



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

IMCOM Safety Office

August 26, 2025

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

This letter is the **Reply to a Notice of Violation Report No. 04009083/2025001**. The docket number is 040-09083. The detailed reply to the Notice of Violation is attached to provide (1) the reason for the violation (2) the corrective steps that have been taken and the results achieved; (3) the corrective steps that will be taken; and (4) the date of 1 November 2025, when full compliance will be achieved. IMCOM HQ will continue to track via management channels and Safety and the Occupational Health Advisory Council (SOHAC) chaired by the Commanding General.

If you have any additional questions, please contact undersigned by phone at 256-450-7898 or e-mail david.a.hermann7@army.mil.

Sincerely,

Enclosure

David A. Hermann
Major, Medical Service Corps
Interim Radiation Safety Officer

Copy furnished:

Regional Administrator, Nuclear Regulatory Commission, Region IV, 1600 East Lamar Blvd, Arlington, TX 76011-4511
Director, ATTN: Jane Marshall, Division of Decommissioning, Uranium Recovery, and Waste Programs, Office of Nuclear Material Safety and Safeguards



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
INSTALLATION MANAGEMENT COMMAND
HEADQUARTERS, U.S. ARMY GARRISON, ALASKA
1046 MARKS ROAD #6000
FORT WAINWRIGHT, ALASKA 99703-6000

AUG 25 2025

AMIM-AKG-SO

MEMORANDUM FOR Commanding General, U.S. Army Installation Management Command-HQ - ATTN: AMIM-SO (Safety Office), 2405 Gun Shed Road, Building 2261, Fort Sam Houston, Texas, 78234-1223

SUBJECT: Reply to a Notice of Violation U.S. Army Installation Management Command – NRC Inspection Notice of Violation 04009083/2025001.

1. Violation: Failure to Implement the Radiation Safety Plan. Severity Level IV. 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 (RCA) to assure safety radiation safety practices. In addition, the licensee failed to monitor equipment for contamination after it had crossed into and exited the RCA in multiple locations.

2. Reason for Violation: On 14 and 15 May 2025, contractors utilized the "Hydro-Ax" method to clear approximately 1,310 meters of vegetation, establishing a 15-foot wide corridor along the Donnelly Training Area radiation control area (RCA) perimeter. During this process, contractors entered the RCA on approximately five occasions, entering approximately one meter into the NRC-licensed RCA boundary with heavy machinery. The work and entries occurred without prior notification to the Garrison Radiation Safety Officer (RSO) and subsequent completion of required visitor escort training briefings or exit monitoring, as stipulated in Radiation Safety Plan (RSP) Sections 2.6 and 11.1.3. The violation stemmed from the contract directing clearing to the RCA perimeter line, rather than a previously discussed buffer zone, and a lack of radiation safety coordination between the Garrison RSO and the work contractors. The work was executed in accordance with a valid work request and Scope of Work contract, which directed clearing to the RCA perimeter line. While the work request correctly identified the Garrison RSO as the Facility Work Area (FWA) Safety and Occupational Health Specialist and Subject Matter Expert (SME) for the project, this critical information was not incorporated into the formal contract. Consequently, the contract documentation prioritized coordination with Fort Wainwright Range Control regarding munitions safety, stating: "Contractor must work closely with Fort Wainwright Range Control to ensure work can be done safely between all training activities in the impact area," without establishing a parallel requirement for radiation safety collaboration with the Garrison RSO.

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2. Corrective Steps Taken:

a. Reporting. On 27 May 2025 the Fort. Wainwright RSO contacted the IMCOM interim NRC License RSO to self-report the incident. On 28 May 2025 the IMCOM NRC License RSO contacted the NRC, with follow-up Teams conversation on 3 June 2025. It was determined the incident did not meet 10 CFR Part 40 notification requirements. No further work was performed near or in the Radiation Control Area and the Garrison RSO provided incident summary. Updates were provided to leadership and to the IMCOM Commanding General at the IMCOM Safety and Occupational Health Advisory Council (SOHAC). The License RSO has informed all DU License Garrison RSOs about the incident as a lesson learned and to post the violation until resolved.

b. Additional signs, identical to the newly placed signs, were requested through the Fort Wainwright Directorate of Public Works (DPW) office. These signs will be placed in the areas identified by the NRC, with extras ordered for replacements in case of damage.

c. Coordination and communication with Range Control have been increased to ensure the Garrison RSO is notified when individuals need to perform work near or within the RCA.

d. The IMCOM interim RSO scheduled two virtual training sessions covering the annual audit checklist and refresher training. These sessions are designed to provide guidance and fulfill the annual internal audit and refresher training with lesson learned on requirements specified in Nuclear Regulatory Commission (NRC) License SUC-1593 Condition 11 Radiation Safety Plan. IMCOM Garrison RSOs at locations with depleted uranium ranges have and will attend one of two audit review and radiation refresher training on 19 and/or 26 August 2025 via MS Teams. Each IMCOM Garrison RSO with NRC License SUC-1593 responsibilities perform annual internal audit outlined in Radiation Safety Plan: Section 19.2 Guide for Annual Audit, and 19.3 Sample Checklist. The Garrison RSO will perform an audit using the checklist and send via email to the IMCOM NRC License interim RSO no later than 12 September 2025 for review.

3. Corrective Steps That Will Be Taken:

a. Signage: Additional signs will be placed at roadways and areas identified by the NRC Inspector during the inspection to notify individuals of the radiological hazard and to keep out. Extra signs have been ordered for replacement purposes if needed. DPW estimates approximately 30 days for the additional signs to be ready. These will be delivered to Range Control at Fort Greely, AK, which will contact the Garrison RSO to

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coordinate the installation of the signs, as the RCA is located approximately 1.5 to 2 hours away from the Garrison RSOs workplace.

b. Sign removal: Previously posted signs within and outside of the RCA will be removed. To facilitate this, Range Control will need to access the RCA to remove the signs that are inside the RCA. Coordination will be established with the Garrison RSO, who is stationed 1.5 – 2 hours away, to ensure entrants receive training and exit monitoring is conducted in compliance with the NRC license.

c. Education and Training:

(1) The Garrison RSO will develop a trifold pamphlet containing information about the Davy Crockett weapon system, the hazards associated with depleted uranium, training requirements, and exit monitoring protocols for RCA access. This pamphlet will be provided to Range Control and DPW for posting in relevant areas and will also be provided to contractors and stakeholders.

(2) The current training PowerPoint presentation will be updated which provides annual training for the Range Control employees and any individuals requiring access to the RCA.

d. Contract Management:

(1) Contract templates for future United States Army Corps of Engineer (USACE), Regional Contracting Office (RCO) and Intergovernmental Service Agreements (IGSA) will be updated to include mandatory coordination with the Garrison RSO for all work near or within the RCA. The following sentence will be added: "Contractor must work closely with the Garrison Radiation Safety Officer to ensure Nuclear Regulatory Commission (NRC) License Conditions are met, including briefings for authorized visitors, and any required exit monitoring."

(2) Formal pre-construction meetings will be established between contractors, Range Control, and Garrison RSO, to review safety requirements and protocols.

(3) Contractors, DPW, the Garrison Safety Office and Range Control will collaborate to promote a culture of safety and compliance. DPW will organize regular meetings and planning sessions to strengthen relationships and enhance coordination among all parties.

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(4) DPW Standard Operating Procedure for developing projects will be updated to include: All scopes of work will be sent to the Garrison Safety Office to review and provide comments.

e. Resolution and program oversight: Periodic assessments of the program and resolution of previous findings will be tracked during the Safety and Occupational Health Advisory Council (SOHAC).

4. Estimated Date for Full Compliance: 1 November 2025, weather permitting.

5. Point of contact for this memorandum is the Garrison Radiation Safety Officer, Kimberlie R. Hughes at kimberlie.r.hughes.civ@army.mil or 907-353-7085.



JOHN W. CAMPBELL
COL, IN
Commanding