Carolina); Fort Polk (Louisiana); Fort Sill (Oklahoma); Fort Jackson (South Carolina); Fort Hunter Liggett (California); Fort Greeley (Alaska); Fort Dix (New Jersey); and Fort Riley (Kansas) on this license in accordance with a schedule developed by the Army.”

The Army decided to follow the Programmatic Approach to address License Condition No.12 of Source Materials License No. SUC-1593, as described in the enclosure to the November 12, 2014, letter from the NRC to the Army (Agencywide Documents Access and Management System [ADAMS] Accession No. ML14293A129). The Army requested a pre-license amendment application meeting (readiness review). The readiness review meeting was held on February 19, 2015, at the NRC Headquarters, in Washington D.C.

**Purpose:**

The purpose of the readiness review is to allow the NRC staff to: (1) identify information gaps between the draft application and the technical content expected to be included in the final application submitted to the NRC; (2) identify major technical or policy issues that may adversely impact the docketing or technical review of the application; and (3) become familiar with the application, particularly in areas where prospective applicants are proposing new concepts or novel design features. The results of a readiness review are intended to inform a prospective applicant in finalizing its application and assist the NRC staff in planning NRC resources in preparation for the review once the application is formally submitted.

The Army submitted its draft license amendment application for the NRC staff to review before the meeting. The meeting notice, agenda, and all of the draft Army documents, except for the Draft Environmental Radiation Monitoring Plan (ERMP) are found at ADAMS Accession No. ML15041A767. The Draft ERMP is found at ADAMS Accession No. ML15043A783. The list of attendees is found at the end of the meeting summary.

Enclosure

**Opening Remarks:**

As part of its opening statements, the NRC stated that:

- Protection of public health and safety and the environment are the NRC's chief priorities.
- The most important licensing priority under Source Materials License No. SUC-1593 is for the Army to comply with License Condition No. 12 by amending its license to include the remaining 15 Army installations with DU from the Davy Crockett M101 Spotting Rounds.
- The NRC identified the quality of applications as a significant contributor to overall project performance and encourages applicants to participate in this voluntary process.
- The NRC staff conducts a readiness review at the request of the applicant. The Army requested a pre-license amendment application review and submitted its draft documents for this purpose.
- The readiness review does not conform to, nor is it part of, the NRC's official acceptance review process and does not predetermine whether the application will be docketed for a detailed technical review.
- The NRC staff's readiness review allows the NRC staff to accomplish the following four activities:
  - Identify any information gaps between the draft application and the technical content expected to be included in the final application submitted to the NRC;
  - Identify any contradicting information that was previously submitted;
  - Identify any major technical or policy issues that may adversely impact the docketing or technical review of the application; and
  - Become familiar with the application, particularly in areas where prospective applicants are proposing new concepts or novel design features.
- The results of the readiness review will be in the form of NRC staff observations and will be shared with the Army at this meeting and documented in the meeting summary. The results should inform the Army in finalizing its application and will assist the NRC staff in planning NRC resources in preparation for the review once the Army's final application is formally submitted.
- The NRC staff's intent is to identify the following: (1) areas where the level of detail is not sufficient (referred to as a technical information gap or TIG); and/or (2) areas where significant information gaps or technical and policy issues might negatively impact the application review schedule (referred to as a significant issue or SI).

- A “significant information gap” exists when missing information is needed to conduct the application review and the issue could not be addressed through a reasonable round of requests for additional information (RAIs) during the technical review. In contrast, a “minor information gap” exists when missing information could be addressed through a reasonable round of RAIs.
- The phrase “reasonable-round of RAIs” could be interpreted as two rounds of RAIs while precluding any adverse impact on the review schedule. For complex issues that can exceed the 30-day response time of RAIs, the NRC staff intends to ensure common understanding of the technical issue early in the process to obtain a timely resolution.
- The NRC’s readiness review’s scope is limited. Specifically, the NRC staff:
  - 1) Shall not provide any guidance to the prospective applicant on what to write to make the information “acceptable” or provide written revision for the prospective applicant’s consideration.
  - 2) Shall not provide actual regulatory determinations (i.e., safety findings) on the draft application.
  - 3) Shall not return with any materials reviewed during the readiness assessment.

The Army, in its opening remarks, stated that it is a priority for the Army to license the remaining sites that have DU from the Davy Crockett weapon system. The Army communicated that it appreciates that the NRC staff is conducting a pre-licensing amendment review and believes that this meeting will be very beneficial for the Army when it further develops its amendment application.

#### **Programmatic Approach: [Significant Issue (SI)]**

The Army presented for the NRC staff with its strategy for licensing the remaining sites that contain DU for the Davy Crockett Weapon System by reviewing its draft NRC Form 313, “Application for Materials License.”

The Army stated that the scope of the Programmatic Approach and therefore its amendment application would include all of the applicable sites that it believes contains DU from the Davy Crockett Weapon System, to include the two Hawaiian sites already licensed.

The Army noted that it is in the process of conducting additional research regarding new information obtained about Fort Dix, located in New Jersey and Fort Greeley, located in Alaska. The Army said that it now believes that Fort Dix and Fort Greeley either have no DU or very small quantities of DU. The Army now believes these sites may not have to be licensed and desires for them to be removed from License Condition No. 12.

The NRC staff:

- Informed the Army that if the Army wants to remove these sites, it must provide its justification through either an exemption request or the amendment application, and needs to determine which is appropriate. Also, the NRC staff said that if the Army provides new information that is inconsistent with what it previously provided, it should identify the inconsistency and explain its basis **(SI)**.
- Informed the Army that it should review its current license (Source Materials License No. SUC-1593) and if the Army believes that that anything other than License Condition No. 12 should be changed, it should identify what it proposes should be changed and provide justification for the change in its amendment application. Also, there may be license conditions that the Army believes do not apply as written given that the license amendment will implement the Programmatic Approach and the Army intends to include the two Hawaiian sites that are already licensed under the Programmatic Approach in its amendment application. The NRC staff said that the Army should address in its application how each existing licensing condition:
  - 1) Remains unchanged;
  - 2) Should be revised and how considering NRC guidance specific to the Programmatic Approach; or
  - 3) Should be removed because it is no longer applicable

For 2) or 3) the Army must provide a rationale for such proposed changes. The NRC staff stated that this is important because the current license is now in effect and the license conditions are obligations that the Army must meet **(SI)**<sup>1</sup>

The Army asked if there were any other license conditions in its current license that would need an exemption request. The NRC staff committed to provide the Army with guidance on the difference between exemptions and amendments and the circumstances under which a request for one versus the other would be appropriate and necessary as related to Fort Dix and Fort Greeley

The Army said that it would review its current license and it would address any change that it wants to propose as part of its amendment application, ensuring that it includes its justification for each proposed change.

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<sup>1</sup> Although not discussed at this meeting, on 3-2-15, the Army and the NRC had a clarification teleconference on the additional guidance on environmental monitoring that is specific to the Davy Crockett Licensing Actions under the Programmatic Approach. This additional guidance was provided to the Army on 2-27-15. In the 3-2-15 teleconference, the NRC explained that if the Army proposes to change the current license conditions related to air and vegetation sampling in its amendment application, the Army will need to discuss how these results relate to the original licensing action and how they now relate to the Programmatic Approach and the additional guidance provided on 2-27-15.

**Draft Decommissioning Funding Plan: (all TIGs)**

The NRC staff observed the following:

- The decommissioning funding plan (DFP) narratives should identify the key assumptions and provide an explanation/basis for those assumptions.
- The decommissioning cost estimates (DCE) should identify sources/references for all unit costs (e.g., standardized labor/equipment rates)
- A licensee should use the latest NRC guidance when developing its DFP and DCE (NUREG-1757, Vol. 3, Rev. 1).

The Army said that it intends to address these points in its amendment application.

**NRC's Regulations that implement the National Environmental Protection Act: (all TIGs)**

The NRC staff observed the following:

- For a DU possession-only situation, the NRC staff believes that for this type of license amendment, a Categorical Exclusion or CATX, appears to be appropriate under 10 CFR 51.22(c)(14)(xv). The NRC will make a decision on the National Environmental Policy Act (NEPA) level after the Army's final amendment application has been submitted and the NRC has been able to evaluate the proposed action.
- If the Army believes that the proposed action fits the CATX, it should ensure that it identifies the proposed action as a CATX and include justification for use of the CATX.
- Section 106 of the National Historical Preservation Act (NHPA) [sometimes referred to as Section 106] requires the NRC to initiate consultation upon receipt of an application. If the undertaking is one that might affect historic properties, the NRC will identify consulting parties and begin consultation. If the undertaking is DU possession-only and does not include the disturbance or removal of DU (i.e., does not have the potential to affect historic properties), then Section 106 requirements will have been met in Step 1 of the four step Section 106 process. The NRC will make a decision regarding Section 106 consultation after the Army's final amendment application has been submitted and the NRC has evaluated the proposed undertaking.

The Army said it understood the importance of fulfilling the NEPA and NHPA requirements for the amendment, but noted that it was not required to submit anything for NEPA under the initial licensing. The NRC staff said that based on the Army's submittal for licensing the two Hawaiian sites, the NRC staff made the determination that the proposed initial licensing action was a CATX. For the amendment application, the NRC staff must make a determination based on the proposed action as described in the Army's amendment application submittal. The NRC staff asked that the Army either include its Environmental Report (ER) or a discussion of why it

believes an ER is not applicable and whether the Army believes a CATX is applicable to its proposed action and why.

The Army asked for an example of what other licensees or applicants submitted when they believed their proposed actions fit a CATX NEPA level determination. The NRC staff said it will provide additional clarification to the Army regarding the format for submitting information in its application regarding NEPA.

### **Radiation Safety Program Plan Observations: (all TIGs)**

The NRC staff said that the following information could be included in the Radiation Safety Program Plan (RSPP) or the ERMP:

- A description of how the Army will comply with 10 CFR 20.1302 (annual public dose compliance demonstration) at each site should be included in the amendment application. A licensee can demonstrate compliance with this requirement either by measurement or calculation. Also, the NRC staff noted that a licensee could vary how it conducts its compliance demonstration from year to year, switching from a measurement approach to a calculation approach. If a licensee wants such an option, then it should, in its application, describe its methods for both approaches.
- The Army's amendment application should include a description of how the Army will comply with 10 CFR 20, Subpart F—Surveys and Monitoring, for each site with regards to monitoring. Actions that a licensee takes under this requirement usually are tied to how a licensee complies with 10 CFR 20.1302 and/or a licensee's strategy for detecting unplanned releases or spread of contamination. The type of facility or site and its operation and therefore its potential hazard, should drive the extent of a licensee's environmental monitoring and survey program. The NRC staff noted that a licensee's strategy for routine as well as periodic environmental monitoring should be addressed in its application.
- The Army uses the term RCA or Radiation Controlled Area. The NRC regulation on radiation protection (10 CFR 20) does not define the term RCA. 10 CFR Part 20.1003 defines the term "restricted area". The Army should explain how the RCA relates to the term restricted area as defined in 10 CFR Part 20 and how it will comply with applicable requirements in 10 CFR Part 20 for occupational and public protection against ionizing radiation.

The Army said:

- It plans to address the above in either its generic RSPP or ERMP;
- It plans to identify in its environmental monitoring strategy unique circumstances and IF...THEN criteria to address them. It noted that at one of the Davy Crockett sites, there are some cattle grazing in the RCA which it will identify, along with its plans to address this potential pathway, in its application; and

- That since the Army uses the term RCA, it plans to continue to use this term but will identify how it relates to the regulatory term restricted area.

### **Inspection Observations: (SIs)**

The NRC inspection staff said that:

- The Army's draft generic Physical Security Plan (PSP) and draft generic Radiation Safety Program Plan (RSPP) appear to be capable of being readily adapted to site-specific plans. The Army's draft PSP and draft RSPP appear to be capable of being inspected against. However, the Army's draft ERMP does not appear to be in a format that could be readily and consistently adapted to each site. Also, the Army's draft ERMP does not appear to be capable of being modified into a site-specific ERMP that one could inspect against it at each site. For an ERMP to be congruent with the tenants of the Programmatic Approach, the Army should reconsider the format and layout of its draft ERMP and ensure that it could be used in inspection space **(SI)**.
- Licensees that have multiple sites that are similar could develop a master ERMP template that could be adapted to any site, based on existing, NRC-approved sampling plans. This approach may be appropriate for the Army for this license using the Programmatic Approach. Alternatively, the Army could consider using the framework and layout of the February 2012 draft ERMP for Schofield Army Barracks at each site. The NRC staff noted that this document was not approved by the NRC.
- The Army has the option of presenting information in its license amendment application demonstrating to the satisfaction of the NRC that routine sampling is not required at any site. If accepted by the NRC, the Army would not have to address this type of monitoring in its ERMPs for the various sites. For example, if the modeling analysis is accepted and the results meet the regulatory limits plus ALARA, then routine sampling or monitoring may not be required except under specific conditions that may be outside the scope of the bounding model or as outlined in the Army's generic or master environmental surveillance and monitoring program.
- Typically, each newly licensed material site will be inspected within a year of licensing. Thereafter, all licensed material sites will undergo inspections at least once every five years and more frequently during periods of significant onsite activities. However, given that the Programmatic Approach may involve implementation schedules defined in License Conditions, the inspection schedule may be more extensive.

The Army said that:

- It plans to provide IF...THEN criteria in its application as needed under the Programmatic Approach.
- The ERMP is the most challenging aspect of the amendment application and it is an area that might warrant further interaction with the NRC staff through at least another pre-license amendment submission meeting after it develops its second draft of its amendment application.
- The Army requested that the NRC staff provide any additional guidance on environmental monitoring given that there is no NRC-specific guidance developed for these types of sites.

### **Environmental Radiation Monitoring Plan (ERMP) and Performance Assessment Observations: (SIs with related TIG)**

The NRC staff identified what it considers the key elements of a performance assessment under a Programmatic Approach. The NRC staff said that it is important that the Army consider:

- Gathering information to conduct a generic analysis using information available for all sites to identify:
  - Key risk drivers, pathways, parameters, and processes including an evaluation of a reasonable base case and alternative scenarios
    - Based on above, define source and site characteristics where NRC could easily conclude that regulatory requirements are met in a screening-type analysis **(SI)**.
  - The generic analysis would also identify the need for
    - Supplemental radiological monitoring, and
    - Collection of additional information to support preparation of a site-specific analysis to assess risk of sites that might not be bounded by the screening analysis **(SI)**.
- Ensuring that the Army's application clearly identifies the Army's methodology and clearly describe the Army's rationale for how the Army will determine the type of environmental monitoring and frequency (effluent, environmental surveillance, media and analysis parameters) that would be applied to each specific site to be licensed. The NRC explained that the generic program plans would be like cook books that if followed would lead to acceptable site-specific programs **(related TIG)**.

The NRC staff said that:

- The Army's draft application for the ERMP is following the Programmatic Approach by stating that there will be a document describing, for a specific RCA, what samples will be taken, where these samples will be taken, how often these samples will be taken, and how these samples will be analyzed for DU. Under a Programmatic Approach, the ERMPs should include or reference a process and criteria which will be followed to come to those determinations.
- However, the Army's draft amendment application is lacking the rationale for how the Army will determine the type of monitoring and the frequency of monitoring. Also, the Army's draft application does not address which site characteristics will be looked at and what criteria will be used for judging such site characteristics regarding whether or not sampling will be conducted.
- The Army's draft application does not clearly state what baseline monitoring will be done across all sites, or how it will decide when no routine monitoring is needed.
- An applicant must demonstrate in its application through calculation and/or modeling that the Total Effective Dose Equivalent (TEDE) to the maximally exposed individual would not exceed the annual limit as stated in 20.1302 (b). Upon licensing, then annually, the licensee would need to make such a demonstration. The NRC staff said that the Army's application should identify the method it plans to use to demonstrate compliance with the public dose limit.
  - If the Army decides to solely rely on calculations/modeling to exclude environmental pathways, then under the Programmatic Approach to licensing, the Army would need to provide detailed calculations in its application. Approval of this information must occur during initial licensing or subsequent amendments. Approval of modeling parameters must be accomplished as a licensing action, not an inspection action.
- The RESRAD modeling provided by the Army for the current license (Source Materials License No. SUC-1593) does not account for ground disturbing events but rather only the resting state of the DU spotting rounds and only the parameters specific to the Hawaiian sites **(SI)**.
- The Army must address the resting state of the DU and the ground disturbing events. The NRC staff said that RESRAD is not appropriate to model the ground disturbing events. The Army must use the appropriate models for its performance assessment **(SI)**.
- The Army could use supplemental studies from other Army licensed facilities that the Army believes will support its evaluation.

The Army said that:

- It understands that it must address both the resting state and ground disturbing events in its application.
- It may conduct air sampling during a simulated exercise to address or supplement its analysis of ground-disturbing events.
- DU at the Jefferson, Yuma and Aberdeen Proving Grounds maybe difficult to compare to the DU found at the Davy Crockett sites; however, the Army said that it may be able to relate some characteristics such as how far DU can travel under different wind conditions.
- It plans to provide IF...THEN criteria in its application as needed under the Programmatic Approach to licensing.

**Public Comments:**

There were no members of the public that attended the meeting in person at the NRC Headquarters. There was one member of the public on the teleconference in the morning; however when the NRC asked if the public had any questions for the NRC staff or had any comments, there were none.

**Closing Remarks:**

The NRC stated that the meeting was beneficial and that the NRC staff believes its observations should inform the Army's development of its amendment application. The readiness review also will assist the NRC staff in planning NRC resources in preparation for the review once the application is formally submitted.

The Army stated that it also agrees that the meeting was beneficial. The Army said that it believes that another readiness review meeting is necessary after it considered the NRC staff's observations and develops its second draft of its amendment application.

**Action Items:**

- It is the NRC's goal to have the meeting summary documenting staff observations within 30 working days of this meeting.
- The NRC will provide clarification to the Army regarding whether an exemption request or an amendment request would be needed if the Army decides to propose that sites from the current license be removed from License Condition No. 12.<sup>2</sup>
- The Army will identify whether any of its proposed actions to be included in its amendment application submittal have not been analyzed under NEPA analysis. If there are some proposed actions that have not been analyzed under NEPA, it will identify them in its application and provide the necessary Environmental Report with its amendment application.
- The NRC staff said it will provide additional clarification to the Army regarding the format for submitting information in its application regarding NEPA.<sup>3</sup>
- The Army will look at the requirements in 10 CFR Part 20 and ensure that it has adequately identified and addressed the occupational radiation protection requirements in its amendment application.
- The NRC will provide the Army with any additional guidance on environmental monitoring given that the sites are unique and no NRC guidance for these types of sites has been developed.<sup>4</sup>
- If the NRC approves the amendment request, the NRC will determine the inspection schedule (frequency) for these sites that are to be licensed under the Programmatic Approach. Because license conditions with implementation schedules will be likely under the Programmatic Approach, the NRC will provide the Army with an opportunity to review and comment on the draft license conditions before they are finalized. Also, the NRC staff will address inspection resources and planning, as needed.
- The NRC informed the Army that it intends to continue to reach out to the Hawaiian stakeholders since the Army clarified that the license amendment will include the two Hawaiian sites.

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<sup>2</sup> Provided to the Army on February 27, 2015, ML15061A184).

<sup>3</sup> Provided to the Army on February 27, 2015, ML15061A192 and March 5, 2015, ML15068A101).

<sup>4</sup> Provided to the Army on February 27, 2015, ML15061A168).

List of Attendees:

NRC:

Amy Snyder  
Varghese Kurian  
Dr. Leah Parks\*  
Dr. Robert Evans\*, RIV  
Reginald Augustus  
Mirabelle Shoemaker  
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Member of the Public:

Mark Donaghy\*, University of Wisconsin (no contact information)

\* participated through teleconference