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DEPARTMENT OF THE NAVY

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From: Officer in Charge, Naval Sea Systems Command Detachment,
Radiological Affairs Support Office (RASO)
To: Commander, Engineering Field Activity West, Naval
Facilities Engineering Command (ATTN: Dave Song, Code
1832.3)
Subj: REVIEW OF PHASE III RADIATION INVESTIGATION OF FORMER NRDL
SITES AND COMPLETION OF THE IR-02 SURFACE CONFIRMATION
RADIATION SURVEY DRAFT FIELD WORK PLAN
Ref: (a) EFAWEST Memo (Mr D. Song) of 26 Oct 1995
Encl: (1) Comments on CTO 0285, Radiation Investigation of
Former NRDL Sites and Completion of the IR-02 Surface
Confirmation Radiation Survey Draft Field Work Plan

1. As requested in reference (a), NAVSEADET RASO has reviewed the subject work plan. Comments are provided in enclosure (1).
2. NAVSEADET RASO points of contact are LCDR L. L. Fragoso or Mr. R. W. Lowman, DSN 953-4692, commercial 804-887-4692.


D. E. FARRAND

Copy to:
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COMMENTS ON CTO 0285
RADIATION INVESTIGATION OF FORMER NRDL SITES
AND COMPLETION OF THE IR-02 SURFACE CONFIRMATION RADIATION SURVEY
DRAFT FIELD WORK PLAN

1. Page 5. Section 1.2, fifth paragraph. The sentence "Most natural radiation sources are occur in soils" should be rephrased.
2. Page 5. Section 1.3, second paragraph. The special nuclear material license from NRDL has been terminated.
3. Page 6. Section 1.4. Change the last sentence to read "The intent of this phase of the radiation investigation is to determine if all the remaining buildings and sites meet the criteria for free release".
4. Page 7. Sections 2.1 & 2.2. *In situ* gamma spectroscopy should only be used whenever there is indication of radioactive contamination and not as a routine method for surveying the site.
5. Page 10. Section 3.0, third sentence. Modify this sentence from "...personnel and released for unrestricted use..." to "...personnel and released by the cognizant regulatory agency for unrestricted use...".
6. Page 25. Section 3.1.4.2, first paragraph. Correct the sentence "Eight rooms with had some contamination".
7. Page 26. Section 3.1.4.3., first paragraph. Change the last sentence from "The tritium was steam cleaned..." to "The building was steam cleaned to remove the tritium contamination. Subsequent sampling with wipes showed background levels".
8. Page 26. Section 3.1.4.3., fourth paragraph. Change the first sentence from "A radiological survey..." to "Sampling was performed by the Navy on concrete...". The rest of the paragraph, must be modified to reflect this change.
9. Page 28. Section 3.1.4.5., first paragraph. Modify the third sentence from "...trace amounts of radionuclides were found in the..." to "...trace amounts of radionuclides were used in the...".
10. Page 30. Section 3.2.1.2., first paragraph. Change the word in the third sentence from "transferee" to "transferred".
11. Page 32. Section 3.2.1.2., last paragraph. The third sentence should indicate that *in situ* gamma spectroscopy will be performed only if contamination is found.

12. Page 33. Section 3.2.1.2., second paragraph. Eliminate this paragraph since it is a duplicate of the previous paragraph.
13. Page 34. Section 3.2.2.1., second sentence under "Recommendation". Correct the grammar of the second sentence.
14. Page 34. Section 3.2.2.1, first paragraph under "Proposed Investigation". A gas proportional or GM survey instrument should be used to survey for ⁹⁰Sr in structures instead of a NaI detector. Radiochemical analysis is the method of choice for detection of ⁹⁰Sr in soil.
15. Page 48. Section 3.3. The surface confirmatory radiation survey showed that IR-02 is contaminated with radioluminescent materials. Therefore, additional surveys in inaccessible areas inside IR-02 will not yield any useful information except to confirm that the area is contaminated. These surveys are only required if the inaccessible areas are at the boundary of the site and the additional information will help in further delineating the horizontal extent of the contamination.