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To: [Cherry, Robert N CIV USARMY IMCOM HQ \(USA\)](#)
Cc: [Koenick, Stephen](#); [Ridge, Christianne](#)
Subject: Summary of 1/27/22 Discussion and Requested Clarifications for the revised Quality Assurance Project Plan (dated 11/29/21)
Date: Friday, January 28, 2022 11:28:00 AM
Attachments: [image006.png](#)

Dr. Cherry,

Consistent with our discussion on January 27, 2022, there are two areas of the revised Quality Assurance Project Plan (QAPP), dated 11/29/21, that you submitted with your recent amendment request (ML21343A034) that would be appropriate to clarify with this amendment. They are both on Worksheets #11 and #15a.

The first area is the statements regarding soil sampling for eroded soil. Worksheet #11, Step 3, of the QAPP states, "Semiannual soil sampling is required if the general erosion rate for the RCA is greater than 2 tons per acre per year or if the localized erosion rate in an area of 25m² exceeds a volume of 3.75 m³ per year." As we discussed, the Army's procedure for soil sampling if an area of soil greater than 25 m² eroded from an RCA is discovered during routine operations and maintenance activities, is more accurately described in Section 2.3 (SOIL) of the Site-Specific Environmental Radiation Monitoring Plans (ERMP)s for each site. These ERMPs, dated March 18, 2020 (ML21165A013), are already incorporated under License Condition 11. Therefore, the statements in the QAPP on Worksheet #11, Step 3, should be revised to be consistent with those in the ERMPs so that the Army's procedures regarding soil sampling for eroded soil are clear. As we discussed, referencing Section 2.3 of the Site Specific ERMPs instead of the statements above in the QAPP would be achieve this consistency.

The second area is the action level regarding the weight percent of U-235. Worksheet 11 in several places identifies that if the U-238/U-234 ratio by alpha spectrometry is greater than 3.0 for any sampled media, then the sample will be analyzed by ICP-MS, and if the weight percent of U-235 is less than 0.711 percent, the Army notes corrective actions.

However, Worksheet 15a, "Project Action Levels for the ERM Media" taken alone, lists the weight percent as an action level that will be applied to all samples, rather than a second tier action level only for those samples exceeding the ratio of 3 action level. Please clarify the statements on Worksheet 15a to be consistent with those on Worksheet 11.

We will replace the version of the QAPP you submitted in November with the new version with these two clarifications.

I will enter this email into ADAMS on Docket No. 040-09083 to document our discussion and path forward.

Please let me know if you have any questions.

Priya Yadav, P.E.

Project Manager

U.S. Nuclear Regulatory Commission



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