

JUN 9 1987

License: 42-23539-01AF
Docket: 030-28641

Department of the Air Force
USAF Radioisotope Committee
HQ AFOMS/SGPR
Brooks AFB, Texas 78235-5000

Gentlemen:

Thank you for your letter dated June 1, 1987, describing corrective actions implemented in response to violations identified in our Notice of Violation dated May 5, 1987. We have no questions at this time and will review your corrective actions during a future inspection.

We interpret your statements in Item 2 of your response as a request to reduce the assigned severity level for the first violation in the Notice of Violation. We evaluated this violation at Severity Level IV because there was no breach of package integrity. Had there been such a breach, this violation would have been evaluated at Severity Level III. Therefore, no change in severity level assignment is warranted.

Sincerely,

Original Signed By:
WILLIAM L. FISHER

William L. Fisher, Chief
Nuclear Materials and Emergency
Preparedness Branch

bcc w/ltr dtd 6/1/87 from licensee:
DMB (ML-41)
D. D. Martin
R. L. Bangart
W. L. Fisher
C. L. Cain
NMSS
RIV File
RSTS
D. A. Powers

C:NMLS:K
CLCain;ap
6/4/86

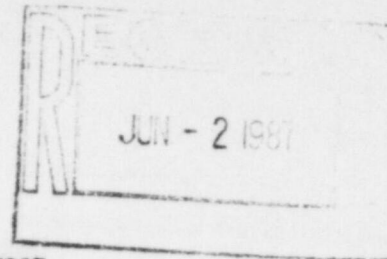
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WLFisher
6/8/86

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42-23539-01AF PDR

ML-41
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DEPARTMENT OF THE AIR FORCE
HEADQUARTERS UNITED STATES AIR FORCE
BOLLING AFB DC 20332-6188



0 1 JUN 1987

REPLY TO AFOMS: SGPR
ATTN OF BROOKSAFB TEXAS 78235-5000

SUBJECT Notice of Violation - 5 May 1987, License No. 42-23539-01AFP,
Docket No. 030-28641

TO Nuclear Regulatory Commission
Region IV
Radiological and Safeguards
Programs Branch
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

1. The following is submitted in response to subject notice of violation and confirms statements and representations made by Air Force representatives during the 14 April 87 conference with your representatives at Arlington, Texas.

2. No exception is taken to the findings of violation. The significance of the report of an improperly sealed container from Billy Mitchell Field should be mitigated by the reported double packaging of the compasses. It is highly unlikely that the compasses could have been lost from the outer container during conditions normally incident to transportation (reference para 1c of 3 Apr 87 letter from HQ Air Force Reserve at attachment 1).

3. In both cases, the cause for the violation was failure by base personnel to follow shipping instructions provided by the San Antonio Air Logistics Center (SA-ALC), Directorate of Material Management, office responsible for coordinating waste disposal shipments for the Air Force. This failure appears in both cases to have occurred as a result of inadequate coordination by the base generating organization (supply) and the packaging and shipping organization (transportation) (reference HQ Air Force Reserve and HQ Air Training Command correspondence at attachments 1 and 2).

4. Corrective actions have been taken specific to the bases involved. These consisted of suspending any further shipments of waste radioactive materials by the bases to waste disposal sites except by qualified representatives of SA-ALC or a contract waste broker (reference SA-ALC/MMIR and MMI letters at atch 3 and 4).

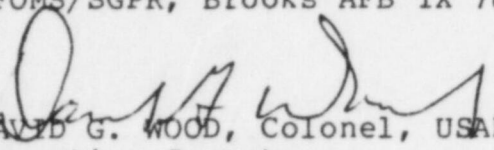
5. In addition to actions specific to the involved bases, initiatives have been taken Air Force wide. One of these was sponsorship of additional training in radioactive waste disposal for Air Force supply and transportation personnel by SA-ALC.

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JLPP

Several dates for the training have been established in July and August 1987 (reference messages at attachments 5 and 8). The USAF Radioisotope Committee (RIC) reviewed the incidents and directed that, as a near term solution, no radioactive waste shipments would be made by bases to commercial low level waste burial sites unless brokered on-site by a qualified representative of the SA-ALC Directorate of Material Management or authorized contract radioactive waste broker. This action was implemented by an all major commands (ALMAJCOM) message on 7 April 1987. The RIC has also directed that revisions be made to Air Force directives governing disposal of radioactive wastes--specifically, Air Force Technical Order 00-110N-2, Radioactive Waste Disposal--to more explicitly identify generator, supply, and transportation responsibilities in waste disposal actions and establish a more auditable trail of handling for quality control by a designated individual such as the base or permit radiation safety officer (RSO). Once this has been accomplished, a review of training requirements will be made to ensure that individuals identified as responsible for quality control will have adequate training for that task. An initial target date for establishing the long-term solution is within six months. Depending on the outcome of the training requirements review, this may have to be extended, or the revised procedures implemented incrementally as base personnel become trained. Instructions have also been sent to transportation officers to frustrate any shipments addressed to commercial waste sites. (reference HQ USAF/LEYS/LETT/SGPR message at attachment 9, excerpt from minutes of 11 March 1987 RIC meeting at attachment 10, and HQ USAF/LETT 87 messages at attachments 11 and 12)

6. As you are aware, subsequent to the violations noted, we have identified problems with additional shipments of condemned commodities being sent to the SA-ALC for disposal. Our initial investigations show similar coordination problems between supply and transportation organizations with these "waste" shipments. A separate written report specific to the bases involved has been provided. We will, however, address these latter incidents in context with our ongoing actions responsive to this notice of violation.

7. We trust that this response adequately addresses your concerns. If there are any questions, please do not hesitate to contact me by phone (Commercial [512] 536-3331) or by letter (HQ AFOMS/SGPR, Brooks AFB TX 78235-5000).


DAVID G. WOOD, Colonel, USAF, BSC
Executive Secretary,
USAF Radicisotope Committee
Office of the Surgeon General

- 11 Atch
1. HQ AFRES/SGPB ltr 3 Apr 87
 2. HQ ATC/SGPB ltr 6 Apr 87
 3. SA-ALC/MMIR ltr undated
 4. SA-ALC/MMI ltr 19 Feb 87
 5. SA-ALC/MMI msg 20 Feb 87
 6. SA-ALC/MMIROB msg
13 May 87
 7. SA-ALC/MMIRO msg 15 May 87
 8. SA-ALC/MMIR msg 15 May 87
 9. HQ USAF/LEYS/LETT/SGPR msg
7 Apr 87
 10. Excerpt from RIC meeting
11 Mar 87
 11. HQ USAF/LETT msg 22 May 87
 12. HQ USAF/LETT msg 28 May 87



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR FORCE RESERVE
ROBINS AIR FORCE BASE, GEORGIA 31098-6001

3 APR 1987

REPLY TO
ATTN OF SGPB

SUBJECT Radioactive Material Disposal Incident - 440 TAW Gen Billy Mitchell Field, WI

TO HQ AFOMS/SGPR

1. Reference your telephone inquiry of 2 April 1987 and message P021600Z Apr 87, subject: Nuclear Regulatory Commission (NRC) Enforcement Conference, I again contacted the 440 TAW Base Commander, Occupational Health Nurse and Transportation Squadron supervisor to determine the status of the December 1986 lensatic compass disposal problem with Chem-Nuclear at Barnwell, SC, and any follow-on action or investigation that may have occurred since that time. The following facts were determined:

A. A 440 TAW Supply representative made contact with the lensatic compass item manager at Kelly AFB IAW T.O. 110N series requirements, and received a package of forms and shipping instructions.

B. When the lensatic compasses were delivered to the 440 TAW Transportation representative, there was no one present to receive the items/oral briefing on instructions obtained from the Kelly AFB item manager. The lensatic compasses and paperwork were left for disposition upon return of the Transportation representative.

C. The Transportation representative did not recognize the importance of the paperwork and the relationship between the Air Force, Chem-Nuclear Inc., and the Nuclear Regulatory Commission (NRC). He researched the requirements for shipping lensatic compasses in transportation regulations and came to the conclusion that the compasses were exempted from radioactive material shipping requirements by 49CFR 173.422. As a precaution to protect the compasses, he double packed the items before completing what he considered a routine shipment.

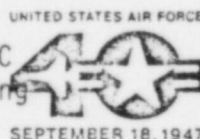
2. It appears clear that a break-down of communications between the Supply and Transportation representatives resulted in this incident with Chem-Nuclear Inc. and the NRC. The 440 TAW Radiation Protection Officer was not contacted for advice or consultation, and consequently had no chance to prevent the resulting problems.

3. The Base Commander has personally counselled the involved parties and expressly forbidden the future shipment of any radioactive materials from Gen Billy Mitchell Field. Any new disposal requirements will be handled by a host-tenant-support SAC installation with experience in this area.

FOR THE COMMANDER

Victor E. Hiatt

VICTOR E. HIATT, Lt Col, USAF, BSC
Chief, Bioenvironmental Engineering
Office of the Command Surgeon



atch 1



DEPARTMENT OF THE AIR FORCE

HEADQUARTERS AIR TRAINING COMMAND (ATC)
RANDOLPH AIR FORCE BASE TX 78150-5001

REPLY TO
ATTN OF SGPB

06 APR 1987

SUBJECT Nuclear Regulatory Commission (NRC) Enforcement Conference (HQ AFOMS/SGPR Msg 021600Z Apr 87)

TO HQ AFOMS/SGPR

1. The attached letter from HQ ATC/LGTT provides the information you requested. The specific questions answered are based on a telephone conversation from Lt Col David Wood, HQ AFOMS/SGPR, to Maj Denton Crotchett, HQ ATC/SGPB, on 2 April 1987.

2. If you need additional information please contact CMSgt Detwiler or Mr Schones, HQ ATC/LGTT, AV 487-3463/4776.

DENTON R. CROTCHETT, Major, USAF, BSC
Staff Bioenvironmental Engineer

1 Atch
HQ ATC/LGTT Ltr, 6 Apr 87

cc: HQ ATC/LGTT w/o Atch



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR TRAINING COMMAND
RANDOLPH AIR FORCE BASE, TX 78150

6 APR 1987

REPLY TO
ATTN OF LGTT

SUBJECT Improper Shipment of Radiological Waste from Columbus AFB (Your Ltr, 2 Apr 87)

TO
HQ ATC/SGPB

1. In response to your letter, the following reply is submitted to questions posed in para 2.

a. QUESTION: What was done at base and/or HQ ATC to identify causes for the shipping error?

ANSWER: Lack of coordination between supply and transportation. And lack of identification of waste on shipping documents. See Atch 1.

b. QUESTION: What was done at base and/or HQ ATC to correct the errors?

ANSWER: (1) Columbus AFB was barred from further shipping.

(2) HQ ATC/LGTT sent message to all command bases advising of the problem (Atch 2).

(3) HQ ATC/LGS/LGT furnished instructions to all command bases on procedures to follow when radioactive waste is being shipped (Atch 3).

(4) HQ ATC/LGTT briefed all Chiefs of Transportation on the importance of strict compliance with instructions furnished by SA-ALC/MMI on 24 Mar 87 (Atch 4).

(5) HQ ATC/CC informed of situation 13 Feb 87 (Atch 5).

(6) Requested all command bases submit nominees to attend a one week training course offered through SA-ALC/MMI (Atch 6). Response to the training has been very good.

c. QUESTION: Since the SA-ALC sent specific shipping instructions/guidance to the base on the material:

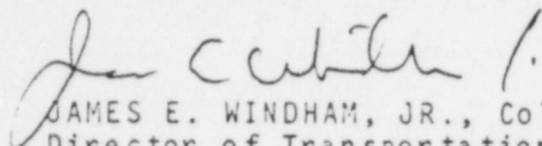
(1) Did other procedural guidance prevent the base from following the instructions?

ANSWER: Procedural guidance did not prevent the base from following the instructions. On the contrary, procedural guidance should be enhanced to clearly document RADIOACTIVE WASTE on the documentation. Further, there is clearly a lack of education and a lack of experience in dealing with shipments of waste.

atcl 2 apr 87

or: (2) Did the base not follow the instructions? Who was accountable, and was appropriate disciplinary action taken? (Names are not required, but was an individual identified?)

ANSWER: Transportation personnel were prepared to follow the instructions furnished by SA-ALC/MMI. However, during the transfer of the property from supply to transportation the identity of the waste was lost. No particular person was identified and no disciplinary action was deemed appropriate.



JAMES E. WINDHAM, JR., Colonel, USAF
Director of Transportation
DCS/Logistics

6 Atch

1. Memo for Record,
4 Feb 87 (Columbus AFB
TMO)
2. HQ ATC/LGT Msg,
052045Z Feb 87
3. HQ ATC/LGS/LGT Msg,
091400Z Mar 87
4. HQ ATC/LGTT Talking
Paper, 10 Mar 87
5. Staff Summary Sheet
(Copy), 13 Feb 87
6. HQ ATC/LGT Msg,
031545Z Mar 87

cc: ATC/LG

Memo for Record

4 Feb 87

SUBJ: Shipment of Radioactive Waste

- Instructions for the shipment (radiac sets) received from SA-ALC/MMIROB, Kelly AFB, TX O/A 28 Jan 87.
- Information as to consignee was furnished to Base Supply by Mr. Smith as follows:
 - Chem-Nuclear Systems, Inc.
 - DOD Consolidation Facility
 - PO Box 828, #2 Osborn Road
 - Snelling, SC 29812
- Shipment control number: AF-87-16.
- All information was furnished to Base Supply as required.
- Mr. McGee was informed that there were special procedures for the movement of radioactive waste, and Mr. Smith had all the instructions. Mr. McGee was instructed to see Mr. Smith when the items were received for shipment.
- Supply ran the documents and pulled and inspected the property on 29 Jan 87.
- Items were brought to Packing and Crating on 30 Jan and packaged, labeled and shipped without documentation as required by instructions from SA-ALC/MMIROB.
- Items were brought to Mr. Hunt, LGTTW and he was not told that they were to be shipped as radioactive waste.
- Mr. Smith received a phone call from Capt Jordan 4 Feb, 1130 hours advising shipment was at Chem Nuclear Systems in a frustrated status (they refused to accept shipment).
- Mr. Smith told Capt Jordan he would check into the matter and call him back.
- At 1405 4 Feb 86, Mr. Smith called Capt Jordan (Mr. Ferguson was on phone) and Capt Jordan advised that the big problem is this same type of situation has occurred 3 times within the past 1½ months by different installations. Capt Jordan advised:
 - Columbus AFB will be barred from further shipments of radioactive waste. Message will come from Division level to LGT, with possibly an info copy to the Base Commander.
 - If we have any more shipments of this type, Capt Jordan or one of his personnel will have to come and oversee the operation.
 - Someone from this base must attend a week long course on shipment of radioactive material. The course will be at Chem Nuclear Systems and paid for by AFLC Kelly AFB. Transportation and per diem will have to be base funded.
 - Two other installations have had this same problem and are now barred from shipping radioactive waste. They are Chanute AFB and Billy Mitchell Field.

atcl² app II
ATCh 7

- Capt Jordan stated it was really nobody's fault and just a misunderstanding that has happened to others.

- Unfortunate there have been so many instances of this type in such a short period of time with different bases.

- A message will be sent out to all installations concerning these types of shipments.

- We may take some heat from the states involved.

- At 1510 hours 4 Feb 87, Mr. Schones, Hq ATC called Cpt Crihfield to say their office was aware of the situation and we could expect a letter from Hq ATC; also a letter to the Wing Commander.

cc: HQ SA-ALC w/atch/MMIROB
Ltr Dtd 23 Jan 87 w/atch

14

MSG HSC926

PRIORITY

DATE: 036

TIME: 2320

III
add² app
ATCH 2

HQ ATC RANDOLPH AFB TX

OPR: DA- 2

DAA- 2

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12FTW RANDOLPH AFB TX

OPR: ~~WUC-1~~

LG-5
LGT4
CC

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ZNR UUUUU

P 052045Z FEB 87

FM HQ ATC RANDOLPH AFB TX//LGT//

TO AIG 619//LGT//

AIG 619

AIG 8110//LGT//

AIG 8110

INFO BUWAAA/SA-ALC KELLY AFB TX//MMIROB//

BT

UNCLAS

SUBJ: RADIOACTIVE WASTE DISPOSAL

1. IN THE PAST TWO MONTHS THERE HAVE BEEN TWO INCIDENTS INVOLVING IMPROPER SHIPMENTS OF RADIOACTIVE WASTE FROM ATC BASES TO A BURIAL LOCATION IN SOUTH CAROLINA. A CURSORY INVESTIGATION OF THESE SERIOUS INCIDENTS INDICATES A LACK OF PROPER CONTROLS AND PROCEDURES.
2. UNTIL SUCH TIME THAT A PERMANENT SOLUTION TO THE SITUATION IS SENT TO THE FIELD, EACH TMO MUST REPEAT MUST GET PERSONALLY INVOLVED IN ALL SHIPMENTS CONSIGNED TO CHLM-NUCLEAR SYSTEMS INC., CONSOLIDATION FACILITY, 12 OSBORN ROAD, SNELLING, SOUTH CAROLINA, 29812.
3. PROCEDURES FOR REQUESTING SHIPPING INSTRUCTIONS ARE CONTAINED IN T.O. 00-110N-2, RADIOACTIVE WASTE DISPOSAL, 15 AUG 86. AS A MINIMUM THE TMO OFFICER/TRAFFIC MANAGER WILL PERSONALLY REVIEW THE PACKING, MARKING, SHIPPING AND NOTIFICATION REQUIREMENTS TO ENSURE THAT THE

PAGE 2 RHWRT4249 UNCLAS

INSTRUCTIONS FURNISHED BY SA-ALC/MMIROB HAVE BEEN FOLLOWED PRECISELY AS WRITTEN, PRIOR TO RELEASE OF THE SHIPMENT TO ANY CARRIER FOR TRANSPORTATION.

4. HQ ATC/LGTI WILL BE AN ADDRESSEE IN ANY CORRESPONDENCE CONCERNING RADIOACTIVE WASTE DISPOSAL, INCLUDING REQUESTS FOR SHIPPING

PRIORITY

PAGE 1

PRIORITY

PAGE 2

MLN 10261

INSTRUCTIONS.

5. YOUR PERSONNEL MUST UNDERSTAND THAT REGULATIONS, REQUIREMENTS, AND PROCEDURES FOR SHIPPING RADIOACTIVE MATERIAL AS WASTE ARE MUCH MORE RESTRICTIVE THAN SHIPPING IT FROM ONE BASE TO ANOTHER AS A SERVICEABLE ITEM. DIFFERENT RULES APPLY. ENSURE THAT ALL PACKING AND CRATING AND FREIGHT PERSONNEL KNOW THE DIFFERENCE.

6. POC IS MR ROBERT SCHONES, HQ ATC/LGTT OR CMSGT DETWILER, HQ ATC/LGTT, AV 487-3463/4776.

BT

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NNNN

PRIORITY

PAGE 2

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DL 091400Z Mar 87 RR

UUUU

LGSP270915

H2 ATC RANDOLPH AFB TX//LGS/LGT//

AIG 8110//LGS/LGT//

XMT H2 ATC RANDOLPH AFB TX

UNCLAS

SUBJ: SHIPMENTS OF RADIOACTIVE ASSETS

REFS: A. AFM 67-1, VOL II, PART TWO, CHAPTER 13, PARA 50-2

D. TO DD-110H-2, 15 AUG 86

1. SHIPMENTS OF RADIOACTIVE MATERIALS/RADIOACTIVE WASTE WILL REQUIRE JOINT ACTION BY SUPPLY AND TRANSPORTATION.

A. SUPPLY INSPECTION WILL OBTAIN AS MUCH OF THE INFORMATION {USER'S KNOWLEDGE} NECESSARY FOR SHIPMENTS {TRANSFERS} OF RADIOACTIVE WASTE.

B. SUPPLY WILL ENSURE DD FORM 1348-1 WILL LIST THE CERTIFICATION DESCRIBED IN PARAGRAPH 50.2A OF REF A ABOVE.

C. RADIOACTIVE WASTE MUST BE DISPOSED IN ACCORDANCE WITH TO DD-110H-2. TRANSPORTATION IS RESPONSIBLE FOR CONTACTING SA-ALC FOR SHIPPING INSTRUCTIONS. SUPPLY WILL ASSIST TRANSPORTATION IN COMPLIANCE WITH SHIPPING INSTRUCTIONS.

D. SUPPLY WILL TRANSFER RADIOACTIVE WASTE TO TRANSPORTATION AS OUTLINED IN PARAGRAPH 50.2B. SUPPLY WILL ORALLY INFORM

MR TREVIN0, LGSP, 74537

WILLIAM A. COOS, Lt Col, USAF
Director of Supply
AFM/Logistics

attch 2 app IV
ATCh 3

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LGSP270915

TRANSPORTATION THE SHIPMENT CONSISTS OF RADIOACTIVE MATERIAL OR
RADIOACTIVE WASTE. SUPPLY WILL ALSO ENTER THE REQUIRED INFORMATION
IN BLOCK C OF DD FORM 1348-1 (RADIOACTIVE WASTE OR RADIOACTIVE).

2. THIS IS A JOINT LGS/LGT MSG. POC IN LGS IS MR J. TREVINO,
AUTOVON 487-4537; POC IN LGT IS CMSGT D. DETWILER, 487-4627.

MR: Informs Supply and Transportation the shipments of radioactive
waste/radioactive materials will be processed jointly. Explains
radioactive waste will be transferred to Transportation and
identified as hazardous waste or hazardous material. Hazardous
waste must be shipped IAW TO DD-110N-2. *Chemate and Columbus are*

Waiting for this clarification joint.

LGSP

LGSP

LGS

(Sign)

LGTT

6 Mar 87

878 LGSP/Mr Trevino/74537/ct/27 Feb 87

TALKING PAPER

ON

RADIOACTIVE WASTE DISPOSAL

- Recurring problem Air Force wide
 - Improper shipping procedures to commercial waste disposal sites causes major problems for Air Force shippers
- Problems are
 - Lack of training and education
 - , Transportation personnel are not familiar with Environmental Protection Agency requirements, and Title 40 CFR which outline strict guidance and compliance procedures
 - SAALC/MMI is responsible for providing shipping instructions, upon request
 - SAALC/MMI is arranging a one week, tuition paid, course in Radioactive Waste Disposal procedures at a commercial waste facility in South Carolina (Ref HQ ATC/LGT message P031545Z Mar 87 to AIG 619 and 8110)
 - Per diem and travel funded from base O&M
 - Lack of coordination between Supply and Transportation
 - Lack of identification of waste on shipping documents
 - HQ ATC/LGS/LGT furnished coordination and identification requirements in their message 091400Z Mar 87 to AIG 8110/LGS/LGT,
- Air Force directives that address radioactive waste are
 - AFM 67-1, Vol II, Part Two, Chapter 13, Para 50-2 for Supply
 - T.O. 00-110N-2 for Transportation

STAFF SUMMARY SHEET

COPY

TO	ACTION	SIGNATURE (Signature), GRADE AND DATE	TO	ACTION	SIGNATURE (Signature), GRADE AND DATE
1 CS	Info		6		
2 CV	Info		7		
3 CC	Info		8		
4			9		
5			10		

SURNAME OF ACTION OFFICER AND GRADE	SYMBOL	PHONE	TYPIST'S INITIALS	SUSPENSE DATE
CMSgt Detwiler	LGTT	74776	dgp	

SUBJECT	DATE
Shipment of Radioactive Waste	13 FEB 87

SUMMARY

1. ISSUE: Shipments of radioactive waste to a contractor operated waste disposal site in South Carolina require strict compliance with State and Federal laws, regulations and requirements. Since Dec 86 two ATC bases have not complied with these procedures causing temporary cancellations from further shipments to the disposal site until additional training has been received.

BACKGROUND: Use of radioactive nuclides in material results in radioactive waste being generated at many AFB activities. To effectively provide for disposal of this waste, San Antonio Air Logistics Center (SA-ALC) negotiates and maintains requirement type contracts with radioactive waste disposal contractors. In addition, SA-ALC acts as the coordinating agency between field activities and the contractor.

Upon request, SA-ALC provides specific shipping instructions and directions to the shipper to ensure compliance with state and federal laws.

KEY POINT: Although shipping instructions were requested and furnished, violations still occurred on shipments from Chanute AFB IL and Columbus AFB MS. Lack of prior notification of shipment and improper packaging were the primary deficiencies.

LGT VIEWS: There appears to be a lack of coordination between shippers (supply, medics etc.,) and transportation in identifying shipments as radioactive waste. A message, Tab 1, was sent to all LGTs outlining the problem and interim measures to be taken to preclude another violation. All Traffic Management Officers have been contacted by telephone to emphasize the importance of strict compliance with SA-ALC instructions.

OTHER VIEWS: HQ USAF/LE message (Tab 2) to all MAJCOMs on 29 Jan 87 emphasized the need to establish a thorough Air Force-wide training program on hazardous materials/hazardous waste (HM/HW) issues. The USAF Task Force is forming a training Tiger Team comprised of both MAJCOM and base-level representatives. The conclusions of the Tiger Team will form the structure for an Air Force-wide program in HM/HW training.

attach 2 app IV
ATCH 5

RECOMMENDATION: HQ ATC/LGT coordinate and closely monitor procedures and training requirements with SA-ALC. Discuss this subject thoroughly at the ATC Chief of Transportation Conference in March 1987 and make it an item of special interest on all staff visits. Participate to the maximum on the USAF Tiger Team.

2 Tab

1. HQ ATC/LGTT Msg,
052045Z Feb 87

2. HQ USAF/LE Msg,
292200Z Jan 87

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TIME: 1548

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RHWIRMA RHWIERA RUCLBHA RHWRAAA RHWRTC RUVEDVA RUCISBA RUCLERA RUVEFF
RHWJENA.

ZNR 00000

P 031545Z MAR 87
FM HQ AFC RANDOLPH AFB TX//LGT//
TO AIG 819//RM/LGT/LGS//
AIG 8110/RM/LGT/LGS//

BT

UNCLAS

SUBJ: TRAINING REQUIREMENTS FOR SHIPPERS/GENERATORS OF RADIOACTIVE
WASTE FOR DISPOSAL

REF: KELLY AFB/MMI 202000Z FEB 87 (NOTAL) SUBJ: RADIOACTIVE WASTE
DISPOSAL INSTRUCTIONS FOR SHIPPERS/GENERATORS

1. REFERENCED MESSAGE IS RETRANSMITTED FOR YOUR IMMEDIATE ACTION
QUOTE.

1. DUE TO SEVERAL RECENT INCIDENTS INVOLVING THE IMPROPER
PACKAGING AND SHIPMENT OF RADIOACTIVE MATERIAL TO COMMERCIAL LOW-
LEVEL DISPOSAL FACILITIES, THREE AIR FORCE BASES HAVE BEEN BARRED
FROM FURTHER SHIPMENTS. THESE INCIDENTS WERE A RESULT OF
TRANSPORTATION/SUPPLY PERSONNEL NOT BEING ADEQUATELY TRAINED IN
THE PROPER PACKAGING AND SHIPMENT PROCEDURES FOR RADIOACTIVE WASTE.
FUTURE INCIDENTS OF THIS TYPE COULD RESULT IN THE AIR FORCE BEING
BARRED FROM DISPOSING IN COMMERCIAL LOW-LEVEL WASTE SITES. IT IS

PAGE 2 RHRATC9129 UNCLAS

THEREFORE IMPERATIVE THAT EACH AIR FORCE AND AIR NATIONAL GUARD
INSTALLATION HAVE PERSONNEL WHO ARE PROPERLY TRAINED IN RADIOACTIVE
WASTE PACKAGING AND SHIPPING PROCEDURES.

2. REQUEST EACH ADDRESSEE IDENTIFY PERSONNEL AT EACH INSTALLATION
WHO WILL ATTEND A JOINT ARMY/AIR FORCE WEEK LONG SEMINAR ON
PACKAGING, TRANSPORTATION AND DISPOSAL OF RADIOACTIVE WASTE.
TENTATIVE DATES FOR THIS SEMINAR ARE THE LAST TWO WEEKS IN JUNE AND
MIDDLE THREE WEEKS IN JULY. DATES FOR THE COURSE MAY ALSO BE
AVAILABLE IN AUGUST DEPENDING ON THE NUMBER OF INTERESTED
PERSONNEL. ALL SEMINARS WILL BE CONDUCTED IN COLUMBIA, SOUTH
CAROLINA. COST TO PERSONNEL ATTENDING THIS SEMINAR WILL BE PER
DIEM AND ROUND TRIP TRAVEL EXPENSES TO THE SEMINAR LOCATION.

3. PERSONNEL IDENTIFIED TO ATTEND THIS SEMINAR SHOULD CONTACT
CAPT DO

MLN 17079

PAGE 1

~~THIS MESSAGE SUBMITTED TO~~

~~CAPT JORDAN 5 MAR 87 1000~~

Atch 2 app VII
ATCh 6

N JORDAN OR MR KENNETH VAUGHN AT AUTOVON 945-4643 OR
COMMERCIAL (512) 925-4643 NLT 3 APR 87 TO ALLOW ADEQUATE TIME FOR
COURSE SCHEDULING.

4. THIS IS A COORDINATED MMI, AFOMS/SGPR, AND AMCCOM/AMSMC/PCA
MESSAGE.

UNQUOTE.

2. SINCE TWO OF THE THREE BASES BARRED FROM FURTHER SHIPPING ARE

PAGE 3 RHWRATC9129 UNCLAS

IN ATC, ATTENDANCE AT THIS TRAINING IS HIGHLY RECOMMENDED AND
ENCOURAGED.

3. PROVIDE YOUR NOMINEES DIRECT TO KELLY/MMI WITH INFO TO
HQ ATC/LGT/LGS.

4. THIS IS A COORDINATED HQ ATC/LGT/LGS MESSAGE.

B1

#9129

NNNN

LGT DD
LGS Truino (3)



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS SAN ANTONIO AIR LOGISTICS CENTER (AFLC)
KELLY AIR FORCE BASE, TEXAS 78241-5000



REPLY TO
ATTN OF: MMIR

SUBJECT: Radioactive Waste Disposal Discrepancies

TO: HQ 440th CSG/LGT
General Billy Mitchell Field
300 East College Avenue
Milwaukee, Wisconsin 53207

1. References:

a. Radioactive Material Shipment, HQ SA-ALC Control Number AF34-86.

b. SA-ALC/MMIR MSG 301400Z (DEC 86).

2. Attachment 1 is a letter from Chem-Nuclear Systems, Inc., detailing discrepancies found with the referenced radioactive material shipment, which was returned to you 5 Jan 87. Because of these discrepancies, you were barred (reference b.), from further radioactive waste shipments pending approval of your packaging and shipping processes. In order to obtain this approval we must comply with State of South Carolina requirements listed on page 3 of attachment 1. Accordingly, the following actions will be accomplished prior to future radioactive waste shipments from your installation:

a. A representative or representatives from your installation will be required to attend a week long Radioactive Waste Packaging, Transportation and Disposal Seminar presented by Chem-Nuclear Systems, Inc., in Columbia, South Carolina, prior to any unsupervised shipments being made. Your installation will be responsible for funding travel and per diem costs associated with attendance at this seminar. Time frames for this seminar are tentatively scheduled for the last two weeks in June, three weeks in July, and depending on demand, possibly additional seminar dates in August. Please furnish to MMIROB the names of individuals you are planning to have attend this seminar, and their preference for either June, July or August. This information should be submitted NLT 15 March to allow adequate time for course scheduling.

b. In the interim prior to training, radioactive material shipments from your installation will be made by a representative from MMIROB. You are responsible for furnishing a fund site for travel and per diem expenses incurred by this individual. Once this is received appropriate travel arrangements will be made.

3. Any questions regarding this letter should be addressed to Capt Don Jordan or Mr. Kenneth Vaughn at AV 945-4643 or commercial (512) 925-4643.

1 Atch^h

Chem-Nuclear Ltr, 7 Jan 87

14



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS SAN ANTONIO AIR LOGISTICS CENTER (AFLC)
KELLY AIR FORCE BASE, TEXAS 78241-5000

14-A-8

19 FEB 1987



REPLY TO
ATTN OF: MMI

SUBJECT: Discrepancies with Radioactive Waste Shipment AF 87-16

TO: 14 FTW/RM
Columbus AFB, MS 39701

1. Attachment 1 is a letter from Chem-Nuclear Systems, Inc., detailing discrepancies found with the subject radioactive waste shipment. Correct shipment procedures were provided in a 23 Jan 87 letter from SA-ALC/MMIROB to your LGTTF section.

2. In accordance with DOD 4160.21-M, Chapter 6, Paragraph 87, SA-ALC/MMIR has overall responsibility for ensuring proper disposal of radioactive material within the Air Force and Air National Guard. Accordingly, because of discrepancies noted with the subject shipment, your installation is barred immediately from making further radioactive waste shipments to a commercial low-level disposal facility. To insure that future waste shipments from your installation are properly accomplished, the following actions are required:

a. Prior to making any unsupervised shipments, a transportation representative and/or other representatives from your installation are required to attend a week long radioactive waste packaging, transportation and disposal seminar presented by Chem-Nuclear Systems, Inc., in Columbia, South Carolina. Your installation will be responsible for funding travel and per diem costs associated with attendance. Time frames for this seminar are tentatively scheduled for the last two weeks in June, middle three weeks in July, and depending on demand, possibly additional seminar dates in August. Please furnish to SA-ALC/MMIROB the names of individuals who are planning to attend this seminar, and their preference for either June, July, or August. This information should be submitted NLT 30 March to allow adequate time for course scheduling.

b. In the interim prior to training being received, radioactive waste shipments from your installation will be made by a representative from SA-ALC/MMIROB. You will be responsible for furnishing a fund site for travel and per diem expenses incurred by this individual.

atch 4

3. Please address any questions regarding this letter to Capt Don Jordan or Mr. Kenneth Vaughn at AUTOVON 945-4643.

1 Atch

Chem-Nuclear Ltr, 6 Feb 87

J. NOEL, Deputy Chief
Item Management
Directorate of Material

GREAT!

PRIORITY

10471 1033 054787

STORAG/AC CO OR CREF DE WFO DPC DFM JA LG LGT 6P SS SV BX MGR CLINIC HC SL SE
CD/CC CNE CY EH FH FD SC XE AFCONS AFHKL AFOMC DET-26 OEHL OSI AFDTL MWR
AN SAMPED SAMPED CLMT 0199 6575 6904 8075 DET 20 DP T/A SVD OPR

TTT/00 FVVKAA-5170 0320052-0000--ROUTNHA.

200000Z FEB 87
H DIP RMT HGT KELLY AFB TX//MMI//
H RUM/ETA/HO APO ELMOH/AF AFB AK//LGT/LGS//
H FORD/AC USAFE FANSTEIN AB GE//LGT/LGS//
H HART/AC ATO FANDOLPH AFB TX//LGT/LGS//
H OVER/AC AFRES ROBINS AFB GA//LGT/LGS//
H HUBER/AC AFCC SCOTT AFB IL//LGT/LGS//
H UNH/AC AFLO WRIGHT PATTERSON AFB OH//DSS/DST//
H GEAR/AC AFSC ANDREWS AFB MD//LGT/LGS//
H HUBER/AC MAC SCOTT AFB IL//LGT/LGS//
H UNH/AC PACAF HICKAM AFB HI//LGT/LGS//
H GEAR/AC SAC AFFUTT AFB NE//LGT/LGS//
H UCIFE/AC TAC LANGLEY AFB VA//LGT/LGS//
H UNH/AC AFSPCECOM PETERSON AFB CO//LGT/LGS//
H UNH/AC ESC KELLY AFB TX//LGT/LGS//
H AF ABERN/AC USAF WASHINGTON DC//LEYS/LETT//
H GEAR/AC USAF WASHINGTON DC//SGP//
H UNH/AC AFOS EFOONS AFB TX//SGP//
H UCIFE/AC CON ROCK ISLAND IL//ANSHO/FOA/BU//



AGE 2 FVVKAA-5170 UNCLAS

SUBJECT: RADIOACTIVE WASTE DISPOSAL INSTRUCTIONS FOR SHIFFERS/
GENERATORS
DUE TO SEVERAL RECENT INCIDENTS INVOLVING THE IMPROPER PACKAGING
AND SHIPMENT OF RADIOACTIVE MATERIAL TO COMMERCIAL LOW-LEVEL DISPOSAL

ACTIVITIES, THREE AIR FORCE BASES HAVE BEEN BARRED FROM FURTHER
SHIPMENTS. THESE INCIDENTS WERE A RESULT OF TRANSPORTATION/SUPPLY
PERSONNEL NOT BEING ADEQUATELY TRAINED IN THE PROPER PACKAGING AND
SHIPMENT PROCEDURES FOR RADIOACTIVE WASTE. FUTURE INCIDENTS OF THIS
KIND COULD RESULT IN THE AIR FORCE BEING BARRED FROM DISPOSING IN
COMMERCIAL LOW-LEVEL WASTE SITES. IT IS THEREFORE IMPERATIVE THAT
WHEN AIR FORCE AND AIR NATIONAL GUARD INSTALLATION HAVE PERSONNEL
WHO ARE PROPERLY TRAINED IN RADIOACTIVE WASTE PACKAGING AND SHIPPING
PROCEDURES.

REQUEST EACH ADDRESSEE IDENTIFY PERSONNEL AT EACH INSTALLATION
WHO WILL ATTEND A JOINT ARMY/AIR FORCE WEEK LONG SEMINAR ON
PACKAGING, TRANSPORTATION AND DISPOSAL OF RADIOACTIVE WASTE.
TENTATIVE DATES FOR THIS SEMINAR ARE THE LAST TWO WEEKS IN JUNE AND
THE FIRST THREE WEEKS IN JULY. DATES FOR THE COURSE MAY ALSO BE
AVAILABLE IN AUGUST DEPENDING ON THE NUMBER OF INTERESTED PERSONNEL.

AGE 3 FVVKAA-5170 UNCLAS

ALL SEMINARS WILL BE CONDUCTED IN COLUMBIA, SOUTH CAROLINA. COST TO
PERSONNEL ATTENDING THIS SEMINAR WILL BE PER DEIM AND ROUND TRIP

ahls

TRAVEL EXPENSES TO THE SEMINAR LOCATION.

PERSONNEL IDENTIFIED TO ATTEND THIS SEMINAR SHOULD CONTACT CAPT
JOHN JORDAN OR MR KENNETH VAUGHN AT AUTOVON 945-4643 OR COMMERCIAL
945-4643 DLT 3 APR 87 TO ALLOW ADEQUATE TIME FOR COURSE
SCHEDULING

THIS IS A COORDINATED NMJ, AFOMS/SCFR, AND AHCCOM/ANSMC/PCA
MESSAGE.

~~0170~~

NN

att. 4

RCV MSG # TIME RADAY
20141 2232 133/87

ROUTINE

657042E/AC CC DA DAFD DE XPC DPC DFM JA LG LGT MU SP SS SV BX MGR CLINIC HC SL
SE HSC/CC CMS CV EH FA RD SC XR AFCONS AFHRL ~~AFCONS~~ DET-26 CEHL OSI AFDTL MWR
SAM SAM/EL SAM/CC OLMT 2199 6575 6906 8075 DET-20 DP T/A SVC OPR 7

RTTUZYUO RUVKAA5676 1332223-0000--RUVTHNA.

ZNR 00000

R 131700Z MAY 87

FM DIA NAT HGT KELLY AFB TX//MMIROB//
TO RUCVAAA/28MU BARKSDALE AFB LA//LGTT//
RUDTHAA/28MU CARSWELL AFB MI//LGTT//
RUELFHA/28MU DYESS AFB TX//LGTT//
RUDTDA/2215MU GRAND FORKS AFB ND//LGTT//
RUDNDA/2415MU HALSTROM AFB MO//LGTT//
RUEFHAA/21APEFU MARCH AFB CA//LGTT//
RUDTHAA/5098MU REESE AFB TX//LGTT//
RUCINLA/3808MU FLATTSBURGH AFB NY//LGTT//
RUEDHAA/426MU LORING AFB NE//LGTT//
RUEDEHA/4168MU GRIFFIS AFB NY//LGTT//
RUCIFHA/3798MU HURTSWORTH AFB MI//LGTT//
RUDDDAA/98RU DEALE AFB CA//LGTT//
RUSTDAA/908MU F E WARREN AFB MI//LGTT//
RUCIEHA/976MU ELYTHEVILLE AFB AR//LGTT//
RUDTIA/3515MU YHITENAM AFB MO//LGTT//
RUCIDHA/938MU CASTLE AFB CA//LGTT//
RUCIETA/3058MU GRISSON AFB IN//LGTT//
INFO RUCVAAA/HC SAC OFFUTT AFB NE//LGTT//



PAGE 2 RUVKAA5676 UNCLAS

RUVTHNA/AFCONS EPOOKS AFB TX//SGPR//

RUCIETA/CDR AMCCOM ROCK ISLAND IL//AMSHC-PCW-FAC(R)//

BT

UNCLAS

SUBJECT: RADIOACTIVE WASTE PACKAGING, TRANSPORTATION AND DISPOSAL
SEMINAR

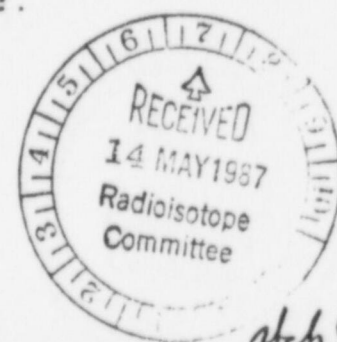
1. DATES FOR THE SUBJECT SEMINAR HAVE BEEN ESTABLISHED. THEY ARE
13-17 AND 20-24 JULY AND 3-7 AND 10-24 AUGUST 1987. ALL PERSONS WHO
HAVE EXPRESSED INTEREST IN ATTENDING THIS COURSE NEED TO TELEPHONE
AMCCOM AS SOON AS POSSIBLE FOR COURSE RESERVATIONS AND INFORMATION.
CLASSES WILL BE FILLED ON A FIRST CALL FIRST SERVED BASIS. AMCCOM
POINTS OF CONTACT ARE MS CHRIS HANSEN, AUTOVON 793-3032, OR MR JIM
TRITZ, AUTOVON 793-3861.

2. COST TO PERSONNEL ATTENDING THIS COURSE WILL BE PER DIEM AND
TRAVEL EXPENSES TO THE MARIOTT HOTEL IN COLUMBIA SOUTH CAROLINA.

3. QUESTIONS CONCERNING THIS MESSAGE SHOULD BE DIRECTED TO
KENNETH VAUGHN OR DON JORDAN, SA-ALC/MMIROB, AUTOVON 945-4647.

BT

END



afch 6

REC MSG * TIME RADAY
30786 2228 135/87

ROUTINE

LS7DWBG/AC CC DM DAFD DE XPC DPC DFM JA LG LGT MU SP SS SV BX MCF CLINIC HC SL
SE MSD/CC CMS CV EH FA RD SC XR AFCONS AFHRL AFOMS DET-26 DEHL DEI AFDTL MWR
SAB SAM/EK SAM/CC OLT 2199 6575 6906 8075 DET-20 DP T/A SVC OPR 7

RTTUZYUW RUVKAA7958 1352202-UUUU--RUWTHA.

ZNR UUUUU

R 154530Z MAY 87

FM DIA MAT HGT KELLY AFB TX//MHIR//

TO RNRATC/HQ ATC RANDOLPH AFB TX//LGTT//

RUNTNEA/STPC SHEPPARD AFB TX//LGTT//

RUEBFLA/913TAGP WILLOW GROVE ARF PA//LGSD//

RUELEA/3380SUF KEESLER AFB MS//LGTT//

RUVBWA/3480SUF GOODFELLOW AFB TX//LGTT//

RUMBNA/5540SM HOSPITAL NELLIS AFB NV//SGPB//

RUVRAA/940SG DUBBINS AFB GA//LGTT//

RUEFFA/3415TRANS LOURY AFB CO//LGTTW//

RUCIHA/928TAG CHICAGO O'HARE IL//LGSD/LGTT//

RUMNDA/323TRANSPS MATHER AFB CA//LGTT//

RUVKVA/3700TRANSPS LACKLAND AFB TX//LGTT//

RUTRAA/64FTW REESE AFB TX//LGTT//

RUCIRH/133FTF MINNEAPOLIS ST PAUL IAP ST PAUL MINNESOTA//

RUVKVA/3700SUF LACKLAND AFB TX//LGSDI//

RUEBKA/343TFW EIELSON AFB AK//LGSP//

RUMENA/5073ABG SHENYA AFB ADAK//LGSD//

RUCISA/CTTC CHANUTE AFB IL//LGTT//

RUELEA/14FTW COLUMBUS AFB MS//LGTT//

PAGE 2 RUVKAA7958 UNCLAS

RUCIFSA/910TAG YOUNGSTOWN MUNI APRT OH//LGT//

RHURAA/12TRNS RANDOLPH AFB TX//LGTT//

RUCIRH/934TAG MPLS ST PAUL IAP MN//LGTT//

RUMBKA/21TFW ELMENDORF AFB AK//LGTT//

RUMBBA/162TFG TUCSON IAP AZ//LGTT//

RUVBBA/132TFW DES MOINES MUNI APRT IA//LGTT//

RUMBDA/185TFG SIOUX CITY MUNI APRT SERGEANT BLUFF IA//

SGPB/LGTT//

RUCLEPA/MEDC TWO ARNOLD AFS TN//LGTT//

RUVAFLC/USAF MEDCEN WRIGHT PATTERSON AFB OH//SGHRT

INFO RUWTHA/AFOMS BROOKS AFB TX//SGPR//

RUCIAFB/CDR AMCCOM ROCK ISLAND IL//AMSHC-PCW-FAC(R)//

BT

UNCLAS

SUBJECT: RADIOACTIVE WASTE PACKAGING, TRANSPORTATION AND DISPOSAL
SEMINAR

1 DATES FOR THE SUBJECT SEMINAR HAVE BEEN ESTABLISHED. THEY ARE
13-17 AND 20-24 JULY AND 3-7 AND 10-24 AUGUST 1987. ALL PERSONS WHO
HAVE EXPRESSED INTEREST IN ATTENDING THIS COURSE NEED TO TELEPHONE
AMCCOM AS SOON AS POSSIBLE FOR COURSE RESERVATIONS AND INFORMATION.

PAGE 3 RUVKAA7958 UNCLAS

CLASSES WILL BE FILLED ON A FIRST CALL FIRST SERVED BASIS. AMCCOM
POINT OF CONTACT ARE MS CHRIS HANSEN, AUTOVON 793-3032, OR MR JIM
TRITZ, AUTOVON 793-3861.

2 COST TO PERSONNEL ATTENDING THIS COURSE WILL BE PER DIEM AND



alt 7

TRAVEL EXPENSES TO THE MARIOTT HOTEL IN COLUMBIA SOUTH CAROLINA.

3. QUESTIONS CONCERNING THIS MESSAGE SHOULD BE DIRECTED TO
KENNETH VAUGHN OR DON JORDAN, SA-ALC/MMIROB, AUTOVON 945-4643.

BT

~~87938~~

NNNN

RCV. MSG 10
30701

TIME
2225

FADAY
135/87

ROUTINE

W570ABG/AC CC DA DAPD DE XFC DPC DFM JA LG LGT MM SP SS SV BX MGR CLINIC HC SL
SE HSD/CC CMS CY EH PA RD SC XR AFCONS AFHRL AFONS DET-26 DEHL SEI AFDTL MWR
SAM SAM/EK SAM/CC OLMT 2199 6575 6906 8075 DET-20 DP T/A SVC OPR 7

RTTUZYUW RUYKAAA7956 1352155-UUUU--RUYTHHA.

ZNR UUUUU

R 151400Z MAY 87

FM DIR. NAT. MGT. KELLY AFB TX//MMIR//

TO RHMCAAA/CLARK AB RP//LGTT

RHAKAAA/KADENA AB JA//LGS//

RUAKBFA/SUMON AB KOR//LGTT//

INFO RUYHAAA/HQ PACAF HICKAM AFB HI//LGT/LGS//

RUYTHHA/AFONS BROOKS AFB TX//SGPR//

RUCINFB/CDR AMCCOM ROCK ISLAND IL//AMSMC-PCW-FA(R)//

BT

UNCLAS

SUBJECT: RADIOACTIVE WASTE PACKAGING, TRANSPORTATION AND DISPOSAL
SEMINAR

1. DATES FOR THE SUBJECT SEMINAR HAVE BEEN ESTABLISHED. THEY ARE
13-17 AND 20-24 JULY AND 3-7 AND 10-24 AUGUST 1987. ALL PERSONS WHO
HAVE EXPRESSED INTEREST IN ATTENDING THIS COURSE NEED TO NOTIFY
CDR AMCCOM ROCK ISLAND IL//AMSMC-PCW-FA BY MESSAGE AS SOON AS
POSSIBLE FOR COURSE RESERVATIONS AND INFORMATION. AMCCOM POINTS OF
CONTACT ARE MS CHRIS HANSEN, OR MR JIM TRITZ.

2. COST TO PERSONNEL ATTENDING THIS COURSE WILL BE PER DIEM AND
TRAVEL EXPENSES TO THE MARIOTT HOTEL IN COLUMBIA SOUTH CAROLINA.

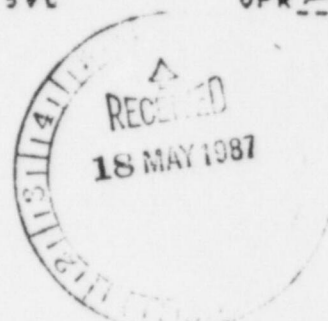
PAGE 2 RUYKAAA7956 UNCLAS

3. QUESTIONS CONCERNING THIS MESSAGE SHOULD BE DIRECTED TO
KENNETH VAUGHN OR DON JORDAN, SA-ALC/MMIROB, AUTOVON 945-4643.

BT

47956

NNNN



at 8

MSG # TIME RADAY
21930, 1718 097/87

ROUTINE

RTTUHQ/HC CC DA DAFD DE KPC DPC DPA JA LG LGT SP SS SV BX MGR CLINIC HC SL SE
HSD/CC CHS CV EH PA HD SC KR AFOMIS AFHRL AFMS DET-26 DEHL ISI AFDTL MWR
SAM SAM/EC SAM/CC JLT 2139 6575 6916 8075 DET 20 OF T/A SVC OPR

RTTUHQ/HC RUEAHQA3817 0971-51-0000--RUMTNA

ZNR UUUUU

R 071000Z APR 87

FM HQ USAF WASHDC //LEYS/LETT/SGPR//

TO ALMAJCOM//LGS/LGT/SGP//

RUEAFLE/HQ AFLE WPAFB OH//DSS/DST/SGP/MM//

RUMTNA/HQ AFSpaceCOM PETERSON AFB CO//LKS/SG//

RUEAUSA/HQB WASHDC //LG//

RUEPAHA/HQ AFRES ROBINS AFB GA//LGS/SGP//

RUEOAH/HQ ANGSC ANDREWS AFB MD //SG//

INFO RUEKAAH/SA-ALC KELLY AFB TX//MIIR//

RUMTNAH/AFOMS BROOKS AFB TX//SGPR//

BT

UNCLAS ALMAJCOM 0127/87

SUBJ: DISPOSAL OF RADIOACTIVE WASTE

REF: T.O. 00-110N-2

1. DUE TO SEVERAL RECENT INCIDENTS INVOLVING THE IMPROPER PACKAGING AND SHIPMENT OF RADIOACTIVE WASTE TO COMMERCIAL LOW-LEVEL DISPOSAL FACILITIES, THE USAF RADIOISOTOPE COMMITTEE HAS DEEMED IT NECESSARY TO HALT ALL SHIPMENTS OF LOW-LEVEL RADIOACTIVE WASTE TO COMMERCIAL DISPOSAL FACILITIES WITHOUT THE ON SITE PRESENCE OF A QUALIFIED BROKER FROM SA-ALC/MMIR OR BROKER ON CONTRACT THROUGH SA-ALC/MMIR.

PAGE 02 RUEAHQA3817 UNCLAS

THE BROKER WILL VERIFY THE ACCURACY OF THE PACKAGING OF THE MATERIAL AND WILL ENSURE THAT ALL REQUIRED FORMS ARE PROPERLY PREPARED AND ATTACHED TO THE RADIOACTIVE WASTE. EACH INSTALLATION WILL BE REQUIRED TO PROVIDE SA-ALC/MMIR A FUND SITE FOR TRAVEL AND PER DIEM EXPENSES INCURRED BY THEIR BROKER. THE ONLY EXCEPTION TO THE POLICY LISTED ABOVE IS FOR OVERSEAS UNITS. OVERSEAS UNITS MAY CONTINUE TO SEND RADIOACTIVE WASTE SHIPMENTS TO KELLY AFB, TX, FOR REBROKERAGE PRIOR TO SHIPMENTS TO THE WASTE DISPOSAL SITE UPON DIRECTION FROM SA-ALC/MMIR. PROCEDURAL CHANGES TO DD-110N-2, AND APPLICABLE SUPPLY, TRANSPORTATION AND SURGEON GENERAL REGULATIONS THAT WILL PROVIDE THE REQUIREMENT FOR MORE DETAILED COORDINATION AND QUALITY CONTROL ARE BEING DEVELOPED. THE ABOVE PROCEDURE, HOWEVER, WILL REMAIN IN EFFECT UNTIL THE USAF RADIOISOTOPE COMMITTEE DEEMS THAT CORRECTIVE ACTIONS ARE EFFECTIVE.

3. INITIAL INVESTIGATION OF ALL THREE INCIDENTS INDICATES A LACK OF KNOWLEDGE THAT SHIPMENTS OF RADIOACTIVE WASTE DIFFER FROM SHIPMENTS OF RADIOACTIVE MATERIAL, A LACK OF COORDINATION BETWEEN SUPPLY AND TRANSPORTATION AND A LACK OF QUALITY CONTROL. IN ALL THREE INCIDENTS, EITHER SUPPLY OR TRANSPORTATION HAD REQUESTED DISPOSITION INSTRUCTIONS FROM SA-ALC/MMIR. THE INSTRUCTIONS SENT TO THE

PAGE 03 RUEAHQA3817 UNCLAS

INSTALLATIONS WERE SUFFICIENTLY DETAILED TO ENSURE THE PROPER HANDLING OF THE PROPERTY. HOWEVER, IN ALL THREE INCIDENTS, THE DISPOSITION INSTRUCTIONS WERE NOT COMPLIED WITH. THE PRIMARY CAUSE APPEARS TO BE THE SEPARATION OF THE INSTRUCTIONS FROM THE PROPERTY.



Atch 9

4. ANY QUESTIONS CONCERNING THIS POLICY SHOULD BE ADDRESSED TO
LT. COL MILLER, AF/LEYS, AUTOVON 225-3854; MR SPARKS, AF/LETC,
AUTOVON 227-4742; OR LT COL WOOD, AFMS/SGPR, AUTOVON 240-3331.
BT

03817

NNNN

4. Old Business:

a. Action Items:

(1) AF Radioactive Waste:

(Open - Action: AF/JACE
SA-ALC/MMIROB
HQ USAF/LEYS/LETC
HQ AFOMS/SGPR)

Capt Jordan presented current procedures (Atch 3) for processing radioactive waste disposal requests by SA-ALC/MMIROB and the status of outstanding disposal requests (Atch 4). The Committee then reviewed the specifics of the improper waste shipments received at the disposal site from Chanute AFB, Billy Mitchell Field, and Columbus AFB (Atch 5) and SA-ALC/MMIROB's corrective action (Atch 6). Lt Col Burr reminded the Committee of his concern voiced at the last meeting over direct shipments by bases without MMIROB or a contract broker on-site. The Committee agreed that shipments had to be packaged by or under the supervision of trained personnel. Despite prior Air Force audit findings, the Committee believed the problem with the waste shipments necessitated concern for the broader issue of proper packaging of non-waste radioactive materials shipments since the same criteria for packaging applied. Lt Col Buchanan stated that the present guidance in T.O. 00-110N-2 on Transportation's role was not consistent with their role on shipments of other materials. The Committee concluded the following actions would be taken:

(a) AF/LETC would review, in detail, all documentation associated with the improper waste shipments to ascertain if proper identification had been made to Transportation of the commodities involved and if proper type cargo codes existed for the item.

(b) As an interim measure, AF/LEYS would prepare joint SG/LE guidance to Commands requiring all waste shipments to be prepared under the direct on-site supervision of SA-ALC/MMIROB or a qualified contract waste broker. Funding support for travel and costs above the disposal itself are to be borne by the unit generating the waste.

(c) AF/LEYS would chair a working group comprised of AF/LETC, SA-ALC/MMIROB and HQ AFOMS/SGPR representatives to develop a permanent viable solution to this problem.

(d) On complex shipments, SA-ALC/MMIROB would determine the need to "double broker" the shipment to minimize the chance of error.

(e) On the related matter of requirement for a transport permit for wastes from Mississippi, AF/JACE will ascertain status of Air Force action to accept or challenge the state's authority to impose such a requirement.

at 110

KCV MSG B TIME RADAY
31867 1420 141/87

ROUTINE

LS7DABG/AC CC DA DAPD DE XPC DPC DPH JA LG LGT MU SP SS SV BX MGR CLINIC HC SL
SE MSD/CC CMS CV EV PH SO SC XR AFCONS AFHRL AFONS DET-26 OEHLS OSI AFDTL MWR
SAM SAM/EX SAM/CC OLMT 2199 L575 L906 8075 DET-26 DP T/A SVC OPR

RTTUZYUW RUEAHQA1910 22 MAY 1987 -UUUU--RUWTHHA

ZNF UUUUU

R 202213Z MAY 87

FM HQ USAF WASHDC //LETT//

TO AIG 10968

INFO RUVKAAA/AFONS BROOKS FB TX//SGPR//

RUVKAAA/SA-ALC KELLY AFB TX//MMIR//

ACCT AF-ACKJRF

BT

UNCLAS

SUBJECT: DISPOSAL OF RADIOACTIVE WASTE, HQ USAF/LEYS/LETT/SGPR MSG

071000Z APR 87

1. REF MSG IS QUOTED IN PART FOR INFORMATION: "DUE TO SEVERAL INCIDENTS INVOLVING THE IMPROPER PACKAGING AND SHIPMENT OF RADIOACTIVE WASTE TO COMMERCIAL LOW-LEVEL DISPOSAL FACILITIES, THE USAF RADIOISOTOPE COMMITTEE HAS DEEMED IT NECESSARY TO HALT ALL SHIPMENTS OF LOW-LEVEL RADIOACTIVE WASTE TO COMMERCIAL DISPOSAL FACILITIES WITHOUT THE ON SITE PRESENCE OF A QUALIFIED BROKER FROM SA-ALC/MMIR OR BROKER ON CONTRACT THROUGH SA-ALC/MMIR. THE BROKER WILL VERIFY THE ACCURACY OF THE PACKAGING OF THE MATERIAL AND WILL ENSURE THAT ALL REQUIRED FORMS ARE PROPERLY PREPARED AND ATTACHED TO THE RADIOACTIVE WASTE. EACH INSTALLATION WILL BE REQUIRED TO PROVIDE SA-ALC/

PAGE 02 RUEAHQA1910 UNCLAS

MMIR A FUND CITE FOR TRAVEL AND PER DIEM EXPENSES INCURRED BY THEIR BROKER. THE ONLY EXCEPTION TO THE POLICY LISTED ABOVE IS FOR OVERSEAS UNITS. OVERSEAS UNITS MAY CONTINUE TO SEND RADIOACTIVE WASTE SHIPMENTS TO KELLY AFB, TX FOR REBROKERAGE PRIOR TO SHIPMENT TO THE WASTE DISPOSAL SITE UPON DIRECTION FROM SA-ALC/MMIR. PROCEDURAL CHANGES TO DD-110N-2, AND APPLICABLE SUPPLY, TRANSPORTATION, AND SURGEON GENERAL REGULATIONS THAT WILL PROVIDE THE REQUIREMENT FOR MORE DETAILED COORDINATION AND QUALITY CONTROL ARE BEING DEVELOPED. THE ABOVE PROCEDURE, HOWEVER, WILL REMAIN IN EFFECT UNTIL THE USAF RADIOISOTOPE COMMITTEE DEEMS THAT CORRECTIVE ACTIONS ARE EFFECTIVE."

UNTIL FURTHER NOTICE, ALL TRANSPORTATION OFFICES WILL INSTRUCT PERSONNEL INVOLVED IN PACKAGING AND TRANSPORTATION THAT ANY, REFLAT, ANY MATERIAL RECEIVED FOR DIRECT SHIPMENT TO EITHER OF THE FOLLOWING ADDRESSES WILL BE IMMEDIATELY FRUSTRATED. ONCE THE SHIPMENT IS FRUSTRATED, THE CONSIGNOR OR GENERATOR SHOULD CONTACT SA-ALC/MMIR FOR GUIDANCE/ASSISTANCE:

1. CHEM-NUCLEAR SYSTEMS, INC.
DOD CONSOLIDATION FACILITY
P.O. BOX 828
TWO OSEORN ROAD

PAGE 03 RUEAHQA1910 UNCLAS

SHELLING SC, 29812
U.S. ECOLOGY
CALIFORNIA DIVISION
7066-A COMMERCE CIRCLE



afch "

PLEASANTON CA 94566

NOTE: SA-ALC/MHROB POCS FOR GUIDANCE/ASSISTANCE ARE CAPT JORDAN AND MR. VAUGHN. AUTOVON 945-4643. CORRESPONDENCE SHOULD BE ADDRESSED TO SA-ALC/MHRO.

3. THE FOLLOWING ARE SOME OF THE PROBLEMS/VIOLATIONS THAT HAVE CAUSED RADIOACTIVE WASTE SHIPMENT CURTAILMENTS. THIS INFORMATION IS PROVIDED TO PROMOTE A BETTER UNDERSTANDING OF THE CRITICAL NATURE OF THE PROPER HANDLING OF RADIOACTIVE WASTE. INSTRUCTIONS ON HOW TO AVOID ALL OF THE FOLLOWING VIOLATIONS WERE INCLUDED IN THE SHIPPING INSTRUCTIONS PROVIDED BY SA-ALC/MHRO. THE INSTRUCTIONS WERE NOT FOLLOWED.

A. FAILURE TO PROVIDE 48-HOUR NOTICE TO THE CONSOLIDATION FACILITY - VIOLATION OF SOUTH CAROLINA DHEC LICENSE 287-04, SECTION 14.

NOTE: NOTIFICATION MUST BE MADE AT LEAST 48 HOURS PRIOR TO ARRIVAL OF SHIPMENT WITHIN THE STATE.

B. ORIGINAL RADIOACTIVE WASTE MANIFEST WAS NOT INCLUDED WITH THE

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SHIPMENT. THE YELLOW COPY WAS ATTACHED TO PACKAGE NO. 1 BUT HAD NO SIGNATURES WITH EITHER CERTIFICATION STATEMENT AND DID NOT LIST PACKAGE NO. 2.

(1) VIOLATION OF SC DHEC LICENSE 287-04, SECTION 14.

(2) VIOLATION OF DOT 49 CFR, PART 172.202 AND 172.203.

(3) VIOLATION OF NRC 10 CFR, PART 20.311.

NOTE: BY LAW, A MANIFEST IS MANDATORY FOR DISPOSAL OF SHIPMENTS. CARRIERS THAT DO NOT USE MANIFESTS MUST NOT BE USED.

C. FAILURE TO INCLUDE, AS REQUIRED, SOUTH CAROLINA FORMS - VIOLATIONS OF SC DHEC LICENSE 287-04, SECTION 13.

NOTE: SA-ALC PROVIDED THIS GUIDANCE.

D. OVER PACK CONTAINER DID NOT INDICATE THE INNER PACKAGE COMPLIED WITH PRESCRIBED SPECIFICATIONS:

(1) VIOLATION OF DOT 49 CFR, PART 173.25 (A)(4).

(2) VIOLATION OF NRC 10 CFR, PART 71.5.

NOTE: THIS COULD RESULT IN UNDESIRABLE EXPOSURE TO RADIOACTIVE MATERIAL AND/OR ASSOCIATED RADIATION BY PERSONNEL HANDLING MATERIAL.

E. YELLOW LABEL II ON PACKAGE DID NOT HAVE TRANSPORT INDEX ENTERED IN APPLICABLE SPACE:

1) VIOLATION OF SC DHEC LICENSE 287-04, SECTION 14.

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2) VIOLATION OF DOT 49 CFR, PART 172.403 (G)(3).

NOTE: SEE 3D ABOVE.

NO BILL OF LADING INCLUDED WITH SHIPMENT - VIOLATION OF DOT 49 CFR, PART 172.200. NOTE: SEE 3B ABOVE.

F. IMPROPERLY SEALED PACKAGED:

1) VIOLATION OF SC DHEC LICENSE 287-04, SECTION 14.

2) VIOLATION OF DOT 49 CFR, PART 173.24.

NOTE: SEE 3D ABOVE.

ALL TRANSPORTATION PERSONNEL INVOLVED IN THE HANDLING OF RADIOACTIVE WASTE SHIPMENTS SHOULD BE MADE AWARE OF THE FOREGOING PROBLEMS/VIOLATIONS FOR FUTURE REFERENCE, I.E., THESE SEEMINGLY SMALL ERRORS ARE VIOLATIONS OF PUBLIC LAW AND/OR STATE ENVIRONMENTAL LAWS. POTENTIAL PENALTIES CAN RANGE FROM FINES TO IMPRISONMENT OR BOTH FOR VIOLATIONS INVOLVING RADIOACTIVE AND OTHER HAZARDOUS WASTE.

THE BOTTOM LINE IS: RULES THAT APPLY TO RADIOACTIVE WASTE SHIPMENTS ARE DIFFERENT THAN RULES THAT APPLY TO "RADIOACTIVE" SHIPMENTS (SERVICEABLE/REPAIRABLE ITEMS). THE ITEM MAY HAVE THE SAME

NOMENCLATURE, I E , LENSATIC COMPASS, HOWEVER THE RULES ARE
SIGNIFICANTLY DIFFERENT.
L. POCS ARE MF. SPARKS (HQ USAF/LETT, AUTOVON 227-4742), LT COL

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MILLER (HQ USAF/LEYS, AUTOVON 227-4742), OR COL WOOD (AFOMS/SCFR,
AUTOVON 240-3331).
BT
#1910

NNNN

NOV MSG # 33125 TIME 1606 RADAY 145/87

ROUTINE

0570H06G/AC CC DA DAPD DE XPC DPC DPM JA LG LGT MU SP S9 SV BX MGR CLINIC HC SL
SE HQD/CC CAS CY EV PA S. SC XR AFCDMS AFHRL AFHMS DET-26 DEHL OSI AFDTL MWR
SAM SAM/EX SAM/CC OLMT 2199 6575 6906 8075 DET-20 DP T/A SVC OPR 7

RTTUZYUW RUEAHQA2937 1481604-UUUU--RUMTHA.

ZNR UUUUU

R 281213Z MAY 87

FM HQ USAF WASHDC //LETT/LEYS/SGPR//

TO AIG 19970

INFO RUMTHA/AFCDMS AFCDMS AFB TX//SGPR//

RUMKAAA/SA-ALC KELLY AFB TX//MMIR//

INFO AF-ACKJFF

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SUBJECT: DISPOSAL OF RADIOACTIVE WASTE, HQ USAF/LEYS/LETT/SGPR MSG

071000Z APR 87

THIS MESSAGE IN TWO PARTS

PART I FOR CONUS SHIPPERS ONLY

1. CONUS SHIPPERS COMPLY WITH HQ USAF/LETT/LEYS/SGPR MSG 2022-32 MAY

87. DISREGARD THIS MESSAGE

PART TWO FOR OVERSEAS ACTIVITIES ONLY.

2. SUBJECT MSG IS QUOTED IN PART FOR INFORMATION: "DUE TO SEVERAL INCIDENTS INVOLVING THE IMPROPER PACKAGING AND SHIPMENT OF RADIOACTIVE WASTE TO COMMERCIAL LOW-LEVEL DISPOSAL FACILITIES, THE USAF RADIOISOTOPE COMMITTEE HAS DEEMED IT NECESSARY TO HALT ALL SHIPMENTS OF LOW-LEVEL RADIOACTIVE WASTE TO COMMERCIAL DISPOSAL FACILITIES



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WITHOUT THE ON SITE PRESENCE OF A QUALIFIED BROKER FROM SA-ALC/MMIR OR BROKER ON CONTRACT THROUGH SA-ALC/MMIR. THE BROKER WILL VERIFY THE ACCURACY OF THE PACKAGING OF THE MATERIAL AND WILL ENSURE THAT ALL REQUIRED FORMS ARE PROPERLY PREPARED AND ATTACHED TO THE RADIOACTIVE WASTE. EACH INSTALLATION WILL BE REQUIRED TO PROVIDE SA-ALC/MMIR A FUND CITE FOR TRAVEL AND PER DIEM EXPENSES INCURRED BY THEIR BROKER. THE ONLY EXCEPTION TO THE POLICY LISTED ABOVE IS FOR OVERSEAS UNITS. OVERSEAS UNITS MAY CONTINUE TO SEND RADIOACTIVE WASTE SHIPMENTS TO KELLY AFB, TX FOR REBROKERAGE PRIOR TO SHIPMENT TO THE WASTE DISPOSAL SITE UPON DIRECTION FROM SA-ALC/MMIR. PROCEDURAL CHANGES TO DD-110N-2, AND APPLICABLE SUPPLY, TRANSPORTATION, AND SURGEON GENERAL REGULATIONS THAT WILL PROVIDE THE REQUIREMENT FOR MORE DETAILED COORDINATION AND QUALITY CONTROL ARE BEING DEVELOPED. THE ABOVE PROCEDURE, HOWEVER, WILL REMAIN IN EFFECT UNTIL THE USAF RADIOISOTOPE COMMITTEE DEEMS THAT CORRECTIVE ACTIONS ARE EFFECTIVE."

3. UNTIL FURTHER NOTICE, ALL TRANSPORTATION OFFICES WILL INSTRUCT PERSONNEL INVOLVED IN PACKAGING AND TRANSPORTATION THAT ANY, REPLAT, ANY MATERIAL RECEIVED FOR PACKAGING/TRANSPORTATION THAT IS RADIOACTIVE OR IS SUSPECTED TO BE RADIOACTIVE IN NATURE WILL BE FRUSTRATED UNTIL THE MATERIAL IS POSITIVELY IDENTIFIED. ALL RADIOACTIVE



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MATERIAL SHIPMENTS WILL BE PROCESSED IAW REF MSG, PARA 1, RELATIVE TO OVERSEAS ACTIVITIES. PLEASE NOTE THAT SHIPMENT IS DEPENDENT ON DIRECTION FROM SA-ALC/MMIR. NO SHIPMENT WILL BE ENTERED INTO THE TRANSPORTATION SYSTEM WITHOUT DIRECTION FROM SA-ALC.

Alt 12

NOTE: SA-ALC/MHIOB POCs FOR GUIDANCE/ASSISTANCE ARE CAPT JORDAN/MH.
VAUGHN: AUTOVON 945-4643. CORRESPONDENCE SHOULD BE ADDRESSED TO
SA-ALC/MHIOB.

4. POCs ARE MR. SPARKS (HQ USAF/LETT, AUTOVON 227-4742), LT COL
MILLER (HQ USAF/LEYS, AUTOVON 227-3854), OR COL WOOD (AFOMS/SGPR,
AUTOVON 240-3331).

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