



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

July 24, 2025

Major David A. Hermann,
Radiation Safety Staff Officer
U.S. Army Installation Management Command
ATTN: Director, Safety Office
4400 Martin Road, Building 4400
Redstone Arsenal, AL 35898-5000

SUBJECT: U.S. ARMY INSTALLATION MANAGEMENT COMMAND - NRC INSPECTION
REPORT AND NOTICE OF VIOLATION 04009083/2025001

Dear Major David Hermann:

On June 24-25, 2025, the U.S. Nuclear Regulatory Commission (NRC) completed an inspection at the Donnelly Training Area, Fort Wainwright, Alaska. On June 25, 2025, the NRC inspector discussed the results of the inspection with yourself and other members of your staff. The results of the inspection are documented in the enclosed report.

Based on the results of the inspection, the NRC has determined that one Severity Level IV violation of NRC requirements occurred. The violation involved your failure to implement the radiation safety plan when workers entered the radiologically restricted area in mid-May 2025. The violation was evaluated in accordance with the NRC Enforcement Policy. The current Enforcement Policy is included on the NRC's Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>. The violation is cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding it are described in detail in the subject inspection report. The violation is being cited in the Notice because it was identified by the NRC.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. If you have additional information that you believe the NRC should consider, you may provide it in your response to the Notice. The NRC's review of your response to the Notice will also determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with Title 10 of the *Code of Federal Regulations* Part 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter, its enclosure, and your response will be made available electronically for public inspection in the NRC Public Document Room and from the NRC's Agency-wide Documents Access and Management System (ADAMS), accessible from the NRC website 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 matter, please contact Stephanie Anderson, Senior Health Physicist, at (817) 200-1213 or the undersigned at (817) 200-1249.

Sincerely,



Signed by Josey, Jeffrey
on 07/24/25

Jeffrey E. Josey, Chief
Decomm., ISFSI, and Operating Reactor Branch
Division of Radiological Safety and Security

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

Enclosures:

1. Notice of Violation
2. Inspection Report No. 04009083/2025001

cc w/ encl: Distribution via LISTSERV

U.S. ARMY INSTALLATION MANAGEMENT COMMAND - NRC INSPECTION REPORT
04009083/2025001 – DATED JULY 24, 2025

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DOCUMENT NAME: U.S. ARMY INSTALLATION MANAGEMENT COMMAND - NRC INSPECTION REPORT
04009083/2025001

ADAMS ACCESSION NUMBER: **ML25198A268**

☒ SUNSI Review By: SGA		☒ Non-Sensitive ☐ Sensitive		☒ Publicly Available ☐ Non-Publicly Available
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NOTICE OF VIOLATION

U.S. Army Installation Management Command
Redstone Arsenal, Alabama

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

During an NRC inspection conducted on June 24-25, 2025, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

Materials License SUC-1593, Amendment 9, License Condition 11, states, in part, that the licensee shall conduct operations in accordance with the commitments, representations, and statements contained in the Programmatic Radiation Safety Plan (RSP), "Radiation Safety Plan for IMCOM [Installation Management Command] Ranges Affected by M101 Davy Crockett Spotting Round Depleted Uranium," dated May 26, 2023 (ADAMS Accession No. ML23158A058).

The RSP, Section 2.6, states, in part, that all visitors to the radiation control area (RCA) will comply with the requirements of this RSP. Depending on the areas to be accessed and the nature of the visit, the Garrison Radiation Safety Officer (RSO), as necessary, will escort visitors in order to assure safe radiation safety practices. Section 11.1.2 also states, in part, that all equipment and vehicles will be monitored for contamination as they leave the RCA.

Contrary to the above, on May 14-15, 2025, the licensee failed to conduct operations in accordance with the commitments, representations, and statements contained in the Programmatic RSP. Specifically, when Department of Public Works (DPW) contractors were onsite to clear trees and install new warning signs, the Garrison RSO was not informed, as necessary, to escort the visitors in order to assure safe radiation safety practices. Work request DTA TA516, was not adequately written to require DPW contractors to inform the Garrison RSO prior to starting work close to the RCA boundary, in order for the Garrison RSO to inform and escort the contractors to ensure safe radiation safety practices. Due to the Garrison RSO not being contacted prior to the start of the work by the DPW contractors, the contractors were not trained in the potential hazards in the area. In addition, the licensee failed to monitor equipment for contamination after it had crossed into and exited the RCA at multiple locations.

This is a Severity Level IV violation (Section 6.3.d.3).

Pursuant to the provisions of 10 CFR 2.201, U.S. Army Installation Management Command is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001, with a copy to the Regional Administrator, Region IV, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation or severity level; (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken; and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an

adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued requiring information as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Your response will be made available electronically for public inspection in the NRC Public Document Room or in the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

In accordance with 10 CFR 19.11, you may be required to post this Notice within 2 working days of receipt.

Dated this 24th day of July 2025

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

Docket No. 040-09083

License No. SUC-1593

Report No. 04009083/2025001

Cost Activity Code: 001085

Licensee: U.S. Army Installation Management Command

Facility: Donnelly Training Area, Fort Wainwright, AK

Location: Fort Wainwright, AK

Inspection Dates: June 24-25, 2025

Inspector: S. Anderson, Senior Health Physicist

Accompanied by: J. Josey, Chief

Approved by: Jeffrey E. Josey, Chief
Decommissioning, ISFSI, and Operating Reactor Branch
Division of Radiological Safety and Security

SUMMARY

The U.S. Nuclear Regulatory Commission (NRC) conducted an inspection of licensed material located at Fort Wainwright, Alaska. A notice of violation is documented in report section 02.04

List of Findings and Violations

Failure to Implement the Radiation Safety Plan	Report Section 02.04
Severity Level IV NOV (VIO 040-09083/2025-001) Opened	IP 87126
The inspector identified a violation of License Condition 11, involving the licensee's failure to implement the Programmatic Radiation Safety Plan (RSP). Specifically, Department of Public Works (DPW) contractors were not escorted in the radiation control area to assure safe radiation safety practices. In addition, the licensee failed to monitor equipment for contamination after it had crossed into and exited the RCA at multiple locations.	

Additional Tracking Items

None.

SITE STATUS

Donnelly Training Area is a 631,324-acre installation located in interior Alaska, directly south of Delta Junction and 108 miles southeast of Fairbank. The entire installation is operational and includes 124 ranges.

At the time of the inspection, the U.S. Army did not know if any cleanup or retrieval of these rounds or remnants has occurred at the Georgia Range on Donnelly Training Area at Fort Wainwright therefore, it is assumed that most, if not all, of the 20 kilograms (kg) of depleted uranium (DU) from the rounds fired remains in the range. As such, the range has been permanently designated as radiation control area (RCA) with strict controls for personnel entry and monitoring upon exit. Because of the size of the installation, the Command routinely excludes personnel from these ranges unless there is a unique and specific need for entry.

INSPECTION SCOPES

The inspection was conducted using the inspection procedure (IP) 87126, "Broad Scope Academic and Research & Development Programs". The currently approved IP is located on the public website at <http://www.nrc.gov/reading-rm/doc-collections/insp-manual/inspection-procedure/index.html>. The inspector reviewed selected procedures and records and interviewed personnel to assess licensee performance and compliance with Commission rules and regulations, license conditions, site procedures, and standards. The inspection was declared complete when the objectives of the IP were met, consistent with Inspection Manual Chapter (IMC) 2800, "Materials Inspection Program."

IP 87126 – Broad Scope Academic and Research & Development Programs

Observation of Activities (IP Section 02.01)

The inspector conducted site tours to observe where the licensed material was located. The areas or activities observed included:

- (1) Georgia Range
- (2) Arkansas Range
- (3) Colorado KD Range
- (4) Recent work activities to re-mark the RCA boundary which included removal of trees and addition of Caution, Radioactive Material signage

Assessment of Dose to Workers and the Public (IP Section 02.02)

The licensee's environmental radiation monitoring program included collecting environmental samples at sample location SWS-01:

- (1) Two samples of surface water which are analyzed for total uranium
- (2) Two samples of sediment which are analyzed for total uranium

Due to the lack of anticipated radiation exposure, the licensee is not required to have a routine external or internal radiation worker exposure program.

Surveys for Contamination and Exposure Control (IP Section 02.03)

The inspector reviewed surveys and exposure control as follows:

- (1) All DU possessed is located at historical Davy Crockett surface danger zone which consists of 984 acres and was known as the Georgia Range. The licensee has no record of removed DU from the RCA.
- (2) The licensee possessed 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.

Safety and Security of Licensed Material (IP Section 02.04)

The inspector reviewed the licensee's ability to assure safety and security of the depleted uranium at the site by:

- (1) Ensuring range is appropriately posted to notify individuals that they would be entering an RCA
- (2) Reviewing Work Request DTA TA516 failure on May 14-15, 2025, involving hydro axe and post appropriate signs marking possible radiologic control area in TA516

Management Oversight (IP Section 02.05)

The inspector reviewed the licensee's oversight program and interviewed the Garrison RSO:

- (1) Annual Audits
- (2) Garrison RSO training for the last 3 years

INSPECTION RESULTS

Failure to Implement the Radiation Safety Plan	Report Section 02.04
Severity Level IV NOV (VIO 040-09083/2025-001) Opened	IP 87126
The inspector identified a violation of License Condition 11, involving the licensee's failure to implement the Programmatic Radiation Safety Plan (RSP). Specifically, Department of Public Works (DPW) contractors were not escorted in the radiation control area to assure safe radiation safety practices. In addition, the licensee failed to monitor equipment for contamination after it had crossed into and exited the RCA at multiple locations.	
<u>Description:</u> On May 14-15, 2025, DPW contractors were onsite to clear trees and install new warning signs for the radiation control area. The contractors were using work request DTA TA516 to perform these activities. Following the completion of these activities the contractors left the site and informed DPW that the work was complete.	
Following notification of work completion, it was determined that the contractors had performed work without notifying DPW or the RSO, and that they had crossed the boundary of the Radiation Control Area (RCA).	
The inspectors reviewed Materials License SUC-1593 and noted that License Condition 11, states, in part, that except as specifically provided otherwise, the licensee shall conduct operations in accordance with the commitments, representations, and statements contained	

in the RSP, "Radiation Safety Plan for IMCOM [Installation Management Command] Ranges Affected by M101 Davy Crockett Spotting Round Depleted Uranium," dated May 26, 2023 (ADAMS Accession No. ML23158A058).

The RSP, Section 2.6 states, in part, all visitors to the RCA will comply with the requirements of this RSP. Depending on the areas to be accessed and the nature of the visit, the Garrison RSO, as necessary, will escort visitors in order to assure safe radiation safety practices. In addition, Section 11.1.2, states, in part, all equipment and vehicles will be monitored for contamination as they leave the RCA.

Inspectors determined that work request DTA TA516, was not adequately written to require DPW contractors to inform the Garrison RSO prior to starting work close to the RCA boundary, in order for the Garrison RSO to inform and escort the contractors to ensure safe radiation safety practices. Due to the Garrison RSO not being contacted prior to the start of the work by the DPW contractors, the contractors were not trained in the potential hazards in the area. In addition, the licensee failed to monitor equipment for contamination after it had crossed into and exited the RCA at multiple locations.

Inspectors determined that the licensee failed to conduct operations in accordance with the commitments, representations, and statements contained in the Programmatic RSP.

Corrective Actions: The licensee is tracking this issue and developing corrective actions.

Analysis: The contractors and their equipment entered the RCA without the proper training or being escorted, and their equipment was not monitored for contamination as it left the RCA. The contractors and/or their equipment could have come in contact with DU fragments during the work activity.

Enforcement:

Severity: This issue was determined to be a Severity Level IV, cited violation, consistent with NRC's Enforcement Policy, dated August 23, 2024, as informed by materials operations example 6.3.d.3, in which "a licensee failed to implement procedures as required by Materials License SUC-1593, License Condition 11.

Violation: Materials License SUC-1593, Amendment 9, License Condition 11, states, in part, that the licensee shall conduct operations in accordance with the commitments, representations, and statements contained in the Programmatic Radiation Safety Plan (RSP), "Radiation Safety Plan for IMCOM [Installation Management Command] Ranges Affected by M101 Davy Crockett Spotting Round Depleted Uranium," dated May 26, 2023 (ADAMS Accession No. ML23158A058).

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request DTA TA516, was not adequately written to require DPW contractors to inform the Garrison RSO prior to starting work close to the RCA boundary, in order for the Garrison RSO to inform and escort the contractors to ensure safe radiation safety practices. Due to the Garrison RSO not being contacted prior to the start of the work by the DPW contractors, the contractors were not trained in the potential hazards in the area. In addition, the licensee failed to monitor equipment for contamination after it had crossed into and exited the RCA at multiple locations.

Enforcement Action: This violation is being treated as a cited violation, consistent with Section 2.3.2 of the Enforcement Policy.

EXIT MEETING

The inspector verified no proprietary information was retained or documented in this report:

- On June 25, 2025, the inspector conducted a final exit briefing with Major David Hermann, and other members of the licensee's staff.

ADDITIONAL DOCUMENTS REVIEWED

None.