

Browder, Rachel

From: Browder, Rachel
Sent: Tuesday, August 01, 2017 1:08 PM
To: 'john_norris@uhaul.com'
Cc: Engel, Kaitlin; 'marlena.brewer@alaska.gov'; Whited, Jeffrey; Kellar, Ray; Koenick, Stephen; Howell, Linda; Maier, Bill
Subject: NRC/ORNL Initial Site Visit

Mr. Norris

Thank you for your time and assistance on July 18-19th, 2017 while Ms. Kaitlin Engle (Oak Ridge Associated Universities) and I surveyed the property located at 5700 Boundary Avenue. Anchorage. As we mentioned, a courtesy copy of the report of the initial status visit will be provided to you, with the original report being sent to Amerco Real Estate Company.

As discussed last Thursday, July 19, 2017, I wanted to provide you some information regarding the Nuclear Regulatory Commission's (NRC) regulations for a general licensee. The military dials and gauges that were identified in the building that contain radium (self-luminous) are considered general licensed material. General licensed material is similar to other types of general licensed material, such as Tritium Exit signs or Smoke Detectors.

When we promulgated our regulations in 2007 (as a result of the Energy Policy Act of 2005) we determined that an individual could possess luminous products, including military dials and gauges, provided that no more than 100 items are used or stored at the same location at any one time. In this context, "same location" refers to a single building where up to 100 radium items (e.g., gauges or dials) may be safely used or stored at any one time under a general license. This determination was made to ensure that members of the public would not exceed the public dose limit since members of the public are the ones that typically possess these types of military dials and gauges. This regulation is specified under Title 10 of the Code of Federal Regulations (CFR) Part 31.12, "General license for certain items and self-luminous products containing radium-226," which can be found at: <http://www.nrc.gov/reading-rm/doc-collections/cfr/part031/>. As we mentioned to you last week, due to the number of gauges possessed, the *Amerco Real Estate Company* is considered a general licensee, which is totally acceptable.

There are additional regulations that you should be aware of, for a general licensee. These regulations are located under 10 CFR 31.12, as referenced above, which includes but is not limited to, that the holder of a general license shall:

- (1) Notify the NRC should there be any indication of possible damage to the product so that it appears it could result in a loss of the radioactive material. A report containing a brief description of the event, and the remedial action taken, must be furnished to the Director of the Office of Nuclear Material Safety and Safeguards, U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001 within 30 days.
- (2) Not abandon products containing radium-226. The product, and any radioactive material from the product, may only be disposed of according to 10 CFR 20.2008 or by transfer to a person authorized by a specific license to receive the radium-226 in the product or as otherwise approved by the NRC.
- (3) Not export products containing radium-226 except in accordance with 10 CFR Part 110.

- (4) Dispose of products containing radium-226 at a disposal facility authorized to dispose of radioactive material in accordance with any Federal or State solid or hazardous waste law, including the Solid Waste Disposal Act, as authorized under the Energy Policy Act of 2005, by transfer to a person authorized to receive radium-226 by a specific license issued under 10 CFR Part 30, or equivalent regulations of an Agreement State, or as otherwise approved by the NRC.

You are allowed to keep the military dials and gauges at your facility. As we discussed, it would not be advisable to start handling the gauges and dials stored in the building, simply because of the unknown conditions of the building, floor, and items inside the building. However, as a general licensee, you are authorized to possess, use, or transfer the relics. As an example, any number of Army/Navy stores may sell military artifacts, including radium dials and gauges. As long as they have less than 100 of the gauges in any one location (e.g., building), then they're considered a general licensee and are allowed to sell those items to members of the public.

However, if you decide that you want to dispose of the sources (gauges), I've provided some organizations below that you may contact. I'd suggest contacting Russ Meyer, with CRCPD, at 512-761-3822. He can provide some initial guidance, especially since you're located in Alaska, which may be a significant consideration. I've also copied him on this email, so you have his email address. The NRC is limited by our statutes under Congress, to only act as regulator. So we are not authorized to collect unused sources, artifacts, etc. Please notify me if you dispose of the military dials and gauges currently at your facility.

Disposal Options:

- CRCPD's Source Collection and Threat Reduction (SCATR) Program, is applicable to unwanted sources with a commercial disposal option that are under either a general or specific license, by the NRC. This primarily focuses on sources that are intact and have little to no contamination. The site owner would need to register the source with SCATR. For information on the SCATR program, contact CRCPD (Russ Meyer), or see <http://www.crcpd.org/StateServices/SCATR.aspx> and <http://osrp.lanl.gov/crcpdscatr.shtml>. To register sources, see <http://osrp.lanl.gov/PickUpSources.aspx>
- DOE's Off-Site Source Recovery Project (OSRP), is applicable to higher activity sources than the SCATR program that do not have feasible commercial disposal options. This only applies to sealed sources and is unlikely to apply to all discrete sources of radium. The site owner would need to register the source with OSRP. For information on the OSRP, contact CRCPD (Russ Meyer) or see <http://osrp.lanl.gov/index.shtml>. To register sources, see <http://osrp.lanl.gov/PickUpSources.aspx>.
- CRCPD Assistance with Unwanted Radioactive Material, provides information assistance in finding affordable, legal disposition for unwanted sources. For information, contact CRCPD (Russ Meyer). As stated by CRCPD:
 - CRCPD can provide funds to state, county, or local radiation control programs for their disposition of discrete radioactive material if:
 - The owner cannot afford the cost of disposition, or
 - The owner should not be held liable for the disposition, or
 - The material was taken into custody by a radiation control program but the owner could not be traced, or
 - The material is an unacceptable risk of loss or theft.
 - This is accomplished under an agreement between the radiation control program and CRCPD. CRCPD pay vendors and CRCPD reimburses the radiation program for payment of Vendors.

We also wanted to provide you with Mrs. Marty Brewer's contact information. She is the State of Alaska Liaison Officer to the NRC, and whom I met with while I was in Anchorage the other week. Mrs. Brewer is on the Alaska Hazmat response team. In the event there is an unforeseen fire or environmental hazard that may possibly impact the secure storage of the military dials and gauges, you should consider making the local response team aware of the storage location of the military dials and gauges on the property. In that regard, you may want to consider contacting Mrs. Brewer, since she could easily provide the necessary information logistically to her counterparts on the local hazmat response team.

Marlena Brewer, Environmental Program Specialist IV
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In addition, there is information on radium available on the NRC website at: <http://www.nrc.gov/materials/radium.html>, which also contains "Related Information" on the right-hand side of the website.

Again, I greatly appreciate your time and assistance as we completed our survey of the property and buildings. If you have any additional questions, please do not hesitate to contact me at the phone numbers shown below, or Mr. Jeff Whited (jeffrey.whited@nrc.gov or 301-415-4090).

Sincerely,
Rachel Browder

Rachel S. Browder, CFP

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