



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND
2405 GUN SHED ROAD
JOINT BASE SAN ANTONIO FORT SAM HOUSTON, TX 78234-1223

November 29, 2021

ATTN: Document Control Desk
Deputy Director, Division of Decommissioning, Uranium Recovery and Waste Programs
Office of Nuclear Material Safety and Safeguards
Mailstop T5A10
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Deputy Director:

Reference Source Materials License no. SUC-1593, docket number 040-09083. We are submitting a request to amend license condition #11 by replacing the current Radiation Safety Plan, dated December 6, 2019, and the current Quality Assurance Project Plan, dated January 2021, with updated versions.

The enclosed new Radiation Safety Plan, dated November 29, 2021, contains a few changes in procedures and minor revisions in style.

- The requirement in the old section 2.4.2 to maintain "a log of routine range activities in [radiation control areas] as they occur" will instead be included on the exit monitoring forms (section 21.1 and 23).
- The requirement in the old section 2.4.2 to discuss entries into radiation control areas (RCAs) at Garrison (sic) Radiation Safety Committee meetings is deleted because it is superfluous.
- The requirement in the old section 3.1 to provide maps of RCAs to Garrison Radiation Safety Officers (RSOs) is deleted because these maps are "required" documents in license condition 11. The Garrison RSOs will have all "required" documents on file in accordance with section 21.2.

The enclosed new Quality Assurance Project Plan, dated November 2021, changes references of actions levels from Environmental Protection Agency (EPA) drinking water standards (30 micrograms total uranium per liter of water) to fifty percent of the Nuclear Regulatory Commission uranium effluent standard (150 picocuries per liter of water). This proposed change was prompted by observations of NRC inspectors during inspections this year about water sampling results and is justified as follows:

- The old action level is derived from an EPA regulation, not from an NRC regulation.
- The water being sampled is not used for drinking water.
- The uranium in the samples is unlicensed natural uranium. If any licensed depleted uranium was in the samples, it was undetectable and hence unimportant.

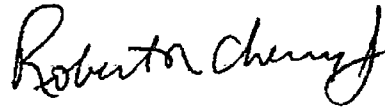
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- Fort Carson and, to a lesser degree, Yakima Training Center have natural uranium background concentrations in soil significantly greater than other licensed sites. This is supported by our measurements of uranium in sediment samples at all license sites. So, it should not be surprising that the action level based on the EPA regulation, which is equivalent to about 20 picocuries total uranium activity per liter of water, is occasionally exceeded at Fort Carson and Yakima Training Center.

The new Quality Assurance Project Plan also updates personnel names.

If you have any questions concerning this letter, please contact me by telephone at 210-466-0368 or 210-618-8059 or by email at robert.n.cherry.civ@mail.mil.

Sincerely,

A handwritten signature in black ink that reads "Robert N. Cherry". The signature is written in a cursive style with a large initial "R".

Robert N. Cherry
License Radiation Safety Officer

Enclosures