UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 2, 2021

Mr. Jerry Low, Contracting Officer
Department of the Navy, Naval Sea Systems Command
1333 Isaac Hull Avenue, SE
Washington Navy Yard 20376-0001

SUBJECT: RESPONSE TO REQUEST FOR RECOMMENDATION TO TRANSFER POSSESSION OF THE SURFACE SHIP SUPPORT BARGE TO APTIM FEDERAL SERVICES, CONTRACT N00024-20-C-4139

Dear Mr. Low:

In a February 2, 2021 letter to the Nuclear Regulatory Commission (NRC) (Agencywide Document Access and Management System [ADAMS] Accession No. ML21043A134), the Department of the Navy, Naval Sea Systems Command (NAVSEA) requested NRC staff to review a request from Aptim Federal Services (Aptim) and make a recommendation to NAVSEA as to whether to transfer possession of the Surface Ship Support Barge (SSSB) to Aptim for characterization and relocation to Mobile, Alabama prior to the hurricane season before approval of the decommissioning work plan in anticipation of decommissioning activities described in the Decommissioning Work Plan (DWP) (ADAMS Accession No. ML20269A446) dated September 2, 2020, currently under NRC review.

Upon transfer, Aptim would assume responsibility for and control over the SSSB. Aptim would then proceed to complete initial radiological characterization and conduct inspections of holds and ballast tanks in preparation for tow transport to the Alabama Shipyard in Mobile, Alabama. Once at the Alabama Shipyard, Aptim would transfer the SSSB from the barge to land in preparation for decommissioning work. As indicated by Aptim in their request referenced in your February 2 letter, Aptim will not commence decommissioning work unless NAVSEA accepts the proposed DWP, including consideration of the NRC's evaluation and recommendation.

According to the request, Aptim will draw on the experience of individuals from decommissioning work completed on the U.S. Army Corps of Engineers *Sturgis* MH-1A reactor barge (*Sturgis*), including disposal of the Class A and Class B low-level radioactive waste and mixed low-level waste at the Waste Controls Specialists facility in west Texas. Non-radiologically contaminated portions of the *Sturgis* were released for unrestricted use following extensive radiological clearance surveys. The *Sturgis* project is comparable to or greater than the SSSB in size, scope, complexity and radiological and industrial hazard. As required under Aptim's contract for decommissioning the SSSB, the *Sturgis* also required transfer of possession, transport from Virginia to a dismantlement site alongside the Gulf of Mexico, decontamination, dismantlement, and waste disposition.

The referenced request indicates that Aptim will directly manage work control, quality assurance, safety, and radiological programs. Although not being utilized for the SSSB project,

Aptim has NRC and NRC Agreement State licenses for performing a variety of activities including site characterization, decontamination of facilities, treatment and packaging of wastes, and waste transport for transfer to authorized recipients.

Also, in its DWP, Aptim provided an organization chart showing the planned project organization. Resumes for key management personnel were also provided to document that key Aptim employees are qualified by education, training, and experience for their positions. Aptim plans to establish an organization responsible for radiological safety, industrial health and safety, quality assurance, project administration, waste operations, and project controls. This organization would provide a management team with control over the decommissioning. The individual filling the Radiation Protection Manager position is a certified health physicist with decommissioning related experience at Naval Station Treasure Island, Hunters Point Naval Station, the *Sturgis,* and Humboldt Bay.

While the DWP review is ongoing, its contents are consistent with the transfer request in demonstrating the technical competency of Aptim to conduct and complete radiological decommissioning.

Based on its review of the provided transfer request and DWP, the NRC staff determined that the applicants have described a project organization that will provide the requisite experience and expertise for the decommissioning of the SSSB. Therefore, NRC concludes that Aptim has demonstrated sufficient technical competency and experience to safely complete radiological decommissioning of the SSSB. Therefore, the NRC recommends NAVSEA proceed with the transfer of possession with responsibility for SSSB to Aptim in order to complete preparations for decommissioning, including initial characterization, inspections, and transport to Alabama Shipyard in Mobile, Alabama pending the results of NRC's review and recommendation on acceptance of the DWP.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html.

If you have any questions on this recommendation, please contact Ted Smith at theodore.smith@nrc.gov, 301-415-6721.

Sincerely,

Bruce A. Watson, Chief
Reactor Decommissioning Branch
Division of Decommissioning, Uranium
Recovery, and Waste Programs
Office of Nuclear Material Safety
and Safeguards

cc: S. Picard, NAVSEA
H. Duff, NAVSEA

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