

From: [Cahill, Christopher](#)
To: [Wardrobe, Leonardo](#)
Cc: [Reichard, Michael](#)
Subject: FW: FW: NRC semi-annual wipe testing
Date: Monday, April 13, 2020 8:24:29 AM

Leo,

Can you take this? There is a high priority to get these done. This should be similar to what Mike did for UCONN. He can provide background support if needed.

CHris

-----Original Message-----

From: Trapp, James <James.Trapp@nrc.gov>
Sent: Monday, April 13, 2020 8:16 AM
To: Cahill, Christopher <Christopher.Cahill@nrc.gov>
Subject: FW: FW: NRC semi-annual wipe testing

-----Original Message-----

From: Trapp, James
Sent: Thursday, April 09, 2020 11:27 AM
To: Smith, Gary P CIV USARMY NGIC (USA) <gary.p.smith68.civ@mail.mil>
Cc: Cahill, Christopher <Christopher.Cahill@nrc.gov>; DeFrancisco, Anne <Anne.DeFrancisco@nrc.gov>; Nick, Joseph <Joseph.Nick@nrc.gov>
Subject: RE: FW: NRC semi-annual wipe testing

Gary - thank you for your request. I will provide your request to a member of my staff for resolution - you will be hearing from us soon.

Thank you for your service.

-----Original Message-----

From: Smith, Gary P CIV USARMY NGIC (USA) <gary.p.smith68.civ@mail.mil>
Sent: Thursday, April 09, 2020 11:06 AM
To: Trapp, James <James.Trapp@nrc.gov>
Cc: Mikulski, Timothy H CIV USARMY HQDA ASO (USA) <timothy.h.mikulski.civ@mail.mil>
Subject: [External_Sender] FW: NRC semi-annual wipe testing
Importance: High

Good Morning Mr. Trapp,

My name is Gary Smith and I am the Safety Specialist for the National Ground Intelligence Center Foreign Materials Branch in Aberdeen Proving Ground, MD.

I am looking for guidance on a waiver for wipe testing of my radioactive commodities. I do not have my license number on hand but I maintain a small number of foreign commodities under the US Army's control.

As you can see in my communications with Tim Mikulski below, I am trying to ascertain if a waiver is possible for wipe testing of my commodities. The following facts come into consideration.

- All commodities remain under strict security controls to include access control of the building
- Alarms are monitored by the Military Police at APG at all times

- Storage room is contained behind 3 separate alarm protected doors and then 2 locked doors
- All previous wipe testing of the commodities for the past 12 plus years have come back negative

I am not sure when I will return to work to complete the wipe testing but the previous was completed in October 2019 with negative results.

Please advise as to the appropriate actions needed to ensure my next inspection is not failed due to non-testing as required by my license.

Thanks you for your time and consideration,

Regards,

Gary

Gary P. Smith
NGIC/FMOB Safety
570-677-4178

From: Mikulski, Timothy H CIV USARMY HQDA ASO (USA)
Sent: Thursday, April 09, 2020 10:28 AM
To: Smith, Gary P CIV USARMY NGIC (USA)
Subject: RE: NRC semi-annual wipe testing

Gary,

Good point, I didn't plan on doing a blanket DA request for a waiver.

My thought was for you to possibly reaching out to the Region I-originated materials licenses, Mr. James Trapp, RI/Division of Nuclear Materials Safety (DNMS), James.Trapp@nrc.gov. To let him know, as you have stated, all of the radioactive material remains under proper control, just the request to waive the current requirement from completing the wipe testing.

We don't require anything at our level, just want to ensure the NRC understands your situation and will provide you relief from having to perform the wipe test, and not cause any problems, when an inspection occurs and the wipe tests were not complete.

Thanks,

Tim

Tim Mikulski, CHP
Office of the Director of Army Safety
Army Radiation Safety Officer
Phone (703) 697-1321
DSN 227-1321
Cell (703) 623-0155
NIPR: timothy.h.mikulski.civ@mail.mil
SIPR: timothy.h.mikulski.civ@mail.smil.mil

-----Original Message-----

From: Smith, Gary P CIV USARMY NGIC (USA) <gary.p.smith68.civ@mail.mil>
Sent: Thursday, April 9, 2020 10:08 AM

To: Mikulski, Timothy H CIV USARMY HQDA ASO (USA) <timothy.h.mikulski.civ@mail.mil>
Subject: RE: NRC semi-annual wipe testing

Tim,

Thanks for the information, just to clarify...

Can you tell me if you are requesting a blanket waiver for all Army licenses?

My inventory remains under complete control. Nothing regarding the security of the commodities has changed. The same security protocols exist and all alarms/intrusion detection remains in place.

Do you need an official letter from me/NGIC/FMOB requesting a waiver? The only issue I have is the license remains at work. I do not have the information on the license at home where I am working from. Work is 3 hours from here. - To clarify... we have a apartment in APG and our permanent home is in Northeastern PA.

Please advise.

Thanks

Gary

Gary P. Smith
NGIC/FMOB Safety
570-677-4178

From: Mikulski, Timothy H CIV USARMY HQDA ASO (USA)
Sent: Thursday, April 09, 2020 9:58 AM
To: Smith, Gary P CIV USARMY NGIC (USA)
Subject: RE: NRC semi-annual wipe testing

Gary,

We're all well and adjusting to the change, but health and happy. Hope you and all of your family are safe and health during this time.

I received the following NRC guidance from Steve Acker, ATEC ATC. Also attached is RIS 2010-04 for completeness.

From my read, each NRC licensees need to request a waiver from the NRC. Please review. You may need to request a waiver, via email because the NRC too is teleworking, but believe, because of the circumstances will provide you relief from sampling until a time when it feasible.

Please let me know your thoughts and please keep in touch.

Thanks,

Tim

Tim Mikulski, CHP
Office of the Director of Army Safety
Army Radiation Safety Officer
Phone (703) 697-1321
DSN 227-1321
Cell (703) 623-0155
NIPR: timothy.h.mikulski.civ@mail.mil

SIPR: timothy.h.mikulski.civ@mail.smil.mil

-----Original Message-----

From: Smith, Gary P CIV USARMY NGIC (USA) <gary.p.smith68.civ@mail.mil>

Sent: Thursday, April 9, 2020 9:17 AM

To: Mikulski, Timothy H CIV USARMY HQDA ASO (USA) <timothy.h.mikulski.civ@mail.mil>

Subject: NRC semi-annual wipe testing

Tim,

Hope this email finds you and your family well and clear of COVID-19!

I have a question regarding the semi-annual wipe testing of my radioactive commodities. Do you know if the NRC is waiving this testing period? My testing was due in March so I'm late already. Work is only being accomplished on an as needed/mission essential basis currently so I haven't been to work since 13 March.

From my understanding, we have tested every six months since 2012 (my records) without any finding or leakage.

Please advise.

Take care, stay safe,

Gary

Gary P. Smith
NGIC/FMOB Safety
570-677-4178