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

LN 42-23539-01AF 10FEB 1903 DN 030-28641

ATTN OF. BROOKS AFU TEXAS 78230-5000

Request for Exception from Six Month Leak Test Requirement USAF Radioactive Material Permit No. 04-09951-1AFP

<sup>TO</sup> USNRC, Region IV ATTN: Mr. D. Blair Spitzberg 611 Ryan Plaza, Suite 1000 Arlington TX 76011

1. The 1155 Technical Operation Division at McCielian AFB CA is currently authorized nine strontium 90 Titanate (one model 25 A at 95 kCl, one model E at 79 kCl, and seven model Fs at 81 kCl each) and one strontium 90 orthotitanate (model 100F at 250 kCl), radiothermoelectric generators (RTGs) manufactured by Teler ne Energy Systems. The RTGs are used at an unmanned facility it five sites, each with two RTGs in the vicinity of Benchmark Monty, Burnt Mountain AK for the generation of electricity. These sites are 16.5 miles E/NE of Christian AK and 65 miles north of Ft. Yukon AK (latitude N67 25'06'' and longitude W144 36'11'') and are contained in locked, fenced, contained and secure areas. Access to the sites can only be practically accomplished by air.

2. The current leak test condition is six months and has been carried out thus far during late spring and early fail. However, with this schedule, there have been problems in obtaining safe air transportation of personnel to the sites due to unpredictable and inclement weather conditions. We do not believe that the incremental radiation safety value attained by performing six month leak tests offsets the endangerment to human life presented by attempting air travel during unpredictable and inclement weather conditions which prevail most of the year at the sites. Request NRC grant an exception to the six month leak test requirement, allowing leak tests and physical inventories to be made annually during the few months of most stable weather conditions which occur in summer.

3. Any questions or comments regarding the above should be addressed to this office at commercial telephone number (512) 536-3331 or in writing.

DAVID G. WOOD/ COH, USAF, BSC Executive Secretary, USAF Radiolsotope Committee Office of the Surgeon General CC: HQ USAF/SGP HQ AFLC/SGBE 1155 TOD/DLS

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