February 10, 2012



U.S. Nuclear Regulatory Commission, Region IV Attn: Director, Division of Nuclear Materials Safety 1600 East Lamar Blvd., Suite 400 Arlington, TX 76011-4511

# Re: Notification of Initiating Activities Under Nuclear Materials License Number 05-27748-01

Dear Regional Administrator:

MACTEC Development Corporation (MDC) is providing written notification prior to initiating activities at a temporary job site, as required by Nuclear Materials License Number 05-27748-01, Amendment 5, Docket Number 030-36204.

MDC will be implementing its license to control radiological activities at the former Naval Air Station Alameda Point (NAS Alameda), located in Alameda, California, starting on or about February 27, 2012. Licensed activities include the installation of groundwater monitoring and injection wells at locations where there is a potential for radioactive materials to exist in soils at the site, specifically within areas IR-1 and IR-32 Sites.

MDC has contacted Ms. Catherine Hicks, Radiologic Health Branch, California Department of Public Health, requesting reciprocity, as California is an Agreement State. Enclosed with this notification letter is a copy of the Request for Reciprocity letter submitted to her office on February 10, 2012, without attachments.

In accordance with the license requirements, the following information is provided:

13. A. (1) The estimated type, quantity, and physical/chemical forms of licensed materials include

- Previous radiological operations at NAS Alameda involved the use of 91b materials, radioluminescent materials, technically enhanced naturally occurring radioactive materials (TENORM), and naturally occurring and accelerator-produced radioactive materials (NARM).
- There is an extremely small probability of locating radioactive material in the form of sealed tritium and/or radium luminescent deck/pier markers historically used to mark U.S. Navy ships stationed at NAS Alameda. There is no quantity estimate for these deck markers.
- The site's Radiological Work Plan identifies cesium-137, cobalt-60, depleted uranium, radium-226, strontium-90, thorium-232, and uranium oxide (UO2) as contaminants of concern at the site; however, there is no quantity estimate for these

radionuclides because the majority of the landfill material is expected to be free of residual radioactivity. If radioactive material is present, it is expected that the radioactive material would have a physical/chemical form of a fixed contamination, either on the external surface of landfill debris or imbedded in the physical landfill material.

13. A. (2) The specific site location is IR-1 and IR-32 Sites, NAS Alameda, Alameda, California.

13. A. (3) Planned licensed activities include installation of groundwater monitoring and injection wells. Radioactive waste material identified and collected by MDC will be placed in low-level radioactive waste bins provided by the U.S. Navy's low-level radioactive waste (LLRW) contractor. After the bin has been filled or the project is completed, the bin will be returned to the LLRW contractor for management and disposition. Responsibilities for management and control of radioactive waste material will be performed in accordance with the LLRW contractor's Memorandum of Understanding.

13. A. (4) The estimated start date is Monday, February 27, 2012, with a completion date of no later than August 24, 2012, at which point MDC intends to invoke a State of California Radioactive Materials License for the remainder of the project.

13. A. (5) The point of contact for this project is

-	Alejandro (Alex) Lopez
	AMEC Senior Health Physicist
	9177 Sky Park Court
	San Diego, CA 92123
Phone:	(858) 514-7728, office
	(970) 778-0449, cell

MDC will notify the NRC in writing of the status of the temporary job site and the disposition of the licensed material within 30 days of completing project activities.

Thank you for taking this matter into consideration. If you have any questions regarding this notification, please call me at (970) 243-2861.

Sincerely,

Michael P. McDonald, CHP, RRPT Radiation Safety Officer/Manager of Projects Radiological Services and Engineering

MPM



February 10, 2012

Ms. Catherine Hicks California Department of Public Health Radiologic Health Branch 1500 Capitol Avenue, 5<sup>th</sup> Floor, MS 7610 Sacramento, CA 95814-5506

# Re: Request for Reciprocity for Out-of-State Licensees

Dear Ms. Hicks:

MACTEC Development Corporation (MDC) is providing written request to obtain reciprocity in the State of California, as per 180 NAC 3-028, "Reciprocal Recognition of Licenses," to perform radiological work (described below) at the former Naval Air Station Alameda Point (NAS Alameda), located in Alameda, California starting on or about February 27, 2012. Licensed activities include the installation of groundwater monitoring/injection wells at locations where there is a potential for radioactive materials to exist in soils at the site, specifically within areas IR-1 and IR-32 Sites.

MDC is currently licensed by the U.S. Nuclear Regulatory Commission (NRC) to receive, store, use, and/or possess radioactive materials incidental to activities involving radiological services including site characterization, decontamination, decommissioning, or remediation. MDC's Radioactive Materials License, Number 05-27748-01, Docket Number 030-36204, expiration date March 31, 2013, is attached with this letter.

MDC hereby requests that the State of California grant reciprocity for MDC to use its NRC license to perform radiological work in the state of California, starting on or about February 27, 2010. The following information describes the scope and circumstances under which this work is planned.

- 1. The estimated type, quantity, and physical/chemical forms of licensed materials include:
  - Previous radiological operations at NAS Alameda involved the use of 91b materials, radioluminescent materials, technically enhanced naturally occurring radioactive materials (TENORM), and naturally occurring and accelerator-produced radioactive materials (NARM).
  - There is an extremely small probability of locating radioactive material in the form of sealed tritium and/or radium luminescent deck/pier markers historically used to mark U.S. Navy ships stationed at NAS Alameda. There is no quantity estimate for these deck markers.
  - The site's Radiological Work Plan identifies cesium-137, cobalt-60, depleted uranium, radium-226, strontium-90, thorium-232, and uranium oxide (UO2) as contaminants of concern at the site; however, there is no quantity estimate for these

radionuclides because the majority of the landfill material is expected to be free of residual radioactivity. If radioactive material is present, it is expected that the radioactive material would have a physical/chemical form of a fixed contamination, either on the external surface of landfill debris or imbedded in the physical landfill material.

- 2. The specific site location is IR-1 and IR-32 Sites, NAS Alameda, Alameda, California.
- 3. Planned licensed activities include installation of groundwater monitoring and injection wells. Radioactive waste material identified and collected by MDC will be placed in low-level radioactive waste bins provided by the U.S. Navy's low-level radioactive waste (LLRW) contractor. After the bin has been filled or the project is completed, the bin will be returned to the LLRW contractor for management and disposition. Responsibilities for management and control of radioactive waste material will be performed in accordance with the LLRW contractor's Memorandum of Understanding.
- 4. The estimated start date is Monday, February 27, 2012, with a completion date of no later than August 24, 2012 at which point MDC intends to invoke a State of California Radioactive Materials License for the remainder of the project.
- 5. The point of contact for this project is:

Alejandro (Alex) Lopez
 AMEC Senior Health Physicist
 9177 Sky Park Court
 San Diego, CA 92123
 Phone: (858) 514-7728 office
 (970) 778-0449 cell

Thank you for your consideration of the matter. If you have any questions regarding this request, please call me at (970) 243-2861.

Sincerely,

Michael P. McDonald, CHP, RRPT Radiation Safety Officer/Manager of Projects Radiological Services and Engineering

MPM

# Torres, RobertoJ

From:McDonald, Michael [MPMCDONALD@mactec.com]Sent:Monday, February 13, 2012 3:36 PMTo:Torres, RobertoJSubject:RE: Request for additional informationAttachments:MOU Alameda AMEC final 2-13-12.pdf; AMEC-NAVY MOU final.pdf

Mr. Torres,

Thank you for getting in touch with me regarding the missing agreements. Attached with this email are two <u>Draft</u> MOUs that were submitted this morning to RASO and the "other" site licensees at the project site. The first MOU is written between AMEC and the RASO. It follows the standard template that the RASO and various licensees have used in the past. The second MOU is the NAS Alameda base wide MOU between the various site's licensees. Again, both of these MOUs are in draft format and may change after comments are received and incorporated from either RASO and the other site licensees.

Please accept these draft copies with the assurance that final, signed MOUs will be submitted to the NRC (you via email ?) prior to the actual start of work.

As always, please contact me directly with questions or concerns.

Thanks

Mike

# Michael P. McDonald, CHP, RRPT

Environment & Infrastructure Manager of Projects: Radiological Services and Engineering 751 Horizon Ct. Ste 104, Grand Junetion, CO 81508 Office 970-243-2861 | Mobile 970-270-5314 | Fax 970-256-7356 <u>michael.p.mcdonald@amec.com</u>

From: Torres, RobertoJ [mailto:RobertoJ.Torres@nrc.gov]
Sent: Monday, February 13, 2012 1:28 PM
To: McDonald, Michael
Subject: Request for additional information

Mr. McDonald:

The NRC has received your 14-day notification letter dated February 10, 2012 in accordance with condition 15 of NRC License 05-27748-01. However the written agreement as described in condition 16, and required to be submitted with the 14-day notification, was not included. Please submit written agreement.

Roberto J. Torres Senior Health Physicist U.S. Nuclear Regulatory Commission - Region IV Division of Nuclear Materials Safety Nuclear Materials Safety Branch B 1600 East Lamar Boulevard Arlington, Texas 76011-4511 Telephone 817-200-1189 Facsimile 817-200-1188 <u>robertoj.torres@nrc.gov</u>

# **b**576942

# MEMORANDUM OF UNDERSTANDING

Date: February 13, 2012

RE: US NRC License Use at Naval Air Station Alameda Point, Alameda, California

#### Background

A project team, consisting of AMEC Environment & Infrastructure, Inc. (AMEC) and Environmental Dimensions, Inc. (EDi) is performing work involving radioactive materials at the former Naval Air Station Alameda Point (NAS ALAMEDA), Alameda, California, specifically in Sites 1 and 32. The work requires licensed controls due to the presence of radioactive materials and the subsequent potential for occupational exposures, both of which are subject to oversight by the Nuclear Regulatory Commission (NRC).

Tetra Tech EC, Inc. (TtEC) is performing work as part of the Seaplane Lagoon site, which may involve sampling and remedial actions. TtEC may also perform basewide radiological survey activities at various buildings and sites around NAS ALAMEDA where no contamination is suspected to be found. TtEC utilizes team member Radiological Survey & Remedial Services (RSRS) LLC as radiological subcontractors for this work. Additionally, TtEC is performing work at Site 2.

B&B Environmental Safety, Inc. (B&B) is providing brokerage services inclusive of the offsite transport and disposal of project generated radioactive waste and the staging of Department of Transportation (DOT) approved waste storage and transportation containers. The control of radioactive waste package activities and site locations designated for "post loading" bin operations are subject to requirements in the B&B NRC Materials License No. 04-29369-01.

AMEC, TtEC, RSRS, B&B, and NWT have each been issued RMLs by the US Nuclear Regulatory Commission (NRC). Additionally, EDi has been issued a RML by agreement state (Tennessee). AMEC is contractually bound to conduct and coordinate tasks, activities and support efforts specific to NAS Alameda under contract award N62473-08-D-8816, CTO 0002 under its NRC RML.

TtEC and B&B are contractually bound to control radioactive materials generated under other specific contracts with the government using their RML. B&B may possess radioactive materials under their specific license, incidental to performance of their contract to the U.S. Army for disposal of radioactive materials.

It is important to note that EDi is not utilizing any RML, except for exempt-quantity check sources which are an authorized use listed below.

The intent of this memorandum is to outline the general applicability and responsibilities of each project team organization as it applies to work scope and license compliance. In no instance will a support organization for AMEC, RSRS, B&B, or TtEC be authorized to utilize the AMEC, RSRS, B&B, or TtEC NRC RML without an Authorized User (designated in writing according to the limitations of the appropriate license) being physically present on the job site during performance of work.

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#### NAS Alameda Radiation Safety Committee

A Radiation Safety Committee (RSC), consisting of the Radiation Safety Officer (RSO), or designee, for AMEC, RSRS, B&B, and TtEC will meet at least monthly to discuss current status and uses of radioactive materials licenses at Alameda Point. The RSC may meet via telephone. The RSC may post in a convenient location (currently the TtEC On-site trailers) the current boundaries and areas of control under each license, including authorized radioactive materials storage areas. Minor changes to areas of control of the appropriate RML may be made by notifying the Naval Sea Systems Command Detachment Radiological Affairs Support Office (RASO) as soon as practical (and within 72 hours) without prior meeting of the RSC.

AMEC will take temporary control of Sites 1 and 32 from RSRS using their RML on 2/27/12 in performance of their contract, using a RSC-approved method for transferring license control (which will include RASO notification). TtEC will take temporary control of Site 2 from RSRS using their RML on 2/27/12 in performance of their contracts, using a RSC-approved method for transferring license control (which will include RASO notification). B&B is authorized to establish and maintain radioactive material storage areas in convenient locations, with prior authorization from the Naval Facilities Engineering Command Southwest Division (NAVFAC SW), RASO, and Army Joint Munitions Command (AJMC), with notification to the RSC.

#### General Use of Individual Licenses

Each organization within the team has distinct areas of operation and responsibility as defined by their respective clients (AMEC, RSRS, TtEC, EDi, and B&B). Controls over the following items or activities as applicable to respective scope of work or license requirements will be as follows:

- Training and record maintenance for employees, visitors, and subcontractors of each company.
   AMEC for AMEC and EDi site staff working under Contract N62473-08-D-8816, CTO
  - AMEC for AMEC and EDI site staff working under Contract N62475-08-D-8816, CTO 0002
  - RSRS for RSRS and other contractors while performing other health physics support services at NAS ALAMEDA
  - B&B for B&B site staff
  - TIEC for TIEC and RSRS site staff working under TIEC contracts for radiological removal of sewer and storm drains, contracts for sampling and radiological removals at SPL, Site 2 activities, and basewide radiological surveys of buildings and sites at NAS ALAMEDA
- Control of exempt-quantity radioactive materials used for calibration or operational checks of radiation detection and laboratory equipment.
  - AMEC for AMEC owned sources at NAS ALAMEDA
  - o EDi for EDi owned sources at NAS ALAMEDA
  - RSRS for RSRS owned sources at NAS ALAMEDA
  - o B&B for B&B owned sources at NAS ALAMEDA
  - o TtEC for TtEC owned sources at NAS ALAMEDA
- Dosimetry (internal/external) management and associated record maintenance for onsite personnel:
  - o AMEC for AMEC, EDi site staff and authorized subcontractors and visitors
  - o B&B for B&B site staff
  - o TtEC for TtEC site staff

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Note: Visitors or subcontractors entering a radiologically controlled area for less than one shift (8 hours) will not require dosimetry if escorted by a trained staff person with dosimetry who represents the responsible licensee. Dosimetry management will be conducted by the licensee (AMEC, RSRS, TtEC, or B&B) and will include site-specific radiological training for assigned personnel and contractors. Use of dosimetry by an individual demonstrates completion of prerequisite training for radiologically controlled area access.

- Control of individual work areas contractually designated for activities where radioactive
  materials are known or suspected of being present.
  - NAS ALAMEDA Site RSRS
  - NAS ALAMEDA Sites 1 and 32 AMEC
  - NAS ALAMEDA Site 2 TtEC
  - NAS ALAMEDA Sewer and Storm Drain Removal contracts TtEC
  - O NAS ALAMEDA Seaplane Lagoon sampling and removal contracts TtEC
  - NAS ALAMEDA Basewide Radiological Surveys TtEC
  - NAS ALAMEDA Radioactive Material Storage Areas not otherwise covered B&B

Note: RSRS's scope of work requires that radiological support be provided for Navy authorized contractors and project visitors often present throughout all of NAS Alameda. In order to accommodate those activities unrelated to TtEC's and/or B&B's contract scope, RSRS may at times need to escort Navy authorized persons into radiologically controlled areas maintained by TtEC, and/or B&B. Access protocol associated with such needs will be conducted in advance between the Navy and the applicable RSO or RSO representative.

- · Control of waste materials in designated work areas.
  - NAS ALAMEDA Site RSRS and/or B&B
  - NAS ALAMEDA Sites 1 and 32 AMEC
  - NAS ALAMEDA Site 2 TtEC
  - NAS ALAMEDA Sewer and Storm Drain Removal contracts TtEC
  - $\odot$  -NAS ALAMEDA Scaplane Lagoon sampling and removal contracts TtEC
  - NAS ALAMEDA Basewide Radiological Surveys TtEC
  - o NAS ALAMEDA Radioactive Material Storage Areas not otherwise covered B&B
  - Issuance and maintenance of Radiation Work Permits for controlled work.
    - o NAS ALAMEDA Site RSRS
    - NAS ALAMEDA Sites 1 and 32 AMEC
    - NAS ALAMEDA Site 2 TtEC
    - NAS ALAMEDA Sewer and Storm Drain Removal contracts TtEC
    - NAS ALAMEDA Seaplane Lagoon sampling and removal contracts TtEC
    - o NAS ALAMEDA Basewide Radiological Surveys TtEC
    - NAS ALAMEDA Radioactive Material Storage Areas not otherwise covered B&B
- Inventories of radioactive materials, including waste.
  - NAS ALAMEDA Site RSRS and/or B&B
  - NAS ALAMEDA Sites 1 and 32 AMEC
  - o NAS ALAMEDA Site 2 TtEC
  - NAS ALAMEDA Sewer and Storm Drain Removal contracts TIEC
  - o NAS ALAMEDA Seaplane Lagoon sampling and removal contracts TtEC
  - NAS ALAMEDA Basewide Radiological Surveys TtEC and B&B
  - NAS ALAMEDA Radioactive Material Storage Areas not otherwise covered B&B

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- Reports and other administrative requirements including those to the RASO and other regulatory agencies.
  - NAS ALAMEDA Site RSRS and/or B&B
  - NAS ALAMEDA Sites 1 and 32 AMEC
  - NAS ALAMEDA Site 2 TtEC
  - NAS ALAMEDA Sewer and Storm Drain Removal contracts TtEC
  - NAS ALAMEDA Seaplane Lagoon sampling and removal contracts TtEC
  - NAS ALAMEDA Basewide Radiological Surveys TtEC
  - o NAS ALAMEDA Radioactive Material Storage Areas not otherwise covered B&B

#### **Transfer of Radioactive Materials**

The primary envisioned occasion for potential transfers of radioactive material between organizations is the accumulation of packaged and/or containerized waste. Primary storage areas have been established at the site and are currently under the control of TtEC as part of their Sewer and Storm Drain Removal and the Seaplane Lagoon sampling and removal contracts. During the course of work, radioactive material may be accumulated by AMEC, RSRS, B&B, TtEC (and their support organizations), or others not named. Any radioactive material designated as waste thus generated will require transport and transfer to a designated project storage area to await disposal. Transportation of radioactive material generated for relocation to approved offsite disposal sites is currently under the responsibility of B&B. The minimum requirements for transfer of such waste materials between the organizations will consist of the following:

- A brief description of the waste
- · An inventory of packages / containers to include total number and contents
- A label identifying dose rate, known or suspected isotope(s) and a curie content approximation for the package / container
- Date, time and individual signatures of the personnel completing the transfer

Following transfer activities, B&B will log and maintain control of the materials. Once packaged / containerized materials are designated for loading, off site transfer and disposal, B&B will arrange for transportation of the containerized materials / waste to offsite facilities for treatment and/or disposal.

#### **Occurrence Reporting**

In any event, the responsible RSO (or RSO representative) will notify all other site RSOs (or designated representatives), as soon as practical, of any of the following occurrences that may affect personnel from other organization(s):

- Contamination events that require decontamination (personnel or equipment)
- Contamination levels including airborne radioactivity/dose rate events that stop operations
- Any regulatory reporting event
- Any noncompliance with the requirements of this MOU
- The RSO or RSO representative of the offending party shall be responsible for reporting non-compliance issues to the applicable regulatory and/or oversight agencies

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## Jurisdictional issues and Changes

Jurisdictional issues or specific situations not covered under this agreement will be discussed between AMEC, TtEC, RSRS, and B&B for resolution. Signatures placed below by site Radiation Safety Office Representatives for each project team member will indicate approval of the contents within this document, and concurrence with the resultant agreement.

Michael McDonald, Radiation Safety Offi NRC RML No. 05-27748-01 Docket No. (		Date
Daryl DeLong, RSRS Radiation Safety Of NRC RML No. 27-29309-01 Docket No. 0		Date
Nathan Smith, TIEC Radiation Safety Offi NRC RML No. 29-31369-01 Docket No. 0		Date
Willie Bremer, B&B Assistant Radiation S NRC RML No. 04-29369-01 Docket No. 0		Date
Stanley Waligora, EDi Radiation Safety Of State of Tennessee RML R-01103-C-1	Ticer	Date
<ul> <li>cc: L. Lowman, NAVSEA DET RASO</li> <li>E. Abkemeier, TtEC Corporate Rad</li> <li>C. Edgmon, EDi Program Manager</li> </ul>		rotection Manager
AMEC Environment & Infrastructure, Inc. 751 Horizon Ct., Ste. 104 Grand Junction, CO 81506 Tet (970)243-2861	ww.amec.com	a.



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# MEMORANDUM OF UNDERSTANDING

February 13, 2012

## Re: AMEC US NRC License Use at former Naval Air Station Alameda

### Background

The U.S. Navy has requested that AMEC Environment & Infrastructure Inc. (AMEC) provide radiological services in support of the Remedial Design and Remedial Action Installation Restoration Site 1 Project, Contract No. N62473-08-D-8816 CTO 002 at the former Naval Air Station (NAS) Alameda in Alameda, California. As a requirement of the contract, radiological services will be performed by AMEC under AMEC's Nuclear Regulatory Commission (NRC) Radioactive Materials License No. 05-27748-01.

Radiological operations involving licensed radioactive materials at the former NAS Alameda were previously authorized by Atomic Energy Commission (AEC) licenses and NRC licenses or Naval Radioactive Materials Permits (NRMPs). All previous licenses and NRMPs have been terminated. Additionally, previous radiological operations at this site involved the use of 91b materials, radioluminescent materials, technically enhanced naturally occurring radioactive materials (TENORM), and naturally occurring and accelerator-produced radioactive materials (NARM). Currently, the Navy is authorized use of NRC licensed radioactive materials through the Navy's NRC Master Materials License and is recognized as owner of all the radioactive materials at Alameda. The Naval Sea Systems Command Detachment, Radiological Affairs Support Office (NAVSEADET RASO), as technical support center to the Naval Radiation Safety Committee, oversees radiological work performed by AMEC for the Navy.

### General Use of Individual Licenses

The dividing line of organization responsibilities is the point at which the radioactive material transfers custody from the Navy to AMEC, or from AMEC back to the Navy. Because the radioactive material controlled under radiological remediation is inferred by historical references and not known or adequately quantified, both organizations realize that an exact inventory of radioactive material is not feasible. However, a conservatively high estimate based cn professional judgment and best available technology will be used. The following contains a natural progression of the radiological remediation and decontamination process, and the organization specific responsibilities.

Prior to AMEC mobilization for radiological remediation and/or decontamination work, the Navy is responsible for the inventory of radioactive material, posting radiological areas in accordance with 10 CFR 20, and providing radiation awareness training to individuals with access to the

AMEC Environment & Infrastructure, Inc. 751 Horizon Ct., Ste. 104 Grand Junction, CO 81506 Tel (970) 243-2861 radiologically impacted site/area. The Navy shall provide AMEC with information that gives a conservative estimate of the type, quantity and physical/chemical forms of radioactive material they are likely to recover and the site locations where the radioactive material is located or has potential to exist. This information is necessary to ensure that the radioactive material quantities will not exceed the limits listed in the AMEC NRC license, and to ensure that an accurate 14-day notification is made to the NRC as required by the AMEC NRC License No. 05-27748-01, Condition 13A.

Upon AMEC mobilization to perform radiological remediation and decontamination work. AMEC will be responsible for posting radiological areas in accordance with 10 CFR 20, and providing the appropriate radiation awareness training to individuals with access to the radiologically impacted site under AMEC control. At the point that any radioactive material is removed from a surface or soil, that radioactive material becomes the responsibility of AMEC for radicactive material inventory. The inventory estimate may be based on radioanalytical measurement or thumb rules based on instrument measurements but it must be isotope specific. Note that these measurements may be conducted by contractors as defined in a NAS Alameda site-specific MOU between AMEC and other site radiological contractors. Any radioactive material that remains in the original location remains in the possession of the Navy. Although the Navy will retain legal possession of radioactive material that has been left in place. AMEC will identify the location and maintain control of the radioactive material and provide appropriate posting in accordance with 10 CFR 20 until the end of the contract. In the event of any radiological emergency, such as a spill of radioactive material, AMEC will provide initial emergency response, stabilize the situation, and obtain Navy concurrence on final resolution prior to returning to work. Unless specifically stipulated in a site specific contract, AMEC is not obligated to engage in any radiological clean up as the result of an accident not caused by a AMEC employee or its contracted partners.

Upon completion of AMEC radiological work and/or termination of the contract, the Navy will resume responsibility for radiological posting and training requirements in accordance with 10 CFR 20 for those sites not free released without restrictions, including areas where radioactive material was found but left in place. AMEC shall return any remediated radioactive material that has no means of disposal to the custody of the Navy or other entity that possesses an appropriate NRC license, as directed by the Navy. AMEC shall provide written listing of current areas containing radioactive material identified during radiation survey operations prior to relinquishing responsibilities to the Navy.

### Occurrence Reporting

In all non routine events during AMEC radiological remediation operations under a contract between AMEC and the Navy, the AMEC Radiation Safety Officer (RSO) or designee will notify NAVSEADET RASO as soon as practical. Non-routine events are defined as but not limited to:

- Contamination events that require personnel decontamination;
- Contamination levels including airborne contamination or dose rates that stop operations;
- Any regulatory reporting event; or
- Any noncompliance with the requirements of this MOU.

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The AMEC RSO or designee shall be responsible for reporting noncompliance issues to the applicable regulatory agencies as required by their NRC license or as specified in their contract with the Navy.

## Jurisdictional Issues and Changes

Jurisdictional issues or specific situations not covered under this agreement will be discussed between the Navy and AMEC for resolution and documented by amendment of this memorandum of understanding. Signatures placed within this MOU by the AMEC RSO (or designated NRC license representative) and the NAVSEADET RASO representative will indicate approval of the contents within this document, and concurrence of the resultant agreement.

Michael P. McDonald, AMEC RSO

Date

Laurie Lowman, NAVSEADET RASO Lead Environmental Program Manager

Date

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This is to acknowledge the receipt of your letter/application dated  $\underline{\Im/1\Im/1}$ , and to inform you that the initial processing, which includes an administrative review, has been performed. 2 There were no administrative omissions. Your application will be assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information. Please provide to this office within 30 days of your receipt of this card: Q 0\_ days. The action you requested is normally processed within A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved. Your action has been assigned Mail Control Number h 5 7 6 9 2 Δ When calling to inquire about this action, please refer to this mail control number. You may call me at 817-860-8103.

NRC FORM 532 (RIV) (10-2006)

Śinderely, fice Licensing Assistant

BETWEEN: Accounts Receivable/Payable and Regional Licensing Branches		[ FOR ARPB USE ] INFORMATION FROM LTS Program Code: 03234 Status Code: Pending Amendment Fee Category: 14A 1D 3N 4B Exp. Date: 03/31/2013 Fee Comments: Decom Fin Assur Reqd: N		
License Fee Wo	orksheet - Licens	e Fee Transmittal		
1. APPLICATION ATTAC Applicant/Licensee:	HED MACTEC DEVELOPME	NT CORPORATION		
Received Date:				
Docket Number:	3036204			
Mail Control Number:	576942			
License Number: Action Type:	05-27748-01 Notifications			
Action Type.	110000013			
2. FEE ATTACHED	1			
Amount:	1			
Check No.:		9		
3. COMMENTS	Signed:	Unal Lifere		
	Date:	2/14/1×		
B. LICENSE FEE MANAG	SEMENT BRANCH (Check	when milestone 03 is entered / / )		
1. Fee Category and An	nount:			
2. Correct Fee Paid. Appl	lication may be processed f	for:		
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Renewal:		*		
License:				
3. OTHER	a an agus sa bar a sa an			
	Signed:			
	Date:			