Supplemental Information to
APTIM Decommissioning Work Plan
Surface Ship Support Barge, Dismantlement and Disposal, Revision 1, April 2021
May 8, 2021

These responses are submitted as supplemental information to the APTIM Decommissioning Work Plan, Surface Ship Support Barge, Dismantlement and Disposal, Revision 1, April 2021.

1) *Reminder on the surveyor efficiency factor of 0.75 vs 1, as discussed yesterday.*

   Response:
   We understand that NRCs position is that the surveyor efficiency, even when using directly coupled data-logging GPS tracking and post processing of the data, cannot exceed 0.75. APTIM will use a surveyor efficiency of no greater than 0.75 when planning and conducting the final status survey.

2) *Reminder on the survey unit discussion by surface media, as discussed yesterday.*

   Response:
   Preliminary Survey Unit (SU) designations are discussed in the Baseline Survey Plan and Final Status Survey Summary. It was recognized that the actual number and size of SUs would be based on site conditions including surface media encountered during the baseline survey. The baseline survey of the Alabama Shipyard project site was conducted between April 12 and April 24, 2021. During the baseline survey, SUs were modified from the preliminary designations to maintain size limits and to keep SUs to one surface media type per SU. The SU design basis will be discussed in the Baseline Survey Report and those SU designations will be reflected in the FSSP.

3) *Clarification request: Will the liner and berm be under the SSSB and CS or just the SSSB?*

   Response:
   The liner will be under the SSSB. The CS will include road plates, as required, for heavy equipment traffic and staging of materials."

   The rationale for not having the liner under the CS is:
   - A liner would be difficult to maintain under the CS considering the use of heavy equipment and potential hot work.
   - Liquids will be drained from any/all structures, systems and components prior to moving items in the CS
   - Residual radioactivity of the SSSB structures, systems and components brought into the CS will be very low.
   - The work area is covered and protected from rainwater

   Due to the low-level residual contamination on the SSSB structures, systems and components that will be brought into the CS, it is anticipated that surfaces underneath the CS will stay below DCGLs and will therefore be classified as Class 2 SUs for the FSS. Surveys of materials taken into the CS as well as routine surveys performed within the CS will verify that residual contamination remains below the DCGLs. Should contamination on surface media underneath the CS become contaminated above the DCGLS, the areas will be remediated, and the impacted SUs will be classified as Class 1 for the FSS.

4) *Clarification request: for the time period before runoff/discharge monitoring is in place, is APTIM relying on ASY's discharge permit for non-radiological effluents with the state or some other mechanism (recognizing this is a temporary configuration)?*

   Response:
   ASY will continue their required NPDES monitoring before, during, and after the SSSB project. As part of APTIM's Environmental Monitoring Plan, storm water sampling will be conducted quarterly with additional sampling conducted following any rain event that exceeds the collection and storage capacity of the storm water collection system if berms are overrun. Storm water sampling was initiated during the baseline survey in April. Storm water samples will be analyzed for radiological parameters (gross alpha/beta, C-14, Co-60, Fe-55, Ni-63, Cs-137) and total lead, total PCBs and reference elements aluminum, iron, and manganese; total suspended solids and pH. Sampling will continue through the conclusion of D&D activities.

5) *Request for clarification: Clarify the airborne effluent monitoring commitments for the SSSB work/site. Staff are unclear as to exactly how APTIM plans to monitor airborne effluents. For example, Section 8.3 (subsection 2) of the DWP states, in part, "however, for air emissions, the Action Limit will be 20% of the Appendix B Table 2 Column 1 limits as these are based on a committed effective dose equivalent of 50 mrem/year and the 10 CFR 20 ALARA limit for air emissions is not to exceed 10 mrem/year." Also, in the Environmental Monitoring Plan, Section 4.3, states "The general area of any HEPA-filtered exhaust discharged directly to the environment outside of controlled areas will be sampled." Staff cannot determine if the monitoring planned is "stack monitoring" which staff consider should be consistent with typical stack monitoring methods (e.g., 40 CFR 60 Appendix A-3, ANSI N13.1, or similar) or if this is simply general "area monitoring" such as is typical for occupational monitoring. Explain how APTIM will utilize the monitoring results to estimate public dose impacts from the airborne effluent measurements (e.g., use of COMPLY computer code or something similar).*

   Response:
   General area sampling will be conducted near the discharge of HEPA-filtered exhaust from the CS. This is not stack monitoring. This air sampling will be used to monitor for potential occupational airborne radioactive material hazards.

   Perimeter air monitoring will be conducted around the project site boundary. The results of this monitoring will be used to evaluate exposures to the public, via COMPLY or similar calculations or direct comparison with the effluent limits, to demonstrate that dose to a member of the public from airborne effluents is below the constraint on air emissions of 10 mrem/yr.

6) *Request for clarification: Clarify how APTIM will maintain negative pressure or otherwise prevent release of radioactive materials when the hatches are open.*

   Hatches on the SSSB will be opened temporarily for insertion of materials and equipment and for removing packaged waste. During these temporary openings, any adjacent work with the potential to produce airborne radioactivity concentration above the DAC will be suspended. In addition,

barriers such as plastic strip curtains, will be placed between active work areas and the Heavy Component Shop where most waste will be removed from the Clean House.

7) *Statement of Clarification: Clarify the designated waste generator to be listed on, and to be signatory on all respective waste manifests.*

Section 9.2 of the DWP mistakenly lists the Navy as the waste generator. By contract, APTIM is to be the waste generator, and will be named as such on all waste manifests and will sign all manifests accordingly.