

From: [Koffman, James](#)
To: [Ullrich, Betsy](#)
Cc: [McDowell, Charles R](#); [Dumont-Carrion, Rosalba](#)
Subject: [External_Sender] Correspondence from NRC - RE: facilities surveys
Date: Thursday, October 28, 2021 2:38:40 PM
Importance: High

Ms. Ullrich,

The assembly of DU tank munitions at MLAAP was ceased back in the early 1990s. I do not think we have any swipe testing data from those production operations from 25 plus years ago. We do have some swipe testing data from trucks being shipped out of the installation in past years and if that would be of any value or assistance in evaluating the submission I would be glad to send some of those to you. Since the DU cores were encased in the tank projectiles I was hopeful that swipe testing of buildings, bunkers, etc. might be avoided. We have not had to go through this process before and not being very familiar with the regulations you referenced in your e-mail it sounds like without data from the assembly buildings and storage bunkers we may have to go through a swipe testing type activity or process to certify that the facilities are free of any radioactive contamination. If this is the case we would have to decide with the personnel we still have available at this time which bunkers, buildings, etc. were involved in the DU ammunition assembly and hire a subcontractor to perform this radiation swipe testing project. If this is the case let us know and maybe we can have a phone call early next week to discuss further. Let us know what day and time works best for you. Due to my pending retirement at the end of this year, I will be copying Mr. Charles McDowell our Environmental Manager and our Facility Director Rosalba Dumont-Carrion on future correspondence because they may be involved in the actions to finalize the license termination. Thank you very much for your feedback and look forward to talking with you about this.

Thank you very much

James Koffman

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Safety is our # 1 Value! 24 hours a day....7 days a week

From: Ullrich, Betsy [mailto:Elizabeth.Ullrich@nrc.gov]

Sent: Wednesday, October 27, 2021 1:23 PM

To: Koffman, James <James.Koffman@aollc.biz>

Subject: [EXTERNAL] facilities surveys

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Mr. Koffman,

I did not see any surveys of the bunkers, process lines, or other areas where licensed materials were stored or handled in the past. These surveys are required by 40 CFR 42.(j) and (k). Although DU is a solid, we have identified contamination from solid DU in the past, at similar facilities. A radiation survey also may verify that no discrete items of DU remain.

I know that such surveys were discussed in the 2008 inspection, and perhaps at later inspections. Please note that the release criteria for DU contamination is small; the NRC screening value for DU, that meets the 10 CFR 20 Subpart E requirement that residual contamination not exceed 25 millirem in a year to anyone, is 101 dpm per 100 square-centimeters, of which not more than 10% is assumed to be removable. You may use this criteria for surveys, or you may develop your own using the NRC's DandD code (which was updated with more likely re-suspension factors) or with RESRAD. If you opt to use RESRAD codes to develop site-specific Derived Concentration Guideline Levels (DCGL) then you would need to provide the input parameters, output files, and sensitivity analyses of any variables selected for use in the code, along with the basis for the selection of each variable. DCGLs developed using RESRAD are required to be evaluated by our program office, and will take additional time.

Guidance may be found in NUREG 1757 and MARSSIM. Please note that Appendix B of NUREG-1757, Volume 2 contains B, "simple approach for Conducting Final Radiological Surveys". You might be eligible to perform surveys using the simple approach.

<https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1757/index.html>

Decommissioning Guidance

<https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1575/index.html> MARSSIM

Let me know if you have any discussions.

Betsy

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