



**DEPARTMENT OF THE ARMY**  
**HEADQUARTERS JOINT BASE LEWIS-MCCHORD**  
**1010 LIGGETT AVENUE, BOX 339500, MAIL STOP 1AA**  
**JOINT BASE LEWIS-MCCHORD, WA 98433-9500**

March 25, 2015

Joint Base Safety Office

U.S. Nuclear Regulatory Commission, Region IV  
ATTN: Mr. James L. Thompson, Senior Health Physicist  
1600 East Lamar Boulevard  
Arlington, Texas 76011-4511

Dear Mr. Thompson:

We are reporting the improper transfer of generally licensed devices (GLDs) that transpired at Joint Base Lewis-McChord (JBLM) on or about 14 April 2014. Discovery and verification of the event transpired on 20 March 2015 around 1330 hrs local. Telephonic notification to the NRC took place at 1735 local; Mr. Donald Norwood took the report and assigned EN: 50913 case number.

The following GLDs items were turned into Joint Base (JB) Supply Division (see enclosure 1, Units DA Form 3161 turn in document) and sent the Defense Logistics Agency (DLA) Disposition Services, located on installation (See enclosure 2a thru 2c, DA Form 1348-1 Issue/Release/Receipt Document):

- a. 2 ea. Smith Detecting Sabre 4000, SN: 43105 and 43135, containing 15 mCI of Ni-63 normal form, solid each.
- b. 2 ea. GE Vapor Tracer 2, SN: K190014411 and K190014412, containing 10 mCI of Ni-63 normal form, solid each.
- c. 1 ea. GE Itemiser 3, SN: 050449010283, containing 10 mCI of Ni-63 normal form, solid.

Background:

a. The GLD equipment was issued to what were at the time Fort Lewis and McChord Air Force Base under the Department of Defense (DoD) Guardian Program. It was then issued to the respective Directorates of Emergency Services (DES) (e.g., Department of Army Police, Installation Guards, Fire Departments and Security Forces). Because the GLDs were commercially obtained and under general license, they were assigned a non-standard National Stock Number (NSN) enabling them to be tracked through the installation's automated property book. This permitted them to be issued and placed on users' hand receipts.

b. Additional controls were put in place for all GLDs:

(1) The GLD's were added to the annual radiation sources inventory per Army requirements in DA PAM 385-24, 1-4, k, (4), to be accomplished every April. The last inventory was 15 April 2014; the next is due 15 April 2015. (See enclosure 3, March 2014 Survey).

(2) GLDs with isotopes were wipe tested annually by this office and the wipe samples were sent to a certified lab for analysis. 180 day testing was performed by our office upon request. (See enclosure 4 results from Redstone lab).

c. Because DES was not using the equipment, the Joint Base Radiation Safety Officer (JB RSO) recommended the equipment be turned in for proper disposal. (See enclosure 5, Memorandum for record).

d. DES directed their supply personnel to turn in the equipment. A DA Form 3161 document was prepared and the equipment turned in to Joint Base Lewis-McChord (JBLM) Supply Division as documented in paragraph 2 of this memorandum. Because a non-standard NSN was used these items did not come up on the Fed Log (SCIC contains hazard code) as potentially containing radioactive isotopes and was transferred to DLA.

e. Since DLA uses Fed Log to identify items that may potentially contain isotopes and a non-standard NSN was used when delivered, the items were classified as scrap. There are basically three codes for scrap at this point in the process; these particular devices were classified as MUT or "For Mutilation". This particular code is considered a "negative revenue" service contract as it entails DLA having to pay out to dispose of it versus "positive revenue" where the material is sold for revenue. According to the Disposition Services Area Manager, the likely destination of the material would have been the contractor, New Phoenix, Greenville TX, which is a common mutilation contractor mutilation designated items originally considered electronics or instruments.

No known exposures, injuries or contamination have been identified at JBLM or at the DLA facility related to this incident. Additionally, no exposures to individuals are known to have occurred at the off-site contractor processing location. Exposure at this area is doubtful considering the low energy of the isotope, (Ni-63, 66 KeV); the amount of the isotope present in each device and due of the particular encasement surrounding each source within its respective detector shell.

The JB RSO and Safety Office have made every attempt to track the material through DLA. Notifications made to Installation Management Command (IMCOM) RSO and Department of the Army RSO prior to notification to the NRC.

Causal factors directly contributing to this incident:

a. DES Supply personnel were not briefed that the items to be turned-in contained a radioactive isotope.

b. Non Standard NSNs are not listed in Fed Log.

c. Non Standard NSNs are not assigned Special Controlled Item Control (SCIC) codes that indicate the presence of radiological material in a device.

d. The Supply Division and DLA had no item description. They did not read the accompanying manuals which provided an identification of the present hazard.

e. Items were not inspected by personnel for radiation labels affixed to each one of the devices or they were not trained to recognize the hazard label markings.

Actions taken to prevent recurrence:

a. The Army Radiation Safety Officer has sent a message to all Army commands, to remind them about the proper handling and disposition of GLDs (enclosure 6).

b. The IMCOM RSO will reinforce the management policy for GLDs throughout the Army.

c. The turn-in and disposal for all GLDs will begin with the installation or garrison RSO, who will take place the items into unwanted radioactive material storage. Items will then be reported to Joint Munitions Command, Safety and Risk Management Directorate, ATTN: AMSJM-SFR, 2695 Rodman Avenue, Rock Island, IL 61299-6000, for disposition instructions.

d. A copy of TB 43-0137 showing a pictures of each GLDs item on installation will be provided to DLA staff and Supply Division Personnel. This material will be incorporated into their awareness training.

e. The citations received from the NRC will be provided to each RSO on installation with instruction to post where all employees can review.

f. Within 5 working days of the transfer of any non-standard NSN containing a radioactive isotope, the JB RSO will be notified so he or she can notify the NRC ensuring compliance with 10 CFR 31.5©(9).

JBLM point of contact is Mr. Mark D. Henisey, JB RSO, or Mr. Peter F. Strohm, Safety Director, telephone (253) 967-3079/6764.

Sincerely,



Thomas A. Dougherty Jr.  
Manager, Technical Safety Support (Alt JB RSO)  
Joint Base Safety Office

6 Enclosures  
as

CF:  
Joint Base Commander  
Mr. Peter F Strohm  
IMCOM RSO (Dr. Robert N. Cherry)  
HQDA ASO (Gregory R. Komp, DA RSO)

Enclosure 1  
DA Form 3161  
Units Turn-in Document to Supply Division

**REQUEST FOR ISSUE OR TURN-IN**  
(DA PAM 710-2-1)

3. SEND TO: PBO		ISSUE TURN-IN		SHEET NO. 1		NO. SHEETS 1		1. REQUEST NO.		2. VOUCHER NO.					
4. DATE MATERIAL REQUIRED (YYYYMMDD)				5. DODAAC				6. PRIORITY				7. ACCOUNTING/FUNDING DATA			
8. REQUEST FROM: Sac-D Supply DES W12KFC				9. END ITEM IDENT				9a. NAME/MANUFACTURER				9b. MODEL			
* CODE I-Initial R-Replacement				TURN-IN FWT-Fair Wear And Tear RS-Report of Survey				EX-Excess SC-Split of Charges				10. PUBLICATION <b>IPBO</b>			
11. JOB ORDER NO.				9c. SERIAL NO.											

12. ITEM NO. a	STOCK NO. b	ITEM DESCRIPTION. c	UNIT OF ISSUE d	QUANTITY e	CODE f	SUPPLY ACTION g	UNIT PRICE h	TOTAL COST i	DATE (YYYYMMDD) j	POSTED BY k
1	666501C006155	Detector-s/n# 050449010283	EA	1	EX	1	\$37,931	0.00	4/05-0186	CE F
2	664001C023711	Vapor Tracer #09-4844	EA	1	EX	1		0.00		CE F
		S/N# K190014411								
3	664001C023711	Vapor Tracer #09-8478	EA	1	EX	1	\$24,783.68		4/05-0187	CE F
		S/N# K190014412								
4	662501C061338	Saber 2000 S/N#43105	EA	1	EX	1 ✓				CE F
5	662501C061338	Saber 2000 S/N#43135	EA	1	EX	1 ✓				CE F
		... NOTHING FOLLOWUP...					\$24,393.20		4/05-0188	
SHEET TOTAL									GRAND TOTAL	

13. ISSUE/TURN-IN "QUANTITY" COLM IS REQUESTED	DATE (YYYYMMDD)	BY	14. ISSUE QTY IN "SUPPLY ACTION" COLUMN	DATE (YYYYMMDD)	BY	15. REC QTY IN "SUPPLY ACTION" COLUMN	DATE (YYYYMMDD)

PREVIOUS EDITION MAY BE USED.

DA FORM 3161, DEC 2000

EWCL1

APD PE V1.03ES

**Enclosure 2**  
**DD Form 1348-1**  
**Supply Division Transfer Documents to DLA**

DD FORM 1348-1A, JUL 91 (EG) ISSUE RELEASE/RECEIPT DOCUMENT

1	2	3	4	5	6	7	8	9	0	1	2	3	4	5	6	7	8	9	0	1	2	3	4	5	6	7	8	9	0	1	2	3	4	5	6	7	8	9	0	1	2	3	4	5	6	7	8	9	0
24. DOCUMENT NUMBER & SUFFIX (30-44)																1. TOTAL PRICE			2. SHIP FROM			3. SHIP TO																											
A5J EA00002 SZ3380 NA 1F																UNIT PRICE			DOLLARS			CTS																											
W800D841050188																DOLLARS			CTS			4878640																											
6625DSTESTEQU																5. DOC DATE			8. NMFC			7. FRT RATE			8. TYPE CARGO			9. PS																					
EA00002F24,393.20																4105																																	
W12KFC HAND HJELD TRACER DETECTOR SABER 2000 SMI																10. QTY. RECD			11. UP			12. UNIT WEIGHT			13. UNIT CUBE			14. UFC			15. SL																		
SN: 43105, 43135																16. FREIGHT CLASSIFICATION NOMENCLATURE																																	
Point of Contact: CLIFFORD LUND Telephone No: 2539672469																17. ITEM NOMENCLATURE																																	
This is an APPROVED ETID generated document. (SZPA037)																LAB INSTRUMENT TEST EQUIPMENT																																	
																18. TY CONT			19. NO CONT			20. TOTAL WEIGHT			21. TOTAL CUBE																								
																22. RECEIVED BY						23. DATE RECEIVED																											

POSTED


CLIFFORD

EWCL 2J

DD FORM 1348-1A, JUL 91 (EG) ISSUE RELEASE/RECEIPT DOCUMENT


1	2	3	4	5	6	7	2	2	2	2	2	2	4	4	4	4	5	5	5	5	5	5	6	6	6	6	6	6	6	7	7	7	7	7	7	7	8	8	1	1. TOTAL PRICE			2. SHIP FROM W800D8		3. SHIP TO SZ3380	
D I C O D E N T		R I F R O M		M & S		U I N S S		Q U A N T I T Y		S U P P L E - M E N T A R Y A D D R E S S		S I F U N D		D I S - T R I - B U - T I O N		P R O - J E C T		P R I		R E E L D		D D A A T T E		R I		O C M O N T		U N I T P R I C E		D O L L A R S		C T S		4. MARK FOR NH												
A5J		EA00002		SZ3380		NA		1F		2478348		4956696																																		

24. DOCUMENT NUMBER & SUFFIX (30-44)



W800D841050187

25. NATIONAL STOCK NO. & ADD (6-22)



6640DSLABEQUP

26. RIC (4-6)  
UI (23-24)  
QTY (25-28)  
CON CODE (71)  
DIST (85-86)  
UP (74-80)



EA00002F24,783.48

27. ADDITIONAL DATA

W12KFC VAPOR TRACER 2  
SN: K190014411, K190014412

Point of Contact: CLIFFORD LUND Telephone No: 2539672469




5. DOC DATE 4105		6. NMFC		7. FRT RATE		8. TYPE CARGO		9. PS			
10. QTY. REC'D		11. UP		12. UNIT WEIGHT		13. UNIT CUBE		14. UFC		15. SL	
16. FREIGHT CLASSIFICATION NOMENCLATURE											
17. ITEM NOMENCLATURE LABORATORY EQUIPMENT AND SUPPLIES											
18. TY CONT			19. NO CONT			20. TOTAL WEIGHT			21. TOTAL CUBE		
22. RECEIVED BY									23. DATE RECEIVED		

This is an APPROVED ETID generated document. (SZPA037)

ENCL 26



DD FORM 1348-1A, JUL 91 (EG) ISSUE RELEASE/RECEIPT DOCUMENT

1	2	3	4	5	6	7	2	2	2	2	2	2	4	4	4	4	5	5	5	5	5	5	6	6	6	6	6	6	6	6	7	7	7	7	7	7	8	1	1. TOTAL PRICE		2. SHIP FROM W800D8		3. SHIP TO SZ3380							
DI COD INF T			RI FROM			M & S			UI NS IS			QUANTITY			SUPPL- MENTARY ADDRESS			SIG FUND			DIS- TRI- BU- TION			PRO- JECT			P R I			R E Q L D			D E L E T E			A D V			RI			O C M P O N E N T			UNIT PRICE		DOLLARS		CTS	
A5J			EA00001			SZ3380			U			NA			1F			1900000		1900000		4. MARK FOR NH																												
24. DOCUMENT NUMBER & SUFFIX (30-44)																											5. DOC DATE 4105		6. NMFC		7. FRT RATE			8. TYPE CARGO			9. PS 7													
25. NATIONAL STOCK NO. & ADD (9-22)																											10. QTY. REC'D		11. UP		12. UNIT WEIGHT			13. UNIT CUBE		14. UFC		15. SL 0												
26. RIC(4-6) UI (23-24) CITY (25-28) CON CODE(71) DIST (85-86) UF (74-80)																											16. FREIGHT CLASSIFICATION NOMENCLATURE																	17. ITEM NOMENCLATURE EXPLOSIVE DETECTOR						
27. ADDITIONAL DATA		W12KFC SN: 05044010283																									18. TY CONT		19. NO CONT		20. TOTAL WEIGHT			21. TOTAL CUBE																
Point of Contact: CLIFFORD LUND Telephone No: 2539672469																									22. RECEIVED BY					23. DATE RECEIVED																				

This is an APPROVED ETID generated document. (SZPA222)

EWCL 2c

**Enclosure 3**  
**March 2014 Survey**

**GENERALLY LICENSED EQUIP SURVEY MARCH 14**

ION SCAN 400B	1	17195	YAKIMA Bldg 164	2 wipes
	2	17195	YAKIMA Bldg 164	
SABRE 4000 Ion Scanner	7	43105	JBLM LEWIS 2007 Basement	1 Q-TIP for Both
	8	43135	JBLM LEWIS 2007 Basement	Spots 1 Q-TIP FOR Spots
IT ION TRACK VAPOR TRACER	9	06034937872/DET# 09-8478	JBLM LEWIS 2007 Basement	
	10	06034937872/DET# 09-8478	JBLM LEWIS 2007 Basement	
	11	DET# 09-4844	JBLM LEWIS 2007 Basement	
	12	DET# 09-4844	JBLM LEWIS 2007 Basement	
	13	03044939811/DET#09-10941	MCCHORD FIELD P-21	ANNUAL
	14	03044939811/DET#09-10941	MCCHORD FIELD P-21	
	23	03044939840/09-10509	MCCHORD FIELD SFS SUPPLY	
	24	03044939840/09-10509	MCCHORD FIELD SFS SUPPLY	
	25	03044939840/09-9646	MCCHORD FIELD SFS SUPPLY	
	26	03044939840/09-9646	MCCHORD FIELD SFS SUPPLY	
GE ITEMIZER	27	BLANK		
	3	????????	YAKIMA	3 SWIPES
	4			

15	20296		MCCHORD P-21		
16	20296		MCCHORD P-21		
	0				
17	20293		MCCHORD P-21		
18	20293		MCCHORD P-21		
19	4034907380		MCCHORD P-21		
20	4034907380		MCCHORD P-21		
21	20277		MCCHORD P-21		
22	20277		MCCHORD P-21		
5	SSG DYE (907-388-2986) BIPOD		BLDG 11351 A		
6	SSG DYE (907-388-2986) BIPOD		BLDG 11351 A		

**Enclosure 4  
Lab Results**

**US ARMY TMDE ACTIVITY  
Radiation Standards Laboratory  
WIPE/LEAK TEST ANALYSIS RESULTS**

Report Date: 20 May 2014  
Page 1 of 2

**FROM:** US Army Aviation and Missile Command  
AMSAM-TMD-SR-C  
Bldg 5417 Nuclear Counting  
Redstone Arsenal AL 35898-5400

**TO:** Joint Base Safety Office  
IMLM-SO  
2nd St Box 339500 MS66  
Joint Base Lewis-McChord WA 98433-9500

**PHONE:** 256-876-7666/3839  
**DSN:** 746-7666/3839

**PHONE:** 253-967-4011; 253-966-6925  
**DSN:** 357-4011; 347-6925

**E-MAIL:** redstone.nuclear.counting@conus.army.mil

**E-MAIL:** mark.henisey@us.army.mil; thomas.a.dougherty.civ@mail.mil

**Submission ID:** E 14127A P3 1412702 L **Descr:**  
**Counting System:** LSC-E

**Isotope:** H-3

**Analysis Completed:** 20 May 2014

Sample Identification	Sample Date	DPM BETA	Microcuries (µCi) BETA
05	04 Apr 2014	0.0	0.000000
06	04 Apr 2014	9.9	0.000004
Limit of Detection		18.8	0.000008

Report Date: 20 May 2014  
Page 1 of 2

EWCL4

US ARMY TMDE ACTIVITY  
Radiation Standards Laboratory  
WIPE/LEAK TEST ANALYSIS RESULTS

Report Date: 20 May 2014  
Page 2 of 2

Submission ID: E 14127A P3 1412702 L

REMARKS: Results for Ni-63 wipes, submitted with the wipes on this report, will be provided on a separate report.

Traceability to NIST is provided by the standard(s)/source(s) identified below.

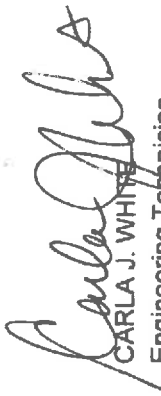
Tritium SN: 1227798, last calibrated date: 3 October 2012

These sample analyses were accomplished in accordance with RSL SOP NC-01, Leak/Wipe Test Analysis Operations, using a liquid scintillation counter calibrated with NIST traceable sources. Supporting documentation relative to NIST traceability is on file and is available for examination upon audit or request. The combined expanded measurement uncertainty for tritium is +/- 6.9% with a confidence level of 95%. This applies only to the samples analyzed and cannot be used to infer future results of similar samples.


Environmental conditions in the laboratory at the time of measurement were within acceptable ranges: 22 +/- 3 degrees C, 35-70% relative humidity.

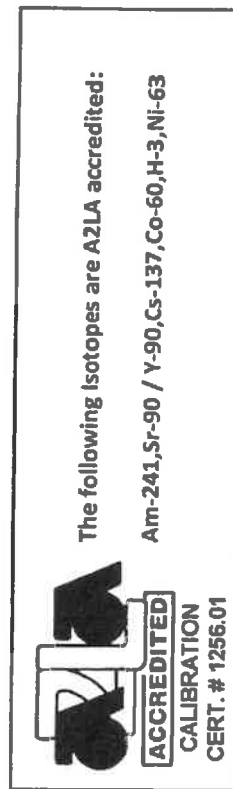
These analyses are accredited to ISO/IEC 17025-2005 by the American Association for Laboratory Accreditation (A2LA Certificate No. 1256.01) and fully comply with the provisions of ANSI/NC-SL Z540.1-1994. In addition, the quality system of the Army Primary Standards Laboratory is registered to ISO 9001:2008. This report shall not be reproduced except in full without written permission of the Radiation Standards Laboratory.

Analysis Performed by

  
CARLA J. WHITE  
Engineering Technician,  
Nuclear Counting

Approved by

  
C. MARTIN JOHNSON, JR.  
Senior Radiochemist, Nuclear Counting  
and Special Projects



Report Date: 20 May 2014  
Page 2 of 2

ENCL 43

**REDSTONE NUCLEAR COUNTING LEAK/WIPE ANALYSIS REQUEST Page 1 of 2**

**Submitting Organization (complete address):**

DEPARTMENT OF THE ARMY  
 Joint Base Safety Office  
 ATTN: : IMLM-SO  
 2ND ST. BOX 339500 MS66  
 Joint Base Lewis-McChord, WA 98433-5000

**Mail Samples To:**

US ARMY AVIATION AND MISSILE COMMAND  
 AMSAM-TMD-SR-C  
 BLDG 5417 NUCLEAR COUNTING  
 REDSTONE ARSENAL AL 35898-5000

**Direct Questions/Concerns To:**

CML: 256-876-7666/3839/0472  
 DSN: 746-7666/3839/0472  
 usarmy.redstone.amcom.mbx.nuclear-counting@mail.mil

**Primary Recipient of Analysis Results:**

**Name:** MARK D. HENISEY  
**DSN:** 357-4011 **COML:** 253-967-4011  
**Email:** mark.d.henisey.civ@us.army.mil

**Radionuclide (circle):** H-3 & Ni-63 MUST BE INDIVIDUAL WIPES can  
 NOT be combined with other isotopes)

Gross a/b/g, Am-241, Sr-90/Y-90, Cs-137, Cd-109, Co-57, Co-60,  
 dU, Pu-238, Pu-239, H-3, Ni-63, Other:

**Secondary Recipient of Analysis Results:**

**Name:** THOMAS A. DOUGHERTY  
**DSN:** 347-6925 **COML:** 253-966-6925  
**Email:** thomas.a.dougherty.civ@mail.mil

**Type:**  Leak Test  Area Wipe  Package

**Facility or Device(s) Being Tested :**  
 Semi Annual Gen Licence Wipe Tests

Are these samples being submitted as a result of release of radioactive material from an incident or accident?  
 accident?  Yes  No If Yes, notify this laboratory via phone or email with mail tracking information.

Sample ID/Serial Number	Description of Wipe	Radioisotope	Date of Survey
1	ION SCAN 400B Semi Annual (Yakima)	Ni-63	3/31/2014
2	ION SCAN 400B Semi Annual (Yakima)	Ni-63	3/31/2014
3	GE ITEMIZER (Yakima)	Ni-63	3/31/2014
4	GE ITEMIZER (Yakima)	Ni-63	3/31/2014
5	Wipe Survey of Damaged Mortar Bipod	H-3	4/4/2014
6	Wipe Survey of Damaged Mortar Bipod	H-3	4/4/2014
7	SABRE 4000 Semi Annual (Q-tip)	Ni-63	3/31/2014
8	SABRE 4000 Semi Annual (Q-tip)	Ni-63	3/31/2014
9	VAPOR TRACER Semi Annual (Det 09-8478)	Ni-63	3/31/2014
10	VAPOR TRACER Semi Annual (Det 09-8478)	Ni-63	3/31/2014
11	VAPOR TRACER Semi Annual (Det 09-4844)	Ni-63	3/31/2014
12	VAPOR TRACER Semi Annual (Det 09-4844)	Ni-63	3/31/2014
13	VAPOR TRACER Semi Annual (Det 09-10941)	Ni-63	3/31/2014
14	VAPOR TRACER Semi Annual (Det 09-10941)	Ni-63	3/31/2014

**Remarks:** TACOM LCMC Safety Office

Reserved for Laboratory Use

**RECEIVED**

MAY - 7 2014

Pro Number: 1412701L / 1412702L

W: 63/H 3 Type

TO 25 2

  
 RSO/RPO Signature

EWCL4b



**REDSTONE NUCLEAR COUNTING LEAK/WIPE ANALYSIS REQUEST Page 2 OF 2**

**Submitting Organization (complete address):**

DEPARTMENT OF THE ARMY  
 Joint Base Safety Office  
 ATTN: : IMLM-SO  
 2ND ST. BOX 339500 MS66  
 Joint Base Lewis-McChord, WA 98433-5000

**Mail Samples To:**

US ARMY AVIATION AND MISSILE COMMAND  
 AMSAM-TMD-SR-C  
 BLDG 5417 NUCLEAR COUNTING  
 REDSTONE ARSENAL AL 35898-5000

**Direct Questions/Concerns To:**

CML: 256-876-7666/3839/0472  
 DSN: 746-7666/3839/0472  
 usarmy.redstone.amcom.mbx.nuclear-counting@mail.mil

**Primary Recipient of Analysis Results:**

Name: MARK D. HENISEV  
 DSN: 357-4011 COML: 253-967-4011  
 Email: mark.d.henisev.civ@us.army.mil

**Radionuclide (circle):** (H-3 & Ni-63 MUST BE INDIVIDUAL WIPES can NOT be combined with other isotopes)

Gross a/b/g, Am-241, Sr-90/Y-90, Cs-137, Cd-109, Co-57, Co-60, dU, Pu-238, Pu-239, H-3, Ni-63, Other:

**Secondary Recipient of Analysis Results:**

Name: THOMAS A. DOUGHERTY  
 DSN: 347-6925 COML: 253-966-6925  
 Email: thomas.a.dougherty.civ@mail.mil

**Type:**  Leak Test  Area Wipe  Package

**Facility or Device(s) Being Tested :**

Semi Annual Gen License Wipe Tests

Are these samples being submitted as a result of release of radioactive material from an incident or accident?  
 accident?  Yes  No If Yes, notify this laboratory via phone or email with mail tracking information.

Sample ID/Serial Number	Description of Wipe	Radioisotope	Date of Survey
15	GE ITEMIZER (20296)	Ni-63 ▼	3/31/2014
16	GE ITEMIZER (20296)	Ni-63 ▼	3/31/2014
17	GE ITEMIZER (20293)	Ni-63 ▼	3/31/2014
18	GE ITEMZER (20293)	Ni-63 ▼	3/31/2014
19	GE ITEMIZER (40349073800)	Ni-63 ▼	3/31/2014
20	GE ITEMIZER (40349073800)	Ni-63 ▼	3/31/2014
21	GE ITEMIZER (20277)	Ni-63 ▼	3/31/2014
22	GE ITEMIZER (20277)	Ni-63 ▼	3/31/2014
23	VAPOR TRACER Semi Annual (Det 09-10509)	Ni-63 ▼	3/31/2014
24	VAPOR TRACER Semi Annual (Det 09-10509)	Ni-63 ▼	3/31/2014
25	VAPOR TRACER Semi Annual (Det 09-9646)	Ni-63 ▼	3/31/2014
26	VAPOR TRACER Semi Annual (Det 09-9646)	Ni-63 ▼	3/31/2014
27	BLNK	▼	

Remarks: TACOM LCMC Safety Office

Reserved for Laboratory Use

**RECEIVED**

ProNumber

# Type

TD

*(Signature)*  
 RSO/RPO Signature

EWCL 4c

**Enclosure 5**  
**JB RSO Memorandum for Record**



REPLY TO  
ATTENTION OF

**DEPARTMENT OF THE ARMY**  
**HEADQUARTERS, JOINT BASE LEWIS-MCCHORD**  
**1010 LIGGETT AVENUE, BOX 339500, MAIL STOP 1AA**  
**JOINT BASE LEWIS-MCCHORD, WA 98433-9500**

IMLM-SO

March 20, 2015

MEMORANDUM FOR RECORD

SUBJECT: Improper Disposal of Radioactive Devices

1. On March 19, 2015 the JBLM DOL Supply section cc:d the Joint Base Safety Office (JBSO) on an email exchange with the Nuclear Regulatory Commission (NRC) in response to a letter they had received from the NRC. The JBSO requested copies of the letter and any email traffic.
2. After reviewing the letter and email traffic, the JBSO determined the NRC had simply sent a reminder on 27 February 2015 to DOL Supply Central Receiving that DOL needed to keep track of generally-licensed devices received, and that no response was necessary (Enclosure 1). On 19 March 2015 DOL Supply contacted the NRC directly asking for more information (Enclosure 2). NRC sent back a listing of five serial numbered generally-licensed items they knew had been shipped to JBLM and requested a report by 9 April 2015 if Central Receiving no longer possessed them (Enclosure 2). Also on 19 March 2015, DOL Supply sent a response to the NRC that they were unable to determine what devices were being referenced and asked for more information (Enclosure 2). In that response, DOL Supply cc:d the JBSO. Mr. Dougherty, JBSO, told DOL Supply the JBSO would handle response to the NRC, and contacted the NRC.
3. From the 19 March 2015 email thread, I recognized two of the identified serial numbers, 43105 and 43135, as detectors on which I had conducted period leak test surveys in the Building 2007A armory. Last fall, I had contacted DES to survey the two items requiring 180-day tests, and was told that the items were turned in and gone. I asked for paperwork but was told they didn't have it there. I had previously suggested to DES personnel in prior visits that if the items were no longer needed, they should consider turning them in, and that they would be turned in to me as the Joint Base Radiation Safety Officer when they were no longer required. I therefore assumed the DES had set the detectors aside in building 3088 where other Generally Licensed items had been stored previously and were simply awaiting paperwork before releasing them to me.
4. On March 19, I contacted DES to locate the items and began an inquiry with DLA Disposition Services to see if the items had mistakenly made it to them. During this inquiry I discovered the items had in fact been turned in to JBLM DOL along with two other detectors, then sent on to DLA, classified as scrap, and sent out for destruction. The two other detectors, were GE Ion Track Vapor Tracer 2's (serial numbers: 09-8478 and 09-4844).

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SUBJECT: Improper Disposal of Radioactive Devices

5. Following that discovery, I made a request to DES to confirm whether the detectors stored at two locations McChord Field (B569 and the 627ABG Armory P-21) were still on hand, or whether they might also have been turned in to JBLM DOL. As of the end of the day, 20 March 2015, there was no positive confirmation one way or the other, although the DOL Supply section stated they have no record of any other devices having been turned in. DES will continue to research the McChord Field devices on Monday, 23 March 2015.

6. For additional information, contact the undersigned, Comm. (253-967-4011), DSN 357-4011/or [mark.d.henisey.civ@mail.mil](mailto:mark.d.henisey.civ@mail.mil).

Encl  
as



MARK D. HENISEY  
Joint Base Radiation Safety Officer

**From:** [Dougherty, Thomas A Jr CIV \(US\)](#)  
**To:** [Cross, Beverly J CIV USARMY IMCOM \(US\)](#); [Hector.rodriquez-luccion@nrc.gov](#)  
**Cc:** [Henisey, Mark D CIV USARMY IMCOM PACIFIC \(US\)](#); [Lasch, Eugene T \(Tom\) CIV USARMY IMCOM CENTRAL \(US\)](#); [Allen, Michael J CIV USARMY IMCOM CENTRAL \(US\)](#); [Reed, Darwin K CIV USARMY IMCOM CENTRAL \(US\)](#); [Thompson, Frank L CIV \(US\)](#); [McGuire, Karen L CIV USARMY TACOM \(US\)](#); [Strohm, Peter F CIV USARMY \(US\)](#); [Crooks, Kelly W CIV USARMY JMC \(US\)](#)  
**Subject:** RE: LTR DTD 2-27-2015 GL-723609 Nuclear Regulatory Commission (UNCLASSIFIED)  
**Date:** Thursday, March 19, 2015 12:07:32 PM  
**Importance:** High

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Bev,

Our office will respond to the NRC inquire on General Licensed SABER 4000. We have the inventories, SN: and who has what where. I have already placed a call and left a voice message with the NRC POC, Mr. Rodriguez.

Mr. Rodriguez,

Mr. Henisey (Joint Base RSO) or myself (Alt JB RSO) will provide you with the information you requested. Thank you for your understanding in this matter.

V/R

Tom Dougherty  
Cell 253-905-5413 - Desk 253-966-6925  
e-mail: [thomas.a.dougherty.civ@mail.mil](mailto:thomas.a.dougherty.civ@mail.mil)  
Evaluate Our Service  
[http://ice.disa.mil/index.cfm?fa=card&site\\_id=957&service\\_provider\\_id=101539](http://ice.disa.mil/index.cfm?fa=card&site_id=957&service_provider_id=101539)

-----Original Message-----

**From:** Cross, Beverly J CIV USARMY IMCOM (US)  
**Sent:** Thursday, March 19, 2015 11:41 AM  
**To:** [Hector.rodriquez-luccion@nrc.gov](#)  
**Cc:** [Henisey, Mark D CIV USARMY IMCOM PACIFIC \(US\)](#); [Lasch, Eugene T \(Tom\) CIV USARMY IMCOM CENTRAL \(US\)](#); [Allen, Michael J CIV USARMY IMCOM CENTRAL \(US\)](#); [Reed, Darwin K CIV USARMY IMCOM CENTRAL \(US\)](#); [Thompson, Frank L CIV \(US\)](#); [Dougherty, Thomas A Jr CIV \(US\)](#)  
**Subject:** FW: LTR DTD 2-27-2015 GL-723609 Nuclear Regulatory Commission (UNCLASSIFIED)

CLASSIFICATION: UNCLASSIFIED

This office received attached memo. This activity serves as a Distribution Receiving Point for multiple end users. We are unable to determine what devise your office feels was transferred to the installation referenced in this memo. It will greatly assist us to locate the devise in question if we were provided either the document number shipped, the nomenclature or the national stock number of the devise in question. Even a copy of the Commercial or Government Bill of Lading would suffice.

BEVERLY CROSS

Joint Base Lewis McChord, WA  
SUPVR, DOL, Supply Division  
Bldg 9630 door 3  
JOINT BASE LEWIS-McCHORD, Washington 98433  
COMM: 253-967-7334  
DSN: 357-7334  
CELL: 253-753-4017  
FAX: 253-967-7044

EMAIL: [beverly.cross@us.army.mil](mailto:beverly.cross@us.army.mil)

Please visit us on ICE and tell us about our services and how we can better serve you on Joint Base Lewis-McChord by using the following

DOL, Supply and Services (ISD) Comment Card:

[http://ice.disa.mil/index.cfm?fa=card&sp=85998&s=957&dep=\\*DoD&sc=14](http://ice.disa.mil/index.cfm?fa=card&sp=85998&s=957&dep=*DoD&sc=14)

-----Original Message-----

From: Parker, Rita D CIV USARMY IMCOM (US)  
Sent: Thursday, March 19, 2015 10:46 AM  
To: Allen, Michael J CIV USARMY IMCOM CENTRAL (US); Cross, Beverly J CIV USARMY IMCOM (US)  
Cc: Thompson, Frank L CIV (US); Dawson, Steven M CIV USARMY ACC (US); Lasch, Eugene T (Tom) CIV USARMY IMCOM CENTRAL (US)  
Subject: FW: LTR DTD 2-27-2015 GL-723609 Nuclear Regulatory Commission (UNCLASSIFIED)

Classification: UNCLASSIFIED  
Caveats: NONE

Please convert to HTML

Hi all,

Not sure if we still have a record or not but I got the attached in the mail from the NRC yesterday. We need to try and track down the contract for the below listed equipment so this info can be forwarded to the correct owner. NRC has my name on record to stay in compliance and I have no idea who ordered it.

NRC needs a new POC. There is a listing of equipment below.

Thanks, Rita

Rita Parker

PA & COR, SP0600-08-D-5845 Fuels

QAE, W912DY-13-G-0010 Recur Maint

COR, W911S8-12-D-0005 Laundry Svc

COR, W911S8-13-C-0012 HazMat Delivery

MICP Contracts Evaluator

JBLM DOL S&S DIVISION

Bldg. 9660, Bay E, South L St, JBLM, WA 98433

253-967-5443 Cell 360-701-3412

Please let us know how we are serving you by using the Interactive Customer Evaluation link below

[http://ice.disa.mil/index.cfm?fa=card&service\\_provider\\_id=85998&site\\_id=348&service\\_category\\_id=14](http://ice.disa.mil/index.cfm?fa=card&service_provider_id=85998&site_id=348&service_category_id=14)

If everyone is thinking alike, then somebody isn't thinking!

George S Patton

From: Rodriguez-Luccioni, Hector [<mailto:Hector.Rodriguez-Luccioni@nrc.gov>]  
Sent: Thursday, March 19, 2015 9:58 AM  
To: Parker, Rita D CIV USARMY IMCOM (US)  
Subject: RE: LTR DTD 2-27-2015 GL-723609 (UNCLASSIFIED)

Greetings Ms. Parker,

As discussed on the phone the U.S. Nuclear Regulatory Commission (NRC) database shows that the Department of Army located in Central Receiving Point, Building 9630, Fort Lewis, WA, possesses the following generally licensed devices:

Manufacturer

Model Number

Serial Number

Radioisotope

Smiths Detection

Ionscan Sabre 4000

43135

Ni-63 (15 mCi)

Smiths Detection

Ionscan Sabre 4000

43105

Ni-63 (15 mCi)

Smiths Detection

Ionscan Sabre 4000

43303

Ni-63 (15 mCi)

Smiths Detection

Ionscan Sabre 4000

43348

Ni-63 (15 mCi)

Smiths Detection

Ionscan Sabre 4000

43313

Ni-63 (15 mCi)

As required by 10 CFR 31.5, general licensees shall inform the NRC of the transfer of generally licensed devices. If the devices aforementioned are no longer in Central Receiving Point, Building 9630, Fort Lewis, WA, please submit a report with the following information:

- Identification of the device b manufacturer's name, model number, and serial number;



- The name, address, and license number (if it is a specific licensee) of the person receiving the device; and
- The date of the transfer.

Please send the report by April 9, 2015 to the following address:

Director, Office of Nuclear Material Safety and Safeguards

Attn: GLTS

U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

If you have any questions please let me know.

Best regards,

Hector Luis Rodriguez-Luccioni, Ph.D.

U.S. Nuclear Regulatory Commission

Office of Nuclear Material Safety and Safeguards

Division of Materials Safety, States, Tribal and Rulemaking Programs

Material Safety Licensing Branch

(301)415-6004

MS: T-8E18

Hector.Rodriguez-Luccioni@nrc.gov <<mailto:Hector.Rodriguez-Luccioni@nrc.gov>>

From: Parker, Rita D CIV USARMY IMCOM (US)  
[<mailto:rita.d.parker.civ@mail.mil>]  
Sent: Thursday, March 19, 2015 10:24 AM  
To: Rodriguez-Luccioni, Hector  
Subject: FW: LTR DTD 2-27-2015 GL-723609 (UNCLASSIFIED)

Importance: High

Classification: UNCLASSIFIED

Caveats: NONE

Good afternoon Sir,

I have received the subject letter and would appreciate a little more information.

Could you please tell me exactly what material or device is referenced in this letter?

The address is a location where I worked over 4 years ago. DOL Central Receiving

Point was the recipient of locally purchased materials and equipment for the whole installation at that time.

Could you have mailed it to the wrong person? If there is a contract associated with this equipment, I

would like to get the letter to the correct owner.

Thanks, Rita

Rita Parker

PA & COR, SP0600-08-D-5845 Fuels

QAE, W912DY-13-G-0010 Recur Maint

COR, W911S8-12-D-0005 Laundry Svc

COR, W911S8-13-C-0012 HazMat Delivery

MICP Contracts Evaluator

JBLM DOL S&S DIVISION

Bldg. 9660, Bay E, South L St, JBLM, WA 98433

253-967-5443 Cell 360-701-3412

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<[http://ice.disa.mil/index.cfm?fa=card&service\\_provider\\_id=85998&site\\_id=348  
&service\\_category\\_id=14](http://ice.disa.mil/index.cfm?fa=card&service_provider_id=85998&site_id=348&service_category_id=14)>

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George S Patton

Classification: UNCLASSIFIED  
Caveats: NONE

Classification: UNCLASSIFIED  
Caveats: NONE

CLASSIFICATION: UNCLASSIFIED

**Enclosure 6**  
**DA RSOs Guidance to Commands**  
**GLD Transfers**

FYSA

The Nuclear Regulatory Commission (NRC) is looking closely at generally licensed radioactive items at Army installations. Examples of these items are tritium exit signs and some of the commercial off the shelf chemical detection equipment such as the Sabre or ADP detectors with nickel-63 sources. The installation that purchases a generally licensed radioactive item becomes a "general licensee" and must comply with NRC rules.

Specific area of consideration is the transfer/movement of these items. As required by 10 CFR 31.5, general licensees shall inform the NRC of the transfer of generally licensed items. The general licensee will return the item to the manufacturer or send to a specific licensee able to receive the item. The general licensee cannot transfer the items to another general licensee unless the NRC and Installation RSO are notified. (This includes transfers to another Army unit or activity) The Joint Munitions Command Radioactive Waste Disposal program office has a specific license to receive these items, but you must request disposition and receive authorization before shipping to JMC. POC is Mr. Mike Kurth, DSN 793-1046/8423, com (309) 782-1046/8423.

The NRC requires general licensees provide the following when transferring their items:

- Identification of the device manufacturer's name, model number, and serial number;
- The name, address, and license number (only if it is a specific licensee) of the person receiving the device; and the date of the transfer.

General licensees shall report the above information to the following address:

Director, Office of Nuclear Material Safety and Safeguards  
Attn: GLTS  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

The NRC POC for questions regarding this requirement is:

Hector Luis Rodriguez-Luccioni, Ph.D.  
U.S. Nuclear Regulatory Commission  
Office of Nuclear Material Safety and Safeguards Division of Materials Safety, States, Tribal and Rulemaking Programs Material Safety Licensing Branch  
(301) 415-6004  
Luccioni@nrc.gov <mailto:Luccioni@nrc.gov>>

Please direct questions on this topic to Mr. Kurth, [michael.f.kurth.civ@mail.mil](mailto:michael.f.kurth.civ@mail.mil), (309) 782-8423.

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