



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS UNITED STATES AIR FORCE
WASHINGTON DC 20330



26 October 2017

FROM: USAF RADIOISOTOPE COMMITTEE SECRETARIAT

TO: DR. ROBERT EVANS (USAF MML Manager, NRC Region IV)

Subject: Response to 60-day NRC Inspection Letter -- Overview

This memorandum provides responses to selected elements of the 60-day Nuclear Regulatory Commission (NRC) Inspection Letter that are not addressed in other documents within the package provided to the NRC Master Materials License (MML) Inspection Team. Comments are provided by section number corresponding to the 60-day letter format. USAF MML staff responses to questions are given in italics.

I. Management Oversight

- Organizational chart that includes the Senior Executive Management through the Radiation Control Program staff (current and changes since last biennial inspection).
 - *Organizational chart provided in main document package. The Radioisotope Committee (RIC) is currently supported by the following staffers: Lt Col Scott Nemmers joined the MML staff in August 2016. Lt Col A. J. Cagle left the MML program in June 2017 and was replaced by Lt Col Alan Hale in July 2017. Maj Bruce Murren retired from the Air Force in 2016, but returned to the MML program as a contractor. Mr. Craig Refosco left his contract position in the summer of 2016. Maj Tamala Gulley was brought onto the MML staff in mid-2017. Dr Ram Bhat and Capt Phillip Lopez were MML staffers prior to the previous MML inspection in 2015. The information technology/records management (IT/RM) position is not currently filled, but contracting actions are underway to hire a replacement as of October 2017.*
- Current membership of the Master Radiation Safety Committee, including new members, vacancies and actions to fill those positions.
 - *Detailed information is provided in another document in this package. Currently the MML staff (otherwise known as the Radioisotope Committee Secretariat or RICS) is at full staffing other than the aforementioned IT/RM position, which is expected to fill within the next two to three months.*
- Describe any recent efforts, or future plans, on your part to improve the safety performance of permittees operating below acceptable levels for ensuring public health and safety.
 - *The USAF MML program operates under the principles of continuous process improvement, which also aligns with the Air Force Surgeon General's initiatives of building a "culture of safety" and providing "trusted care" to those served and supported by the Air Force Medical Service. Current efforts underway include*

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- *but are not limited to the following tasks. (1) Alignment of both RICS operations and AFIA/SG inspections with standard NRC guidelines for operations and inspections. (2) In concert with the AFIA Radioactive Materials Permit Inspector, the RICS is reviewing all MML permits to identify incorrect or ambiguous language in our materials permits. Standardized permit language and condition statements are under development and are being implemented for categories of permits (such as 'Troxler' and 'Medical' categories). Permit condition appropriateness is also part of this review effort. This is an ongoing process and is not completed at the time of this inspection. (3) Reworking the MML file management system is planned, with a new file plan for storage and management of electronic files, as well as completion of file digitization and storage of historical files, and a re-evaluation of hardcopy file management and storage methods.*
- Description of your perspective of your program's strengths and weaknesses. These strengths and weaknesses should be supported by examples of successes, problems, or difficulties which occurred during this review period.
 - *A potential weakness with any military program is Active Duty member turn-over. Unlike many civilian radiation control and materials management programs where staff may be employed by the program for over a decade or more, the Air Force moves its officers to new duty assignments in roughly four-year cycles. This higher-than-normal turn-over rate can create staffing gaps and training deficiencies for the RICS. The RICS is currently recovering from such a staffing gap and is now close to 100% manning. Training gaps for two new personnel slated for Licensing and Inspections will close in March 2018 and October 2018. It is a testament to former RICS members and longtime staffers that previous MML inspections have demonstrated that these gaps did not critically impact USAF compliance with NRC requirements. Communication between MML staff on the RICS and the users of radioactive materials is key to the successful management of our program. Education efforts to provide additional training and tools to Installation Radiation Safety Officers (RSOs) and Permit RSOs is underway using the Department of Defense's milSuite content management and delivery system. Information on policy, inspections, high-interest items, and standard practices are part of this webpage. This website is expected to become an education and training tool that encourages and strengthens communication between the RICS and our Permittees.*

II. Technical Staffing and Training

- Provide a staffing plan, or complete a listing of personnel using the suggested format below, that provides the professional (technical) person-years of effort applied to the MML program by individual. Include the name, position, and the fraction of time spent in the following areas: administration, materials permitting & inspection activities, event

response, other. If these regulatory responsibilities are divided between offices, the table should be consolidated to include all personnel contributing to the MML radiation control program. Include all vacancies and identify all senior personnel assigned to monitor work of junior personnel. The table heading should be: Name, Position, Area of Effort, FTE%

- *Response provided in separate attachment.*
- List the vacant positions in each program, the length of time each position has been vacant, and a brief summary of efforts to fill the vacancy.
 - *Response provided in separate attachment.*

III. Status of Materials Inspections

- Prepare a table identifying the permits with inspections that were/are overdue by more than 25% of the scheduled frequency at any time during the review period. The schedule for inspection frequency is set out in NRC Inspection Manual Chapter 2800. (Note: Although the licensee may be more restrictive and perform inspections more frequently, the list should be based on the inspection frequency in MC2800. Further, unless the MML licensee requests and receives approval from NRC (or has been asked by NRC and agreed) to follow a temporary instruction, the MML will be inspected in accordance with the current inspection procedure and not a temporary instruction.) The list should include initial inspections that are overdue. Include the following information: Permittee, Name, Insp. Frequency, Due Date, Time Overdue
 - *Response provided in separate attachment.*
- List of Inspection frequency and program code by permit type.
 - *Response provided in separate attachment.*
- List individual permittees or groups of permittees that you are inspecting at a different frequency than called for in NRC Inspection Manual Chapter 2800 and state the reason for the change.
 - *Response provided in separate attachment.*

IV. Technical Quality of Inspections

- List changes made to your written inspection procedures during the review period.
 - *As noted in Section I, the AFIA/SG Radioactive Materials Inspector is moving to align inspection policies for MML permits with those of the NRC to the greatest extent possible within the Air Force Inspector General's structures and*

guidelines. This includes maximum possible use of standard NRC inspection policies, references, checklists, and reporting forms. Previous AFIA inspectors used many NRC tools for compliance, but did not standardize on them as current efforts support. This effort is intended to enhance transparency between NRC, AFIA, and the RICS, as well as strengthen standard materials management practices within the Air Force that are common to NRC Licensees and Agreement States.

- Describe internal procedures for conducting supervisory accompaniments of inspectors in the field.
 - *The AFIA/SG inspector follows NRC guidelines for supervisory accompaniments.*

- Describe the type of instrumentation used during inspections and methods/frequency of calibration. Are all instruments properly calibrated at the present time? Were there sufficient calibrated instruments available through the review period?
 - *Previous AFIA/SG inspectors utilized permittee survey instruments that were on site for any inspections. Verification of calibration of the instrument was performed as part of the inspection process prior to use by AFIA/SG staff. This practice was identified by NRC staff during accompanied inspections during this period to the AFIA/SG inspector as less than satisfactory. As a consequence, actions are underway to acquire appropriate instrumentation for AFIA staff use during radioactive material permit inspections.*

- List of inspections that resulted in violations. Include the following information: Permittee, Program code, Date of inspection, Severity Level
 - *Response provided in separate attachment.*

V. Technical Quality of Permitting Actions

- List any major, unusual, or complex permits issued such as amendments, terminations, new permits, decommissioning, or renewals. Also identify any new or amended permits that now require emergency plans.
 - *Response also provided in separate attachment. No extraordinary or complex permits were issued during this period. No new MML permits required emergency response plans.*

- Discuss any variances from NRC licensing policies and/or procedures during the review period.
 - *Response also provided in separate attachment. No variances from NRC policies were issued/granted.*

- List changes made in your written permitting procedures (new procedures, updates, policy memoranda, etc.) during the review period.
 - *Response also provided in separate attachment. No significant changes were made to permitting procedures. Current Air Force instructions pertaining to radioactive material use and radiation protection are currently under review and are expected to be approved for implementation in 2018.*
- List non-standard permit conditions used during the review period.
 - *Response also provided in separate attachment. No non-standard permit conditions were used during this review period.*

VI. Responses to Events or Incidents and Safety Concerns or Allegations

- List reportable events or incidents (e.g., medical events, doses to embryo/fetus or nursing child, overexposures, lost and abandoned sources, incidents requiring 24 hour or less notification, etc.) that were ongoing or occurred during the review period. Show whether the incident is open or closed and whether it was reported to the NRC. The list should be in the following format: Permittee Name, Permit#, Date of Incident/Report, Type of Incident, Status, Reported to NRC
 - *Response provided in separate attachment.*
- List any changes to procedures for investigating incidents and events made during the review period.
 - *Response provided in separate attachment. No changes.*
- List any changes to your procedures for handling safety concerns or allegations made during the period of this review.
 - *Response provided in separate attachment. No changes.*
- List of all safety concerns or allegations received during the review period. Show whether the allegation is open or closed and whether it was referred by NRC.
 - *Response provided in separate attachment.*
- List of all wrongdoings identified during the review period. Show whether the action is open or closed.
 - *Response provided in separate attachment.*

VII. Response to Additional Focus Elements

- Summarize the work that was conducted during the period for the following:
 - National Source Tracking System (NSTS),
 - Decommissioning work conducted under the MML.
 - *Responses provided in separate attachment.*

SCOTT A. NEMMERS, Lt Col, USAF, BSC
Acting Secretary, USAF Radioisotope Committee



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS UNITED STATES AIR FORCE
WASHINGTON DC



24 October 2017

MEMORANDUM FOR NRC MML PROJECT COORDINATOR

FROM: HQ AFMSA/SG3PB (RADIOISOTOPE COMMITTEE SECRETARIAT)

SUBJECT: MML Biennial Review Questionnaire Documentation Submittal

Enclosed you will find the documentation requested in your 21 August 2017 "Biennial Inspection Notification and Review Questionnaire" memorandum. My staff and I look forward to a productive inspection with your staff at the end of the month.

I can be reached at (703) 681-7876 or via email at scott.a.nemmers.mil@mail.mil with any questions.

SCOTT A. NEMMERS, Lt Col, USAF, BSC
Chief, Medical Physics
Acting Chief, Radioisotope Committee Secretariat
Office of the Air Force Surgeon General



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS UNITED STATES AIR FORCE
WASHINGTON DC



15 May 2017

MEMORANDUM FOR NRC REGION IV (DR. ROBERT EVANS)

FROM: HQ AFMSA/SG3PB (RADIOISOTOPE COMMITTEE SECRETARIAT)

SUBJECT: MML Policy- Qualifications for USAF Master Materials License (MML) Health Physics Reviewer and Health Physics Inspector

The USAF must ensure that only appropriately qualified personnel participate in the day-to-day management of the MML. The USAF must also indicate viable pathways for capable officers, enlisted, and civilian personnel to achieve meaningful roles in source, special nuclear, and byproduct (radioactive) materials management under the auspices of the MML. Quality experience with the MML remains an advantage for hiring decisions at the US Nuclear Regulatory Commission (NRC), over 40 NRC 'Agreement States', and other USG departments and agencies. The purpose of this policy memo is to document and communicate an innovative new set of qualification criteria for health physics support of the MML.

The NRC issues the MML to the Department of the Air Force. The Secretary of the Air Force has signed Air Force Policy Directive 40-2, *Radioactive Materials (Non-Nuclear Weapons)*, which delegates to the Air Force Surgeon General (AF/SG) the responsibility to “resource for, oversee and enforce the control of radioactive materials (RAM),” and to the USAF Radioisotope Committee (RIC) the responsibility to “manage the AF use of RAM by AF personnel, approve or deny such use, and enforce compliance with the Air Force MML.” Additional USAF policy on roles and responsibilities for the RIC, RIC Secretariat, AF Inspection Agency (AFIA), and USAF School of Aerospace Medicine (USAFSAM) may be found in Air Force Instruction (AFI) 40-201, *Radioactive Materials Management*.

With this revised training policy, we intend to contribute solutions in response to the national discussion on the need to develop more radiation professionals as reflected in the December 2015 National Council on Radiation Protection and Measurements (NCRP) Statement No. 12 entitled “Where Are the Radiation Professionals (WARP)?” We further intend to create vocational qualification opportunities for undergraduate enlisted personnel in the spirit of recent USAF initiatives like the Air Force Credentialing Opportunities On-Line [COOL]. ***To implement these intentions, the USAF plans to involve more enlisted personnel in the health physics roles and responsibilities of the MML.***

Multiple roles and responsibilities associated with the MML mirror NRC regulatory roles. These roles include Materials Health Physics Reviewer, Materials Health Physics Inspector, Decommissioning Project Manager and Technical Reviewer, and Decommissioning Inspector. The qualification criteria for these NRC roles may be found in the NRC Inspection Manual Chapter 1248 (<https://www.nrc.gov/reading-rm/doc-collections/insp-manual/>). The NRC does not stipulate formal college degree requirements in their qualification criteria but instead relies primarily on practical experience and NRC training courses

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(<https://scp.nrc.gov/training.html>). The USAF has historically relied on former Air Force Specialty Code (AFSC) 43Y4 and current AFSC 43E4G, staff health physics officers, along with limited NRC coursework to realize a materials health physics qualification timeline shorter than that of that the timeline implied by NRC qualification journals. ***The recent establishment of the Bioenvironmental Engineering Radiation Skills (BERS) Course at USAFSAM, in conjunction with recent NRC approval for undergraduate enlisted attendance at NRC Agreement State (and MML) training courses, allows an acceptable qualification time-line for well-defined MML support by talented enlisted personnel.***

I hereby establish the revised minimum materials health physics qualification criteria and priority training goals for all MML Health Physics Permit Reviewers and Inspectors:

a. For AFSC 43E3G (Bioenvironmental Engineer/BEE officer fully qualified in health physics), AFSC 43E3M (BEE officer fully qualified in the medical physics), and personnel qualified to fill positions classified by the Office of Personnel Management (OPM) as GS-1306-11 through GS-1306-15 (civilian Health Physicist)— for signature authority on actions involving all license/permit codes and types:

- Complete a RIC-approved 40-hour RSO course
- Complete NRC Course G-108 Inspection Procedures
- Complete NRC Course G-109 Licensing Procedures
- Complete annual NRC Allegations Training
- Complete annual USAF Training for Information Protection
- Complete USAF training on No FEAR Act
- Review content of MML, AFD 40-2, AFI 40-201, and AFI 48-148
- Review documents of understanding/agreement co-signed by NRC and USAF
- Review documents of understanding/agreement co-signed by NRC and DoD
- RIC Secretariat (RICS) only-- review RIC Standard Operating Procedures

b. For AFSC 43E3A (fully qualified BEE), AFSC 4B071 (fully qualified Bioenvironmental Engineering Technician), and AFSC 43E1G (BEE officer initially qualified in health physics)— for signature authority on actions involving Generally Licensed, Exempt Distribution, and USAF Template Permitted sources; and, Portable Gauges covered in NUREG 1556 Volume 1:

- Complete all qualification criteria for paragraph “a.” above
- ***Complete the BERS course offered by USAFSAM***
- ***Complete NRC Course H-122/S Fundamental Health Physics***

c. For AFSC 43E3A, AFSC 4B071, and AFSC 43E1G— for signature authority on actions involving all license/permit codes and types:

- Complete all qualification criteria for paragraph “b.” above
- ***Complete NRC Course H-123 Intermediate Health Physics***
- ***Complete NRC Course H-201 Advanced Health Physics***

d. Priority training goals for all MML Health Physics Reviewers and Inspectors:

- Complete NRC Course G-205 Root Cause Workshop
- Complete NRC Course H-308 Transportation of Radioactive Materials

e. Priority training goals for MML Irradiator Permit Reviewers and Inspectors:

- Complete NRC Course H-315 Irradiator Technology
- Complete NRC Course S-201 Materials Control/Security System

f. Priority training goals for MML Medical Use Permit Reviewers and Inspectors:

- Complete NRC Course H-304 Diagnostic/Therapeutic Nuclear Medicine
- Complete NRC Course H-312 Internal Dosimetry
- Complete NRC Course H-313 Brachytherapy, Gamma Knife, and Other

g. Priority training goals for USAF Decommissioning Technical Reviewers and Inspectors:

- Complete NRC Course H-111 Environmental Monitoring for Radioactivity
- Complete NRC Course H-115 Characterization/Planning for Decommissioning
- Complete NRC Course H-119 Air Sampling for Radioactive Materials
- Complete NRC Course H-120 Radiation Survey/Assess for Materials/ Equipment
- Complete NRC Course H-121 Multi-Agency Radiation Survey/Site Investigation
- Complete NRC Course H-410 RESRAD Training Workshop
- Complete NRC Course H-411 RESRAD-OFFSITE Training Workshop
- Complete NRC Course H-412 Advanced RESRAD Training Workshop
- Complete NRC Course H-500 Visual Sampling Plan

USAFSAM has retained its charge to “...provide technical and on-site health physics support...as required to prevent, investigate and mitigate human exposure or environmental contamination” in direct support of the MML, in accordance with AFI 40-201. ***USAFSAM personnel engaged in direct support of the MML and qualified as GS-1306-XX (or appropriate LabDemo or AcqDemo classification/grade), AFSC 43E3G, or AFSC 4B071 with SEI 492 may execute unit-funded TDYs to complete courses listed under paragraph “g.” above. Please note that NRC course attendance by USAFSAM personnel is contingent upon prioritization and submission by the RIC Secretariat and subsequent case-by-case approval by the NRC.***

In addition, the USAF relies on properly qualified Installation Radiation Safety Officers (IRSOs) to carry out roles and responsibilities as discussed in AFI 40-201 and AFI 48-148, *Ionizing Radiation Protection*, in direct support to management of the MML. Note that the BERS course was not fielded at the time of publishing for the current version of AFI 48-148, so the current version of that AFI does not codify BERS, or in turn a role for AFSC 4B071 Non-commissioned Officers (NCOs) as a first option for IRSO appointment. Because enlisted IRSOs become outstanding candidates for future enlisted MML support roles, I hereby welcome and encourage the inclusion of qualified AFSC 4B071 NCOs in the preferential selection of IRSOs. ***Until the next interim change or revision of AFI 48-148 is published, the preferred criteria for AFSC 4B071 NCO appointment as IRSOs will be as follows:***

- Complete a RIC-approved 40-hour RSO course
- **Complete the BERS course**

The AF/SG point of contact is Lt Col Anthony J. Cagle, (703) 681-6988, DSN 761 or via email at anthony.j.cagle.mil@mail.mil.

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ANTHONY J. CAGLE, Lt Col, USAF, BSC
Chief, Radiation Health
Radioisotope Committee Secretariat
Office of the Air Force Surgeon General

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Attachments:

1. 22 April 2016 email from NRC Headquarters
2. NRC Training Courses for MML- Descriptions
3. 30 April 2017 AFOCD- 43EXX
4. 30 April 2017 AFECD- 4B0X1

cc:

SAF/IEE (Col Costantino)
HQ USAF/SG3P (Col Cunningham)
HQ AFMSA/SG3PB (ALL)
HQ AFIA/SG (Col Kindt and Maj Kice)
HQ AFLOA/JACE (Mr. Curtis)
ALL MAJCOM/SGPB
USAFSAM/OE (Col Odden)



**DEPARTMENT OF THE AIR FORCE
HEADQUARTERS UNITED STATES AIR FORCE
WASHINGTON DC**



24 October 2017

MEMORANDUM FOR RECORD

FROM: AFMSA/SG3PB

SUBJECT: NRC Biennial Inspection Questionnaire – (II.) Technical Staffing and Training

1. Please see complete listing of personnel in the table below.

Name	Position(s)	Area of Effort	FTE%
Lt Col Anthony Cagle	-Chief, Radiation Health	Administration Mat'l Permitting & Inspection Event Response Other	
Lt Col Scott Nemmers	-Chief, Radiation Health -Deputy Chief	Administration Mat'l Permitting & Inspection Event Response Other	
Capt Phillip Lopez	-Deputy Chief -Chief, Medical Rad Health Ops	Administration Mat'l Permitting & Inspection Event Response Other	20% 50% 20% 10%
Mr. (Maj Retired) Bruce Murren	-Deputy Chief -Chief, Rad Health Ops -Health Physicist, AO	Administration Mat'l Permitting & Inspection Event Response Other	10% 70% 10% 10%
Dr. Ram Bhat	-Health Physicist, AO	Administration Mat'l Permitting & Inspection Event Response Other	5% 75% 15% 5%
Mr. Craig Refosco	-Health Physicist, AO	Administration Mat'l Permitting & Inspection Event Response Other	10% 70% 10% 10%
Mr. David Cessor-Culver	-Database Manager	Administration Mat'l Permitting & Inspection Event Response Other	45% 25% 15% 15%

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2. The following positions are currently vacant.

a. Database Manager

- i. This position has been vacant since June 2016. The RICS has pursued a contract replacement for this position since that time. Several requests for resources and funding were brought forward, but none were executed in the inspection timeframe. A new 12-month contract has been recently executed, and we are expecting a replacement by EOM Oct 2017.

b. 2x Air Force Officer Positions (tentative vacancy)

- i. These positions have been vacant since Sep 2016 and June 2017. Both Lt Col Hale and Maj Gulley have arrived on RICS staff, but currently they don't meet the training requirements for MML Health Physics Permit Reviewers and/or Inspectors. Lt Col Hale's expected training completion date is 31 March 2018, and Maj Gulley's expected training completion date is 31 October 2018.

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SCOTT A. NEMMERS, Lt Col, USAF, BSC
Chief, Medical Physics
Office of the Air Force Surgeon General
Defense Health Headquarters

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DEPARTMENT OF THE AIR FORCE
HEADQUARTERS UNITED STATES AIR FORCE
WASHINGTON DC



31 October 2017

MEMORANDUM FOR RECORD

FROM: HQ AFMSA/SG3PB (RADIOISOTOPE COMMITTEE SECRETARIAT)

SUBJECT: MML Biennial Review Questionnaire Documentation Section 1, Management Oversight

The Management Oversight Section requests 5 items to be provided.

1. The organization chart is attached to the memo, see Attachment 1.

2. The membership to the “Master Radiation Safety Committee” known as the Radioisotope Committee has ten voting members. This membership comes from Air Force Instruction 40-201, *Radioactive Materials Management* and is in the below table. The only vacant position will be filled by Lt Col Hale, when he completes NRC training and meets requirements to fill the Radioisotope Committee Secretariat position.

Office Represented	Primary Appointee
The Assistant Secretary of the Air Force for Installations, Environment and Logistics	Col Joe Costantino
Deputy Chief of Staff for Logistics, Installations, and Mission Support	Mr. Dave Carrillo/Maj Klein (CE)
Assistant Surgeon General, Health Care Operations	Col David Cunningham (Chair)
Assistant Surgeon General, Health Care Operations	Col Kirk Phillips
Assistant Surgeon General, Health Care Operations	Vacant
Assistant Surgeon General, Health Care Operations	Lt Col Scott Nemmers
Air Force Inspection Agency	Maj Richard Kice
Air Force Safety Center	Dr. Steven Rademacher
US Air Force School of Aerospace Medicine	Col Wendy Odden
Air Force Radioactive Recycling and Disposal Office	Mr. Mark Mays

SCOTT A. NEMMERS, Lt Col, USAF, BSC
Chief, Medical Physics
Acting Chief, Radioisotope Committee Secretariat
Office of the Air Force Surgeon General

Organizational Chart

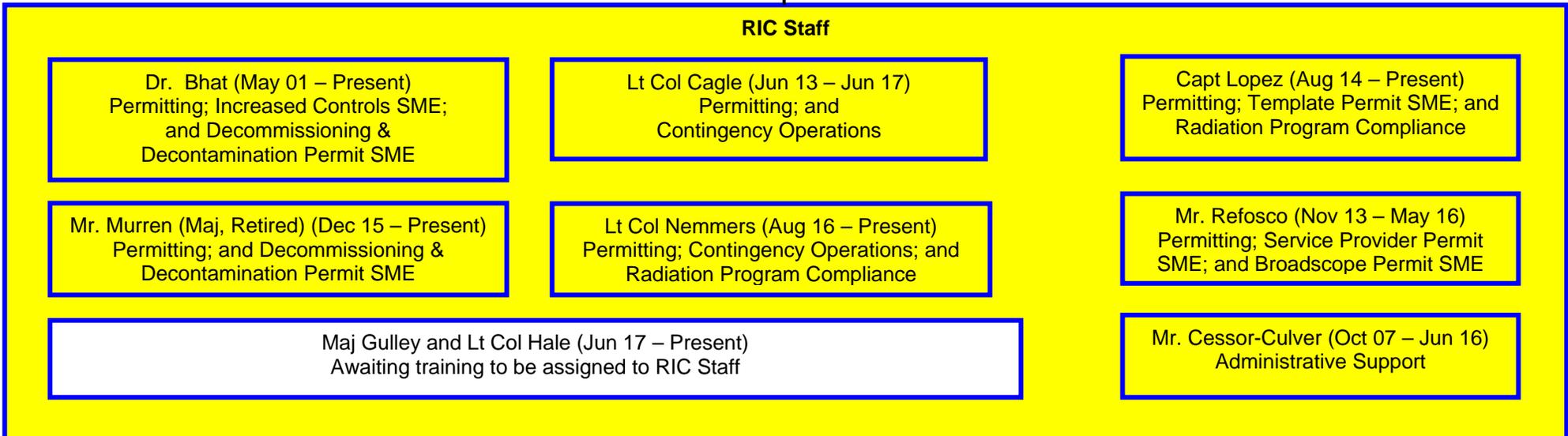
USAF Radioisotope Committee Secretariat (RICS)

(Oct 15– Present)

USAF Radioisotope Committee (RIC) Chair
Col Cunningham (Aug 15 – Present)

Associate Chief, Bioenvironmental
Col Phillips (Jan 14 – Present)

RIC Secretariat
Chief
Lt Col Cagle (Aug 15 – May 17)
Lt Col Nemmers (Acting) (May 17 – Present)
Deputy Chief
Capt Lopez (Aug 15 – Mar 16)
Maj Murren (Mar 16 – Nov 16)
Lt Col Nemmers (May 17 – Present)



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