

**CABRERA SERVICES**
RADIOLOGICAL • ENVIRONMENTAL • REMEDIATION

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06035316

April 19, 2017

Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713
ATTN: Director, Division of Nuclear Materials Safety

RE: NRC Radioactive Materials License No. 06-30556-01, Amendment No. 08:
Notification of License Implementation in Areas of Exclusive Federal Jurisdiction at Site
WR111, Hill Air Force Base, Utah

Cabrera Services Inc. (Cabrera) is providing this written notification of its intent to utilize NRC Radioactive Material License No. 06-30556-01, Amendment No. 08 (herein referred to as Cabrera's NRC License) in support of operations at a temporary job site. Enclosures include:

- the specific information required by Cabrera's NRC License Condition No. 18A including details of the planned approach to remove potentially radioactive soils and debris from an on-site burial trench and provide radiological controls and oversight for other on-site operations
- the Memorandum of Understanding (MOU) between the U.S. Air Force and Cabrera

The Updated Hill AFB Decommissioning Plan was previously reviewed and approved by the NRC (Accession Number: ML15282A506; <http://www.nrc.gov/docs/ML1528/ML15282A506.html>). If you should have any questions regarding this status update or amendment request, please contact me at (352) 610-2150.

Sincerely,

Michael S. Winters, CHP
Radiation Safety Officer

594593
RADIOACTIVE MATERIALS-002

**License Condition No. 18A Attachment
Magnesium-Thorium Disposal Remedial Action
WR111 Little Mountain Test Annex, Hill Air Force Base, Utah
(May 2016)**

1) Estimated type, quantity, and physical/chemical form(s) of material.

Soils within the Little Mountain Test Annex (LMTA) Magnesium-Thorium Disposal Trench Site (i.e., Site WR111) are impacted with radium-226 (^{226}Ra), thorium-230 (^{230}Th), thorium-232 (^{232}Th) and decay progeny above background levels resulting from historic burning and burial of magnesium-thorium scrap and waste materials associated with the manufacture of controls, accessories, and engine parts. Radioactive material is expected to be present both as discrete items/debris and as distributed contamination in soil.

2) Specification of the site location.

The Little Mountain Test Annex (LMTA) Magnesium-Thorium Disposal Trench Site WR111, Hill Air Force Base (AFB), is located in Weber County, Utah. Site 111 is approximately 15 miles northwest of Hill AFB in a remote area adjacent to the Great Salt Lake and west of Ogden, Utah. Site WR111 is approximately 200 × 150 feet (ft) in area and is enclosed by a chain-link fence in the southeastern corner of the LMTA.

3) Description of project activities that are planned for the site, including waste management and disposition.

Project Activities

Residual Contaminated Soil Removal- Soils that failed statistical analysis will be located and excavated. Cabrera has identified several areas that will require remediation for the successful completion and ultimate release of the LMTA disposal trench.

Final Status Survey—FSS sampling will be performed in the identified residual elevated areas following removal of contaminated soils. The FSS will be performed in accordance with the Decommissioning Plan to demonstrate that radiological clean-up objectives have been met.

Packaging & Shipping of Waste — Wastes are being loaded into plastic-lined & covered dump trucks for over-the-road transport to U.S. Ecology in Grandview, ID.

Remedial excavation areas will be returned to AF control pending review and acceptance of FSS results followed by backfill & restoration of the remedial excavation(s).

Radiological Controls

Radiological controls will be implemented and enforced under Cabrera's NRC Radioactive Materials License No. 06-30556-01. General project radiological controls will include the following:

- Site access controls and personnel monitoring (dosimetry & "frisking") will be employed for access to Site radiological areas. The flow of personnel and equipment through the site

will be strictly controlled at all times to assure that personnel and equipment are properly screened prior to being released from the RCA and into the support area or offsite.

- Equipment will be screened for potential radioactivity both before being accepted onsite or prior to use and after use prior to being released offsite.
- Misting dust suppression will be used to precondition soils during excavation and handling to control fugitive dust emissions and maintain intakes ALARA.
- The use of equipment in direct contact with potentially radiologically-impacted materials will be minimized to the extent practicable during the project to minimize the potential for spreading radiological contamination.
- Proper decontamination procedures will be followed to address potential radiological contamination of equipment and/or materials.
- Proper measures will be taken to prevent the spreading of potentially radiologically-impacted materials.
- General site surveys will be completed prior to initiating site activities and upon completion of the investigation to assess the potential for the spread of radiological contamination.
- Air monitoring for airborne radioactive material will be conducted as specified in the RPP.
- Personnel will be monitored regularly for contamination and routine surveys will control potential radiological exposures.

Waste Management and Disposition

Stockpiled contaminated soils will be loaded into trucks using a front-end loader with a bucket scale and transported for disposal to US Ecology in Grand View, Idaho. Once loaded, the soil will be covered and secured using tarps before the trucks are allowed to leave the site.

4) Estimated project start date and duration.

Site operations will proceed on or about Monday, May 8, 2017. Operations will continue for an estimated duration of 1-2 weeks.

5) Identification of, and information on how to contact, key project personnel.

Michael Winters, CHP
Radiation Safety Officer
Mobile/Office: (352) 610-2150
Email: mwinters@cabreraservices.com

Scott Hay
Project Health Physicist
Office: (702) 645-9727
Mobile: (702) 236-8401
Email: shay@cabreraservices.com

Greg Bright, RRPT
Site Radiation Safety Lead/Authorized User
Office: (508)-315-6246
Mobile: (781)-264-4445
Email: gbright@cabreraservices.com

Please contact Mike Winters should you have any questions regarding this notification of intent to utilize Cabrera's NRC License.

**MEMORANDUM OF UNDERSTANDING
BETWEEN HILL AIR FORCE BASE AND CABRERA SERVICES, INC.
FOR
REMEDATION AND DECOMMISSIONING
AT WR-111 LITTLE MOUNTAIN TRAINING ANNEX**

Date: January 6, 2016

To: Harry Briesmaster III, Director, 75th Civil Engineer Group, Hill Air Force Base (AFB)
Allen Kidner, 75 AMDS/SGPB, Radioactive Material Permit No. UT-00517-00/03AFP
Radiation Safety Officer (RSO), Hill AFB

From: Mike Winters, RSO, Cabrera Services

Subject: Licensing Interface - Removal of Thorium-Containing Soils at WR-111 Little Mountain Training Annex

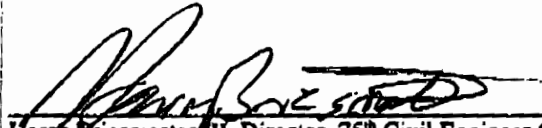
The purpose of this memo is to define the interface between two Nuclear Regulatory Commission (NRC) licensees during removal of thorium-containing soils at the WR-111 Little Mountain Training Annex Magnesium/Thorium Disposal Trench (herein referred to as the Site): Hill Air Force Base (Hill AFB) 75th Civil Engineer Group (CEG) and Cabrera Services Inc. (Cabrera). Cabrera's NRC License Number 06-30556-01, Amendment No. 08 (herein referred to as Cabrera's NRC License) Condition 13 requires a written agreement between the licensee and the customer if both hold a license issued by the NRC or Agreement State. The U.S. Air Force Radioisotope Committee (AFRIC), in agreement with the NRC, controls the subject Site radioactive materials and is considered a licensee. The AFRIC has issued Radioactive Material Permit Number UT-00517-01/00AFP to 75 CEG to authorize possession, storage, and transfer of thorium-containing soils at the Site for purposes of recovery and storage. This agreement does not establish any new requirements or rights on parties not subject to this agreement. This MOU specifically fulfills the requirements of Cabrera's NRC License Condition No. 13.

The licensees (75 CEG and Cabrera) will be involved with removal of thorium-containing soils at the Site. The work is scheduled to occur during spring of 2016. Cabrera will provide radiological controls during work evolutions associated with the thorium containing soils. A detailed description of the work to be performed is provided in the *Decommissioning Plan* (EA/Cabrera 2015a) and the *Remedial Design/Remedial Action Work Plan* (EA/Cabrera, 2015b).

Cabrera will provide radiological controls that include, but are not limited to, radiological training of personnel as required, routine radiological surveys associated with work evolutions at the Site, survey and release of equipment used within the radiological controlled area, oversight of excavation, characterization, packaging, and manifesting/shipping of thorium-containing soils and site wastes off-site for disposal, remedial support surveys, and final status surveys, including gamma walkover surveys and soil sample collection for off-site analysis.

This agreement includes a commitment by Cabrera and 75 CEG to ensure safety. Further, Cabrera agrees to assist 75 CEG as requested during emergency actions to clean up the temporary job site, if required.

This memo represents a licensing interface agreement between 75 CEG and Cabrera. Future modifications, if any, will be likewise documented.


Harry Briesmaster III, Director, 75th Civil Engineer Group
Hill AFB, UT 84056

20 Jan 16
Date

Allen R Kidner

Allen Kidner, 75 AMDS/SGPB
Permit RSO. Hill AFB. UT 84056

14 Jan 16
Date

Mike Winters

Mike Winters, RSO, Cabrera Services, Inc.

2016-01-05
Date



ACKNOWLEDGEMENT - RECEIPT OF CORRESPONDENCE

Name and Address of Applicant and/or Licensee

Cabrera Services, Inc.
ATTN: Michael S. Winters, CHP, Radiation
Safety Officer
50 Founders Plaza
Suite 207
East Hartford, CT 06108

Date

April 27, 2017

License Number(s)

06-30556-01

Mail Control Number(s)

594593 (Notification)

Licensing and/or Technical Reviewer or Branch

Decommissioning & Technical Support Branch
(Branch 3)

This is to acknowledge receipt of your: Letter and/or Application Dated: 04/19/2017

The initial processing, which included an administrative review, has been performed.

Amendment Termination New License Renewal

There were no administrative omissions identified during our initial review.

This is to acknowledge receipt of your application for renewal of the material(s) license identified above. Your application is deemed timely filed, and accordingly, the license will not expire until final action has been taken by this office.

Your application for a new NRC license did not include your taxpayer identification number. Please complete and submit NRC Form 531, Request for Taxpayer Identification Number, located at the following link: <http://www.nrc.gov/reading-rm/doc-collections/forms/nrc531.pdf>
Follow the instructions on the form for submission.

The following administrative omissions have been identified:

[Empty box for listing administrative omissions]

Your application has been assigned the above listed MAIL CONTROL NUMBER. When calling to inquire about this action, please refer to this control number. Your application has been forwarded to a technical reviewer. Please note that the technical review, which is normally completed within 180 days for a renewal application (90 days for all other requests), may identify additional omissions or require additional information. If you have any questions concerning the processing of your application, our contact information is listed below:

Region I
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Division of Nuclear Materials Safety
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(610) 337-5260, (610) 337-5313,
(610) 337-5398, or (610) 337-5239