

From: [Snyder, Amy](#)
To: [Cherry, Robert N CIV USARMY IMCOM HQ \(US\)](#)
Cc: [Valadez, Ernesto Jr CIV USARMY IMCOM HQ \(US\)](#)
Subject: RE: RE: [Non-DoD Source] Proposed modification to SUC-1593 Amendment 3 - Proposed License Conditions
Date: Thursday, June 07, 2018 7:51:00 AM

Bob,

Thanks for your quick response.

Regarding 1 below- I think the NRC technical staff used it in their safety evaluation discussing the impacts of fire vs explosions- i.e., fires can occur. So I am going to leave it in.

Regarding 2 below- a FRN needs to be issued for an opportunity for hearing and the technical staff needs to review the technical report. So it will be reviewed as part of the next amendment along with the Dec 2017 submittal.

A

-----Original Message-----

From: Cherry, Robert N CIV USARMY IMCOM HQ (US) [<mailto:robert.n.cherry.civ@mail.mil>]
Sent: Tuesday, June 05, 2018 5:08 PM
To: Snyder, Amy <Amy.Snyder@nrc.gov>
Cc: Valadez, Ernesto Jr CIV USARMY IMCOM HQ (US) <ernesto.valadez.civ@mail.mil>
Subject: [External_Sender] RE: [Non-DoD Source] Proposed modification to SUC-1593 Amendment 3 - Proposed License Conditions

All below looks fine to me, Amy.

Two comments:

1. You should delete from item 11, Attachment 9, "Examples of Army Range fires," September 30, 2015, (ML15294A276). I submitted these news articles when the NRC asked me if range fires ever occurred on ranges other than Hawaii. I did not expect this to be included as "incorporated as reference." It really adds nothing to the license.

2. You can also take this opportunity to allow the revision of "M101 Impact Areas" (also item 11) that I sent you on February 16 (attached for your convenience). This corrects the location of the RCA at Donnelly Training Area, Fort Wainwright (located on Fort Greely). That would close out two amendment requests with a single amendment.

Bob

Bob Cherry
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-----Original Message-----

From: Snyder, Amy [<mailto:Amy.Snyder@nrc.gov>]

Sent: Tuesday, June 05, 2018 1:26 PM

To: Cherry, Robert N CIV USARMY IMCOM HQ (US) <robert.n.cherry.civ@mail.mil>

Subject: [Non-DoD Source] Proposed modification to SUC-1593 Amendment 3 - Proposed License Conditions

Importance: High

All active links contained in this email were disabled. Please verify the identity of the sender, and confirm the authenticity of all links contained within the message prior to copying and pasting the address to a Web browser.

Hi Bob,

Please see below proposed changes to License Conditions for Amendment No. 3 (change of Figures 1.2 for Fort Polk, Fort Riley, and PTA ERMPs) and let me know via email you agree.

Thank you

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Existing License Condition 18 (to be modified):

18. Within 6 months of the effective date of License Amendment No. 2, the licensee shall fully implement each installation's site-specific environmental radiation monitoring plan.

Proposed License Condition 11(changes are in bold):

18. Within 3 months of the effective date of License Amendment No. 3, the licensee shall fully implement their revised final site-specific environmental radiation monitoring plans for Fort Polk, LA, Fort Riley, KS, and the PTA, HI due to the change in sampling locations resulting from License Amendment No. 3.

Existing License Condition 11 (to be modified):

11. Except as specifically provided otherwise, the licensee shall conduct operations in accordance with the commitments, representations, and statements contained in the license amendment application:

- * Programmatic RSP, "Radiation Safety Plan for IMCOM Ranges Affected by M101 Davy Crockett Spotting Round Depleted Uranium," dated December 31, 2015 (ML16004A369);

- * Programmatic PSP; "Physical Security Plan for US Army Installation Management Command Ranges Affected by Depleted Uranium in M101 Davy Crockett Spotting Rounds," dated December 31, 2015 (ML16004A369);

- * Army's Form 313, "Application for Materials License," items 1-7, dated June 1, 2015 (Pkg. ML15161A454);

- * Attachment 3, "Calculation of TEDE to Individual Likely to Receive Highest Dose," dated June 1, 2015 (Pkg. ML15161A454);

- * Attachment 4, "Attachment 4. How the Army Determined the M101DU RCAs," dated June 1, 2015 (Pkg. ML15161A454);

- * Attachment 5, "Bounding Calculations Using RESRAD 7.0 and RESRAD-OFFSITE 3.1," dated June 1, 2015 (Pkg. ML15161A454);

- * Attachment 8, "Arguments against Air Sampling During HE [High Explosive] Fire into RCAs [Radiation Control Areas]," dated June 1, 2015 (Pkg. ML15161A454);

- * Email clarifying RCAs at Fort Knox, KY, dated January 29, 2016 (ML16041A107);

- * Attachment 8, "Estimating Public Exposure to Airborne Depleted Uranium Outside the U.S. Army Pohakuloa Training Area, Hawaii," September 30, 2015, (ML15294A276);

- * Attachment 9, "Examples of Army Range fires," September 30, 2015, (ML15294A276);

- * Attachment 10, "Arguments against Air Sampling During HE Fire into RCAs, rev. 1," September 30, 2015, (ML15294A276);

- * Attachment 11, "Calculation of Public Dose SOP," September 30, 2015 (ML15294A276);

- * Programmatic ERMP, "Programmatic Approach for Preparation of Installation-specific Environmental Radiation Monitoring Plans", dated September 15, 2016 (ML16265A218);

- * "US Army Decommissioning Funding Plan (DFP) for License Number SUC-1598," dated February 9, 2016 (ML16042A232);

- * Maps of the locations of the RCAs, "M101 Impact Areas," dated December 31, 2015 (but, sent February 12, 2016, (ML16048A358);

- * Army's emails clarifying M101 Target Areas (Radiation Control Areas), dated February 12, 2016 (ML16048A347) May 24, 2016 (ML16341C807), and December 7, 2016 (ML1651A092)

- * Army's Statement of Intent, dated June 1, 2015 (ML15161A458);

- * Site-Specific Environmental Radiation Monitoring Plans and Associated Quality Assurance Plan, dated September 15, 2016 (Pkg ML16265A221)

Proposed License Condition 11(changes are in bold):

Except as specifically provided otherwise, the licensee shall conduct operations in accordance with the commitments, representations, and statements contained in the license amendment application and related submissions:

- * Programmatic RSP, "Radiation Safety Plan for IMCOM Ranges Affected by M101 Davy Crockett Spotting Round Depleted Uranium," dated December 31, 2015 (ML16004A369);
- * Programmatic PSP; "Physical Security Plan for US Army Installation Management Command Ranges Affected by Depleted Uranium in M101 Davy Crockett Spotting Rounds," dated December 31, 2015 (ML16004A369);
- * Army's Form 313, "Application for Materials License," items 1-7, dated June 1, 2015 (Pkg. ML15161A454);
- * Attachment 3, "Calculation of TEDE to Individual Likely to Receive Highest Dose," dated June 1, 2015 (Pkg. ML15161A454);
- * Attachment 4, "Attachment 4. How the Army Determined the M101DU RCAs," dated June 1, 2015 (Pkg. ML15161A454);
- * Attachment 5, "Bounding Calculations Using RESRAD 7.0 and RESRAD-OFFSITE 3.1," dated June 1, 2015 (Pkg. ML15161A454);
- * Attachment 8, "Arguments against Air Sampling During HE [High Explosive] Fire into RCAs [Radiation Control Areas]," dated June 1, 2015 (Pkg. ML15161A454);
- * Email clarifying RCAs at Fort Knox, KY, dated January 29, 2016 (ML16041A107);
- * Attachment 8, "Estimating Public Exposure to Airborne Depleted Uranium Outside the U.S. Army Pohakuloa Training Area, Hawaii," September 30, 2015, (ML15294A276);
- * Attachment 9, "Examples of Army Range fires," September 30, 2015, (ML15294A276); Attachment 10, "Arguments against Air Sampling During HE Fire into RCAs, rev. 1," September 30, 2015, (ML15294A276);
- * Attachment 11, "Calculation of Public Dose SOP," September 30, 2015, (ML15294A276);
- * Programmatic ERMP, "Programmatic Approach for Preparation of Installation-specific Environmental Radiation Monitoring Plans," dated September 15, 2016 (ML16265A218);
- * "US Army Decommissioning Funding Plan (DFP) for License Number SUC-1598," dated February 9, 2016 (ML16042A232);
- * Maps of the locations of the RCAs, "M101 Impact Areas," dated December 31, 2015 (but, sent February 12, 2016 (ML16048A358);
- * Army's emails clarifying M101 Target Areas (Radiation Control Areas), dated February 12, 2016 (ML16048A347), May 24, 2016 (ML16341C807), and December 7, 2016 (ML16351A092);
- * Army's Statement of Intent, dated June 1, 2015 (ML15161A458);
- * Site-Specific Environmental Radiation Monitoring Plans and associated Quality Assurance Plan, dated September 15, 2016 (Pkg ML16265A221)for all Radiation Control Areas except those located at Fort Polk, Fort

Riley, and the Pohakuloa Training Area; and

* Revised Final Site-Specific Environmental Radiation Monitoring Plans for Fort Polk, Fort Riley, and Pohakuloa Training Area Radiation Control Areas, dated

May 2017, May 2017, and April 2017, respectively (ML17158B356) and associated Quality Assurance Plan, dated September 2016 (ML16265A233).

Amy

Amy Snyder, Senior Project Manager

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