

TO: Regional Administrator - US Nuclear **FROM:** Regulatory Commission

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FAX #:

PHONE:

DATE: Tuesday, March 30, 2021 2:22:50 PM

PAGES: 08

COMMENTS:



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March 30, 2021

Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713
ATTN: Director, Division of Nuclear Materials Safety

RE: NRC Radioactive Materials License No. 06-30556-01, Amendment No. 09:
Notification of License Implementation at the Aberdeen Proving Grounds Experimental Facility
#9, Building 1179, Aberdeen Proving Ground, Aberdeen, Maryland.

Cabrera Services Inc. (Cabrera) is providing this written notification of its intent to utilize NRC
Radioactive Material License No. 06-30556-01, Amendment No. 09 in support of operations at a
temporary job site. Enclosures include:

- The specific information required by Cabrera's NRC License Condition No. 19A.
- A Memorandum of Understanding between licensee's as required by Cabrera's NRC License Condition No. 13.
- Cabrera Participant Notes from 23 Apr 2020 call between APG, Cabrera and NRC.

If you should have any questions regarding this notification or the planned work activities, please
contact me at (352) 610-2150.

Regards,

Michael S. Winters, CHP
Radiation Safety Officer

Enclosures



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LICENSE USE DETAILS PROVIDED PER CONDITION #19A

1) Estimated Type, Quantity, and Physical/Chemical Form(s) of Material

The property owner has a portion of building 1179 located on the EF-9 site that is due for routine facility upgrades as part of a larger base wide project. Cabrera has been contracted to perform radiological surveys of the portions of Building 1179 where work is planned and, adjacent grounds (lay-down) areas to support the overall planned upgrade work.

The structures and surrounding grounds at the Site are known to be or have been contaminated with isotopes of uranium (U), primarily U-238. Depleted uranium is expected to be encountered within materials to be handled by Cabrera during the survey.

A review of available APG survey data from the facility "Target Bay" noted maximum radiation levels up to 2.2 milliroentgen per hour with a G-M detector; removable contamination levels (dpm/100cm²) were less than 5,000 beta and less than 1,000 alpha. Note that the "Target Bay" is not a planned work area.

In recent surveys of planned work areas, observed exposure rates were less than or equal to 0.2 mR/hr; removable contamination levels (dpm/100cm²) were less than 5,000 beta and less than 1,000 alpha.

Once mobilized, Cabrera will setup Reference Background Area's (RBA's) as part of our pre-renovation surveys of the Site to include building materials, soil and asphalt. Cabrera will be collecting survey data to include volumetric/gamma scans of soil areas, loose and fixed surface contamination measurements for alpha and beta radioactivity. The results of radiological surveys will be used by the Cabrera RSO and AU to establish required radiological controls during subsequent building work under Cabrera's license and, for other purposes, as determined by APG.

Meeting notes from the April 23, 2020 call are attached that discuss conversations between all stake holders prior to work plan development to discuss the regulatory path forward and expectations of project work products.

Estimated quantity is unknown at this time as data collected will be used to determine the estimated activity for future mobilizations. It is assumed that it will consist of low levels of activity based on prior use of the structure.

2) Specification of the Site Location

Experimental Facility -9, Partial Section of Building 1179 Aberdeen Proving Ground, Aberdeen, Maryland



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3) Description of Project Activities including Waste Management and Disposition.

Cabrera will delineate and assume licensed control over the predetermined project area as stated in the attached MOU. Once mobilized and project area delineated, Cabrera will setup Reference Background Area's (RBA's) as part of our characterization of the Site to include building materials, soil, and asphalt. Cabrera will be collecting survey data to include volumetric/gamma scans of soil areas, loose and fixed surface contamination measurements, and a combination of static/scan measurements for alpha and beta analysis. These radiological surveys will be used to support future work activities and could be used in part in the event that APG wants to terminate license use at the EF-9 site.

All Investigative Derived Waste generated from this project will be disposed of at the site. Soil samples will be collected and sent off site for analysis and disposed of by the laboratory under their procedures and applicable licenses.

4) Estimated Project Start Date and Duration.

Site mobilization operations will proceed on Monday, April 12, 2021 with an expected 2-day project setup. License activities will commence on or after April 14, 2021 with an expected 2-week duration.

5) Identification of, and Information on How to Contact, Key Project Personnel.

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EF-g Modernization

Meeting Notes – 23 Apr 2020

Attending

Mike Plonski, Cabrera Services; Scott Kay, Cabrera Services; Stephen Hammann, Cabrera Services; Stephan Owe, Cabrera Services; Elizabeth Ullrich, NRC; Dan Hamilton, ARL; Mike Borisky, ARL; Ben Alexander, ARL

Discussion

- Work is not classified as a decommissioning but is a demolition. Follow decommissioning process except NEPA review. This project is part of the building so does not fall under definition of decommissioning which covers entire building.
- NEPA review is not required at this time. If there is found to be an impact to the environment, then a NEPA review may be required. Will keep ARL environmental involved.
- Activities performed that are not allowed on ARL's license can be informed on Cabrera's license as long as the work is covered under their license. No amendment is needed for ARL's license unless changing requirements of the license.
- ARL Radiation Committee will review and approve of Cabrera's Radiation Protection Plan. Don't need to send radiation protection plan sent to NRC.
- According to contract, demolition and site work will be on Cabrera's license. When demolition and site work are done, then final status survey will be conducted. If unrestricted area release is not achieved, then new construction will be done on Cabrera's license. If unrestricted area release is achieved, then new construction will be done through ARL.



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**Memorandum of Understanding
Experimental Facility #9, Building 1179 Partial Demolition
Aberdeen Proving Ground, Aberdeen, Maryland**

Date: June 12, 2020

To: Daniel Hamilton, Radiological Safety Officer, Army Research Laboratory at Aberdeen Proving Grounds, Maryland

From: Michael S. Winters, CHP, Radiological Safety Officer, Cabrera Services Inc.

Subject: Memorandum of Understanding (MOU) between Licensees for Temporary Job Site Activities at the Aberdeen Proving Grounds, Army Research Laboratory, EF-9 Test Facilities - Building 1179 (ARL Support Agreement Number: N6A0097EJ20237)

The purpose of this MOU is to define the independent and shared roles and responsibilities between two U.S. Nuclear Regulatory Commission (NRC) licensees specifically, Department of Army Combat Capability Development Command-Army Research Laboratory (CCDC-ARL) License No's SMB-141 and 19-1205602 and Cabrera Services Inc. Cabrera License No. 06-30556- 01 during execution of Cabrera temporary job site activities supporting the partial building demolition at EF-9, Building 1179 along with, remediation of adjacent impacted soils, drain lines, structures beneath the soil and the construction of a replacement structure. This MOU is established per Cabrera License Condition No. 13.

Cabrera will control access to and implement radiation safety controls in radiological areas established by Cabrera to support temporary job site activities; the CCDC-ARL RSO will control access to all other radiological areas unrelated to Cabrera temporary job site activities. Testing or target-related research shall not be conducted in the attached dome facility during active Cabrera temporary site activities.

Prior to the initiation of partial demolition of building 1179, Cabrera will mobilize to perform a characterization survey of the pre demolition site and surrounding support zone as discussed in the Characterization Survey Plan (CSP) (Cabrera, 2020). During the survey, Cabrera will take license possession of the survey area and collect measurements to determine the nature and extent of the potential contamination, perform waste characterization sampling and collect background information from like, unimpacted land and building materials. During the survey, Cabrera and CCDC-ARL will delineate the separation of license control with temporary signage and limit access to and from the controlled areas as described above. Once completed, Cabrera will demobilize and return the site including any remaining radiological areas, back to CCDC-ARL control.



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After characterization, Cabrera will remobilize and support the construction contractor during the partial demolition of building 1179 and with remediation of immediately surrounding soils, including any exposed drain lines or other structures found within the soil as required. Cabrera will assume responsibility for all radiological monitoring & controls necessary in the demo/excavation work zones to ensure compliance with the Cabrera Radiological Safety Program (RSP). Expected RSP elements include but, are not limited to, radiological surveys (radiation, contamination, and airborne radioactivity), radiological training of personnel, work zone access controls, and unrestricted release of materials and equipment radiological areas. If the contractor decides it is necessary to bring a radiography device on site for use, Cabrera is to contact the CCDC-ARL RSO in advance for obtaining a DA Permit. Individual monitoring of doses to workers within Cabrera controlled areas, if required, is the responsibility of Cabrera.

Cabrera will not take possession of any radioactive material derived from site operations; After the remediation/clean up actions by Cabrera have been taken, Cabrera and the demolition contractor will segregate and package soil, debris, and investigation-derived waste (IDW) for transfer to CCDC-ARL personnel for management under their license.

Once partial demolition has been completed, Cabrera will complete the characterization survey of the previously inaccessible areas under Cabrera's license as defined in the CSP and, if all areas cannot be cleaned to unrestricted area levels, Cabrera will plan to continue license control of the site during the construction phase, as needed, to support construction contractor reconnection of new systems with existing potentially impacted facility infrastructure.

During all contracted work at the EF-9 Bldg. 1179, both parties reaffirm a strong commitment to ensuring overall safety and, to mutually respond to any radiological accidents and support associated temporary job-site clean-up.

This MOU will expire upon agreement with both parties and a notification in advance by either party or when Cabrera licensed activities have been completed at the temporary job site, whichever occurs first.



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Patrick Baker
 Director, Combat Capabilities Development
 Command Army Research Laboratory
 License Nos. SMB-141 & 19-1205602

Date

2020-08-25

Michael S. Winters, CHP
 Cabrera Services Inc. - Radiological Safety Officer
 License No. 06-30556-01

Date

Michael S. Plonski, RRPT
 Cabrera Services Inc. - Resource Manager
 License No. 06-30556-01

Date

Scott Hay
 Cabrera Services Inc. - Technical Project Health
 Physicist
 License No. 06-30556-01

Date