

L-3

May 17, 2018

Regional Administrator
 ATTN: Director, Division of Nuclear Material Safety
 US Nuclear Regulatory Commission Region I
 2100 Renaissance Boulevard
 King of Prussia, PA 19406-2713

Re: **NOTIFICATION OF LICENSE USE UNDER RECIPROCITY AT THE
 FORMER MARE ISLAND NAVAL SHIPYARD, VALLEJO, CA
 BEGINNING JUNE 4, 2018 UNDER U.S. NRC RADIOACTIVE
 MATERIALS LICENSE 09-29309-01, DOCKET NO. 030-38878**

Dear Administrator:

Radiological Survey & Remedial Services LLC (RSRS), under agreement with Up-side Radiological Services, LLC (USRS), will be initiating certain activities at the South Shore Area (SSA) of the Former Mare Island Naval Shipyard (MINS), Vallejo, Solano County, CA under the Nuclear Materials License listed above. In accordance with license condition 18A, RSRS is providing notification to the Nuclear Regulatory Commission that activities will begin under USRS license on June 4, 2018.

The work to be performed on-site was reviewed by the California Department of Public Health, Environmental Management Branch, in a document titled, "Final, Work Plan for Radiological Screening and Survey Activities, South Shore Area, Former Mare Island Naval Shipyard, Vallejo, California, November 2014", which contains attachments for a Radiological Materials Management Plan, and a Radiation Protection Plan. The Radiological Protection Plan provides the site-specific radiological procedures that will be used.

The only radioactive materials expected on site are exempt quantity sealed sources for instrument response testing. In the event that radioactive materials are identified, the material will be turned over to the on-site contractor that is responsible for the handling and storage of radioactive materials at each location.

Pursuant to license condition 13, the delineation of license responsibilities is documented in a Memorandum of Understanding between the Department of the Navy's Naval Facilities Engineering Command (Base Realignment and Closure Office), RSRS, and NOREAS, Inc. (the prime contractor) in consultation with the Department of the Navy's Radiological Affairs Support Office (RASO), that was executed and still in place for previous work in 2014-this Memorandum of Understanding is attached (Attachment 1).

The Radiation Safety Officer (RSO) responsible for notification to the NRC under license condition 18A is Mr. Daryl DeLong. Mr. DeLong will also be the main point of contact for the project.

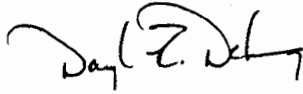
If you have any additional questions, please don't hesitate to email or call Mr. Daryl DeLong at daryl@radsvcs.com or (415) 308-7027.

16352 NW Somerset Dr.
 Beaverton, OR 97006

608953
 NMSS/RGN1 MATERIALS-002

REC RG 1 05 23 18 AM 06 50

Regards,



Daryl DeLong
Radiation Safety Officer

Attachment 1 – Memorandum of Understanding

CC without Attachment:

Officer in Charge, Naval Sea Systems Command Detachment, ATTN: Radiological
Affairs Support Office (Mr. Pat Owens), 160 Main Road, Building 1959, NWS
Yorktown, VA 23691

Dr. Jamshid Sadegbipour, President, NOREAS, Inc. 16361 Scientific Way, Irvine, CA
92631



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE WEST
1455 FRAZEE ROAD, SUITE.900
SAN DIEGO, CA 92108-4310

NAVSEADET RASO
5090

NAVFACENGCOM
5090
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**MEMORANDUM OF UNDERSTANDING
BETWEEN
NAVAL SEA SYSTEMS COMMAND DETACHMENT, RADIOLOGICAL AFFAIRS
SUPPORT OFFICE,
BRAC PMO WEST, AND NOREAS, INC/RSRS, LLC.**

Subj: MEMORANDUM OF UNDERSTANDING (MOU) REGARDING THE
PERFORMANCE OF RADIOLOGICAL SERVICES AT SOUTH SHORE AREA
BY NOREAS, INC/RSRS, LLC AT THE FORMER MARE ISLAND NAVAL
SHIPYARD, VALLEJO, CALIFORNIA

1. Background.

a. The Navy Base Realignment and Closure Program Management Office West (BRAC PMO West), using the Naval Facilities Engineering Command, Southwest Division contracting services (NAVFACSW), has entered into Contract No. N62473-12-C-4812 with NOREAS, Inc. (NOREAS). Under this contract, Radiological Survey & Remedial Services, LLC (RSRS) will provide radiological services as a subcontractor to NOREAS at the South Shore Area of the former Mare Island Naval Shipyard (MINS), Vallejo, California, which is under Concurrent Legislative Jurisdiction between the Navy and the State of California. NOREAS/RSRS will perform radiological services under RSRS's U.S. Nuclear Regulatory Commission (NRC) Radioactive Material License 27-29309-01 under reciprocity with the State of California. This MOU is being established as a requirement of RSRS's license conditions.

b. Some radiological operations involving licensed radioactive materials at MINS were previously authorized by Atomic Energy Commission (AEC) and NRC licenses or Naval Radioactive Materials Permits (NRMPs). All previous licenses and NRMPs were appropriately terminated at the time of termination. Additionally, previous radiological operations at MINS involved the use of 91b materials, radioluminescent materials, technically enhanced naturally occurring radioactive materials (TENORM), and naturally occurring and accelerator-produced radioactive materials (NARM). However, while the Navy is recognized as owner

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of the radioactive materials at MINS, the materials are not currently permitted under the Master Materials License as the materials are considered residual contamination from previous operations which were appropriately decommissioned at the time of termination or not considered licensed radioactive materials by the NRC at the time of use.

2. Organizational Responsibilities. The intent of this section of the MOU is to outline the general applicability and responsibilities of each organization as it applies to their approved performance work statement, field work documents, health and safety plan, radiation health plan, license standard operating procedures and license implementation. Each organization has distinct areas of responsibility as defined by their respective contracted functions.

a. In accordance with the contract specific in paragraph 1.a above, NOREAS/RSRS shall:

(1) Ensure access is controlled to individual work areas under NOREAS/RSRS's control for activities where radioactive materials are known or suspected of being present.

(2) Control radioactive materials used for operational check of radiation detection and laboratory equipment.

(3) Perform work using radiologically sound work practices following standard operating procedures approved under RSRS's U.S. NRC Radioactive Material License, and field work documents approved by the Navy and federal or state regulators, as appropriate.

(4) Maintain training and dose records for NOREAS/RSRS employees and subcontractors, as appropriate.

(5) Prepare, issue and maintain Radiation Work Permits, when required, for work controlled by NOREAS/RSRS.

(6) Maintain custody of Navy radioactive materials, including low-level radioactive waste, found during

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investigations, prior to transfer to the on-site Low-Level
Radioactive Waste (LLRW) contractor or return to Navy possession.

(7) Characterize and inventory radioactive waste
discovered during the performance of field work.

(8) Submit reports and other administrative requirements,
concerning the work, including daily progress reports, when
required, to BRAC PMO WEST, NAVFACSW, NAVSEADDET RASO, and
additional Navy offices as requested. Information will be
provided regarding the radiological conditions of all work areas,
radioactive contamination found, and status of any identified
waste.

(9) Assess contamination levels on personnel, materials
and equipment.

(10) Radiologically free release all equipment, areas,
and spaces used during the performance of site work.

(11) Coordinate public health and safety assurance issues
with the Navy.

(12) Report any unusual radiological findings or
conditions, or violations of radiological controls to the Navy
as soon as possible, not to exceed 24 hours.

b. The Navy shall:

(1) Provide technical oversight of NOREAS/RSRS field
work.

(2) Allow NOREAS/RSRS to perform work using radiologically
sound work practices following standard operating procedures
approved under RSRS's U.S. NRC license, and Navy and regulator
approved field work documents, health and safety plan, radiation
health plan, and performance work statement.

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(3) Monitor site work by performing on-site visits,
tracking on daily site reports and/or participating in conference
calls.

(4) Review all site investigation data.

(5) Provide information about former radiological
operations or possible Navy radioactive materials that could be
encountered during site work.

(6) Coordinate with the MINS LLRW contractor to provide
containers for and disposal of radioactive contaminated materials
or mixed waste found as a result of NOREAS/RSRS site work.

(7) Work with the contractor to address any unexpected
contamination or radiological control issues.

(8) Provide assistance with public health and safety
assurance issues.

(9) Issue public statements regarding radiological issues.

(10) Approve clearance of areas prior to turnover of the
areas for unrestricted use.

(11) Coordinate regulatory agency approval of clearance of
areas prior to turnover of the areas for unrestricted use.

3. Jurisdictional Issues and Changes. Jurisdictional issues or
specific situations not covered under this agreement will be
discussed between the Navy and NOREAS/RSRS for resolution and
documented by amendment of this memorandum of understanding.

4. Effective Period. This MOU is effective upon signatures by
all parties and will expire at the end of the contract awarded to
NOREAS. Either party may terminate this agreement by giving 30
days advance written notice of the effective date of termination,
or upon the written agreement of both parties at a mutually
agreeable date.

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5. Approval.


OWENS.PATRICK.A. Digitally signed by
1281302317 OWENS.PATRICK.A. 1281302317
DN: cn=OWENS.PATRICK.A. 1281302317, o=US
Date: 2014.01.17 08:58:29 -0500

PATRICK OWENS
EPM
NAVSEADET RASO

 1/21/2014

BRIAN HENDERSON
RSRS
RADIATION SAFETY
OFFICER


JAMSHID SADEGHIPOUR
President
NOREAS

 1/9/14
LAWRENCE LANSDALE
NAVFAC BRAC PMO
EV Director
By Direction

May 17, 2018

Department of Public Health
Radiological Health Branch
P.O. Box 997414, MS 7610
Sacramento, CA 95899-7414

Re: **REQUEST FOR RECIPROCITY UNDER U.S. NRC RADIOACTIVE
MATERIALS LICENSE 09-29309-01, DOCKET NO. 030-38878**

**NOTIFICATION OF LICENSE USE AT THE FORMER MARE ISLAND
NAVAL SHIPYARD, VALLEJO, CALIFORNIA BEGINNING AFTER
JUNE 4, 2018**

Dear Mr. Perez:

Radiological Survey & Remedial Services LLC (RSRS), under agreement with Up-side Radiological Services, LLC (USRS), is requesting the ability to utilize our service provider's U.S. Nuclear Regulatory Commission (NRC) Radioactive Materials License in the State of California under license condition 10; (Attachment 1 contains the NRC License) under reciprocity by the Radiation Safety Officer (RSO), Mr. Daryl DeLong. At the present time, no fees nor forms were found on your website to provide radiological surveying services in your state nor was any information regarding reciprocity requests found.

RSRS is also making notification pursuant to license condition 13 (to both the U.S. NRC for information purposes, and to the California Department of Public Health, Radiological Health Branch) that RSRS will be initiating certain activities at the South Shore Area (SSA) of the Former Mare Island Naval Shipyard (MINS), Vallejo, Solano County, CA under the Materials License listed above. RSRS is a subcontractor to NOREAS, Inc., under Navy Contract No. N62473-12-C-4812.

It is our understanding that the site is subject to Concurrent Legislative Jurisdiction between the Navy and the State of California. RSRS is only performing a gamma walkover survey of approximately 2 acres, which is scheduled to take approximately 1 week beginning June 4, 2018.

The work to be performed on-site was reviewed by the California Department of Public Health, Environmental Management Branch, in a document titled, "Final, Work Plan for Radiological Screening and Survey Activities, South Shore Area, Former Mare Island Naval Shipyard, Vallejo, California, November 2014", which contains attachments for a Radiological Materials Management Plan, and a Radiation Protection Plan. The Radiological Protection Plan provides the site-specific radiological procedures that will be used.

Pursuant to license condition 13, the delineation of license responsibilities is documented in a Memorandum of Understanding between the Department of the Navy's Naval Facilities Engineering Command (Base Realignment and Closure Office), RSRS, and NOREAS, Inc. (the prime contractor) in consultation with the Department of the Navy's

*16352 NW Somerset Dr.
Beaverton, OR 97006*

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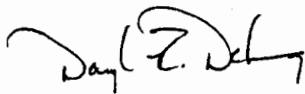
Radiological Affairs Support Office (RASO), that was executed and still in place for previous work in 2014-this Memorandum of Understanding is attached (Attachment 2).

The only radioactive materials expected on site are exempt quantity sealed sources for instrument response testing. In the event that radioactive materials are identified, the material will be turned over to the on-site contractor that is responsible for the handling and storage of radioactive materials at each location.

Therefore, if any fees are due, we request that you notify me directly so that they may be paid forthwith. As part of our request for reciprocity, RSRS will track every day of site operations to ensure that fewer than 180 days (scheduled for less than 5 days) of license activities are performed in the State of California using reciprocity per calendar year.

If you have any additional questions, please don't hesitate to email or call Mr. Daryl DeLong, RSO at daryl@radsvcs.com or (415) 308-7027.

Regards,



Daryl DeLong
Radiation Safety Officer

Attachment 1 – U.S. NRC License 09-29309-01

Attachment 2 – Memorandum of Understanding

CC without Attachments:

Regional Administrator, U.S. Nuclear Regulatory Commission, Region 1, ATTN:
Director, Division of Nuclear Material Safety, 2100 Renaissance Blvd, Suite 100, King of
Prussia, PA 19406

Officer in Charge, Naval Sea Systems Command Detachment, ATTN: Radiological
Affairs Support Office (Mr. Patrick Owens), 160 Main Road, Building 1959, NWS
Yorktown, VA 23691

Dr. Jamshid Sadegbipour, President, NOREAS, Inc. 16361 Scientific Way, Irvine, CA
92631



ACKNOWLEDGEMENT - RECEIPT OF CORRESPONDENCE

Name and Address of Applicant and/or Licensee Daryl DeLong Radiation Safety Officer Up-Side Radiological Services, LLC 324 East Third Street Jacksonville, Florida 32206	Date June 1, 2018
	License Number(s) 09-29309-01
	Mail Control Number(s) 608953
	Licensing and/or Technical Reviewer or Branch Laurie Kauffman Notification Letters

This is to acknowledge receipt of your: **Letter and/or** **Application** **Dated:** May 17, 2018

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 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
 U. S. Nuclear Regulatory Commission
 Division of Nuclear Materials Safety
 2100 Renaissance Boulevard, Suite 100
 King of Prussia, PA 19406-2713
 (610) 337-5260, (610) 337-5313,
 (610) 337-5398, (610) 337-5239**