



DEPARTMENT OF THE ARMY

U.S. ARMY LABORATORY COMMAND
MATERIALS TECHNOLOGY LABORATORY
WATERTOWN, MASSACHUSETTS 02172-0001



REPLY TO
ATTENTION OF

23 June 1992

Base Realignment and Closure Office

Docket No. 50-47

Mr. Alexander Adams
Non-Power Reactors, Decommissioning
and Environmental Project Directorate
Division of Reactor Projects
Office of Nuclear Reactor Regulation
OWPN MS: 11B20
Washington, D.C. 20555

Dear Mr. Adams:

We have encountered two issues in implementing the Decommissioning Order that are best resolved by improving our Decommissioning Plan. One issue has to do with the type of protective clothing to be worn by the workers and the other deals with the sequence in which major tasks are performed. Each issue is outlined below and we request permission to pursue these changes.

Section 2.1.5.1 of the Decommissioning Plan specifies the use of disposable protective clothing. The specification was made with the intent of communicating that we would not be generating liquid radioactive waste through an on-site laundry facility. In order to improve worker comfort during the summer months and, at the same time, reduce the volume of solid radioactive waste generated during the decommissioning, we would prefer to use launderable protective clothing provided by an off-site contractor. The contractor would be appropriately licensed and all transportation would be in accordance with governing Nuclear Regulatory and Department of Transportation regulations as well as state and local regulations.

Section 3.3.1 of the Decommissioning Plan specifies that the cistern will be removed as one of the first activities performed under the Decommissioning Order. The intent was to communicate that immediate subsurface conditions beneath the cistern would be compiled and applied to the remaining excavation work. Removal of the cistern requires excavating more than ten feet out on all sides of the structure. The ten feet limit comes close to the double door access in the south wall, which is the primary access for equipment and material. We would prefer to remove the cistern at a later stage during the decommissioning effort. Subsurface information will still be gathered early, as part of installing protective sheet piling around the cistern. In order to ensure the absence of bedrock and rock in the vicinity of the sheet piling, auger holes will be drilled from which soil will be isotopically analyzed to determine if

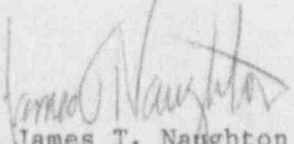
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gross contamination is present. Additionally, monitoring wells have been installed downgradient of the cistern and no groundwater contamination has been detected.

For further information on this request, contact Laura Rodman in the Base Realignment and Closure Office at 617-923-5320 or Peter Cornetta in the Risk Management Office at 617-923-5225.

Sincerely,


James T. Naughton
MAJ, OD
Deputy Director and
Commander

CC:
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