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From: Director, Environmental Readiness Division (N45)
To: Commander, Naval Facilities Engineering Command
Commander, Naval Sea Systems Command

Subj: DON POLICY ON ACTIVITIES INVOLVING GENERAL RADIOACTIVE
MATERIAL (G-RAM) AT ENVIRONMENTAL RESTORATION PROGRAM
SITES

Encl: (1) Department of Navy Policy on Environmental Restoration
Sites Potentially Containing General Radioactive
Material (G-RAM)

1. Enclosure (1) is provided to clarify Navy policy and roles
and responsibilities for general radioactive material (G-RAM)
matters within the Environmental Restoration Program.

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Department of Navy Policy on Environmental Restoration Sites
Potentially Containing
General Radioactive Material (G-RAM)

BACKGROUND

The radioactivity present at Department of Navy (DON) installations may be broadly characterized as Naval Nuclear Propulsion Program (NNPP) radioactive material (N-RAM) or general radioactive material (G-RAM). N-RAM refers to radioactive material used by or under the cognizance of NNPP and is not addressed in this policy. G-RAM is DON radioactive materials that is not used by, controlled by, or associated with the NNPP.

Investigation and cleanup of G-RAM is technically challenging and requires specialized knowledge and expertise. There are special complexities because the management of G-RAM entails overlapping federal and state regulatory authority, including some exercised by the DON itself.

The Base Realignment and Closure Program Management Office (BRAC PMO) and the Naval Facilities Engineering Command (NAVFAC) work together to ensure the Environmental Restoration (ER) cleanup process are appropriately addressed at active installations and BRAC sites. Simultaneously the Naval Sea System Command Detachment, Radiological Affairs Support Office (NAVSEADET RASO) provides complete technical, policy assistance and Naval Radiation Safety Committee oversight for all types of G-RAM. NAVSEADET RASO is also responsible for assisting BRAC PMO and NAVFAC in all aspects of CERCLA investigations and cleanups to ensure CERCLA-listed G-RAM is appropriately addressed for active installations and BRAC sites.

Because of potentially overlapping organizational responsibilities concerning the cleanup of G-RAM potential sites, DON has developed this policy to clarify roles and responsibilities for activities involving G-RAM at ER sites.

APPLICABILITY

Policies and procedures herein apply to all ER response actions for G-RAM funded under Environmental Restoration, Navy (ER,N) or Base Realignment and Closure (BRAC) accounts. Policies and procedures herein do not apply to N-RAM. Commands shall

coordinate any N-RAM matters with the Nuclear Propulsion Directorate, Naval Sea Systems Command (SEA 08)

DEFINITIONS

ALARA (acronym for "as low as is reasonably achievable") is defined in 10 CFR Section 20.1003 as "making every reasonable effort to maintain exposures to radiation as far below the dose limits...as is practical consistent with the purpose for which the licensed activity is undertaken, taking into account the state of technology, the economics of improvements in relation to state of technology, the economics of improvements in relation to benefits to the public health and safety, and other societal and socioeconomic considerations, and in relation to utilization of nuclear energy and licensed materials in the public interest."

G-RAM is Navy and Marine Corps radioactive material, [this includes: byproduct, source, and special nuclear materials; naturally occurring radioactive materials (NORM); technologically enhanced naturally occurring radioactive materials (TENORM); and naturally occurring and accelerator-produced radioactive materials (NARM)] not used by, controlled by or associated with the Naval Nuclear Propulsion Program.

HRA (historical radiological assessment) is a document that is prepared to describe the radiological history of a site and designate radiologically-impacted areas.

LLRW (low-level radioactive waste) is defined as radioactive waste that does not belong in one of the following categories: (1) high-level waste (spent nuclear fuel or the highly radioactive waste produced if spent fuel is reprocessed), (2) uranium milling residues, (3) waste with greater than specified quantities of elements heavier than uranium; and (4) waste generated by the Naval Nuclear Propulsion Program. For purposes of this policy, LLRW is defined as material covered by the Department of Defense Low-level Radioactive Waste Disposition Program (DoD Instruction 4715.6-R).

N-RAM is defined as radioactive material used by, controlled by or associated with the Naval Nuclear Propulsion Program (SEA 08).

Radiologically-Impacted Site is an outdoor area, building or underground system (i.e., sewer) that has a potential of being affected by use of G-RAM or has been determined to be contaminated by G-RAM.

Release Criteria are either CERCLA risk-based cleanup levels or federal or state laws or promulgated regulations that qualify as CERCLA federal or state "applicable or relevant and appropriate requirements" ("ARARs"), whichever is most stringent.

RESPONSIBILITIES

This policy establishes the roles and responsibilities for cleaning up radiological contaminants at ER sites.

1.0 Chief of Naval Operations (CNO N45) shall serve as the Environmental Restoration Resource and Assessment Sponsor and advisor for DON in matters related to the ER Program cleanup of G-RAM, including, but not limited to:

1.1 Development of ER G-RAM policy and guidance.

1.2 Oversight of ER G-RAM policy implementation for NAVSEADET RASO, BRAC PMO, and NAVFACENGCOM.

1.3 Coordination of ER G-RAM requirements with and provision of support to Deputy Assistant Secretary, Navy (Environment).

2.0 Naval Radiation Safety Committee (NRSC) is chaired by CNO N45, and establishes and oversees the policies and requirements for use, investigation, storage, and disposal of all G-RAM, including that related to the ER Program. The CNO has designated NAVSEASYSKOM (SEA-04N) as responsible for overall radiation safety issues involving G-RAM.

3.0 NAVSEASYSKOM (SEA 04N) is responsible for administering the policies and requirements of the NRSC for G-RAM and administering the DON LLRW Program.

4.0 NAVSEADET RASO is a detachment of SEA 04N and the technical support center for CNO N45 and NAVSEASYSKOM (SEA 04N) for all G-RAM issues. In support of the ER Program, NAVSEADET RASO shall:

4.1 Provide technical and policy assistance and support to DON personnel (NAVFAC RPMs at active installations and BRAC PMO BECs at BRAC installations) authorized to select CERCLA response actions addressing CERCLA-listed G-RAM. Assist NAVFAC and BRAC PMO in the evaluation and selection of appropriate ER response actions.

4.2 Provide technical review of contract scopes of work for G-RAM work efforts or other work performed at radiologically-impacted sites.

4.3 Participate, upon request, as a technical expert in evaluating contractors for the selection process for G-RAM projects.

4.4 Provide technical input to the NAVFAC Remedial Project Manager (RPM) for contractor performance reviews in relation to G-RAM.

4.5 Provide technical consultation to the BRAC/NAVFAC RPM on results of G-RAM field operations. This includes, but is not limited to, laboratory reports, daily reports, and survey results.

4.6 Perform on-site evaluations of work efforts, and make written notification of significant findings to the RPM, to assess technical compliance with work documents; federal, state and local regulations; radiological controls; and health physics practices. During these evaluations, NAVSEADET RASO personnel may take confirmatory surveys or samples, and observe field work, but will not participate in field activities.

4.7 Recommend work stoppages to BRAC/NAVFAC as a result of unsafe work practices in the field or unsatisfactory findings during evaluations of G-RAM work practices. Should work stoppages occur, review and concur on corrective actions prior to resumption of field activities.

4.8 Participate in the drafting and technical review process for documents involving G-RAM issues or radiologically-impacted sites. These documents include but are not limited to CERCLA and RCRA documents, Historical Radiological Assessments (HRAs), contractor field work documents, and presentations pertinent to G-RAM aspects of the ER Program.

4.9 Review project schedules pertinent to radiologically-impacted sites or work involving G-RAM. Coordinate document reviews with BRAC/NAVFAC to ensure that compliance schedules in CERCLA Federal Facility Agreements and other enforceable agreements between DON and environmental regulators are complied with or extensions are requested

from the regulators in a timely manner in order to provide sufficient time to perform an adequate review by RASO.

4.10 Review contractor Nuclear Regulatory Commission or Agreement State licenses for performance of work involving G-RAM. This may include review of contractor and subcontractor license applications, standard operating procedures, training requirements, and personnel resumes.

4.11 Investigate radiological incidents involving G-RAM in the ER Program upon notification.

4.12 Collaborate with and support BRAC/NAVFAC to identify potential federal "applicable or relevant and appropriate" requirements ("ARARs") and/or CERCLA risk-based cleanup levels as "release criteria" for G-RAM.

4.13 Collaborate with and support BRAC/NAVFAC to engage with regulatory agencies on G-RAM issues.

4.14 Collaborate with BRAC/NAVFAC on the G-RAM Historical Radiological Assessments review and approval process as it relates to ER.

4.15 Review and comment upon the performance of dose and risk assessments of exposure to G-RAM.

4.16 Upon request, make presentations to officials and the public on G-RAM issues and radiologically-impacted sites.

5.0 BRAC/NAVFAC, in relation to G-RAM and radiologically-impacted sites, shall:

5.1 Ensure that DON personnel authorized to select ER response actions addressing CERCLA-listed G-RAM at active installations and BRAC sites work with NAVSEADDET RASO to evaluate and select appropriate response actions.

5.2 Contact NAVSEADDET RASO upon the discovery or suspect knowledge of a location that may have G-RAM contamination.

5.3 Consult with NAVSEADDET RASO for all G-RAM ER investigations, remedial and removal actions, and DON interaction and communication with federal and state regulatory agencies.

5.4 Ensure that contract scopes of work that include G-RAM work efforts or other work performed at a radiologically-

impacted site are reviewed by NAVSEADET RASO before a request for proposal (RFP) is issued. Consult with NAVSEADET RASO to resolve any G-RAM issues concerning the contractors' proposals.

5.5 When deemed necessary, request NAVSEADET RASO participation in the contractor selection process for G-RAM projects.

5.6 Ensure that NAVSEADET RASO input is solicited for technical G-RAM contractor performance reviews.

5.7 Coordinate with NAVSEADET RASO on contractor G-RAM work stoppages and resolution for resumption of work.

5.8 Coordinate with NAVSEADET RASO to allow access to on-site operations in order to conduct technical compliance oversight.

5.9 Ensure that NAVSEADET RASO is included in the drafting and technical review for all documents that address G-RAM aspects of the ER Program. Coordinate document reviews with NAVSEADET RASO to ensure time necessary to perform an adequate review is scheduled.

5.10 Maintain and provide project schedules to NAVSEADET RASO.

5.11 Work with NAVSEADET RASO to evaluate G-RAM contractor qualifications and ensure appropriate levels of experience and capabilities are available for all selected contractors and subcontractors.

5.12 Collaborate with NAVSEADET RASO to identify potential federal ARARs and/or CERCLA risk-based cleanup levels as release criteria for G-RAM hazardous substances.

5.13 Collaborate with NAVSEADET RASO when engaging with regulatory agencies on G-RAM issues.

5.14 Ensure that proper site radiological controls are enforced at work sites based on NAVSEADET RASO recommendations.

6.0 DON LLRW Disposal Program. BRAC/NAVFAC shall ensure that G-RAM waste, including mixed waste, is disposed of through the DON

LLRW Disposal Program and provide funding to the DoD LLRW Disposal Program Executive Agency to support these efforts.

7.0 Conflict Resolution. Should BRAC/NAVFAC not concur with a proposed NAVSEADDET RASO G-RAM action/decision, the issue shall be elevated through the chains of commands for resolution. Final resolution authority shall be CNO N45.

CONCLUSION

Issues involving G-RAM can be very complex and require close coordination between multiple parties. CNO N45 is responsible for establishing policies and directives regarding the planning, execution, and remediation processes of the ER Program. CNO N45 is also Chairman of the NRSC and therefore has overall radiological responsibility for clean-up activities involving G-RAM. BRAC PMO and NAVFAC are responsible for the overall management of radiological and non-radiological sites within the ER Program. NAVSEADDET RASO is delegated technical authority and cognizance for administering and enforcing the NRSC G-RAM policies and requirements.