



DEPARTMENT OF THE NAVY
OFFICE OF THE CHIEF OF NAVAL OPERATIONS
2000 NAVY PENTAGON
WASHINGTON, D.C. 20350-2000

IN REPLY REFER TO

5104
Ser N455/8U595413
March 16, 1998

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Subj: REPLY TO NRC INSPECTION REPORT 45-23645-01NA/9605

Gentlemen and Ladies:

This is in response to the Nuclear Regulatory Commission, Region II, letter of August 9, 1996, Docket No. 030-29462, Subject: NRC Inspection Report 45-23645-01NA/96-05 and Notice of Violation (NOV). The letter cited violations of NRC requirements in the commodities programs of Naval Sea Systems Command (NAVSEA 04R) and Naval Supply Systems Command (NAVSUP), operating under Navy Radioactive Materials Permits (NRMP) 45-00024-T1NP, 45-00023-T1NP, and 45-00023-T2NP, respectively. The Navy has provided five previous responses to the NRC regarding the subject inspection.

The only outstanding action item from the previous responses was completion of the NAVSUP commodities inventory. The completed NAVSUP inventory is provided in the enclosure. This inventory data will be used as a baseline for future annual inventory reconciliation. Therefore, this letter completes all corrective actions for violations listed in NRC Inspection Report 45-23645-01NA/96-05 and Notice of Violation (NOV).

As noted in our April 10, 1997 letter, disposal records for many commodities did not provide the type of information to identify the specific device nor the number of disposed devices. As a result, past disposal records were inconclusive in determining the actual number of disposed devices. However, the Naval Radiation Safety Committee is confident that the Navy's low level radioactive waste (LLRW) program has been historically effective in controlling the disposal of our licensed radioactive commodities.

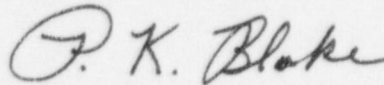
Although we have now improved our computer tracking databases, properly disposed of obsolete items, increased the number of inspections at both headquarters and field levels, we still vigorously seek improvements in commodities control. Specifically, meetings continue between our Radiological Affairs Support Office and NAVSUP and NAVSEA-04R. We are also reviewing options for increased controls on our generally licensed

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commodities. Controlling radioactive commodities continues as a significant concern to the Naval Radiation Safety Committee.

If you have additional questions, please do not hesitate to contact me. My phone number is 703-602-5365.

Sincerely,



P. K. BLAKE
Captain, MSC, U.S. Navy
Executive Secretary
Naval Radiation Safety Committee

Encl:

(1) Specific Response to NRC Inspection Report 45-23645-01NA/9605

Copy to:

Regional Administrator, NRC Region II

BUMED (211)

CMC (SD)

NAVSEA (07R)

NAVSEA (04R)

NAVSUP (421)

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SPECIFIC RESPONSE TO NRC INSPECTION REPORT 45-23645-01NA/9605

1. Violations B and C. The licensee failed to conduct inventories every twelve months and to keep records showing the receipt, transfer and disposal of byproduct material possessed and used under NRMP Nos. 45-00023-T1NP and 45-00023-T2NP.

Response. Inventory, procurement, transfer and disposal data is summarized to date as an attachment. As discussed in previous letters to the NRC, most of the devices authorized by these permits have been in the inventory for 20 to 40 years. For many of the devices, no new purchases have occurred in the last 10 years. An intensive search has been conducted to locate procurement, transfer and disposal records. Much of this historical documentation is no longer available or is incomplete. The inventory data for the devices on NRMP Nos. 45-00023-T1NP and 45-00023-T2NP is based on information received directly from field level activities.

NRMP 45-00023-T2NP INVENTORY RECONCILIATION STATUS

DEVICE AND MODEL	INVENTORY SUMMARY
Wrist Depth Gauge, Items 6A, Tl-204 (1.6 mCi) and 6D, Pm-147 (7 mCi)	Records indicate that 1201 of these items were in the inventory in 1985. There is no record of procurement, transfer, or disposal since the 1985 inventory. The current inventory is 37 items. There are 1164 items unaccounted for.
Divers Wrist Watch, Item 6B, Pm-147 (2 mCi)	Records indicate that none of these items were in the inventory in 1985. There is no record of procurement, transfer, or disposal since the 1985 inventory. The current inventory is one item.
Divers Wrist Compass, Item 6C, Pm-147 (15.5 mCi)	Records indicate that a total of 294 devices were in the inventory in 1985. There is no record of procurement, or disposal since the 1985 inventory. There were 33 devices transferred outside of Navy of which 31 have been returned to Navy custody. The current inventory is 55 items. There are 239 items unaccounted for.
Depth Gauge, Item 6E, Pm-147 (25 mCi)	Records indicate that 239 of these items were in the inventory in 1985. There is no record of procurement, transfer, or disposal since the 1985 inventory. The current inventory is 20 items. There are 219 items unaccounted for.
Tritium Water Standard, Item 6F, H-3 (30 mCi)	Records indicate that 1138 of these items were in the inventory in 1985. Since that inventory, 809 have been procured, 94 properly disposed of and none transferred. The current inventory is 321 items. There are 1532 unaccounted for.

NRMP 45-00023-T2NP INVENTORY RECONCILIATION STATUS

DEVICE AND MODEL	INVENTORY SUMMARY
Aircraft Exit Markers, Items 6A and 6B, H-3 (50 mCi)	Records indicate 10 of these items were in the inventory in 1988, not including items installed on aircraft. Since that inventory, 129 of these items have been procured. There are no records of disposals or transfers. The current inventory is 217 items, which includes items installed on aircraft. An excess* of 88 items is accounted for.
Aircraft Exit Marker, Item 6C, H-3 (90 mCi)	Records indicate that 70 of these items were in the inventory in 1988. There are no records of procurement, disposal, or transfer since the 1988 inventory. The current inventory is 17 items. There are 53 items unaccounted for.
Ice Detector Probes, Item 6E, Sr-90 (50 uCi)	Records indicate that 105 of these items were in the inventory in 1988, not including items installed on aircraft. Documentation indicates that 3 of these devices were transferred to DLA that is authorized to possess these items under their NRC license. There are no records of procurement or disposal since the 1988 inventory. The current inventory is 382 items, which includes items installed on aircraft. An excess* of 280 items is accounted for.

NRMP 45-00023-T2NP INVENTORY RECONCILIATION STATUS

DEVICE AND MODEL	INVENTORY SUMMARY
Toggle Switch, Item 6F, Pm-147 (300 uCi)	Records indicate that three of these items were in inventory in 1988, not including items installed on aircraft. There are no records of procurement, disposals or transfers since the 1988 inventory. This toggle switch was used on the F-14 Tomcat. All but one F-14 was retrofitted with new non-radioactive toggle switches in the mid 1980s. The current inventory is one item and two items unaccounted for.
Drogue Lights, Items 6D, Kr-85 (25 mCi), and 6G, H-3 (500 mCi)	Records indicate that 10 of item 6D and 136 of item 6G were in inventory in 1988, not including items installed on aircraft. Since the 1988 inventory, 420 of item 6G have been procured. There are no records of disposal or transfers since 1988. Once installed on aircraft these devices cannot be differentiated from each other, for this reason the inventory reflects the total of both items. The current inventory, which includes items installed on aircraft, is 1295 items. An excess* of 729 items is accounted for.
Aircraft Wind Indicator, Items 6H and 6I, H-3 (230 to 400 mCi)	No procurement, inventory, or disposal data could be located for these items. These items were used on the AV8 Harrier, which was removed from service in 1983. The current inventory is zero items.

* The excess number of items is due in part to the fact that the 1988 inventory did not take into account items that were already installed on aircraft.