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

5104
Ser N45/19U132369
May 8, 2019

Ms. Robin Elliott
U.S. Nuclear Regulatory Commission, Region I
2100 Renaissance Blvd., Suite 100
King of Prussia, PA 19406-2713

Dear Ms. Elliott:

SUBJECT: BIENNIAL INSPECTION QUESTIONNAIRE RESPONSE

The Nuclear Regulatory Commission (NRC) letter of 10 March 2019 requests supporting information in preparation for the biennial review of the Navy Master Material License (MML). Please find the responses to the Master Material License Biennial Review Questionnaire in the enclosed document. The responses to the questionnaire are the coordinated responses from the Navy technical support centers of the Radiological Affairs Support Office and Navy and Marine Corps Public Health Center.

For additional information, please contact me at (703) 695-5508, or email at jerry.n.sanders@navy.mil.

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J. N. SANDERS, JR.
By direction

Enclosure: Responses to MML Biennial Review Questionnaire

Copy to:
Naval Sea Systems Command (04N)
Bureau of Medicine and Surgery (M95)

MML Biennial Review Questionnaire

Please send the checked information to the NRC MML Project Coordinator. The unchecked items should be available for inspection during the biennial review.

I. Management Oversight

☐ Organizational chart that includes the Senior Executive Management through the Radiation Control Program staff (current and changes since last biennial inspection).

☐ Internal management audits or reviews that have been performed to assess the MML Radiation Control Program, the audit or review findings and their resolutions.

☐ Current internal regulations, policies and/or operating procedures that affect the MML Radiation Control Program.

☐ List of reportable events or incidents that have occurred since last biennial inspection, include any actions taken to address the problems.

☐ Current membership of the Master Radiation Safety Committee, including new members, vacancies and actions to fill those positions.

☐ Minutes of Master Radiation Safety Committee meetings, including dates of meetings, attendance, issues discussed (e.g., MML licensing, program, oversight, inspection, enforcement issues; Master Radiation Safety Committee initiatives and activities; or unique permitting requests/actions, decommissioning activities, enforcement cases, allegations, incidents and events) and their resolutions.

☒ Prepare a summary of the status of the MML licensee's actions taken in response to NRC's comments and recommendations following the last biennial review.

- In NRC inspection report letter No. 03029462/2017003 of 28 July 2017, the Navy received no violations. There were no open violations for the 2017 inspection to close.

☒ 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.

- Following the last biennial review, concluded on 22 June 2017, no permittee performance was below acceptable levels or received an unacceptable inspection review as of 17 May 2019.

- (Originally reported on the 2017 Biennial Inspection) Naval Surface Warfare Center Indian Head Explosive Ordnance Disposal Technology Division completed an inspection on 6-9 September 2016. The command received more notices of violation than they had in the past. Many of these deficiencies were 10 CFR 37 related and indicated that insufficient staff was available to accomplish the administration of the program. As a result of personnel changes in reaction to the inspection, the command requested and was granted a Technical Assist Visit (TAV). As a result of new corrective actions identified in the TAV the command committed to decommissioning the gamma radiography permit and improving radiation staff manning to support the remaining radiological programs. The command's gamma radiography permit was terminated on 30

May 18. An inspection completed on 29 September 2017 found 2 level IV violations which were closed by 14 August 2018 and showed improved compliance on the other programs.

- Naval Surface Warfare Center Carderock Division was inspected on 14-16 September 2018. The command received more notices of violation than they had in the past. Many of these deficiencies were related to the recent loss of both the Radiation Safety Officer (RSO) and Assistant RSO and were administrative in nature. As a result of personnel changes in reaction to the inspection, the command shutdown operations, appointed a new RSO, requested and was granted a TAV which was accomplished on 20-21 March 2019. RASO TAV personnel verified that 11 of 25 inspection deficiencies were corrected and that the command was on schedule and was adequately tracking the remaining deficiencies. A formal re-inspection is scheduled for September 2019 to close corrected violations, verify corrective actions and evaluate the command's recovery.

- Naval Air Forces, U.S Pacific Fleet completed an inspection on 13-15 June 2018. The command received more notices of violation than they had in the past. Their RSO had recently retired and many records could not be found or were incomplete. Their initial corrective action response was considered inadequate. A second response was approved as adequate on 4 March 2019. A TAV is tentatively scheduled for July 2019 when the command's draft change to the operating and emergency procedures will be available. The re-inspection after TAV is scheduled for January 2020.

X

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.

Strengths:

-Strict adherence to rules: Strict adherence to the rules is a central tenet of our program. For example, gamma radiographers will suspend operations and critique procedures or training of personnel if there is a deviation to the procedures during any radiography operations. This is performed on a routine basis.

-Support to the permittees and the Navy: We have the health physics support branch in RASO to help permittees in cases of emergency or to supplement training. We also train over 100 RSOs yearly to support the MML and the machine program.

-Continuous training support: We have established an annual conference to gather all the RSOs and meet with the NRSC technical support centers. During the meeting current topics are discussed and refresher training is offered to all personnel.

-Cadre of professionals with many years of experience: All of the health physics personnel supporting the technical centers or the NRSC have many years of experience in radiological controls and health. The background of most personnel includes work in industrial, medical and reactor programs so they bring a wealth of experience as license reviewers or inspectors. In addition, we provide means for continuing education encourage higher level certification of all the health physics staff.

-Support from the senior Navy/Marine Corps leadership: Flag officers from the Navy are very involved and supportive of the radiological controls program. This support includes protecting against budget cuts, financing additional projects and protecting the manning of RASO and NMCPHC.

Weaknesses:

-Control of contractors doing radiological work for the Navy: While a lot of work has gone into training contracting officers, establishing rules for oversight and publishing procedures, this issue still needs further work because there are still problems surfacing.

[X] Updated permit list sorted by NRC program code, by inspection due date, and by priority if possible. Include the following information:

Name	Permit #	Location	NRC Prog Code	Priority	Last Inspection date	Inspection due date

- Refer to attachment (A), Updated Permit List

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%

[X] List all new professional personnel hired since the last review, indicate the degree(s) they received, if applicable, and additional training and years of experience in health physics, or other disciplines, if appropriate.

- Ms. Crystal M. Sawyer, Radiation Protection Manager, onboard 7 August 2017, B.S. Biology, 15 years of health physics experience with Navy and public companies. Ms. Sawyer was received from the Radiological Training & Technical Support Directorate and has been at RASO since October 2011.

- Mr. Robert A. Greene, Radiation Protection Manager, on board 4 September 2017, B.S. Physics, M.S. Physics, 9.5 years of health physics experience with other federal agencies.

- Mr. Eric E. Sassi, Radiation Protection Manager, onboard 1 October 2019, B.S. Environmental Engineering, M.S. Health Physics, 19 years of health physics experience with the Air Force Mater Material License other federal agencies.

- Ms. Lyndsey Allison-Russell, Support Health Physicist, onboard 1 March 2018, B.S. Physics, 9 years of health physics experience with the Navy. Ms. Allison-Russell was received from the Radiological Training & Technical Support Directorate on a one-year rotation and has been at RASO since November 2014.

- Mr. David Restrepo, Support Health Physicist, onboard pending, B.S. Nuclear Engineering, 1 year of health physics experience with Navy.

-Mr. Greg Kahles, Materials permitting and Inspection for NMCPHC. M.S. Health Physics and twenty years of experience in radiation health in the Navy.

[X] List technical staff who have not yet met the qualification requirements of permit reviewer/materials inspection staff. For each, list the courses or equivalent training/experience they need to attend and a tentative schedule for completion of these requirements.

- Mr. Robert A. Greene: Mr. Greene started the qualification process September 2017. He was qualified to inspect RASP Machine Sources of ionizing radiation on 27 October 2018. He has the following formal training and evaluations to complete per his qualification journal:
(1) Gamma Radiography Inspection Evaluations, 1 remaining as lead inspector (Scheduled for August 2019)
(2) Oral Board Evaluation for Material Inspector and Permit Reviewer

- Mr. Eric E. Sassi: Mr. Sassi started the qualification process October 2018 and has the following formal training and evaluations to complete per his qualification journal:
(1) RADIAC Calibration or Irradiator Services Inspection Evaluation, 1 minimum
(2) Three Gamma Radiography Inspection Evaluations
(3) X-ray Radiography Inspection Evaluations ,2 Remaining
(4) Oral Board Evaluation for Material Inspector and Permit Reviewer

[X] List the technical staff who left your program during this period.

- Mr. Mark H. McCormack, Radiation Protection Manager, Temporarily transferred to Radiological Training & Technical Support Directorate as the acting Lead. Mr. McCormack does not maintain Inspector Proficiency. Mr. McCormack has formally requested to retire from government service in July 2019. His RPM vacancy will be announced for hiring then.

- Mr. Jeff A. Kilmczak, Radiation Protection Manager, Transferred to Radiological Training & Technical Support Directorate. Mr. Kilmczak maintains Inspector Proficiency.

- Ms. Lyndsey Allison-Russell, Support Health Physicist, Transferred to Environmental Protection Directorate to continue her RASO rotation. She was qualified to inspect RASP Machine Sources of ionizing radiation as required by her rotation goals.

- Ms. Dorothy McKenzie, Health Physicist for NMCPHC. Retired from government service.

- *Mr. Greg Kahles, Health Physicist for NMCPHC. Left NMCPHC for a position as the lead Environmental Protection Manager at RASO.*

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.

- 1 current vacant Radiation Protection Manager position open for 4 months. Mr. Restrepo's onboarding is pending and at NAVSEA Headquarters Human Resources (SEA 10).

- Mr. McCormack's pending vacancy will be announced for hiring in July upon his retirement.

- Mr. Kahles position at NMCPHC is currently vacant. The position description is being rewritten.

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 NRG 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 NRG (or has been asked by NRG 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

[X] Do you currently have an action plan for completing overdue inspections? If so, describe the plan.

- Not applicable. No material inspections are overdue per NRC established frequency.

[ ] Copy of current log or other document used to track inspections.

[X] List of Inspection frequency and program code by permit type.

- List of permit types and inspection frequency listed below:

Medical Use Codes

NRMP Type	Frequency (years)
1. Nuclear Medicine (Limited Scope).....	3
2. Nuclear Medicine (Broad Scope).....	1
4. Research (non-human use).....	3
5. Irradiators.....	3
9. Other.....	3

Radiological Affairs Support Program Use Codes

NRMP Type	Frequency (years)
A. Radiography (Fixed and Field Ops)	1
B. General Industrial	5*
C. Instrument Calibration Services	5
D. Decommissioning of Byproduct Material	1
E. R & D Type A Broad Scope	3
F. R & D Type B Broad Scope	5
G. R & D Type C Broad Scope	5
H. SNM (unsealed less than critical mass)	3
I. Portable Gauges	5
J. Analytical Measuring Instruments	T
K. Gas Chromatographs	T
L. DU Munitions Distribution and Storage	3
M. Subcritical Assemblies	5
N. RTG Power Sources	T
O. Radium Luminous Product Possession	3
P. Fixed Gauges	5
Q. Irradiators	5
R. Buried Waste (Substrata)	5*
S. Source Material	5
T. Radioactive Commodities Distribution & Use	3
U. Leak Test Services	T
V. SNM (less than 200 grams)	5
W. Research & Development	5
X. Byproduct Material Standby (No ops)	3
Y. Source Material Standby (No ops)	2
Z. Vehicle and Cargo Interrogation Systems	5

IC. Physical Protection of Radioactive Material Quantities of Concern (in conjunction with inspection of permitted material)

* NSC: No similar NRC code
T – Telephone contact every 5 years after initial inspection

X 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.

- Refer to attachment (B).

IV. Technical Quality of Inspections

X List changes made to your written inspection procedures during the review period.

- NRSC MML SOP Revision 7 of 14 September 2018 added template documents for Inspection Reports NRSC 591 parts 1 through 3 and standardized record retention.

☐ Prepare a table showing the number and types of supervisory accompaniments made, and results of those accompaniments? Include the following information:

Inspector	Supervisor	NRC Program Code	Date

☒ Describe internal procedures for conducting supervisory accompaniments of inspectors in the field

- Per NRSC SOP Revision 7, Section 305, each inspector will be evaluated at least annually while performing an inspection. The evaluation can be performed by an NRSC member, TSC management, or the inspector's direct supervisor. RPD SOP 3 Revision 2 provides more specific guidance on who can perform accompaniments and provides a form that mirrors the NRC Inspector Accompaniment Checklist to document the evaluation.

☒ 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?

RASO

- Thermo-scientific RADEYE G and RADEYE B20 instruments are used to monitor the permittee during inspections and verify nominal readings with Navy calibrated instruments. Instrumentation used for conducting surveys during inspections is calibrated annually by the manufacturer. Instrument selection is based on the source type and isotope to be monitored. A sufficient number of calibrated instruments were available for use throughout the review period.

NMCPHC

-Instrument: Radiation Alert, Type: GM Survey Meter, Model: Inspector and Instrument: Radiation Alert, Type: GM Survey Meter, Model: Inspector EXP. All instruments are properly calibrated and there were sufficient calibrated instruments available through the review period.

☐ List of inspections that resulted in violations. Include the following information:

Permittee	Program code	Date of inspection	Severity Level

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.

- No major, unusual, or complex permits issued such as amendments, terminations, new permits, decommissioning, or renewals. No permit actions required emergency plans per 10 CFR 30.32(i) for this review period.

[X] Discuss any variances from NRG licensing policies and/or procedures during the review period.

- The NRSC's estimated time for completion of permitting actions differs from NUREG-1555 Volume 20 guidance as follows:
(1) Amendment: 180 days / NRC 90 days
(2) Renewal: 365 days / NRC 180 days
(3) New: 365 days / NRC 90 days
(4) Termination: 365 days / NRC 90 days

- Notwithstanding NUREG-1556 series guidance for the "response from applicant," Navy instruction, RAD-010, Section 3, requires permittee to submit a command-endorsed instruction that addresses the following item as part of the permit application:
(1) Responsibilities by organization and position
(2) Audit program with checklists
(3) Survey instrument types and calibration
(4) Material receipt and accountability procedures
(5) Control of radiation exposure to the public
(6) Methods for monitoring personnel for occupational radiation exposure
(7) Training required for authorized users
(8) Operating and emergency procedures for each unique use of radioactive material
(9) Facility diagrams for storage or use of material showing restricted areas, adjacent occupied areas, and additional information required by other sections of this manual
(10) Types and frequencies of required surveys
(11) Leak test procedures and training required to perform the test
(12) Sample analysis procedures and training required to perform the analysis
(13) Equipment maintenance procedures
(14) Radioactive material transportation
(15) Radioactive waste management

[X] List changes made in your written permitting procedures (new procedures, updates, policy memoranda, etc.) during the review period.

- CNO WASHINGTON DC letter 5104 Ser N45/18U132424 of 3 August 2018 adds a restriction on Mr.Jason A. Julao to that existing for Mr. Scott W. Frampton on all NRMPs: "This NRMP is prohibited from allowing Mr. Scott W. Frampton and/or Mr. Jason V. Julao any occupational involvement in NRMP activities."

- COMNAVSEASYSCOM WASHINGTON DC letter 5104 Ser 04N/016 of 15 March 19 provided new guidance for NRMP application submittal.

[ ] Copy of current log or other document used to track licensing actions.

[X] List non-standard permit conditions used during the review period.

- Refer to attachment (C).

[ ] List pending licensing actions, include the following information:

Permittee	Program Code	Action Type	Date Received

IV. Responses to Events or Incidents and Safetv Concerns or Allegations

[X] 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 NRG. The list should be in the following format:

Permittee Name	Permit #	Date of Incident/Report	Type of Incident	Status	Reported to NRC
NSWC Crane Indiana	13-00164-T1NP	November 2016/ July 11, 2017	Loss of Material (Vapor Tracer)	Closed	Yes
Naval Air Force	04-57025-T2NP	19 July 2017/ August 8,2017	Loss of Material (IBIS)	Closed	Yes
Naval Air Force	04-57025-T2NP	3 April 2018/ May 2, 2018	Loss of Material (IBIS)	Closed	Yes

[X] During this review period, did any incidents occur that involved equipment or source failure or approved operating procedures that were deficient? If so, how and when were other permittees who might be affected notified? Was timely notification made to NRC?

- None to report.

[X] For incidents involving failure of equipment or sources, was information on the incident provided to NRC for evaluation of the device for an assessment of possible generic design deficiency? Please provide details for each case.

- None to report.

[X] List any changes to procedures for investigating incidents and events made during the review period.

- No changes were made.

[X] List any changes to your procedures for handling safety concerns or allegations made during the period of this review.

- No changes were made.

[ ] 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.

[ ] List of all wrongdoings identified during the review period. Show whether the action is open or closed.

RASO Permits

Command Name	Permit No. Or Authorization Code	Location	NRC Prog Code	Priority	Last Inspection Date	Date Next Due
Marine Depot Maintenance Command Production Plant Albany	10-67100-U1NP	Albany, GA	03220	3	11/16/2016	11/16/2019
Naval Munitions Command Atlantic (Yorktown DET)	45-47616-C1NP	Yorktown, VA	03222	3	8/2/2016	8/2/2019
Marine Depot Maintenance Command Barstow	10-67100(B)-C1NP	Albany, GA	03222	3	10/27/2016	10/27/2019
Marine Depot Maintenance Command Production Plant Albany	10-67100 (A)-C1NP	Albany, GA	03222	3	11/16/2016	11/16/2019
Naval Munitions Command Atlantic (Mayport DET)	45-47616-C2NP	Mayport, FL	03222	3	2/28/2017	2/28/2020
Naval Submarine Support Facility, New London	06-68316-C1NP	New London, CT	03222	3	5/11/2017	5/10/2020
Puget Sound Naval Shipyard & Intermediate Maintenance Facility (Bremerton)	46-4523A-C1NP	Bremerton, WA	03222	3	5/18/2017	5/17/2020
Naval Shipyard and Intermediate Maintenance Facility Puget Sound (Point Loma)	46-4523A-C1NP	Point Loma, CA	03222	3	7/12/2017	7/11/2020
Norfolk Naval Shipyard	45-42158-C1NP	Portsmouth, VA	03222	3	8/17/2017	8/16/2020
Pearl Harbor Naval Shipyard and Intermediate Maintenance Facility	53-32253-C1NP	Pearl Harbor, HI	03222	3	3/16/2018	3/15/2021
Puget Sound Naval Shipyard & Intermediate Maintenance Facility (Bremerton)	46-4523A-A1NP	Bremerton, WA	03320	1	5/25/2018	5/25/2019
Trident Refit Facility Kings Bay	10-44466-A1NP	Kings Bay, GA	03320	1	6/7/2018	6/7/2019
Surface Warfare Officers School Command Unit	12-3203A-A1NP	Great Lakes, IL	03320	1	8/15/2018	8/15/2019
Portsmouth Naval Shipyard	28-39040-A1NP	NSY Portsmouth NH	03320	1	8/30/2018	8/30/2019

Norfolk Naval Shipyard	45-42158-A1NP	Portsmouth, VA	03320	1	12/3/2018	12/3/2019
Trident Refit Facility, Bangor	46-68438-A1NP	Bangor, WA	03320	1	4/3/2019	4/2/2020
Pearl Harbor Naval Shipyard and Intermediate Maintenance Facility	53-32253-A1NP	Pearl Harbor, HI	03320	1	4/24/2019	4/23/2020
Naval Surface Warfare Center Crane Division	13-00164-Q1NP	Crane, IN	03510	3	3/7/2019	3/6/2022
U.S. Naval Academy Annapolis	19-00161-E1NP	Annapolis, MD	03610	2	4/6/2017	4/6/2019
Naval Surface Warfare Center Carderock Division	19-00167-E1NP	W. Bethesda, MD	03610	2*	8/16/2018	10/16/2019
Naval Research Laboratory Washington DC	08-00173-E1NP	Washington DC and Stennis MS	03610	2	7/19/2018	7/18/2020
Naval Surface Warfare Center Crane Division	13-00164-W1NP	Crane, IN	03620	5	1/30/2015	1/29/2020
Naval Surface Warfare Center Indian Head Explosive Ordnance Disposal Tech. Division	19-00174-W1NP	Indian Head MD	03620	5	9/29/2017	9/28/2022
Naval Air Systems Command Patuxent River MD	19-00019-W2NP	Patuxent River MD	03620	5	10/17/2017	10/16/2022
Naval Surface Warfare Center Division, Dahlgren	45-00178-X1NP	Dahlgren, VA	03810	2	3/19/2019	3/19/2020
USS RONALD REAGAN (CVN 76)	59-22178-X1NP	Yokosuka, JP	03810	2	8/9/2018	8/8/2020
Space and Naval Warfare Systems Command (SPAWAR) Pacific San Diego CA	04-66001-D1NP	San Diego, CA	03900	1	3/1/2018	3/1/2019
Naval Postgraduate School	04-62271-D1NP	Monterey, CA	03900	1	11/2/2018	11/2/2019
Naval Surface Warfare Center Division, Dahlgren	45-00178-D1NP	Dahlgren, VA	03900	1	3/19/2019	3/19/2020
Naval Air Warfare Center Weapons Division	04-60530-L1NP	China Lake, CA	11221	3	11/15/2017	11/14/2020
Naval Sea Systems Detachment Radiological Affairs Support Office	45-45650-N1NP	Yorktown, VA	22130	5	6/23/2016	6/22/2021

Command Name	Permit No. Or Authorization Code	Location	NRC Prog Code	Priority	Last Inspection	Date Next Due
Naval Base Ventura County Point Mugu	04-69232-R1NP	Ventura County, CA	None-R	5	6/18/2014	6/17/2019
Explosive Ordnance Disposal Training & Evaluation Unit Two	45-43505-B1NP	Fort Story, VA	None	3	8/31/2016	8/31/2019
Naval Air Forces, U.S. Pacific Fleet	04-57025-T1NP	San Diego, CA	None	3	10/19/2016	10/19/2019
Naval Oceanographic Office Stennis Space Center	23-62306-B2NP	Stennis, MS	None	3	10/26/2016	10/26/2019
Marine Corps Logistics Base, Albany	10-67004-T1NP	Albany, GA	None	3	11/18/2016	11/18/2019
Naval Air Forces, U.S. Pacific Fleet	04-57025-T2NP	San Diego, CA	None	3*	6/15/2018	1/15/2020
Strategic Weapons Facility, Pacific Silverdale	46-63402-B1NP	Bangor, WA	None	3	1/24/2017	1/24/2020
Strategic Weapons Facility, Atlantic	10-68733-B1NP	Kings Bay, GA	None	3	8/11/2017	8/10/2020
Naval Air Systems Command Patuxent River MD	19-00019-T2NP	Patuxent River MD	None	3	10/17/2017	10/16/2020
Marine Corps Logistics Base, Albany	10-67004-T3NP	Albany, GA	None	3	12/13/2017	12/12/2020
Naval Surface Warfare Center Crane Division	13-00164-B2NP	Crane, IN	None	3	3/21/2018	3/20/2021
Marine Corps Logistics Base, Albany	10-67004-T2NP	Albany, GA	None	3	10/24/2018	10/23/2021
Naval Surface Warfare Center Crane Division	13-00164-T1NP	Crane, IN	None	3	3/7/2019	3/6/2022

NMCPHC Permits

Naval Hospital Jacksonville (waiting on transfer to DHA)	**09-00232-11**	**Jacksonville, FL**	**2121**	**3**	**5/25/16**	**5/25/19**
Naval Medical Center, San Diego	04-00259-11	San Diego, CA	2120	3**	6/28/18	6/28/19

Naval Hospital, Camp Pendleton	04-68094-11	Camp Pendleton, CA	2121	3	8/3/16	8/3/19
Naval Medical Center, Portsmouth	45-00183-11	Portsmouth, VA	02120, 02230	3**	12/8/18	12/8/19
Naval Hospital, Okinawa, Japan	63-68470-11	Okinawa, Japan	2121	3	6/8/17	6/7/20
Naval Hospital, Bremerton	46-68095-11	Bremerton, WA	2121	3	9/28/17	9/27/20
Naval Medical Center Camp Lejeune	32-68093-11	Camp Lejeune, NC	2121	3	4/19/18	4/18/21
Naval Hospital, Guam	56-68096-11	Guam	2121	3	5/18/18	5/17/21
Naval Hospital, Pensacola	09-00203-11	Pensacola, FL	2121	3	2/22/19	2/21/22
Naval Dosimetry Center, Bethesda	19-48539-91	Bethesda, MD	3620	3	4/18/19	4/17/22

* = Reduced inspection priority due to performance.
** = Reduced inspection priority due to complexity of program.

Different Inspection Frequency Summary (Attachment B)

Code Navy/NRC	Navy Inspection Frequency	NRC Inspection Frequency	Reason for Change
B	3	N/A	(1)
C / 3221	3	5	(2)
D / 3900	1	D	(2) (6)
E / 3610	2	3	(2)
F / 3611	3	5	(2) (9)
H / 22120	2	5	(2) (9)
IC1	1	N/A	(3)
IC2	2	N/A	(3)
IC3	3	N/A	(3)
L / 11221	3	5	(2)
M / 22151	2	5	(2) (9)
O	3	N/A	(1)
Q / 3510	3	5	(2)
R	5	N/A	(4)
S / 11210	3	T	(2) (7) (9)
T	3	N/A	(8)
U / 3220	3	T	(5) (7)
X / 3810	2	3	(2)
Z	2	N/A	(1)(9)

(1)No similar category described in MC 2800.
(2) Usage code is more frequently inspected due to increased risk or inventory as a result of the military application.
(3) Increased controls inspections are done in conjunction with the permitted material.
(4) Permitted material buried under a parking lot under legacy regulations, no similar category in MC2800.
(5) Leak test services only provided for a limited number of Navy and Marine Corps clients or the permitted command itself.
(6) D denotes inspections are scheduled at times when the licensee is performing decommissioning activities at the site.
(7) T denotes a telephone contact made by an inspector to evaluate the radiation protection program at NRC interval of 5 years.
(8) Authorizes the storage, distribution, use and disposal of commodities containing permitted material throughout the Navy/Marine Corps.
(9) No permits currently issued under this usage code.

Different Inspection Frequency Summary (Attachment B)

ACTIVITY	*Permit #*	Inspection Periodicity
Naval Medical Center, San Diego	04-00259-11	1
Naval Medical Center, Portsmouth	45-00183-11	1

Inspection frequency has been increased in order to provide sufficient oversight due to the size and complexity of the program.

NON-Standard Permit Conditions Used from June 2017 to May 2019

Permit	Amendment No.	Date Issued	Condition Number	Condition
12-3203A-A1NP	11	13-Sep-17	19	Radioactive Materials shall not be aggregated or collocated such that breaching a common barrier (e.g., a locked door at the entrance of a storage room) would allow access to the radioactive material or devices containing the radioactive material in quantities greater than 21 Curies of Iridium-192.
04-60530-L1NP	10	13-Sep-17	12	The command shall coordinate any decommissioning activities with Naval Sea Systems Command Detachment, Radiological Affairs Support Office (NAVSEADET RASO).
04-60530-L1NP	11	30-Jan-18	12	The command shall coordinate any decommissioning activities with Naval Sea Systems Command Detachment, Radiological Affairs Support Office (NAVSEADET RASO).
04-57025-T1NP	2	3-Aug-18	13	Maintenance or repairs is limited to laser module components which are exterior to the optical module. Disassembly, repairs, or maintenance to the Laser Target Designator Ranger Series optical module shall be performed by the manufacturer or others specifically licensed by the U.S. Nuclear Regulatory Commission or an Agreement State to provide such services.
04-57025-T1NP	2	3-Aug-18	14	COMNAVAIRFOR is responsible for full inventory of the Am-241 used in the EOTS laser assembly on the JSF aircraft. The laser assembly inventory shall be collected by owning commands annually and forwarded to their Type Wing for compilation. Type Wings shall provide a report to the CNAF RSO for record keeping and reconciliation.
04-57025-T1NP	2	3-Aug-18	16	The command shall, upon discovery of the event, immediately report to NAVSEA DET RASO any event listed in NAVSEA S0420-AA-RAD-010, Section 2.23 by telephone at (757)887-4692. Initial follow up written reports shall be made within 10 days with update reports to be determined by NAVSEA DET RASO. The report shall include the information required by NAVSEA S0420-AA-RAD-010, Section 2.27.
04-60530-L1NP	12	3-Dec-18	12	The command shall coordinate any decommissioning activities with Naval Sea Systems Command Detachment, Radiological Affairs Support Office (NAVSEADET RASO).