



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

January 08, 2024

Dr. Robert Cherry
Radiation Safety Officer
U.S. Army Installation
Management Command
ATTN: IMSO/106, Bldg. 2261
2405 Gun Shed Road
JBSA Fort Sam Houston, TX 78234-1223

SUBJECT: NRC INSPECTION REPORT 040-09083/2023-02 – FORT EISENHOWER,
GEORGIA

Dear Dr. Cherry:

This letter refers to the routine, announced, U.S. Nuclear Regulatory Commission (NRC) site inspection conducted on December 12, 2023, at Fort Eisenhower, Georgia. 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 implementation of the programmatic radiation safety plan, physical security plan, environmental radiation monitoring plan, and quality assurance project plan. An exit briefing was held with you and George Conrad, Garrison and Installation Safety Director, at the conclusion of the onsite inspection on December 12, 2023. No violations were identified, and no response to this letter is required.

In accordance with Title 10 of the *Code of Federal Regulations* (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 at 817-200-1234 or the undersigned at (817) 200-1249.

Sincerely,



Signed by Warnick, Gregory
on 01/08/24

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

Docket No. 040-09083
License No. SUC-1593

Enclosure:
NRC Inspection Report 040-09083/2023-002

cc: w/Enclosure
D. Matos, Georgia Department of Natural Resources

NRC INSPECTION REPORT 040-09083/2023-002 - FORT EISENHOWER, GEORGIA DATED JANUARY 08, 2024

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cc:

robert.n.cherry.civ@army.mil
 David.Matos@dnr.ga.gov

NRC INSPECTION REPORT 040-09083/2023-002 - FORT EISENHOWER, GEORGIA

ADAMS ACCESSION NUMBER: **ML24002B101**

<input checked="" type="checkbox"/> SUNSI Review By: RJE	ADAMS <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Non-Sensitive <input type="checkbox"/> Sensitive	<input checked="" type="checkbox"/> Publicly Available <input type="checkbox"/> Non-Publicly Available	Keyword: NRC-002
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**U. S. NUCLEAR REGULATORY COMMISSION
REGION IV**

Docket No.: 040-09083

License No.: SUC-1593

Report No.: 040-09083/2023-002

Licensee: U.S. Army Installation Management Command

Location: Fort Eisenhower, Georgia

Date: December 12, 2023

Inspector: Orysia Masnyk Bailey, Health Physicist
Decommissioning, ISFSI, and Operating Reactor Branch
Division of Radiological Safety and Security
Region I

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

Attachment: Supplemental Inspection Information

EXECUTIVE SUMMARY

U.S. Army Installation Management Command
NRC Inspection Report 040-09083/2023-002

The U.S. Nuclear Regulatory Commission (NRC) performed a routine, announced health and safety site inspection on December 12, 2023, at Fort Eisenhower, Georgia. The inspection included a review of records, interviews with site personnel, and observation of activities. The inspector concluded that the licensee was conducting activities in accordance with regulatory and license requirements.

Observation of Activities

The NRC determined the licensee was in compliance with regulatory requirements associated with radiological controls of restricted areas and postings. The inspector did not identify deficiencies in the sampling locations as noted in their commitments to the NRC. (Section 1.2)

Assessment of Dose to Workers and the Public

The NRC determined that the licensee was in compliance with its dose assessment for workers and the public under its commitments and NRC regulations. (Section 2.2)

Surveys for Contamination and Exposure Control

The NRC reviewed the licensee's contamination and exposure control program and did not identify any deficiencies in its implementation. (Section 3.2)

Safety and Security of Licensed Materials

The NRC did not identify deficiencies in the licensee's safety and security of licensed materials. (Section 4.2)

Management Oversight

The NRC did not identify any deficiencies in the licensee management oversight program. (Section 5.2)

Report Details

Site Status

In August 2005, the Department of the Army discovered remnants of munitions containing depleted uranium (DU) at the Schofield Army Barracks in Hawaii. These remnants were identified as the spotting rounds for the Davy Crockett Weapons System. As a result of this discovery, the U.S. Army Installation Management Command applied for an NRC license in 2008. In 2013, the NRC issued Source Material License SUC-1593 to the Army for possession of DU at two locations in Hawaii. The license was amended in 2016 to include 14 additional locations including Fort Eisenhower, Georgia.

Starting in 1957, the U.S. Army Training Center (Basic) was the major tenant at Fort Eisenhower (previously known as Fort Gordon), Georgia. Although there were no infantry units authorized to field the Davy Crockett weapon at Fort Eisenhower during the Davy Crockett M28 era (1961-1968), the Davy Crockett Weapon System was maintained at Fort Eisenhower and was used for fire power demonstrations by the Training Center.

Two ranges, Range S and 28C, at which the Davy Crockett Weapon System could potentially have been fired, were initially identified. Additionally, Range R15 was identified as a possible range, during an installation site visit by the U.S. Army Corps of Engineers (ACE) on April 28, 2009. After the installation visit, Range E was identified and confirmed by a U.S. Army Veteran as the range that was used for training on and demonstrations of the Davy Crockett Weapon System.

Ranges S, 28C, and R15 were inspected during the installation visit by ACE. No Davy Crockett remnants or munition debris were found. Range E was not inspected by ACE since it was identified after the installation visit.

At the time of the inspection, the Army had not identified or removed any DU from the range because Range E contains unexploded ordnance and access is never granted. If a controlled burn is required, it is initiated from helicopters. If the range catches fire it is allowed to burn to the edges of the range before fire suppression is initiated. Range E, where DU is suspected to be present, has been designated as Radiologically Controlled Areas (RCA).

This NRC inspection was conducted using the applicable section of Inspection Procedure (IP) 87126, Broad Scope Academic and Research & Development Program.

1 Observation of Activities (Risk Module (RM)-1)

1.1 Inspection Scope

The inspector assessed access roads to Range E and the range itself from an observation location as well as the environmental sampling location identified as "Gut" located on the Boggy Gut Creek near the installation's southeastern boundary. The entire RCA is located within the Boggy Gut Creek watershed.

1.2 Observations and Findings

The inspector toured the outskirts of Range E where DU was expected to be located. The inspector did not enter the range due to unexploded ordnance. The range had adequate postings related to the radiological hazards and conditions and interviews with

installation staff indicated that procedures were in place to ensure unauthorized personnel do not have unauthorized access. According to the licensee, there has been no personnel access to the above areas for many years.

The inspector observed the environmental sampling location where a water and sediment sample are taken on a quarterly basis. The location appears to have relatively easy access and the licensee did not report any significant difficulties in obtaining samples.

1.3 Conclusions

The NRC determined the licensee was in compliance with regulatory requirements associated with radiological controls of restricted areas and postings. The inspector did not identify deficiencies in the sampling locations as noted in their commitments to the NRC.

2 Assessment of Dose to Workers and the Public (RM-2)

2.1 Inspection Scope

The inspector reviewed the licensee's radiation monitoring program associated with workers and the public.

2.2 Observations and Findings

Due to the lack of anticipated radiation exposure, the licensee does not have and is not required to possess a routine external or internal radiation worker exposure program. However, the licensee does possess radiation detection instrumentation if DU is found on site to monitor potential contamination; the licensee is not authorized to search for DU on site and has never found such material. The inspector determined that the radiation detection instruments possessed by the licensee were appropriate and calibrated.

The licensee environmental monitoring program consists of one location designated as "Gut" where water and sediment samples are taken and analyzed for total uranium on a quarterly basis. The inspector reviewed the results of the uranium sample analysis and did not identify uranium concentrations above commitments made to the NRC.

During the last NRC inspection at Fort Riley, Kansas, documented in NRC Inspection Report 040-09083/2023-001 dated August 18, 2023 (Agency-wide Documents Access and Management System [ADAMS] Accession Number ML23227A106), the inspector identified that the licensee had committed its contractors to use a uranium analysis method titled "HASL 300" while its contractor was using a uranium analysis method titled "PALA-RAD-026." The NRC performed an independent review and determined that the uranium analysis methods were comparable to one another and did not have any additional questions.

2.3 Conclusions

The NRC determined that the licensee was in compliance with its dose assessment for workers and the public under its commitments and NRC regulations.

3 Surveys for Contamination and Exposure Control (RM-3)

3.1 Inspection Scope

The inspector reviewed the licensee's radiological survey and exposure control program.

3.2 Observations and Findings

The license possesses check sources used for determining the operability of radiation detection instrumentation. All DU possessed is located at Range E within the RCA. The licensee has never removed DU from the RCA. The inspector noted that the licensee did possess appropriate radiation detection instrumentation so if such material is found in the field, the licensee will be able to identify and control any radiological contamination.

As documented in the license reference material if undisturbed, the NRC and licensee has determined the DU is not expected to move outside the confines of the RCA. However, the licensee does have an environmental monitoring program which was reviewed by the inspector and documented in section 2.2 of this report.

3.3 Conclusions

The NRC reviewed the licensee's contamination and exposure control program and did not identify any deficiencies in its implementation.

4 Safety and Security of Licensed Materials (RM-4)

4.1 Inspection Scope

The inspector reviewed the licensee's safety and security of licensed materials as under the license.

4.2 Observations and Findings

The licensee is authorized to possess DU at this site, and it is expected that approximately 30 kilograms is collectively located at Range E. The range is appropriately posted to notify individuals that they would be entering an RCA. The inspector was informed during interviews with licensee staff, and observed in training and procedures that access to the RCA was not allowed as it is located in an unexploded ordnance range.

The licensee possessed two check sources stored with the survey meters. They were used to determine the operability of its radiological detection instrumentation. The inspector noted that sources were properly stored and inventoried as required by licensee procedure.

4.3 Conclusions

The NRC did not identify deficiencies in the licensee's safety and security of licensed materials.

5 Management Oversight (RM-5)

5.1 Inspection Scope

The inspector reviewed the licensee's oversight including audits and training of staff.

5.2 Observations and Findings

The inspector reviewed the licensee's annual audits to include the training and environmental monitoring program and no deficiencies were identified. The inspector interviewed installation staff and noted adequate knowledge to ensure the proper implementation of the program.

5.3 Conclusions

The NRC did not identify any deficiencies in the licensee management oversight program.

6 Exit Meeting Summary

The inspector presented inspection results to the licensee during the on-site portion of the inspection on December 12, 2023. During the inspection, the licensee did not identify any information received by the inspector as proprietary.

SUPPLEMENTAL INSPECTION INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

Daniel Atkins, Range Safety Officer
Dr. Robert Cherry, Radiation Safety Officer
George Conrad, Garrison and Installation Safety Director
Lee Trennel, Safety and Occupational Health Specialist

ITEMS OPENED, CLOSED OR DISCUSSED

Opened

None

Closed

None

Discussed

None

INSPECTION PROCEDURE USED

IP 87126 Broad Scope Academic and Research & Development Programs

LIST OF ACRONYMS USED

ACE	U.S. Army Corps of Engineers
ADAMS	Agencywide Documents Access and Management System
CFR	Code of Federal Regulations
DU	Depleted Uranium
IP	Inspection Procedure
NRC	U.S. Nuclear Regulatory Commission
RCA	Radiologically Controlled Area
RM	Risk Module