



DEFENSE HEALTH AGENCY
7700 ARLINGTON BOULEVARD, SUITE 5101
FALLS CHURCH, VIRGINIA 22042-5101

11 February 2021

Licensing Assistance Team
Division of Nuclear Materials Safety
U.S. Nuclear Regulatory Commission, Region 1 2100 Renaissance Blvd., Suite 100
King of Prussia, PA 19406-2713

Re: Defense Health Agency (license number: 45-35423- 01) Request for Extension of Site Assessment Visits of Military Treatment Facilities (MTFs)

Ladies and Gentlemen:

Section 3(i) of Enclosure 1 in the Administrative Instruction 87 of the Defense Health Agency (DHA), a tie down to the DHA broadscope license, states that the DHA Radiation Safety Director will:

“Provide or coordinate periodic site assistance visits to all DHA facilities operating under the DHA NRC License. Frequency of visits will be based upon program complexity, relative risk of safety, and site compliance with internal and external audits. Site visits will not exceed every 30 months with goal of visitation every 24 months.”

In light of DoD COVID-19 travel restrictions, the DHA anticipates it will not be able to meet the 30 month site visit goal for three MTFs coming due on 05 March 2021. In addition, based on the dates they were added to our license, three MTFs are due by September 2021, twenty three are due by May 2022, and one is due in June 2022.

The DHA is requesting that Site Visit extensions be granted for 180 days for the thirty MTFs under the DHA NRC License. Should the travel conditions favor earlier visits, DHA intends to fulfill the site visit requirements in a shorter time period.

Currently, to ensure MTF Radiation Safety Programs are compliant with the DHA NRC licensing conditions, the DHA has instituted specific oversight measures which include:

- i. DHA representatives participating in every quarterly RSC meetings held locally at the MTFs. This allows DHA to review each MTF's Radiation Safety program closely, provide technical support, and understand the challenges of individual MTFs with regards to compliance.
- ii. Creating an Unusual Occurrence reporting policy that requires MTFs to report everything out of the ordinary, even if minor (with a 24-hr hotline Radiation Safety support). This allows DHA to identify any trend and also share lessons learned information with other MTFs to prevent similar incidents.
- iii. Meeting with MTF ARSOs monthly in a virtual roundtable format to share information, discuss concerns, and answer questions and concerns.

The point of contact for this matter is Mr. [REDACTED] at [REDACTED] civ@mail.mil or (703) 681-5698.

Sincerely,


REYES.RICARDO.
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COL RICARDO REYES, Ph.D.
Radiation Safety Director

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