DEPARTMENT OF THE NAVY
OFFICE OF THE CHIEF OF NAVAL OPERATIONS
2000 NAVY PENTAGON
WASHINGTON DC 20350-2000

5104
Ser N45/19U132340
16 Jan 19

Ms. Orysia Masnyk Bailey
Health Physicist
U.S. Nuclear Regulatory Commission, Region I, DNMS
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406-2713

03029462

Dear Ms. Masnyk Bailey:

This is in reference to your letter dated October 24, 2018 requesting additional information to support a review of the Department of the Navy's (DON) request to extend the decommissioning completion date at Naval Research Laboratory, Chesapeake Beach Detachment (NRLCBD). The Navy's radioactive materials program is licensed with the Nuclear Regulatory Commission (NRC) under Master Materials License Number 45-23645-01NA. Radiological operations involving licensed radioactive materials at NRLCBD were authorized by Naval Radioactive Materials Permit No. 08-00173-E1NP. Chief of Naval Operations Washington, DC letter 5090 N45/18U132372 of May 9, 2018 provided the schedule update for completion of decommissioning activities at NRLCBD, Building 218. The DON responses to the NRC information request concerning the schedule update are forwarded in enclosure (1).

If you have additional questions, I can be reached via phone at (703) 695-5582, or email at jerry.n.sanders@navy.mil.

Sincerely,

SANDERS.JERRY.NORMAN.JR.1134013970
Digitally signed by SANDERS.JERRY.NORMAN.JR.1134013970
DN: c=US, o=U.S. Government, ou=DoD, ou=PKI, ou=USN, cn=SANDERS.JERRY.NORMAN.JR.1134013970
Date: 2019.01.16 16:24:02 -05'00'

J. N. SANDERS, JR
Captain, Medical Service Corps

Enclosures: 1. DON Response to NRC Request for Additional Information

Copy to:
Nuclear Regulatory Commission
Naval Research Laboratory
Naval Sea Systems Command (SEA 04N)
Naval Sea Systems Command Detachment, Radiological Affairs Support Office

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608820

Rec'd. in NMAT-01/28/2019

DON RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION

1. *Please explain why April 30, 2023, was selected to secure funding to support remediation and Final Status Survey (FSS) of Building 218.*
   The date was selected to allow for lead time and uncertainty in procuring Congressional funding as well as to allow adequate time to complete field work and review of the FSS report eliminating submittal of an additional alternate decommissioning schedule.

   As a status update, the Navy was able to obtain FY18 year-end funding to support the remediation and FSS of Building 218. The project is currently contracted for calendar year 2019 with field work beginning in February.

2. *Provided the current FSS report that led you to conclude that Building 218 required additional remediation.*
   Requested FSS report was forwarded separately on electronic media.

3. *Provide a current permit for the depleted uranium (DU) at Building 218.*
   Forwarded in enclosure (2).

4. *Advise how decommissioning activities will be conducted at Building 218. Will you use the previously approved Decommissioning Plan (DP)? Will it need to be amended? If so, when will the amended DP be submitted to the NRC for approval?*
   The decommissioning activities will be conducted to meet the release criteria requirements of the original Final Decommissioning Plan utilizing NUREG-1575 MARSSIM guidance in compliance with 10 CFR 20.1402. The contractor will generate work plans incorporating its specific health and safety and radiation program requirements while ensuring they meet the requirements of the original Decommissioning Plan release standards. Changes incorporating NUREG-1575 MARSSIM guidance will be adopted in the project work plans where appropriate. The Navy does not intend to resubmit an amended project decommissioning plan for approval.

5. *Confirm that the contamination in Building 218 is secured from unauthorized access and describe the security measures in place.*
   Building 218 is kept under lock and key by the Radiation Safety Officer (RSO). A sign is posted on exterior with the RSO contact information.

6. *Provide applicable milestones for your decommissioning process, such as initiation of DP amendment, initiation of remediation initiation of FSS, etc.*
   Currently there are no plans to amend the Decommissioning Plan (DP) to complete the decommissioning process. The work is currently contracted to be accomplished in CY 2019 with anticipated field work beginning in February.
7. *Your August 9, 2013, letter, supporting an alternate decommissioning schedule, indicated that items in 10 CFR 30.36(i)(1)-(4) were not applicable since site remediation and waste disposal had already occurred. Please address these items now.*
   10 CFR 30.36(i) contains considerations for determining whether an alternative schedule is warranted.

Items (1) and (2) are concerned with whether it is technically feasible to complete decommissioning within the allotted 24-month period and whether sufficient waste disposal capacity is available to allow completion of the decommissioning within the allotted 24-month period.

As stated in the Navy's August 9, 2013 letter, the Navy contracted for remediation and final status surveys (FSS) of the Building 218. Site remediation occurred under this action; however, the decommissioning actions conducted did not produce a finalized FSS report in accordance with the requirements of the Decommissioning Plan. The Navy's October 10, 2014 letter request for alternative decommissioning schedule advised the NRC that there was a high probability that additional work was necessary to achieve a technically acceptable FSS report. Further contract action was taken in FY15 to review the previous decommissioning data to identify gaps in the FSS and evaluate any needed rework. Based on the July 2016 review, the Navy contracted rework for the FSS expecting that all areas exceeding the radiological release limits had been remediated. The FSS report for the rework performed during the spring of 2018 identified that areas within B218 still have radioactivity in excess of the Decommissioning Plan release limits. Based on this information, the Navy contracted for remediation of these areas and a new FSS verifying that the site is acceptable for unrestricted use in accordance with the approved Decommissioning Plan. See the responses to items 1 and 4 for current status and action plan.

Items (3) and (4) are concerned with reduction in waste volume and exposure involving short-lived radionuclides. The radionuclide of concern for this permit decommissioning action is depleted uranium (DU), which is not considered a short-lived radionuclide.