

Browder, Rachel

From: Bhat, Ramachandra K CIV USAF AFMSA (US) <ramachandra.k.bhat.civ@mail.mil>
Sent: Wednesday, June 06, 2018 1:31 PM
To: Browder, Rachel; Evans, Robert
Cc: Roginske, Mark F CIV USAF AFCEC (US); Keeney, Gilbert N CIV USAF 711 HPW (US); Bhat, Ramachandra K CIV USAF AFMSA (US); Hale, Alan C Lt Col USAF AFMSA (US); Nemmers, Scott A Lt Col USAF AFMSA (US); Gulley, Tamala L Maj USAF (US); Lopez, Phillip M Maj USAF AFMSA (US); Murren, Bruce A CTR USAF AFMSA (US); Kidner, Allen R CIV USAF 75 MDG (US)
Subject: [External_Sender] FW: Hill AFB WR111 - Request Meeting with NRC to Discuss MARSSIM Equation in Final Status Survey
Attachments: Site WR111_CloseoutReport_Cover Letter_05-31-2018_with Enclosure 1.pdf
Signed By: ramachandra.bhat@us.af.mil

Rachel,

I am forwarding the email Mr. Roginske, Installation Remediation Manager, stating that the contractor wants to have a teleconference with NRC on the subject.

In fact last month, the MARSSIM Committee met to discuss the hot spots in the MARSSIM revision. The draft gives a better explanation for hot spots with unity equation.

If you have any questions regarding this permit please contact me at 703-681-6871 (DSN 761), ramachandra.k.bhat.civ@mail.mil Our web page address is <https://kx2.afms.mil/kj/kx5/radiationprograms/Pages/home.aspx>

The after hours / emergency phone number is 301-981-5058, (DSN 858). Please note that this number is for the Andrews Regional Command Post. When calling, inform them you are calling for the on-call member of the RIC Secretariat and be prepared (if asked) to give: your name, on/off duty phone number, location, and nature of emergency.

We would like to request a call with the NRC to discuss the suggested calculation they included in their concurrence with use of area factors for the WR111 final status survey. They seem to be suggesting adjustment of modified MARSSIM Equation 8-2. Specifically, NRC indicates that the equation should be adjusted so that "survey unit and both elevated areas should be incorporated into one equation consistent with NUREG-1575", and then cites the following statement from Section 8.5.2 of MARSSIM as justification for this action: "[i]f there is more than one elevated area, a separate term should be included for each."

In our interpretation of the MARSSIM guidance, this statement is referring to more than one elevated area in a survey unit (SU), not more than one area in all SUs at the site. MARSSIM indicates that decisions are made on a SU basis. It appears as though they are asking to combine elevated areas from different SUs in this equation. In our opinion, that would be inappropriate. Support for this opinion is provided in the previous paragraph in Section 8.5.2 of MARSSIM, where it specifically indicates that Equation 8-2 should be used to evaluate data within a SU: "If residual radioactivity is found in an isolated area of elevated activity-in addition to residual radioactivity distributed relatively uniformly across the survey unit-the unity rule (Section 4.3.3) can be used to ensure that the total dose is within the release criterion."

I've attached a WR111 Site Closure Report letter that EA/Cabrera has prepared with more details on this issue for your review. I will be sending you a separate email with information on the AFs review of the draft WR111 Site Closure Report along with instructions on how to download the WR111 Site Closure Report.

We would like to set up a conference call with the NRC as soon as possible

to facilitate resolution of these concerns with the MARISSM equation.
Please let me know when the NRC would be available for the call. We can
provide a call-in number once a time has been set. Thanks!

Mark

Mark F. Roginske, PE, GS-13, DAF

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