



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
1600 EAST LAMAR BOULEVARD
ARLINGTON, TEXAS 76011-4511

February 01, 2023

Marci E. Marot
Chair, Radiation Safety Committee
U.S. Department of the Interior
U.S. Geological Survey
One Denver Federal Center
Bldg. 810, ENT E-11, MS-205
Denver, CO 80225

SUBJECT: U.S. GEOLOGICAL SURVEY - NRC INSPECTION REPORT 030-03728/2023-001

Dear Ms. Marot:

This letter refers to the non-routine, announced, U.S. Nuclear Regulatory Commission (NRC) inspection conducted on January 9-11, 2023, at your facility in Lakewood, Colorado. This inspection examined activities conducted under your license as they relate to public health and safety, the common defense and security, and to confirm compliance with the Commission's rules and regulations and the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, interviews with personnel, and site tours.

The inspection included a review of your license application dated September 26, 2022, and the final status survey report attached to your application, requesting release of selected areas located in the Denver Federal Center from your license. The inspection also included an independent confirmatory survey of the areas referenced in the application. The inspection results indicate that the areas meet the NRC's radiological criteria for unrestricted use as provided in Title 10 to the *Code of Federal Regulations* (10 CFR) Part 20, Subpart E. The details of the inspection are provided in the enclosure to this letter. Within the scope of the inspection, no violations were identified, and no response to this letter is required.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter, its enclosure, and your response if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room or from the Agency-wide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <https://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy or proprietary information so that it can be made available to the Public without redaction.

Should you have any questions concerning this inspection, please contact Dr. Robert Evans, Senior Health Physicist, at (817) 200-1234 or the undersigned at (817) 200-1249.

Sincerely,



Signed by Warnick, Gregory
on 02/01/23

Gregory W. Warnick, Chief
Decommissioning, ISFSI and Operating
Reactor Branch
Division of Radiological Safety and Security

Docket Nos. 030-03728; 50-274
License Nos. 05-01399-08; R-113
Control No. 633342

Enclosure:
NRC Inspection Report 030-03728/2023-001

cc: w/Enclosure:
james.grice@state.co.us
jcruz@usgs.gov

US GEOLOGICAL SURVEY - NRC INSPECTION REPORT 030-03728/2023-001 – DATED
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cc:

james.grice@state.co.us
jcruz@usgs.gov

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**U.S. NUCLEAR REGULATORY COMMISSION
REGION IV**

Docket Numbers: 030-03728; 50-274

License Numbers: 05-01399-08; R-113

Report Number: 030-03728/2023-001

Licensee: U.S. Department of the Interior
U.S. Geological Survey

Location: Denver Federal Center
Lakewood, Colorado 80225

Inspection Dates: January 9-11, 2023

Inspectors: Robert J. Evans, PhD, CHP, PE, Senior Health Physicist
Decommissioning, ISFSI, and Operating Reactor Branch
Division of Radiological Safety and Security

Stephanie G. Anderson, Senior Health Physicist
Decommissioning, ISFSI, and Operating Reactor Branch
Division of Radiological Safety and Security

Accompanied By: Troy Johnson, Health Physicist
Decommissioning, ISFSI, and Operating Reactor Branch
Division of Radiological Safety and Security

Eric McManus, Health Physicist
Decommissioning, ISFSI, and Operating Reactor Branch
Division of Radiological Safety and Security

Approved by: Gregory G. Warnick, Chief
Decommissioning, ISFSI and Operating Reactor Branch
Division of Radiological Safety and Security

Attachments: Supplemental Inspection Information
Confirmatory Survey Measurements

Enclosure

EXECUTIVE SUMMARY

U.S. Department of the Interior/U.S. Geological Survey
NRC Inspection Report 030-03728/2023-001

The U.S. Nuclear Regulatory Commission (NRC) performed a non-routine, announced health and safety inspection from January 9-11, 2023, at the U.S. Geological Survey's (USGS) facility in Lakewood, Colorado. The inspection included a review of records, interviews with site personnel, and performance of a confirmatory survey. The inspectors concluded that the licensee conducted final status survey activities in accordance with NRC regulatory, license, and guidance requirements.

Closeout Inspection and Survey

- The inspectors reviewed the final status survey results for four areas that the licensee has requested to be released from the license. The inspectors confirmed that the survey design was consistent with NRC guidance, and the results of the survey were less than the NRC's screening criteria for surfaces and derived concentration guideline level for soil. (Section 1.2.a)
- The inspectors' confirmatory survey results indicate that the four surveyed areas did not contain licensed material above the licensee's screening values for surfaces and derived concentration guideline level for soil, indicating that the areas could be released for unrestricted use. (Section 1.2.b)

Report Details

Site Status

The USGS possessed radioactive material under a broad scope license at the Denver Federal Center, Lakewood, Colorado. The licensee also possesses radioactive material under a non-power reactor license at the Denver Federal Center. The licensee previously decided to permanently discontinue possession and use of radioactive material at four locations. Three of the locations involved use or storage of radioactive material under the materials license 05-01399-08, and the fourth location was a location of use or storage of radioactive material for the non-power reactor license R-113.

By letter dated September 26, 2022 (Agency-wide Documents Access and Management System [ADAMS] Accession No. ML22300A181), the licensee requested the release of Room B15 at Building 15, Room 201 at Building 10, and the yard around Building 10 from the materials license. The licensee also requested release of Room 202 at Building 10 from the non-power reactor license. Attached to the licensee's letter was a final status survey report (FSSR) that was conducted by a contractor on behalf of the licensee.

1 Closeout Inspection and Survey (NRC Inspection Procedure 83890)

1.1 Inspection Scope

The purposes of the inspection were to verify that: (1) the four locations have been decontaminated to acceptable radiological levels for unrestricted use; (2) the licensee performed a final status survey of the areas using procedures consistent with NRC guidance; and (3) the areas met the criteria for release for unrestricted use.

1.2 Observations and Findings

a. Review of FSSR

Attached to the licensee's September 26, 2022, letter was a FSSR for the four locations. The surface area of Room B15 was 23 square meters (m²), Room 201 was 46 m², Room 202 was 43 m², and the yard area around Building 10 was roughly 350 m². If the licensee's request is accepted by the NRC, and the four areas are released from the two licenses, the licensee plans to eventually return the areas to the property owner as appropriate.

The three rooms were classified as Class 2 survey units, using the guidance provided in NUREG-1757, volume 1, revision 2, "Consolidated Decommissioning Guidance: Decommissioning Process for Materials Licensees." The outdoor area was classified as a Class 1 survey unit. Because the licensee had possessed and used radioactive material in loose form, and because the licensee had classified the four areas as Class 1 and 2 survey units, the NRC elected to conduct a confirmatory survey to verify that the areas had been effectively decommissioned and final surveyed.

The radionuclides of concern included both alpha and beta-gamma emitting radionuclides. In accordance with Attachment 10.6b, revision 1, "Guidelines for Deactivating a Radioisotope Utilization Permit (or Decommissioning a Previously Used Laboratory)," to the materials license application dated June 5, 2019 (ML19156A507),

the licensee committed to use the NRC's screening values as provided in Appendix B to NUREG-1757, volume 1, and NUREG/CR-5512, volume 3, "Residual Radioactive Contamination from Decommissioning: Parameter Analysis." The licensee conservatively chose to use the screening value for uranium-238 from NUREG/CR-5512, volume 3, Table 5.19 as a surrogate for the alpha-emitting radionuclides and the screening value for cobalt-60 from Table B.1 from NUREG-1757, volume 1, revision 2 as a surrogate for the beta-emitting radionuclides. The licensee also chose to use more restrictive and conservative screening values for the two radionuclides than specified in the two NUREGs.

The screening value for alpha-emitting radionuclides on surfaces was chosen to be 89.9 disintegrations per minute per 100-square centimeters (dpm/100 cm²), while the screening value for the beta-emitting radionuclides was chosen to be 6,940 dpm/100 cm². The removable radioactivity limits were set at 20-percent of these two screening values. In addition, the licensee conservatively selected an open land soil derived concentration guideline level (DCGL) of 0.7 picocuries per gram (pCi/g) above background, the screening value for radium-226, for radioactivity that may be present in the soil.

A historical site assessment identified three spills at Building 10, two inside Room 201 and one outside of the building. The licensee's records indicated that all three spills were remediated prior to the final status survey. The licensee did not locate any records of on-site burials.

The licensee's representative stated that radioactive material being stored in the three rooms was transferred to other licensed areas. During the onsite inspection, the inspectors reviewed the licensee's records for free release of equipment from the rooms. The records indicate that 186 bricks were surveyed and released from Building 10, and 29 fence posts around the building were surveyed and released.

The inspectors reviewed the information provided in the FSSR and compared the information to the guidance provided in NUREG-1575, revision 1, "Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM)." For example, MARSSIM provides guidance for the recommended sizes for survey units and calculations for determining the minimum number of samples and sample points in each survey unit. The inspectors noted that the licensee had established four survey units in accordance with MARSSIM guidance and calculated the minimum number of samples required to be collected in each survey unit.

The licensee's indoor surveys included scan surveys, fixed-point measurements, and removable contamination samples at each fixed-point measurement location. In each indoor survey unit, the licensee collected 20 fixed point and swipe samples. This included a minimum of 15 random and five judgmental locations. The licensee also collected additional judgmental measurements of equipment, including ventilation ductwork, in the rooms. In the outdoor survey unit, the licensee collected 11 random and three judgmental soil samples.

The licensee's results were presented in Table 18-1 of the FSSR. The highest alpha particulate surface sample result was 40 dpm/100 cm² above background, while the highest beta surface particulate sample result was 1,570 dpm/100 cm² above background. These values were less than the proposed screening value of

89.9 dpm/100 cm² and 6,940 dpm/100 cm², respectively. Further, the licensee applied the unity rule for each location, as described in MARSSIM, and confirmed that that maximum value (0.63) was less than or equal to 1.0. No removable contamination was identified above the removable limits of 20-percent of the DCGLs. Finally, the maximum outdoor soil sample result, 0.466 pCi/g above background, was less than the DCGL of 0.7 pCi/g. Thus, all final status survey results were less than the surface screening criteria and soil DCGL as provided in NUREG-1757, volume 1, and NUREG/CR-5512, volume 3.

The licensee also elected to demonstrate compliance with 10 CFR Part 20, Subpart E, requirements by calculating the potential doses to future occupants of the three indoor areas using the NRC-accepted RESRAD-BUILD software. The model was executed using conservative parameters and the maximum FSSR radioactivity sample results. The results of modeling indicated that doses to occupants would be well below 1-millirem per year with a regulatory limit of 25 millirem per year.

Since the licensee designed a final status survey in accordance with NRC guidance, collected sufficient samples in each survey unit, and with survey results less than the respective screening criteria provided in NRC guidance, the inspectors concluded that the licensee's FSSR sufficiently documented that the four survey units could be released for unrestricted use.

b. Confirmatory Survey

Per MARSSIM, a confirmatory survey is used to provide data to substantiate the results of the licensee's final status survey. Confirmatory survey activities are limited in scope to spot-checking conditions at selected locations, comparing findings with those of the final status survey, and performing independent statistical evaluations of the data developed from the confirmatory survey with the final status survey. The goal is to conduct a sufficient survey so that the NRC can conclude that the licensee's survey program was implemented in a manner that provides confidence in the licensee's results.

The inspectors' final status survey consisted of ambient gamma radiation scans and fixed-point alpha and beta radiation surface measurements. The inspectors chose to forgo soil sampling and removable surface surveys based on the results of the scans and fixed-point measurement surveys. The inspectors elected to use the same DCGLs as proposed by the licensee in its FSSR. Since the licensee's surface sample locations were not clearly marked, the NRC's measurements were a combination of random and judgmental samples.

Prior to conducting the ambient gamma scans and fixed-point alpha and beta measurements, the inspectors measured background levels. These background readings were taken in areas unimpacted by previous operations involving radioactive material. In Building 15, the inspectors recorded background levels on the floors and walls in the basement hallways, the same areas where the licensee collected its background measurements. Each background count consisted of five 1-minute counts. The inspectors averaged the five counts for each location for subtraction from the measurements collected in the three indoor survey units. For the Building 10 outdoor areas, background measurements were taken away from the building in an area outside of the control of the licensee. The average background measurements for surfaces are presented in Attachment 2, Table 1, "Surface Background Measurements," while the

background measurements for outdoor areas are presented in Table 3, "Ambient Gamma Radiation Measurements."

The inspectors collected 38 fixed-point measurements across the three indoor survey units and the outdoor dock area of Building 10. The inspectors measured the gross alpha and gross beta particulate activity levels using Eberline E-600 survey meters connected to SHP380AB alpha-beta probes. The fixed-point measurements were an average of five 1-minute counts at each location.

The net results of the 38 fixed-point measurements, with background subtracted, are listed in Attachment 2, Table 2, "Summary of Fixed-Point Measurements," in units of dpm/100 cm². Since the survey point data represents net values, some measurements may be less than background and are annotated with a negative sign (-). The net values were then compared to the screening values in accordance with NRC guidance. The inspectors noted that the average of the measurements in each survey unit were less than the screening criteria. One measurement (103 dpm/100 cm²) slightly exceeded the licensee's alpha particulate screening value of 89.9 dpm/100 cm². This sample result, while in excess of the conservative screening value, was not considered to be risk significant when the entirety of the survey unit was considered. None of the beta particulate sample results exceeded the screening value of 6,940 dpm/100 cm². The inspectors also implemented the unity rule for each location, as described in MARSSIM. The one alpha survey location that exceeded the screening value, as noted above, also exceeded the unity rule (greater than 1.0).

The inspectors measured the ambient gamma radiation levels throughout the four survey units. The survey was conducted using two Radeye SX survey meters connected to SPA-3 detectors. Prior to the surveys, the inspectors measured background levels in unimpacted areas (Building 15 basement hallways and outside of Building 10). The results of the surveys are presented in Attachment 2, Table 3, "Ambient Gamma Radiation Measurements," in units of counts per minute (cpm). The scan survey results were elevated in certain areas of Room B15 due to licensed material that was located near the room. The inspectors also noted that selected areas in the yard around Building 10 demonstrated slightly elevated measurements, especially near the building loading dock, but the inspectors concluded that these elevated scan survey results were not significant and were not representative of wide-spread contamination in the yard.

In summary, the inspectors concluded that the results of the confirmatory survey demonstrate that the four areas met the criteria specified in 10 CFR Part 20, Subpart E, for release for unrestricted use.

1.3 Conclusions

The inspectors reviewed the final status survey results for four areas that the licensee has requested to be released from the license. The inspectors confirmed that the survey design was consistent with NRC guidance, and the results of the survey were less than the NRC's screening criteria for surfaces and DCGL for soil.

The inspectors' confirmatory survey results indicate that the four surveyed areas did not contain licensed material above the licensee's screening values for surfaces and DCGL for soil, indicating that the areas could be released for unrestricted use.

2 Exit Meeting Summary

The inspectors presented the inspection findings to the licensee's representatives at the conclusion of the onsite portion of the inspection on January 11, 2023. During the inspection, the licensee did not identify any information reviewed by the inspectors as proprietary.

SUPPLEMENTAL INSPECTION INFORMATION

Partial List of Persons Contacted

Licensee Personnel

J. Cruz, RSO

Inspection Procedures Used

IP 83890 Closeout Inspection and Survey

Items Opened, Closed and Discussed

Opened

None

Closed

None

Discussed

None

List of Acronyms

ADAMS	Agencywide Documents Access and Management System
CFR	<i>Code of Federal Regulations</i>
cpm	counts per minute
dpm/100 cm ²	disintegrations per minute per 100 square centimeters
DCGL	derived concentration guideline level
FSSR	final status survey report
IP	NRC Inspection Procedure
MARSSIM	Multi-Agency Radiation Survey and Site Investigation Manual
m ²	meters squared
NRC	U.S. Nuclear Regulatory Commission
pCi/g	picocuries per gram
USGS	U.S. Geological Survey

CONFIRMATORY SURVEY MEASUREMENTS

Table 1: Surface Background Measurements

Bldg., Room	Location	Gross Alpha (dpm/100cm ²)	Gross Beta (dpm/100cm ²)	Surface Type	Survey Meter *
15, basement	Hallway floor	149	7569	Concrete	1
15, basement	Hallway wall	113	6075	Cinder block	1
15, basement	Hallway floor	67	7182	Concrete	2
15, basement	Hallway wall	74	5947	Cinder block	2
15, basement	Hallway floor	144	3872	Concrete	3
15, basement	Hallway wall	122	2703	Cinderblock	3

* Survey Meter 1: Eberline E600 with SHP380AB detector (serial numbers 02463/0906, calibration due date 01/03/2024)

* Survey Meter 2: Eberline E600 with SHP380AB detector (serial numbers 00790/0907, calibration due date 12/20/2023)

* Survey Meter 3: Eberline E600 with SHP380AB detector (serial numbers 00763/1108, calibration due date 01/03/2024)

Table 2: Summary of Fixed-Point Measurements

Survey Point	Bldg., Room	Location	Net Alpha (dpm/100cm ²)	Net Beta (dpm/100cm ²)	Sum of Fractions	Surface Type	Survey Meter *
1	10, Outside	Loading Dock, South end interior	23.89	-542.86	0.219	Concrete	1
2	10, Outside	Loading Dock, South end exterior	27.37	200.00	0.369	Concrete	1
3	10, Outside	Loading Dock, North end exterior	4.21	-557.14	-0.028	Concrete	1
4	10, Outside	Loading Dock, North end interior	54.74	80	0.692	Concrete	1
5	10, Rm 201	Wall, North	71.58	-394.29	0.833	Cinder block	1
6	10, Rm 201	Wall, East	69.47	-894.29	0.735	Cinder block	1
7	10, Rm 201	Wall, West	30.43	-1418.98	0.174	Cinder block	2
8	10, Rm 201	Wall, South	5.43	-1132.85	-0.096	Cinder block	2
9	10, Rm 201	Floor, SE corner	-4.21	-1762.86	-0.306	Concrete (painted)	1
10	10, Rm 201	Floor, NE corner	18.95	-1691.43	-0.008	Concrete (painted)	1
11	10, Rm 201	Floor SW	21.74	-1734.31	0.020	Concrete (painted)	2
12	10, Rm 201	Floor NW corner	78.26	-1573.72	0.747	Concrete (painted)	2
13	10, Rm 201	Floor North central	2.17	-1856.93	-0.241	Concrete (painted)	2
14	10, Rm 201	Floor South central	6.52	-1833.58	-0.183	Concrete (painted)	2
15	10, Rm 201	Floor South central	34.78	-1833.58	0.168	Concrete (painted)	2
16	10, Rm 201	Floor North central	-21.74	-259.85	-0.308	Concrete (painted)	2
17	10, Rm 202	Wall, East	103.16	-920.00	1.151	Cinder block	1
18	10, Rm 202	Wall, North	31.58	-1320.00	0.203	Cinder block	1
19	10, Rm 202	Wall, West	10.87	0.00	0.135	Cinder block	2

Survey Point	Bldg., Room	Location	Net Alpha (dpm/100cm ²)	Net Beta (dpm/100cm ²)	Sum of Fractions	Surface Type	Survey Meter *
20	10, Rm 202	Wall, South	26.09	-1223.36	0.148	Cinder block	2
21	10, Rm 202	Floor, NW corner	-31.58	-1888.57	-0.665	Concrete (painted)	1
22	10, Rm 202	Floor, NE corner	-46.32	-2011.43	-0.866	Concrete (painted)	1
23	10, Rm 202	Floor, SE corner	-31.58	-2128.57	-0.699	Concrete (painted)	1
24	10, Rm 202	Floor, Center	-52.63	-1797.14	-0.914	Concrete (painted)	1
25	10, Rm 202	Floor SW	-15.22	-1956.20	-0.471	Concrete (painted)	2
26	10, Rm 202	Floor central	-6.52	-2131.39	-0.388	Concrete (painted)	2
27	10, Rm 202	Floor NW corner	41.30	-1424.82	0.308	Concrete (painted)	2
28	10, Rm 202	Floor North central	23.91	423.36	0.358	Concrete (painted)	2
29	15, Rm B15	Wall, North	-26.09	151.82	-0.303	Cinder block	2
30	15, Rm B15	Wall, East	-30.43	102.19	-0.364	Cinder block	2
31	15, Rm B15	Floor, SE Corner	21.74	-210.22	0.240	Concrete	2
32	15, Rm B15	Floor, NE corner	-2.17	189.78	0.000	Concrete	2
33	15, Rm B15	Floor, South	-2.17	43.80	-0.021	Concrete	2
34	15, Rm B15	Floor, Central	23.91	116.79	0.314	Concrete	2
35	15, Rm B15	Floor, Crack	36.00	410.91	0.507	Concrete	3
36	15, Rm B15	Floor, NW Corner	46.00	600.00	0.659	Concrete	3
37	15, Rm B15	Floor, SW Corner	32.00	789.09	0.512	Concrete	3
38	15, Rm B15	Floor, West Central	-4.00	443.64	0.014	Concrete	3

* Survey Meter 1: Eberline E600 with SHP380AB detector (serial numbers 02463/0906, calibration due date 01/03/2024)

* Survey Meter 2: Eberline E600 with SHP380AB detector (serial numbers 00790/0907, calibration due date 12/20/2023)

* Survey Meter 3: Eberline E600 with SHP380AB detector (serial numbers 00763/1108, calibration due date 01/03/2024)

Table 3: Ambient Gamma Radiation Measurements

Area/Location	Type	Range (cpm)	Comments	Survey Meter*
Bldg. 15 Basement hallway	Background	23,000	Cinderblock wall Meter critical level 34,000 cpm	1
Bldg. 15 Basement hallway	Background	26,000	Concrete floor Meter critical level 38,000 cpm	1
Bldg. 10, Outdoor area	Background	8,700	Open land Meter critical level 8,900 cpm	1
Bldg. 15, Room B15	Area Scan	28,000-55,000	Concrete floor	1
Bldg. 15, Room B15	Area Scan	25,000-63,000	Cinderblock wall	1
Bldg. 10, Room 201	Area Scan	16,700-18,000	Concrete floor	1
Bldg. 10, Room 201	Area Scan	13,700-16,400	Cinderblock wall	1
Bldg. 10, Outdoor loading dock	Area Scan	15,300-26,200	Concrete floor	1
Bldg. 10	Area Scan	10,400-26,100	Outdoors, around building	1
Bldg. 15 Basement hallway	Background	18,000	Cinderblock wall Meter critical level 28,000 cpm	2
Bldg. 15 Basement hallway	Background	19,000	Concrete floor Meter critical level 29,000 cpm	2
Bldg. 10, Outdoor area	Background	5,500	Open land Meter critical level 5,700 cpm	2
Bldg. 15, Room B15	Area Scan	19,000-36,000	Cinderblock wall and floor	2
Bldg. 15, Room B15	Equipment Scan	18,500-22,000	Ventilation equipment	2
Bldg. 10, Room 202	Area Scan	11,000-12,500	Cinderblock wall	2
Bldg. 10	Area Scan	6,500-19,000	Outdoors, around building	2

* Survey Meter 1: Radeye SX with SPA-3 detector (serial numbers 52198/19211, calibration due date 05/10/2023)

* Survey Meter 2: Radeye SX with SPA-3 detector (serial numbers 52223/19205, calibration due date 12/19/2023)