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DEFENSE LOGISTICS AGENCY  
DEFENSE NATIONAL STOCKPILE CENTER  
1745 JEFFERSON DAVIS HIGHWAY  
ARLINGTON, VIRGINIA 22202



25 JAN 1994

IN REPLY  
REFER TO DNSC-O

SUBJECT: Defense Logistics Agency (DLA) Response to the Nuclear  
Regulatory Commission (NRC) Comments for Curtis Bay  
Depot Remediation Plan

Mr. Dominick A. Orlando, Project Manager  
Decommissioning and Regulatory Issues Branch  
Division of Low-Level Waste Management  
and Decommissioning  
Mail Stop 5E4  
11555 Rockville Pike  
Rockville, MD 20852

Dear Mr. Orlando:

This letter is submitted in response to your letter of 7 Dec 93, concerning the Nuclear Regulatory Commission's (NRC) comments of the Remediation Plan for the Anne Arundel County property adjacent to the Defense National Stockpile Center (DNSC) Curtis Bay Depot, Curtis Bay, Maryland. As required, I am providing the DLA's response to the NRC Staff comments on the DLA's D&D plan for the Anne Arundel County Property in Curtis Bay, MD.

The primary concern your staff expressed, the "lack of sufficient detail", has been addressed in part by providing a copy of all standard operating procedures referenced in the D&D plan. The decision to furnish the references vice incorporating the relevant portions in the plan were based on the desire to minimize the revision effort and associated costs, and to prevent the necessity of revising the plan wherever the applicable references change. Further details which you have requested regarding specifics of the remedial work, safety and health, radiation protection, and survey programs to be implemented on the project will be provided in the site specific work plans to be developed prior to proceeding with remediation work. The D&D plan is intended to be an overall guidance document and was prepared in accordance with NRC Regulatory Guide 3.65. The site-specific work plans will be prepared by DLA's remediation contractor and submitted to NRC for review and concurrence prior to proceeding with remediation of the site.

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The other major area of NRC's concern was the 10 CFR 20 revisions which became effective January 1, 1994, are not reflected in the plan. The plan was prepared in 1993 and included 10 CFR 20 requirements that were in effect at the time. The D&D plan will be modified as required to incorporate the new 10 CFR 20 revisions.

If you have any questions concerning this letter or the attached response, do not hesitate to contact me.

Sincerely,



F. KEVIN REILLY  
Environmental Protection  
Specialist

Enclosures

Response to NRC Staff comments on the Defense Logistics Agency's D&D plan for the Anne Arundel County Property in Curtis Bay, MD

1. Site specific procedures will be approved prior to implementation using Reference NRS-AD-015, "Document Review Procedure". (copy provided)
2. This will be answered after meeting with the contractors to determine their intentions on fencing. Coordination will be required to ensure that adequate fencing is established or maintained and that work to be accomplished will progress such that compliance to the D&D plan is assured.
3. The description of the maintenance of the RCA is contained in Reference ENWD-RP-001, "Radiological Control Procedure for Field Projects". (copy provided)
4. Change paragraph to read: Due to the physical condition of the existing buildings, the characterization survey can not be accomplished on the interior of the walls and roof of each building. To facilitate the characterization survey, a demolition subcontractor will remove the roof and walls to expose the interior surfaces, allowing access to complete the characterization survey. After the characterization survey is complete, the walls and roof will be designated either affected or unaffected and the appropriate remediation or termination survey will be conducted.  
  
A qualified asbestos abatement subcontractor will remove all materials which contain asbestos from the building which might cause an unacceptable spread of asbestos fibers. The activities of the asbestos and demolition subcontractor will be monitored by RUST health physics personnel. All asbestos abatement activities will be conducted in compliance with State of Maryland COMAR 26.11.21 "Control of Asbestos".
5. NRC approval of the characterization survey results prior to beginning remediation activities will be sought.
6. Change paragraph to read: All packaged radioactive waste remaining on site will be disposed of in accordance with reference. 2.5, and transported to an approved disposal facility. When the NRC is satisfied that the entire site has been adequately remediated, RUST personnel and equipment remaining on the site will be demobilized.
7. Refer to Item #1
8. Site specific plans will be prepared according to Reference ENWD-RP-001, "Radiological Control Procedure for Field Project". The Final Survey plan, Site Specific Work plan and the Site Safety and Health plan (SSHP) will be submitted to the NRC for approval prior the any remediation activities being conducted on site.
9. Exact Personnel not determined at this point, Qualification of personnel performing

management and over site functions will be provided.

10. The Project Manager is responsible for all safety and health on site. The Division Health Physicist, Division Industrial Hygienist provide over-site to the RCS. The RCS is qualified by the DHP/DIH. The RCS report directly to the Project Manager with additional reports to the DHP/DIH.
11. Change paragraph to read: All pertinent training records, certification of training and qualification certificates will be kept in the project files by the RCS/SSHS.
12. NSC is not scheduled to perform the asbestos abatement, Anne Arundal County will provide the contractor to perform this function.
13. The method for preparing the Site Safety and Health plan are contained in ENWD-SF-013, "Site Safety and Health Plan Procedure", and NRS-AD-001, "Document Preparation Procedure". (copy provided)
14. Change paragraph to include Reference 2.18, 10 CFR 19 and Reference 2.19, 10 CFR 20.
15. Review procedures for the SSHP are contained in Reference NRS-AD-015, "Document Review Procedure". (copy provided)
16. The rationale and potential exposure estimates will be included in the SSHP. This section of the D&D plan simply states what will be covered in the SSHP
17. Section 4.3 will be revised to list all applicable documents and copies will be provided for review.
18. Item 8.g will be deleted, RUST does not intend to use any commercial laundry facility.
19. Reference NRS-AD-006 "RUST Remedial Services - Nuclear Remedial Services ALARA procedure" (copy provided) details the review procedure to be accomplished by the ALARA Committee. The procedure is to ensure that "AT LEAST" one member of the committee reviews every ALARA procedure.
20. Refer to item 17.
21. ENWD-RP-001 has been revised to reflect the requirements of the new 10 CFR 20.1001 - 20.2401. The D&D plan will be updated.
22. RWP's are reviewed in accordance with NRS-RP-012, which ensures all appropriate RUST personnel are informed and understand the RWP prior to it being used. All RWP's are reviewed by all individuals prior to the start of work. This is accomplished at the "Daily" Safety Meeting. (copy provided).

23. Refer to item 22. The RCS is the responsible individual that will present the requirements of the RWP.
24. NRS-RP-012, "Radiation Work Permits Application and Use" states the RWP may be terminated weekly as specified by the RSO/RCS or equivalent and shall be terminated in accordance with NRS-AD-007, "Nuclear Remedial Services Health Physics Policy Manual".
25. Reference NRS-RP 007, "Access Control Point" (copy provided) states RWP's will be located close to the "entry point" and a copy maintained by the RCS in his/her files.
26. Areas outside the radiation controlled area will be surveyed for contamination on a daily basis.
27. Reference NRS-RP-003, "Absolute filter testing of air filtration systems", cover HEPA ventilation systems. However, HEPA ventilation systems is not expected to be used.
28. Reference RA-OP-001, "Operating Procedure for Brokering of Radioactive Materials". (copy provided)
29. This information is contained in the Site Specific Radiation Protection plan which is an appendix to the SSHP.
30. Refer to item 29
31. Reference NRS-RP-011, "Airborne Radioactive Particulate Monitoring". (copy provided)
32. Reference ENWD-RP-002, " Portable instrument procedure for field projects". (copy provided)
33. Refer to item 32
34. Refer to item 32
35. Reference ENWD-RP-001, "Radiological Control Procedure for Field Projects", has been revised to reflect the new 10 CFR 20 terminology from MPC to DAC.
36. The periodicity will be determined by the RCS in conjunction with DHP and Radiological Engineers assessment of air sampling data.
37. Change item to read: (2) in radiologically controlled areas when remediation work is performed,

38. item will be deleted, it is the same as item 2
39. The requirements outlined in #6 will not be in effect when the walls and roofs are removed.
40. Refer to item 35
41. RUST does not intend to use any commercial laundry facility.
42. Reference RA-OP-001, "Operating Procedure for Brokering of Radioactive Materials", (copy provided) details the packaging, labeling, manifesting and transportation of radioactive waste. A paragraph will be added covering mixed waste and referencing 40 CFR 261 and 10 CFR 61.
43. Interior walls will be designated "Affected" until completion of Characterization Survey. Refer to item #4 for details on roof and wall removal in conjunction with the Characterization Survey.
44. Change item to read: (3) provide a convenient means for determining activity levels per 100cm<sup>2</sup> does not exceed unrestricted release guideline criteria.
45. Due to the varying probe faces that are utilized by RUST, we often use DPM/probe out of convenience and at a later time average the activity per probe detector.
46. Text will be changed to indicate 4 points per survey block will be surveyed.
47. A survey unit is a survey block.
48. Alpha and beta/gamma radiation will be detected in all cases.
49. Change statement to indicate that smear sample will be collected from the location within the survey block which exhibits maximum surface (alpha and/or beta-gamma) activity.
50. Reference NRS-AD-027, "Chain of Custody Procedure". (copy provided)
51. Soil samples will be taken 1 foot beyond contamination levels in excess of 10 pCi/g.
52. Change section 7.4.5 to section 7.4
53. The method for evaluating soil samples will be in accordance with NUREG 5849, in conjunction with Gamma Spectroscopy trained personnel.
54. Include fixed activity to 8.0 A.1
55. Include addition to 8.0 B.1 to incorporate biased sampling to be performed to

demonstrate that the soil concentration averaged over the contaminated area is less than 10 pCi/g.

56. Add "However, final surveys will be performed for the area in which the building was razed.
57. A perimeter fence will be maintained locked after working hours.
58. The annual radiation dose received by a member of the critical population group from the residual radioactive material - predicted by realistic but reasonably conservative analysis and averaged over a time interval of 50 years - should not exceed the basic dose limit of 100 mrem/year. The estimated worker radiation dose from the remediation activity should not exceed 100 mrem/year.
59. Unknown, original cost estimates included RUST subcontractors for asbestos and demolition work. It appears that AAC will perform both the asbestos abatement and demolition with county contractors
60. Standard construction/demolition techniques will be utilized during the deconstruction phase.
61. RUST will remediate any areas found to be above the unrestricted release limits.