



DEPARTMENT OF THE ARMY

HEADQUARTERS, US ARMY ARMAMENT MATERIEL READINESS COMMAND
ROCK ISLAND, ILLINOIS 61299

REPLY TO
ATTENTION OF:

DRSAR-SF

20 AUG 1982

US Nuclear Regulatory Commission
Region III
ATTN: Mr. J. R. Miller
Chief, Technical Inspection Branch
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Sir:

Reference your letter dated 3 August 1982 concerning the recent suspension of our burial permit by the State of Washington. This headquarters, as the designated Army agency for management of disposal of radioactive waste within the Army, is responsible for the audit and certification of these shipments prior to transmittal to one of the commercial burial sites. During the past 2 years, we have added three health physicists to our staff and made numerous changes to improve our program.

The recent violation pointed out in your letter dated 3 August 1982 was the result of an infrequent shipper (Red River Army Depot) attempting to save money by contracting a transporter (United Agriculture) not experienced with transporting radioactive waste. The transportee advised depot personnel that the blocking and bracing was not necessary since it was a "full load." My health physicists were previously not inspecting the trucks prior to departure and were unaware of the change in carrier and lack of blocking and bracing.

A meeting was held with State of Washington officials on 2 Aug 82 concerning our plans to prevent any repeat of these violations. Our response and recommended actions were delivered by letter (Incl 1) and accepted by personnel from the Radiation Control Program office at Washington. We were officially reinstated for use of the Washington burial site on 9 Aug 82.

I believe that the procedures outlined in our letter to the State of Washington will preclude any repeat violations. These procedures are now in

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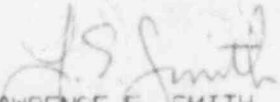
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20 AUG 1982

DRSAR-SF
Mr. J. R. Miller

effect for all shipments of radioactive waste controlled by this headquarters. I appreciate your offer of assistance and would like for my health physicist to meet with members of your staff in the immediate future to discuss our radiological program and problems. I have instructed Mr. Byron Morris to contact your office and arrange a visit at some time suitable for your staff members.

Sincerely,


LAWRENCE E. SMITH
Chief, Safety Office

1 Incl
As stated

Copies Furnished:
Commander, US Army Materiel Development
and Readiness Command
ATTN: DRCSF-P



DEPARTMENT OF THE ARMY

HEADQUARTERS, US ARMY ARMAMENT MATERIEL READINESS COMMAND
ROCK ISLAND, ILLINOIS 61299

Mr. Morris/js
(309) 794-3383

REPLY TO
ATTENTION OF:

DRSAR-SF

27 JUL 1982

Mr. E. L. Gronemyer
Radiation Control Program
DSHS W/S LF-13
Olympia, WA 98504

Dear Mr. Gronemyer:

This headquarters, as manager of the low-level radioactive waste disposal program for the US Army, regrets the recent items of noncompliance pointed out by your inspectors concerning shipment No 2403 from Red River Army Depot (RRAD).

It is our continuing objective to institute new procedures and revise old ones to prevent any reoccurrence of items of non-compliance and anticipate new problems that may arise. We feel the following steps will prevent a reoccurrence of the items of non-compliance found by your inspectors. We will institute these procedures immediately with your approval.

- a. All future shipments from generators whose transportation personnel are not thoroughly familiar with the shipment of radioactive waste will be monitored before and after loading by our Health Physicist. Our Health Physicist was not present during the loading of the recent shipment from RRAD.
- b. Only experienced carriers will be recommended and Army organizations will be required to comply with this recommendation.
- c. The letter at Inclosure 1 will be made a standard part of the Army procedures and each carrier (driver) will be required to sign the certification after receiving comprehensive instructions pertaining to the check points at Washington.
- d. We will continue to assist, audit, and certify the packaging and labeling of the waste material on-site.
- e. We will intensify our efforts to provide training to all Army personnel involved with the generation and ultimate disposal of radioactive waste.

Incl 1

DRSAK-SF
Mr. E. L. Gronemyer

27 JUL 1982

This office will continue annual liaison visits with members of your staff and the US Ecology staff to discuss problem areas and changes to our program which may be desirable in the future. We hope that our actions demonstrate our willingness and desire to fully comply with all state and federal regulations pertaining to the disposal of radioactive waste and are sufficient for us to be granted reinstatement. Point of contact is Mr. Byron Morris, (309) 794-3383 or 3483.

Sincerely,



LAWRENCE E. SMITH
Chief, Safety Office

1 Incl
As stated



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ROCK ISLAND, ILLINOIS 61299

REPLY TO
ATTENTION OF:

DRSAR-SF

Commercial Carriers of Radioactive Waste for US Army

Headquarters, US Army Armament Materiel Readiness Command (HQ, ARRCOM) is the responsible agency for the certification and transportation of all low-level radioactive waste generated within the US Army. The packages you are carrying are within this area of responsibility and must be loaded and transported with strict adherence to state and federal regulations. Monetary fines have been levied for non-compliance in the past.

The material you are carrying has been carefully packaged and is to be transported to US Ecology, Inc., Richland, WA (509) 377-2411 for burial. You must enter the State of Washington at one of the two entry points listed below and stop for an inspection of your vehicle to insure compliance with DOT requirements for vehicles carrying hazardous materials. You will not be allowed entry to the state until your vehicle passes this inspection.

- a. Weigh station at Plymouth (I-80)
Phone: (509) 783-1503
- b. I-90 near Spokane
Phone: (509) 226-3360

You must notify one of the above the check points by phone at least 4 hours prior to entering the state.

STATEMENT OF CERTIFICATION:

I have read and understand the above statements concerning the proper delivery of this shipment of radioactive material. I agree to call one of the two check points listed above at least 4 hours prior to arrival, and stop at the check point for the required inspection prior to entering the State of Washington.

Signature of Driver

Incl 1