



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

March 7, 2019

Dave Clark  
Lead Remedial Project Manager  
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Bldg 50, 2nd floor  
San Diego, CA 92147

SUBJECT: DRAFT FINAL STATUS SURVEY REPORT FOR SELECT AREAS WITHIN THE SOLID WASTE DISPOSAL AREAS WESTSIDE DRIVE, BAYSIDE DRIVE, AND NORTH POINT DRIVE INSTALLATION RESTORATION SITE 12

Dear Mr. Clark:

I am writing to provide you with the U.S. Nuclear Regulatory Commission's (NRC's) request for additional information regarding the U.S. Navy's *Draft Final Status Survey Report For Select Areas within the Excavation Boundary Non-Time Critical Removal Action for Solid Waste Disposal Areas Westside Drive, Bayside Drive, and North Point Drive Installation Restoration Site 12* (Agencywide Documents Access and Management System (ADAMS) Accession Number ML19031B261). The NRC's role at this site is consistent with the monitoring approach defined within the NRC and U.S. Department of Defense's Memorandum of Understanding (ADAMS Accession Number ML16092A294). Under this approach, the NRC staff will review select documents and provide comments regarding NRC's unrestricted use dose criterion of 25 millirem per year.

The NRC staff identified two areas where the staff is seeking additional information. It is requested that you please provide: 1) clarification whether the remaining visible debris described in the sidewalls of excavations will be addressed by future remediation and, if additional remediation will occur, please provide discussion of radiological controls for isolation of the areas described in the subject report that may be impacted by future remediation; and 2) additional details on the scan minimum detectable concentrations and the adequacy of the investigation level used relative to the release criteria. The NRC staff is requesting responses to these comments but recognize that the U.S. Navy does not necessarily need to modify the Final Status Survey Report to address these comments.

In addition, NRC staff is providing the following comments for consideration: It appears as though Scenario B evaluations are being performed based upon the statistical analyses in the report. If so, additional information should be provided that demonstrate background variability requires the use of Scenario B as discussed within NUREG-1505 "A Nonparametric Statistical Methodology for the Design and Analysis of Final Status Decommissioning Surveys." If the background variability is not significant relative to the release criteria concentrations, then Scenario B should not be utilized. Staff further note that, because the reported radium-226 (Ra-226) concentrations in the sampling data presented are all less than the Derived Concentration

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Guideline Levels (DCGLw), further statistical analysis is usually not necessary. Finally, NRC staff note that one could possibly utilize the Uranium-238 concentration as the naturally occurring background concentration for Ra-226, assuming the analysis provides sufficient sensitivity. Please note that NRC staff is not requesting a response to this comment.

In accordance with 10 CFR 2.790 of the NRC's Rules of Practice for Domestic Licensing Proceedings and Issuance of Orders, a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's ADAMS. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

I will contact you in the near future to answer any questions you may have regarding these comments, but if you have any immediate questions, please contact me at (301) 415-5888 or at Richard.Chang@nrc.gov.

Sincerely,

**/RA/**

Richard Chang, Project Manager  
Low-level Waste and Other Projects Branch  
Division of Decommissioning, Uranium Recovery  
and Waste Programs  
Office of Nuclear Material Safety  
and Safeguards

Enclosure: Request for Additional Information

REGISTERED LETTER – RETURN RECEIPT REQUESTED

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**DATE March 7, 2019**

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