



US Department  
of Transportation

Maritime  
Administration

400 Seventh Street, S.W.  
Washington, D.C. 20590

May 27, 1994

U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

**Reference:** Docket No. 50-238  
Request for Amendment of License NS-1  
Nuclear Ship SAVANNAH

**SUBJECT:** REQUEST FOR ADDITIONAL INFORMATION (TAC No. M89505)

Gentlemen:

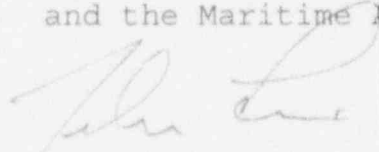
This letter and its attachment provide the additional information and clarification requested in your letter of May 26, 1994, and is submitted on behalf of the U.S. Maritime Administration (MARAD) and the Patriots Point Development Authority (PPDA), joint license holders under the subject possession-only license, who have requested amendment of the license.

Mr. James H. Flatley III, Chief Executive Officer of PPDA has authorized the undersigned to sign and submit this application on behalf of the Patriots Point Development Authority.

Please contact the undersigned via telephone (202) 366-5121 or FAX (202) 366-3889 if there are any further questions or you require any further detail in support of the requested amendment.

Sincerely,

For the Patriots Point Development Authority  
and the Maritime Administration

  
Zelvin Levine  
Senior Technical Advisor

**ATTACHMENTS**

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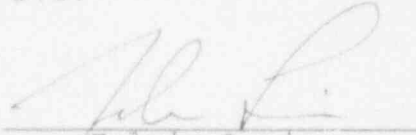
Docket No. 50-238  
Request for Amendment of License NS-1  
Nuclear Ship SAVANNAH

cc: Mr. Alexander Adams  
Project Manager, NRC  
Mail Stop 11B-20


OATH OF ZELVIN LEVINE, SENIOR TECHNICAL ADVISOR

Mr. Zelvin Levine states that he is Senior Technical Advisor to the U.S. Maritime Administration and is authorized to submit this application and execute this oath on behalf of the Maritime Administration and the Patriots Point Development Authority, and that to the best of his knowledge and belief the facts set forth in this letter and attachments are true and correct.

Signed in Washington, D.C.

  
\_\_\_\_\_  
Zelvin Levine

Subscribed before me this 27<sup>TH</sup> day of May in the year 1994:

  
\_\_\_\_\_  
notary public

My Commission Expires November 30, 1998

LICENSEES' RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION  
N.S. SAVANNAH  
DOCKET No. 50-238

Question 1. You propose changes concerning regulations related to radiation protection in Technical Specification (TS) 2.1, 2.2, 2.3, 2.4, and 3.3.1.a. Please provide an analysis that justifies these changes. In T.S. 3.3, and 3.3.1, you propose changing reference to Regulatory Guide (RG) 1.86 to applicable Federal regulations. There are no regulations equivalent to the information given in RG 1.86. Please return references to RG 1.86 to the TS or propose equivalent TS. In other sections of the TS, you propose replacing reference to specific regulations with applicable regulations. Please explain.

**Response:** In each of the TS cited and throughout the TS, licensees' intent was to simplify the TS by inserting a general reference to applicable federal regulations of the NRC and Department of Transportation without reduction of the actual requirement imposed by the specification. In lieu of submitting analysis of each such change, which would necessitate time-consuming review by NRC staff, we conclude it would be prudent at this juncture to retain the TS wording as approved and currently in effect in Amendment No. 11. Accordingly, these requested changes are withdrawn.

Question 2. Please provide additional information on the qualifications of staff from the U.S. Army Center for Public Works, Humphries Engineering Center for assuming the responsibilities held in the TS by the South Carolina Department of Health and Environmental Control, Bureau of Radiological Health.

**Response:** With the relocation of N.S. SAVANNAH away from PPDA, it is clearly impractical for the South Carolina Department of Health and Environmental Control (DHEC), Bureau of Radiological Health to continue to provide the radiation control services. MARAD is amending an existing agreement related to the Army's decommissioned MH-1A floating nuclear power plant STURGIS requiring the same services heretofore provided by DHEC to be provided for MARAD by the Center for Public Works (CPW). CPW has responsibility within the Army Corps of Engineers for three decommissioned army nuclear power plants, including the STURGIS. Radiation health physics surveillance, control and emergency response is provided to CPW by General Health Physics, Inc. of Lorton, Virginia. A detailed resume citing the education, background and qualifications of the Owner/President who is a senior health physicist is **attached**.

Question 3. In TS 3.3, last paragraph, you propose adding the words "transmitted to the security force." Please explain the meaning of this phrase and provide justification.

**Response:** The intent of this proposed change was to accommodate the likelihood that the security force at JRRF would be largely

"roving security" as opposed to a "manned security guard post." However, on closer checking, we determined that both will be provided and, therefore, no change to the existing TS is needed.

Question 4. In TS 3.4.b. you propose removing the words "and monitoring station dosimeter readings" from the content of the written report to the NRC. Please justify this change or leave this wording in the TS.

**Response:** TS 2.4 requires "*thermoluminescent dosimeters (TLDs) or equivalent monitoring devices shall be placed at strategic locations throughout the vessel to monitor the radiation from reactor generated materials*" -- accordingly, the proposed change to TS 3.4.b was incorrect and the text should remain unchanged.

Question 5. In T.S. 3.7 1.6, you propose security in accordance with JRRF's established security procedures. Please explain and justify these procedures. How does this compare with the current TS.

**Response:** On reviewing JRRF's established security procedures, we concluded that the security provided at JRRF is well in excess what has heretofore been provided and required under the TS requirements. However, no change to the TS is necessary and, therefore, the requested change is withdrawn.

Question 6. You proposed in TS 3.7.6. changing the check of level strips from daily to weekly. Please justify this change.

**Response.** This is one of several changes deemed appropriate in light of years of experience at PPDA. However, to facilitate prompt approval of the TS, we withdraw this proposed change.

Question 7. You proposed in TS 3.7.6. changing the inspection of the primary and secondary systems from annually to every four years. Please justify this change.

**Response :** This is one of several changes deemed appropriate in light of years of experience at PPDA. However, to facilitate prompt approval of the TS, we withdraw this proposed change.

Question 8. Please submit a copy of your proposed TS with all changes made.

**Response:** The TS have been revised and dated May 26, 1994, to reflect the licensees' requested changes and deletions, as discussed above.

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## RESUME

John B. Davis  
5917 Bond Ct.  
Alexandria VA 22310  
1(703) 971-3633

### SUMMARY

Health Physics Professional with over thirty years experience in practical applied Health Physics. Environmental Monitoring, Decontamination/Decommissioning, Training, Emergency Planning in military and commercial Nuclear Power programs.

### EDUCATION

George Washington University, BA 1968  
Rutgers University, MS 1970  
Various Professional and Technical Courses 1955 to present

### PROFESSIONAL AFFILIATIONS

HPS-Plenary Member 1962  
Virginia HP Society 1977, Past President  
Wash/Balt HP Society 1974

### HONORS AND AWARDS

Certified Health Physicist 1971  
AEC Fellowship 1969

### TECHNICAL CAPABILITIES

#### Consulting

Provided management consulting for by-product material licensees in areas of licensing and regulatory compliance, program development, procedure development, ALARA program development, and radioactive waste program development.

#### Training

Provided training program development, managed training program for client in area of health physics technician training, general worker training, basic math and science for nuclear plant operators, x-ray safety and shielding for RPOs.

#### RPM/RPO

RPM for two small Army nuclear power plants, large radium disposal project, proposed civilian BWR, RPO on NRC by-product license for Army.

#### Project Management

Provided project management for studies at Atomic Industrial Forum, laboratory services for whole body counting, respirator fit testing, sample analysis, safety audit at large research facility.

#### Environmental Monitoring

Developed Radon Monitoring lab, monitored Army DU munitions firing range for U-238, monitoring program for mothballed nuclear plants.

#### Decontamination/Decommissioning

Building and area decontamination, dismantling of small PWR, industry task force chairman for study on decommissioning of commercial nuclear power plants.

#### Quality Assurance

Provided QA services for EPA super fund site cleanup, audit services in area of radiation protection.

#### Emergency Planning

Provided program development, procedure development, scenario development, audits/ evaluations, training.

## WORK HISTORY

1/82 to Present

General Health Physics, Inc.  
7217 Lockport Pl.  
Lorton, VA 22079  
Owner/President

8/77 to 1/82

Radiation Management Corporation  
3570 Market St.  
Philadelphia, PA 19104  
Washington District Manager

9/74 to 8/77

Potomac Electric Power Company  
1900 Pennsylvania Ave.  
Washington, DC  
Radiation Protection Manager  
Nuclear Fuels Manager  
On Loan to Atomic Industrial Forum

1/59 to 9/74

U.S. Army Engineer Power Group  
Ft. Belvoir, VA 22060  
Senior Instructor Academic Training Department  
RPM Nuclear Power Barge Sturgis  
Senior Instructor Health Physics Training Section  
Senior Health Physicist PM-2A dismantling project  
Instructor Health Physics Training Section.  
RPM PM-2A PWR plant  
Health Physics Technician SL-1 PWR plant.

9/74 to 1/59

Various electronic technician jobs in the army.