



ENVIRONMENTAL SAFETY, INC.

AWARENESS, RESPONSE, SOLUTIONS

Regional Administrator
United States Nuclear Regulatory Commission, Region IV
Attention: Director, Division of Nuclear Material Safety
612 East Lamar Boulevard, Suite 400
Arlington, Texas 76011-4125

Date: 3/4/15
Subject: Temporary Job Site Activity notification IAW NRC License # 04-29369-01
Licensee: **B & B Environmental Safety, Inc., Lathrop, CA 95330**

RE: Initial Notification of activities under the above license,

B & B Environmental Safety, Inc. (BBES) respectfully notifies the U.S. Nuclear Regulatory Commission as defined above of temporary job site status. BBES is working as the radiological controls subcontractor to TRC Solutions, Inc. for a shoreline inspection project and an off-shore and on-shore geotechnical investigation of both transitioned and non-transitioned properties at the former Hunters Point Shipyard, California.

Our client understands the need for 14 days prior notification, our tentative onsite operations start date is March 18, 2015. However operations will commence no later than March 30, 2015. The expected duration of the project will be until the 17th of July, 2015.

A copy of the Project Memorandum of Understanding signed by Kenneth S. Baugh, BBES President/CEO is enclosed.

We are sending this notice via email and will dispatch a pen and ink signature document today Wednesday March 4, 2015 via FedEx to your office.

Specific Site Location: Former Naval Shipyard Hunters Point, CA
Start Date: March 18, 2015
Estimated Completion Date: July 15, 2015

B & B Environmental Safety Project

Specific

Point of Contact / Title:

Kenneth S. Baugh/

Program Manager

Telephone:

**(209) 923-
3018**

Estimated type, quantity and physical/chemical forms of licensed material:

The possible radioactive contaminants are estimated to consist of **Cs-13**, **Ra-226** and **Sr-90**. The potential maximum quantity is not expected to exceed 10 mCi.

Description of project activities:

BBES will monitor materials/samples/equipment/personnel to ensure they are free of possible radiological contamination. Smears will also be taken prior to materials being introduced to the project and at the end of each day of use to ensure materials are free of contamination. For alpha surveys the nominal background is essentially zero. Count times will be increased to provide statistically reliable data consistent with NUREG 1506. For beta/gamma surveys, the re-evaluation level will be the reference mean + 3 Sigma, where sigma is the standard deviation of the beta/gamma readings in the background reference area.

Waste Management and disposition:

If the project encounters radioactive materials that require sampling to determine constituency; BBES will monitor equipment and materials at the Radiation Monitoring Area (RMA). Materials that exceed screening levels: BKG + 3 sigma, will be remanded to the Hunters Point radiological material contractor TetraTech. Materials awaiting confirmatory analytical testing (drilling spoils) will be housed in the proximal end; near the ramped bay doors, of building 813. The end of the building will be placed under license observation/regulatory coverage for the storage of the materials until a final disposition determination can be made.

Final Survey Results Summary:

No used or unscreened materials will be allowed to touch the unprepared surfaces of the RMA. Any material repeatedly not passing screening will be remanded to TetraTech for analytical evaluation and disposition; therefore, a final status survey will not be required.

Complications/Unexpected encounters with radioactive materials:

None to date.

Respectfully,

**Doc
Dennis**

Digitally signed by: Doc
Dennis
DN: CN = Doc Dennis C = US
O = BBES OU = SW Region
Date: 2015.03.04 14:18:07 -
06:00'

Donald "Doc" Dennis, RSO/RME
B & B Environmental Safety, Inc.
(916) 919-6977



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MEMORANDUM FOR RECORD

SUBJECT: Memorandum of Understanding, United States Nuclear Regulatory Commission – Unconditional acceptance of waste material at Hunters Point Naval Shipyard

February 27, 2015

B & B Environmental Safety, Inc. (BBES) is the Radiological licensee and SME for the TRC Solutions, Inc. (TRC) led team that will undertake the shoreline inspection task for C.P. Development Co. L.P. Since BBES is not a Navy contractor and will not be holding, controlling nor processing for disposal any materials from the Hunters Point site that has been determined as “Radioactive Waste”, we suggest an operational MOU be agreed upon between us (BBES) and the Navy’s Basewide Radiological Support Contractor, Tetra Tech EC, Inc (TTEC).

A structural inspection team consisting of TRC Solutions, Inc. (TRC), Underwater Resources, Inc. (URI), ENGEO, Inc. (ENGEO) and B & B Environmental Safety, Inc. (BBES) will be performing work along the shoreline and in parcels B, C, D, E and F. The work requires licensed controls due to the historical presence of radioactive materials and the subsequent potential for occupational exposures, both of which are subject to oversight by the Nuclear Regulatory Commission (NRC) and/or the California Department of Public Health (CDPH), depending on where the operations are conducted in relation to the regulatory jurisdictional dividing line at Hunters Point Naval Shipyard (HPNS).

TRC Solutions, Inc. is the lead contractor for the structural inspection work being conducted as part of the CP Development Co., LP.’s planned redevelopment project at Hunters Point Shipyard Phase II and Candlestick Point (HPS2/CP). Further, the structural inspection is being performed in support of the shoreline improvement designs being completed by Moffatt Nichols Engineers (Moffatt Nichols).

The planned inspection areas have been/are being investigated and evaluated by the U.S. Navy (Navy; the current property owner) and the California Department of Public Health (CDPH; the regulatory oversight agency) for free release from radiological contamination, and are yet to receive unrestricted release. As the TRC Team Radiological designee and Radiological Material License (RML) holder, BBES will perform radiological monitoring functions in designated monitoring areas and guide team members in following radiological safety protocols during structural inspection work.

The TRC team will be conducting monitoring operations in areas that have either transferred from Federal control; or are set to transfer. BBES will utilize both its USNRC RML # 04-29369-01L and its CA RML #7540-39 in conducting monitoring operations.



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The MOU covers the following operations:

1. Once the determination of radioactive waste or found radioactive material is made: sustained and repeated measurements in excess of 3 sigma background, BBES will document the location from which the materials were extracted from or most probable location of contamination for equipment decontamination used in assessments.
2. TtEC will take control of materials and remove materials from BBES area of operations. TtEC will characterize the materials and if the results indicate that the materials are a low level radioactive waste (LLRW), the waste will be transferred to the Navy's LLRW contractor for disposal. If the results of the characterization indicate the materials to be a non-LLRW, the waste will be returned to BBES.
3. BBES will perform survey and monitoring activities to ensure area is returned to ambient background.

Jurisdictional issues should they arise or specific situations not covered under this agreement will be discussed between the respective license signatories of TtEC and BBES for resolution. Signatures placed within this MOU by each Radiation Safety Officer (or RSO representative) will indicate approval of the contents within this document, and concurrence with the resultant agreement.


Adam Berry, TtEC Radiation Safety Officer Representative 3/3/2015
Date


Kenneth S. Baugh, BBES Radiation Safety Officer 2-27-2015
Date

Cc: Steven Adams, TtEC NRC License Radiation Safety Officer
Nathan Smith, TtEC CA License Radiation Safety Officer