



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PA 19406-2713

March 31, 2021

Lieutenant General Douglas M. Gabram
Commanding General, US Army Installation
Management Command
2405 Gun Shed Road
Joint Base San Antonio-Fort Sam Houston
San Antonio, TX 78234-1223

**SUBJECT: ERRATA - NRC INSPECTION REPORT SUC-1593/2019001 DATED –
JUNE 28, 2019**

Dear Lt. Gen. Gabram:

The U.S. Nuclear Regulatory Commission (NRC) has identified inadvertent errors in the NRC Inspection Report SUC-1593/2019001, dated June 28, 2019, (Agencywide Documents Access Management System (ADAMS) Accession Number ML19189A225). The subject line and several other references should state Fort Bragg, not Fort Benning, to indicate the correct location of the inspection.

The NRC is reissuing the inspection report in its entirety to correct these errors. The necessary corrections are reflected in the enclosed report. Please keep a copy of this correspondence and the corrected inspection report for your records. No response is required.

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

Lt. Gen. Douglas M. Gabram

2

Should you have any questions concerning this letter, please contact Orysia Masnyk Bailey, Health Physicist, at 864-427-1032.

Sincerely,

/RA CCahill for/

Anthony Dimitriadis, Chief
Decommissioning, ISFSI
and Reactor HP Branch
Division of Nuclear Materials Safety

License No.: SUC-1593

Docket No.: 040-09083

Enclosure:

Corrected Copy of NRC Inspection Report
SUC-1593/2019001

cc w/Enclosure:

U.S. Army Installation Management Command
ATTN: Dr. Robert Cherry, Radiation Safety Officer,
IMSO/301
Building 2261
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Fort Sam Houston, TX 78234-1223
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ERRATA - FORT BRAGG - NRC INSPECTION REPORT SUC-1593/2019001 DATED – MARCH 31, 2021.

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SUNSI Review Complete: OMasnyk-Bailey

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DATE	03/31/2021	03/31/2021		

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U.S. NUCLEAR REGULATORY COMMISSION REGION I
INSPECTION REPORT

Inspection No. SUC-1593/2019001

Docket No. 040-09083

License No. SUC-1593

Licensee: United States Army Installation Management Command

Address: Fort Bragg, NC

Inspection Dates: May 30, 2019

Inspector: Orysia Masnyk Bailey, Health Physicist Decommissioning, ISFSI,
and Reactor HP Branch
Division of Nuclear Materials Safety

Approved By: Anthony Dimitriadis, Chief
Decommissioning, ISFSI, and Reactor HP Branch
Division of Nuclear Materials Safety

Enclosure

EXECUTIVE SUMMARY

Fort Bragg
NRC Inspection Report SUC-1593/2019001

This U.S. Nuclear Regulatory Commission (NRC) inspection was a routine, announced inspection of activities authorized at Fort Bragg, North Carolina, by NRC Source Materials License SUC-593, Amendment 02, dated February 9, 2017. The inspection disclosed that the licensee was conducting licensed activities in accordance with approved procedures, license requirements, and applicable NRC regulations.

Industrial/Academic/Research Programs

- The licensee implemented all aspects of its program, including the radiation safety plan, physical security plan, and the environmental radiation monitoring plan, and was in compliance with license requirements. The licensee was effectively controlling the security of the depleted uranium (DU) at Fort Bragg. In addition, the licensee was monitoring the environment, which demonstrated there was not any migration of the DU from the radiation controlled area.

Report Details

Summary Status of Licensed Activities

In August 2005, the Department of the Army discovered remnants of munitions containing depleted uranium (DU) at the Schofield Army Barracks in Hawaii, during an unexploded ordnance clearance project. The remnants were identified as spotting rounds that were used with the Davy Crockett Weapons System. The Davy Crockett Weapons System was either an M388 or M390 nuclear projectile developed during the late 1950's and deployed between 1962 and 1968. The weapons system was never used by the military, except during two test explosions in 1962, in a controlled environment at the Nevada Test Site.

The spotting round cartridge (M101) contained DU and was designed to mimic the trajectory of the nuclear projectile due to its density of approximately 18.8 grams per cubic centimeter (g/cm^3) and was used to insure a high probability of impact by the weapons system. The spotting round emitted a puff of white smoke upon impact that allowed the officer in charge to figure the angle and timing calculations for the nuclear projectile. The DU remained intact or mostly intact on or near the surface following impact and did not explode. There were approximately 75,000 DU spotting rounds manufactured and subsequently distributed under the authority of a number of U.S. Atomic Energy Commission licenses that were in effect at the time. There were approximately 30,000 of the spotting rounds fired at Army ranges across the United States. Remnants of the tail assemblies may remain at each installation where the U.S. Army trained with the Davy Crockett weapon system from 1960 to 1968.

The U.S. Army Installation Management Command (IMCOM) applied for an NRC license in 2008 on behalf of the Army for all identified locations that were under NRC jurisdiction. On October 13, 2013, the NRC issued source material license SUC-1593 (Docket Number 040-09083) for the two locations in Hawaii for possession of DU. A subsequent amendment authorized other locations for possession of DU, so that a total of 16 installations were identified on the license, which represented multiple ranges and a total possession limit of 5700 kilograms of DU. The 20-millimeter spotting round weighed approximately one pound and contained about 0.45 pounds (0.204 kilograms) of DU. Licensing documents include an environmental monitoring plan for each installation identified on the license, as well as a security and radiation safety plans.

The NRC initiated its inspection program of the licensee under Manual Chapter 2800, starting in fiscal year 2018, with approximately 4 installations to be inspected every 2 years. This inspection was the first inspection in 2019.

1 Industrial/Academic/Research Programs (87126)

1.1 Inspection Scope

The inspector evaluated whether licensed activities were being conducted to protect public health and safety, the common defense and security, and with the conditions of the license and regulatory requirements.

1.2 Observations and Findings

The license is managed under IMCOM, Fort Sam Houston, Texas, with one point of contact, the License Radiation Safety Officer (LRSO) who is named on the license. The inspector observed that the LRSO was familiar with each of the locations named on the license, was knowledgeable about the history and use of the DU spotting rounds and weapon systems and was well-informed of the status of the activities conducted under the license at Fort Bragg, NC. There is a Garrison Radiation Safety Officer (GRSO) at each installation.

The LRSO visited each installation annually and performed an annual audit at each installation using Inspection Procedure (IP) 87126. This meets the requirement of 10 CFR 20.1101, "Radiation Protection Programs." The LRSO has also developed and maintains a central repository of Davy Crocket DU license files that is available on-line.

a. Implementation of the Radiation Safety Plan

The Radiation Safety Plan, dated December 31, 2015 (ADAMS Accession Number ML16004A369) was submitted and authorized by the NRC under License Condition 11. Fort Bragg has a radiation safety staff, consisting of a GRSO, and assistant GRSO trained in accordance with the Radiation Safety Plan, Section 2.4.1.

The inspector observed that the licensed radiation controlled areas are down range at impact areas used for large projectile fire. The inspector observed the required postings that indicated "Caution – Radioactive Material" signs, as required by Section 14.1 of the Radiation Safety Plan. These are located at the wood line at the periphery of the impact areas. The inspector also observed other NRC required postings, including the NRC Form 3, and the applicable regulations were located at the safety office.

The licensee maintained calibrated instruments as required by Section 17 of the Radiation Safety Plan. The instruments available to the GRSO were appropriate for the licensed material and type of uses anticipated under the possession-only license.

b. Review of Physical Security Plan

The Physical Security Plan, dated December 31, 2015, is required by License Condition 11, and references the Radiation Safety Plan for specific details regarding the control of the radiological boundaries, posting of the boundaries, controlling access to the radiation controlled area, and training of workers entering the area.

During the inspection, the inspector observed that the physical requirements and access control measures to the range were implemented through the installation range control officer in that access to the impact areas are well controlled.

c. Implementation of the Environmental Radiation Monitoring Plan

The licensee developed a site-specific environmental radiation monitoring plan for each installation authorized on the license and each site-specific plan was approved by the NRC under License Amendment Number 02. The environmental radiation

monitoring plan described the physical, geological, groundwater, and habitat of the installation.

The inspector observed employees from Leidos, an environmental sampling contractor, and a representative from the Directorate of Public Works, obtain water samples from one of the approved locations on base (SWS-08). These samples are taken quarterly. DU has never been detected.

1.3 Conclusion

The licensee implemented all aspects of its approved license. No violations were identified.

2 **Exit Meeting Summary**

On May 30, 2019 the NRC inspector presented the inspection results to Dr. Robert N. Cherry of your staff, and members of the Fort Bragg safety staff. No proprietary information was identified during the inspection.

SUPPLEMENTAL INSPECTION INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

R. Cherry, License RSO
V. Wooten, Garrison RSO
Lee Ward, Directorate of Public Works

Leidos

Megan Sherman, Environmental Engineer

INSPECTION PROCEDURES USED

IP 87126 Industrial/Academic/Research Programs

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened

None

Closed

None

Discussed

None

LIST OF ACRONYMS

CFR	Code of Federal Regulations
DU	Depleted Uranium
GRSO	Garrison Radiation Safety Officer
IMCOM	Army Installation Management Command
LRSO	License Radiation Safety Officer
RCA	Radiation Control Area