



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

N00221_004154
MARE ISLAND
SSIC NO. 5090.3.A

December 21, 1995

Robert Carter
Radiological Control Office, Code 105.2
Mare Island Naval Shipyard
Vallejo, CA 94592-5100

Re: Naval Nuclear Propulsion Program (NNPP) Radiological Survey Plan for
Decommissioning of Mare Island Naval Shipyard, Revision 2, Change 1 and Change 2.

Dear Mr. Carter:

This letter constitutes U.S. EPA's agreement with the above referenced document with two exceptions. With respect to the NNPP release criteria for Co-60 of 1 pCi/g, EPA does not agree with this criteria for the purpose of releasing the shipyard for unrestricted use. As you are aware from our previous discussions on this issue, EPA believes that in order to allow for the ultimate transfer of shipyard property without restrictions, cleanup up of Co-60 should strive to meet the goal established in the Superfund program of a 10^{-6} lifetime cancer risk based on a residential exposure scenario. Departure from this goal should only be considered with a formal Record of Decision (ROD) document that evaluates site specific factors to arrive at a site specific decision for each area that does not meet this goal. Since the Navy is not intending to develop a ROD for these cleanup decisions, EPA will be evaluating the data provided to determine if any Co-60 remaining at a site exceeds the above risk goal. Our concurrence on those completion reports where Co-60 is remaining will include a risk screening evaluation.

The second exception is with the historic information contained in the survey plan. Our review of that information continues with the review of each completion report and with the review of the Historic Radiological Assessment.

We appreciate your cooperation in working with us to reach agreement on this document, especially considering that this work is outside of the Installation Restoration program. If you have any questions, please call me at 415/744-2407.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Huetteman".

Tom Huetteman
Remedial Project Manager

cc: Dick Logar, MINS
Chip Gribble, DTSC
Bill Watson, DHS