



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 E. LAMAR BLVD.
ARLINGTON, TX 76011-4511

January 12, 2017

Lt. Col Anthony J. Cagle
USAF Radioisotope Committee Secretariat
AFMSA/SG3PB
7700 Arlington Blvd, Ste 5151
Falls Church, VA 22042-5151

SUBJECT: NRC INSPECTION REPORT 030-28641/2016-001

Dear Lt. Col Cagle:

This letter refers to the U.S. Nuclear Regulatory Commission (NRC) inspection conducted on August 24-25, 2016, at the Hill Air Force Base, Little Mountain Test Annex WR111 site. The NRC performed confirmatory surveys and collected seven soil samples from the site. A preliminary exit meeting was conducted with Mr. D. Wray, Deputy Director, 75th Civil Engineering Center, and other members of his staff, on August 25, 2016. The collected soil samples were analyzed by Oak Ridge Institute for Science and Education and the final sample results were submitted to the NRC on November 17, 2016. The inspector discussed the results of the confirmatory soil samples and inspection with Mr. H. Briesmaster, Director, 75th Civil Engineering Center and other members of his staff, along with members of your staff at the U.S. Air Force Radioisotope Committee, Air Force Medical Support Agency, on December 15, 2016. The inspection results are documented in the enclosure to this inspection report.

During this inspection, the NRC inspector examined activities performed at Little Mountain Test Annex WR111 site to assess compliance with the approved Decommissioning Plan, and with the Commission's rules and regulations, and the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, interviews with personnel, and a confirmatory survey at the WR111 site. Based on the results of the confirmatory survey, the WR111 site requires additional actions and is not approved for unrestricted use in accordance with 10 CFR 20.1402, "Radiological Criteria for Unrestricted Use." No violations were identified and no response to this letter is required.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter, its enclosure, and your response, if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy or proprietary information so that it can be made available to the Public without redaction.

Lt. Col Cagle

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Should you have any questions concerning this inspection, please contact Rachel Browder, Senior Health Physicist, at 817-200-1452 or the undersigned at 817-200-1549.

Sincerely,

/RA/

Lee E. Brookhart, Chief
Fuel Cycle and Decommissioning Branch
Division of Nuclear Materials Safety

Docket: 030-28641

License: 42-23539-01AF

Enclosure:

NRC Inspection Report 030-28641/2016-001

Lt. Col Cagle

-2-

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DATE	1/12/16			

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U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket: 030-28641

License: 42-23539-01AF

Report: 030-28641/16-001

Licensee: Surgeon General of the Air Force
Air Force Medical Support Agency

Permittee: UT-00517-01/00AFP

Location: Hill Air Force Base
75 CEG/CL
Hill AFB, Utah

Dates: August 24-25, 2016

Inspector: Rachel S. Browder, CHP, Senior Health Physicist
Fuel Cycle and Decommissioning Branch
Division of Nuclear Materials Safety
Region IV

Approved by: Lee E. Brookhart, Chief
Fuel Cycle and Decommissioning Branch
Division of Nuclear Materials Safety
Region IV

Attachment: Supplemental Inspection Information

Enclosure

EXECUTIVE SUMMARY

Hill Air Force Base, Little Mountain Test Annex WR111
NRC Inspection Report 030-28641/2016-001

This U.S. Nuclear Regulatory Commission (NRC) inspection was a routine, announced inspection at Hill Air Force Base, Little Mountain Test Annex, WR111 site. The NRC performed confirmatory surveys and collected seven soil samples from the site for analysis. The results were used to determine whether the site met the unrestricted use criteria under 10 CFR 20.1402.

Decommissioning Performance and Status Review

- The licensee conducted remediation activities for the WR111 site in accordance with the Decommissioning Plan and the work plan. The activities were conducted in a manner that ensured protection of health and safety of the personnel performing the work activities, the environment, and the public.
- The licensee shipped the waste to U.S. Ecology, Idaho. The waste met the waste acceptance criteria for the disposal facility, as well as the criteria for unimportant quantities of source material under 10 CFR 40.13(a). Therefore, the potential dose to a worker handling the waste was determined to be significantly low and did not exceed the disposal facility's limit. In addition, the expected dose to a member of the public due to transfer and disposal of the waste was well below the 25 millirem per year limit.
- The NRC performed confirmatory surveys for the WR111 site. Based on the results of the confirmatory survey, it was determined that the area did not meet the criteria for unrestricted use in accordance with 10 CFR 20.1402, and therefore is not acceptable for release at this time.

Report Details

Summary of Little Mountain Test Annex, WR111 Site

Historical records indicated that a magnesium-thorium trench (identified as waste burial site, WR111) was located at the Little Mountain Test Annex, Hill Air Force Base (AFB), Utah. The trench had been created and operated by Atomic Energy Commission (AEC) licensees Marquardt Aircraft Company and Murdock Machine and Engineering Company, successor to the Marquardt Company, between 1959 and 1961, for burial and incineration of magnesium-thorium scrap material in support of the production of BOMARC surface-to-air missile components. The regulations allowed for burial and incineration of source materials at the time the area was authorized under the license. Subsequently, the AEC allowed the license to be terminated on April 12, 1971, without consideration of the magnesium-thorium alloy that had been incinerated and buried at the Little Mountain Text Annex.

The radioactive material buried at the Little Mountain Test Annex is possessed by the U.S. Air Force (USAF) under its NRC Master Materials License (MML) No. 42-23539-01AF, Docket No. 030-28641. As an MML, the USAF authorizes permits for the possession and use of radioactive materials at its facilities or temporary jobsites anywhere in the United States and its territories. The USAF MML issued Permit No. UT-00517-01, Docket No. 040-00517 to 75th Civil Engineering Group (CEG) at Hill AFB for the possession, storage and transfer of low-level radioactive waste materials found at the waste burial site, WR111.

The USAF submitted its Final Decommissioning Plan dated September 2015 (ML15282A463) to remediate the magnesium-thorium burial trench, WR111. The NRC reviewed the document and generated a Safety Evaluate Report (SER) dated January 21, 2016, (ML16013A248) which documented the safety-related impacts of the proposed decommissioning activity. In addition, the NRC generated an Environmental Assessment dated January 21, 2016, (ML16013A246) as required under 10 CFR Part 51 and in compliance with the National Environmental Policy Act (NEPA). The NRC approved the Final Decommissioning Plan by License Condition 20.V, under NRC MML License No. 42-23539-01AF, license amendment number 27, dated March 4, 2016.

The licensee used site-specific dose modeling to calculate the derived concentration guidelines levels (DCGLs) to demonstrate that the WR111 site meets the unrestricted use criteria in 10 CFR 20.1402. Based on its review, the NRC concluded that the DCGLs provided reasonable assurance that exposures as a result of any residual radioactivity remaining at the WR111 site after remediation will comply with the radiological criteria specified in 10 CFR 20.1402.

The USAF contracted with EA Engineering, Science, and Technology, Inc., with subcontractor Cabrera Services, Inc. to perform the work scope, remediation, and final status surveys. The licensee initiated its mobilization and site preparation activities in May 2016 and commenced remediation activities in June 2016. The material exhumed from the trench was loaded into dump trucks and tarped for transportation to U.S. Ecology in Grand View, Idaho. The USAF performed its confirmatory surveys in August 2016 through Wright Patterson AFB, USAFSAM. The NRC subsequently performed its inspection and confirmatory surveys on August 24-25, 2016. The results of the NRC inspection and confirmatory survey are documented in this inspection report.

1 Closeout Inspection and Survey (83890)

1.1 Inspection Scope

To verify that the site has acceptable radiological levels for unrestricted use in accordance with 10 CFR 20.1402.

1.2 Observations and Findings

a. Implementation of the Decommissioning Plan and Final Surveys

The Final Decommissioning Plan (DP) dated September 2015 (ML15282A463) provided the purpose and remediation activities to be performed at the WR111 site, established the radiological controls to ensure health and safety of the workers, and provided the site-specific derived concentration guidelines (DCGLs) for the radionuclides of concern. The approved DCGLs provide reasonable assurance that exposures to residual radioactivity remaining at the WR111 site after remediation will ensure that exposures to individuals will comply with the radiological criteria specified in 10 CFR Part 20.1402. The final work plan (ML15282A466) for the remediation activities at WR111 site was submitted to the NRC in September 2015, as part of the DP package.

The DP provided the health and safety controls that would be established during the remediation activities to ensure protection of workers, the environment, and the public. The controls included air sampling program, contamination control, and instrumentation calibration program. The inspector reviewed work plan and implementing procedures. These guidance documents were thorough and addressed the controls described in the DP, such as monitoring airborne radioactivity, establishing radiologically controlled areas, and zones between the radiological areas and non-contaminated areas. The licensee used water trucks for dust suppression, as needed when personnel were in the affected areas. When the licensee encountered unexpected items, such as drums, the licensee stopped remediation activities and initiated specific procedures to ensure radiological controls were appropriately established. The inspector reviewed the drum excavation protocol that was developed and concluded that it adequately ensured that radiological controls were established for the drums that were unearthed during the remediation activities. Based on the surveys and contents of the drums, the licensee received approval from U.S. Ecology to consolidate the drums with the other waste for disposal at U.S. Ecology, Idaho.

The licensee documented all field activities performed during remediation in the daily reports. Based on the documents reviewed, the licensee demonstrated that radiological controls were established and implemented in accordance with the DP and work plan during the remediation activities.

The DP provided a description of the project management and organizational structure for the planned decommissioning activities to ensure health and safety controls. The DP states that Hill AFB, through the USAF Radioisotope Committee will retain overall responsibility for management and execution of the DP activities. The remediation activities were managed by EA Engineering, Science, and Technology, Inc. (EA) under contract and executed by Cabrera Services (subcontract) in accordance with the DP.

The inspector reviewed the documentation that Cabrera Services submitted in writing to the NRC in support of operations at a temporary job site, as required by its License Condition 18.A. of NRC radioactive materials license number 06-30556-01, Amendment No. 08, as well as the memorandum of understanding between Hill AFB and Cabrera Services, Inc., dated January 6, 2016. The NRC Region I office accepted the licensee's written notification with no further questions, as documented by letter dated June 1, 2016 (ML16160A361).

The DP established the roles and responsibilities for a number of personnel, including the Hill AFB Radiation Safety Officer, Project Managers, Health and Safety Managers and Officers, Quality Control Manager, and other site and field personnel. The inspector reviewed the organizational chart and determined that the designated positions had been filled as described in the DP. The inspector concluded that the expectations and responsibilities of the different positions were performed as discussed in the DP based on the review of the daily project reports, safety meetings, audit reports, and other correspondence.

The USAF Hill AFB Radiation Safety Officer performed an audit on 16 June 2016 during a site visit to observe the remediation activities. The audit report noted that radiological controls were established correctly, that records were in order, and personnel were taking the proper precautions to prevent the spread of contamination. In addition, the licensee's site project manager was at the site approximately twice per week during the remediation activities to observe the contractor's remediation to ensure activities were in accordance with the DP, work plan, and site requirements.

Section 7.9 of the DP required, in part, that the contractor Corporate RSO or designee perform an audit at least once during execution of the project. Cabrera Services principal health physicist performed a two-day audit on July 11 and 12, 2016. The report indicated that the audit was performed to ensure the remediation activities were implemented consistent with the work plan and procedures. The audit report documented four observations by Cabrera Services that were identified to improve work activities and obtain consistency in the implementing procedures. The observations included: 1) minimize the number of meetings held inside the radiologically controlled area (RCA) in order to maintain exposures as low as reasonably achievable, 2) ensure that all personnel entering the RCA wore gloves, even when they may not be handling radioactive materials, 3) modify all Cabrera procedures to reflect ISO-7503 guidance that requires the use of 2- π instrument efficiencies combined with surface efficiencies, and 4) Cabrera procedures should include description of critical level calculations and how these calculations should be used to identify the presence of radiation above background, similar to MARSAME guidance.

The Cabrera Services auditor determined that the observations identified in the report did not have any impact on the radiological protection or the quality of data generated for the WR111 project. The NRC inspector concluded that the observations were insightful and the implementation of the observations would provide clarification to the procedures. In addition, the observations identified did not impact the final soil sample results used in determining the release of the area for unrestricted use.

b. Disposition and Transportation of Material

The licensee provided U.S. Ecology with the waste characterization results based on surveys performed in 2013, which included thorium-230, thorium-232, and radium-226, as well as toxicity characteristics. It was determined that the radioactive material met the criteria under 10 CFR 40.13(a), as unimportant quantities of source material, which is ≤ 0.05 percent by weight source material. In addition, it met the waste acceptance criteria for the radionuclides of concern as specific in the US Ecology disposal facility. The disposal facility generated a dose rate criterion of 104 microrem per hour, for each dump truck to ensure that the waste acceptance criteria for the disposal facility was not exceeded, as well as meeting the criteria for unimportant quantities of source material under 10 CFR 40.13(a). Based on the inspector's review of the truck survey records from the daily logs, it was determined that the licensee did not exceed the dose rate criterion established by U.S. Ecology for disposal to the facility. Therefore, the potential dose to a worker handling the waste was determined to be significantly low and did not exceed the disposal facility's limit. In addition, the expected dose to a member of the public due to transfer and disposal of the waste was well below the 25 millirem per year limit.

The excavation of the radiologically impacted soil began on June 15, 2016, and continued through August 5, 2016. All waste material was shipped to U.S. Ecology in Grand View, Idaho, approximately 300 miles northwest of the licensee's facility. The licensee utilized U.S. Ecology dump trucks for the shipments. The inspector reviewed the licensee's manifests and number of dump truck loads and cumulative tons of radiologically-impacted soil tabulation records. The records indicate there were 175 shipments and a total of 5,514.15 tons of waste disposed at U.S. Ecology, Idaho. The licensee maintained records of the amount of waste material shipped to the U.S. Ecology, Idaho site and received confirmation of receipt from U.S. Ecology, Idaho.

The DP described the process for waste handling, packaging, and transportation. The inspector reviewed the procedures for radiological surveys and classifying radioactive waste. Based on a review of representative records of truck radiological surveys, non-hazardous waste manifests, and vehicle acceptance checklist, the inspector determined that the licensee implemented its procedures effectively and demonstrated that the waste was being shipped to the disposal facility in accordance with the regulatory requirements and implementing procedures.

c. Confirmatory Surveys

On August 24, 2016, the NRC performed confirmatory surveys of the WR111 site. The confirmatory surveys consisted of walk-over radiological surveys and collection of seven soil samples for analyses, by an independent laboratory. The confirmatory surveys were performed to assess and determine the adequacy of the licensee's final status survey design, implementation, and results for demonstrating compliance with the release criteria for the site. The radionuclides of concern for the magnesium-thorium burn trench include radium-226 (Ra-226), thorium-230 (Th-230), and thorium-232 (Th-232). Originally, the thorium had been commercially extracted from monazite ore. The monazite ore contains varying amounts of uranium and thorium-230, which decays to radium-226. This explains why thorium-230 and radium-226 are included in the radionuclides of concern. NRC approved the following DCGL for each radionuclide of

concern. The limiting radionuclide for release of the site for unrestricted use is thorium-232.

	Ra-226	Th-230	Th-232
DCGL (picoCuries per gram (pCi/g)):	1.60	4.30	1.90

The NRC collected seven soil samples based on random sampling with the use of professional judgment based on walk-over surveys results and marked locations of the licensee's collection points. At the time the samples were collected, the NRC had not received the licensee's sample analysis results. The NRC confirmatory samples were collected using a chain of custody process and sent to Oak Ridge Institute for Science and Education (ORISE) as an independent laboratory, for analyses. The soil samples were analyzed by solid-state gamma spectroscopy and alpha spectroscopy for the radionuclides of concern. The sample analyses were performed in accordance with *ORAU Radiological and Environmental Analytical Laboratory Procedures Manual* (ORAU 2016). The analytical results were reported in picocuries per gram (pCi/g). The ORISE data results were provided to the NRC by letters dated October 12, 2016 (ML16308A112) and November 17, 2016 (ML16334A450). The summary of the licensee's soil sample results are available in ADAMS under Accession Number ML16334A491.

The seven NRC confirmatory soil sample locations correspond to the contractor's or U.S. Air Force's locations as indicated below.

NRC Sample Location	Corresponding Contractor Location	Corresponding U.S. Air Force location
1	SU2-50	10
2	-	-
3	SU2-49	-
4	SU2-47	6
5	SU1-30	-
6	SU1-37	-
7	SU3-73	-

The NRC soil sample results based on alpha spectroscopy are provided below.

Soil Sample Results using Alpha Spectroscopy (pCi/g)							
	Ra-226	TPU (2s)	Th-230	TPU (2s)	Th-232	TPU (2s)	SOF (Net)
DCGL	1.60		4.30		1.90		
Background	1.32		1.61		1.79		
Location 1	0.767	0.049	1.340	0.170	3.410	0.390	
dup			1.140	0.150	3.070	0.360	

Soil Sample Results using Alpha Spectroscopy (pCi/g) (CONT.)							
AVG:	0.767		1.240		3.240		
NET Result	0.0		0.0		1.450		
Ratio = (NET/DCGL)	0.0		0.0		0.763		0.76
Location 2							
	0.686	0.026	1.090	0.150	2.660	0.310	
NET Result	0.0		0.0		0.870		
Ratio = (NET/DCGL)	0.0		0.0		0.458		0.49
Location 3							
	Ra-226	TPU (2s)	Th-230	TPU (2s)	Th-232	TPU (2s)	SOF (Net)
	0.787	0.048	1.420	0.180	3.470	0.390	
NET Result	0.0		0.0		1.680		
Ratio = (NET/DCGL)	0.0		0.0		0.884		0.88
Location 4							
	1.159	0.068	2.040	0.240	2.740	0.320	
NET Result	0.0		0.430		0.950		
Ratio = (NET/DCGL)	0.0		0.100		0.500		0.60
Location 5							
	0.992	0.056	2.230	0.270	2.340	0.280	
NET Result	0.0		0.620		0.550		
Ratio = (NET/DCGL)	0.0		0.144		0.289		0.43
Location 6							
	1.132	0.065	1.540	0.190	1.950	0.240	
NET Result	0.0		0.0		0.160		
Ratio = (NET/DCGL)	0.0		0.0		0.084		0.08
Location 7							
	1.398	0.082	13.200	1.400	3.880	0.450	
dup			16.800	1.900	4.600	0.540	
AVG:	1.398		15.000		4.240		
NET Result	0.078		13.390		2.450		
Ratio = (NET/DCGL)	0.049		3.114		1.289		4.452

TPU = Total Propagated Uncertainty at two standard deviations

SOF = sum of fractions or the "unity rule"

The ORISE sample results provided duplicates for location numbers 1 and 7. The duplicate results were averaged, for the respective location. The NET result for each location was calculated based on background subtraction from the analytical result. Then the ratio for each location was calculated by dividing the result by the respective DCGL for the radionuclide. Finally, since the area to be remediated involved more than one radionuclide, the result must also meet the sum of fractions (SOF) or the "unity rule." The

results documented for the SOF are based on the background subtracted results. Due to the additive nature of the dose from each radionuclide, the total residual activity must be proportionally reduced to ensure the sum of each radionuclide divided by its DCGL does not exceed one (unity).

The NRC soil sample results indicated one area (Location #7) exceeded the DCGL based on thorium. In addition, the licensee had informed the NRC that its soil sample results also indicated there were several locations identified that exceeded the DCGL and exceeded the unity rule. A telephone conference was held with the licensee on November 29, 2016, to discuss the analytical results for Site WR111. A summary of the telephone conference, along with the licensee's analytical data results were documented in ADAMS under Accession Number ML16344A475. The licensee will either provide area factors to the NRC for review and approval for the identified elevated areas, or the licensee will perform additional remediation activities, or a combination of both. The licensee stated in part, that any excavated waste will be transported and disposed of at U.S. Ecology, Idaho, using the same dose-based release protocols previously used for transport vehicles. Upon completion of any remediation activities, the licensee will submit additional soil sample results to the NRC for review. Subsequently, the licensee will submit its final status survey report (FSSR) for review by the NRC. Final approval of the FSSR will be performed by license amendment.

The confirmatory survey also included walk-over radiological surveys of the area. The survey equipment used by the inspector was a Ludlum Model 19 microRoentgen/hour ($\mu\text{R/hr}$) survey meter, serial number 32888. The meter was calibrated to radium-226 on July 14, 2016, with calibration due date July 14, 2017. The results observed by the inspector were approximately 18-22 $\mu\text{R/hr}$ across the area, which reflected background dose rates.

In addition, a Ludlum Model 18 analyzer, serial number 15504 was used. The analyzer was calibrated to radium-226, on March 8, 2016, with a calibration due date of March 8, 2017. The analyzer was coupled to a 2x2 sodium-iodide (NaI) scintillation probe Eberline-SPA-3, serial number RN18461. The results observed by the inspector ranged between 11,000 – 16,000 counts per minute (cpm).

1.3 Conclusions

The licensee conducted remediation activities for the WR111 site in accordance with the DP and work plan. The activities were conducted in a manner that ensured protection of health and safety of the personnel performing the work activities, the environment, and public.

The licensee shipped the waste to U.S. Ecology, Idaho. The waste met the waste acceptance criteria for the disposal facility, as well as the criteria for unimportant quantities of source material under 10 CFR 40.13(a). Therefore, the potential dose to a worker handling the waste was determined to be significantly low and did not exceed the disposal facility's limit. In addition, the expected dose to a member of the public due to transfer of the waste was well below the 25 millirem per year limit.

The NRC performed confirmatory surveys for the WR111 site. Based on the results of the confirmatory survey, it was determined that the area did not meet the criteria for unrestricted use in accordance with 10 CFR 20.1402, and therefore is not acceptable for release at this time.

2 Exit Meeting Summary

On December 15, 2016, the NRC inspector presented the final inspection results to Mr. H. Briesmaster, Director, 75th Civil Engineering Center and other members of his staff, along with members of the U.S. Air Force Radioisotope Committee, Air Force Medical Support Agency. The inspector asked the licensee whether any materials examined during the inspection should be considered proprietary. No proprietary information was identified.

SUPPLEMENTAL INSPECTION INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

Licensee

M. Roginske, Project Manager, Hill Air Force Base, AFCEC/CZOM
A. Kidner, Radiation Safety Officer, Hill Air Force Base, 75 AMDS/SGPB
R. Bhat, U.S. Air Force, RIC, AFMSA/SG3PB

INSPECTION PROCEDURES USED

83890 Closeout Inspection and Survey

ITEMS OPENED, CLOSED, AND DISCUSSED

Opened / Closed

None

Discussed

None

LIST OF ACRONYMS

CFR	<i>Code of Federal Regulations</i>
DP	Decommissioning Plan
FSSR	Final Status Survey Report
NRC	U.S. Nuclear Regulatory Commission
ORISE	Oak Ridge Institute for Science and Education
USAF	U.S. Air Force
RIC	Radioisotope Committee