


From: [Snyder, Amy](#)
To: [Cory Harden](#)
Subject: RE: Re: Army Response to Request for Additional Information --US ARMY APPLICATION TO AMEND SOURCE MATERIALS LICENSE NO. SUC-1593- Depleted Uranium From the Davy Crocket Weapon System-
Date: Thursday, November 12, 2015 11:55:00 AM

Thank you

Amy

Amy Snyder, Senior Project Manager
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From: Cory Harden [mailto:333cory@gmail.com]
Sent: Thursday, November 12, 2015 2:10 AM
To: Snyder, Amy <Amy.Snyder@nrc.gov>
Subject: [External_Sender] Re: Army Response to Request for Additional Information --US ARMY APPLICATION TO AMEND SOURCE MATERIALS LICENSE NO. SUC-1593- Depleted Uranium From the Davy Crocket Weapon System-

Hello Amy Snyder,

Your August 31, 2015 letter to Dr. Cherry mentions the Army's Archive Search Report. Here are some notes based on that report.

Cory Harden

“Total rounds verified shipped from Oahu from Lake City Ordnance Plant were 714 rounds... It is highly probable that additional stocks of the Cartridge, 20 mm Spotting M101 were order [sic] from one of the Ordnance Depots (Letterkenny or Pueblo) during the six active years of the Davy Crockett Weapon System in Hawaii.” [ASR p. 41]

.....
Aerial searchers looked for highly visible back/ rear plate assemblies as markers for old spotting

round areas.

“The components of the Davy Crockett system particularly back plate assemblies and windscreens have a very distinct coloring as seen in photos 4-4 and 4-5 [actually 4-9 and 4-10] and are readily observable from the air.” [Memorandum, pp. 4-26 to 4-27]

But the Davy Crockett could be fired from a truck. [[Archive Search Report On the Use of Cartridge, 20mm Spotting M101 for Davy Crockett Light Weapon M28, Schofield Barracks and Associated Training Areas, Islands of Oahu and Hawai'i, Army Corps of Engineers, May 2007,

p. 3-11]

This might leave back/ rear plate assemblies on the truck instead of on the ground.

Hawai'i had 14 trucks for the Davy Crockett. [ASR p. C-291]

.....
Hazardous disposal practices were used during the spotting round era.

“...until the late 1960s, ocean dumping was one of the ways chemical agents and munitions were routinely disposed of since World War I. The other means were **open-pit burning and land burial...**” [Honolulu Star-Bulletin, 11-9-05, bold added]

The spotting rounds might have been treated as scrap, since a 1961 study recommended

“that all spotting rounds be left in the impact area and that the impact area not be considered a radiation area. This suggestion was favorably considered by the...Atomic Energy Laboratory [of the Atomic Energy Commission] [Uranium Alloys for Critical Ordnance Components, Watertown Arsenal Labs, 23 Oct 1961, p. 3; ASR p. 5-26 and

p. C-120]

A memo describes how scrap from range clearance (not DU, not from Pohakuloa) was dumped into a crater in 1962--

“The 6th Ordnance Detachment (ED) conducted range clearance in the Lalamilo Farm Lot, near Kamuela, Hawaii, during 19 February 1962 through 2 March 1962. Recovered were 800+ items of which 333 were destroyed by demolition and the remaining items were classified as scrap. With permission received from the Base Camp Commander, this scrap was dumped into a crater in the artillery impact area at Pohakuloa.”

[Appendix C-20, NARA College Park, Maryland (CP), Report for HQ, United States Army, Hawaii, APO 957 entitled Staff Office Report, Office of the Ordnance Officer, January-March 1962, dated spring 1962, RG 550, Records of the United States Army, Pacific, Entry 17, U.S. Army Hawaii 1959-1963, Box 10, CP-121406-003, in ASR, p. C-296]

On Fri, Nov 6, 2015 at 8:24 AM, Snyder, Amy <Amy.Snyder@nrc.gov> wrote:

| Hello,

The U.S. Army responded to the U.S. Nuclear Regulatory Commission's (NRC's) August 31, 2015 (ADAMS Accession No. ML15240A043) request for additional information (RAI). You may find the Army's RAI response at ADAMS Accession No. ML15294A276.

Thank you.

Amy

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The U.S. Army Installation Management Command (Army) submitted its license amendment application (Agency-wide Documents Management System (ADAMS) Accession No. ML15161A454), dated June 1, 2015, to address the 15 sites subject to License Condition No. 12 of Source Materials License No. SUC-1593 (ADAMS Accession No. ML13259A062). The Army proposes to use a programmatic approach to license 15 sites on multiple U.S. Army installations as well as the sites located on the two Army installations located in Hawaii which are already licensed under Source Materials License No. SUC-1593. The 17 Army installation sites that possess depleted uranium from the Davy Crockett M101 Spotting Rounds, as identified in the application, are located at: Forts Benning and Gordon (Georgia); Forts Campbell and Knox (Kentucky); Fort Carson (Colorado); Fort Hood (Texas); 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 [Donnelly Training Area, Fort Wainwright AK] (Alaska); Fort Dix (New Jersey); Fort Riley (Kansas); and the Schofield Barracks and Pohakuloa Training Area (Hawaii).

The U.S. Nuclear Regulatory Commission (NRC) completed its acceptance review of the Army's application (ADAMS Accession No. ML15194A499). As a result of this review, the NRC staff determined that the Army's amendment application is acceptable for docketing. The NRC staff began its technical review of the application. The license amendment request for 17 U.S. Army installation sites identified in the Army's application will be reviewed under docket number 40-9083. However, please note that although the Army proposes to include the two Hawaiian installations under a programmatic approach to licensing, the current license for those installations remains in effect and can only be modified if the NRC approves the amendment request and amends the license.

The *Federal Register* Notice noticing the proceeding and opportunity to request a hearing and to petition for leave to intervene is scheduled to be published in the *Federal Register* on September 4, 2015.

Thank you,


Amy Snyder



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