R/ GMB/ 89 Jun 92



## DEPARTMENT OF THE NAVY

NAVY ENVIRONMENTAL HEALTH CENTER 2510 WALMER AVENUE NORFOLK, VIRGINIA 23513-2617

Ser 31/ **3717**JUN 03 1992

From: Commanding Officer, Navy Environmental Health Center

Subj: LOW LEVEL RADIOACTIVE WASTE (LLRW) DISPOSAL PROGRAM

Encl: (1) OPNAVNOTE 5100 Ser 455/2U601665 of 7 Apr 92

(2) NAVENVIRHLTHCEN 1tr 6470 Ser 31np/1552 of 30 Jan 92

- 1. Enclosure (1), which establishes policy for disposal of low level radioactive waste (LLRW), is forwarded for information and appropriate action. Enclosure (1) requires that actions be instituted by 1 September to arrange for disposal of all stored LLRW. Paragraph 6 of enclosure (1) defines LLRW for the purpose of this program.
- 2. Enclosure (2) states the requirements for requesting disposal of LLRW from the Naval Sea Systems Command Detachment, Radiological Affairs Support Office which is designated as the technical support center for execution of this program.
- 3. A copy of all requests for disposal of LLRW shall be sent to the Navy Environmental Health Center (NEHC-31).
- 4. The point of contact on this subject is LCDR G. I. Snyder, MSC, USN, Radiation Health Department (NEHC-31), DSN: 564-4657 or Commercial: (804) 444-4657, Ext. 413.

G. I. SNYDER By direction

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USN)NAVMEDRSCHU TWO Manila RP
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Copy to: CNO (OP-455) BUMED (MED-211) NAVSEADET RASO





# DEPARTMENT OF THE NAVY Office of the Chief of Naval Operations Washington, DC 20350-2000

Canc: Mar 93 OPNAVNOTE 5100 Ser 455/2U601665 7 April 1992

## OPNAV NOTICE 5100

From: Chief of Naval Operations
To: All Ships and Stations

Subj: LOW LEVEL RADIOACTIVE WASTE (LLRW) DISPOSAL PROGRAM

Ref: (a) OPNAVINST 6470.3 (b) OPNAVINST 5100.8G

(c) NAVSEAINST 5100.18A

- Purpose. To establish policy for disposal of low level radioactive waste (LLRW).
- 2. Scope. This notice applies to all Department of the Navy (DON) activities engaged in the operational or medical use, handling or storage of radioactive material (RAM), or devices and commodities containing RAM. It does not apply to activities using radioactive materials transferred from the Department of Energy to the Department of Defense in accordance with Section 91B of the Atomic Energy Act of 1954, as amended. Presidential Executive Order 12344, statutorily prescribed by Public Law No. 98-525, 42 U.S.C. § 7158 note (1984), establishes the responsibilities and authorities of the Director, Naval Nuclear Propulsion Program (OP-OON) (who is also the Deputy Commander, Nuclear Propulsion Direc- torate in the Naval Sea Systems Command), including prescription of standards and require- ments for the control and disposition of radioac- tive materials associated with the program. Accordingly, the provisions of this notice do not apply to the management of radioactive materials associated with the Naval Nuclear Propulsion Program.
  - 3. Cancellation. NAVSUPINST 5101.9B.
  - 4. Background. Reference (a) established the Navy Radiation Safety Committee (NRSC) to control the use of RAM within Navy and Marine Corps. This responsibility includes its ultimate disposal. References (b) and (c) establish

Commander, Naval Sea Systems Command (COMNAVSEASYSCOM) as the program manager for the disposal of radioactive waste. Significant changes in national policy and federal regulations concerning the disposal of LLRW have made it necessary to institute a program which is both responsive to the user and cost effective.

5. Discussion. The Navy LLRW disposal program provides a means to minimize quantities of RAM stored at sites worldwide and reduces the potential for radioactive contamination and personnel radiation exposures. The central component of the program is an Interservice Support Agreement (ISSA) between DON and Department of the Army (DOA) for consolidation, compaction and burial of LLRW. In the ISSA, the waste generator will normally pay only transportation costs, not actual burial costs. In those cases requiring extensive on-site assistance, other costs may apply. This ISSA will not only vield a cost savings, but will also provide a positive method of controlling and recording for posterity individual LLRW shipments.

## 6. Definition

- a. For the purposes of this program, LLRW is defined as:
- (1) Surplus, unwanted or unserviceable devices, commodities, instruments and articles readily identifiable as containing radioactive material.
- (2) Radioactive material for which there is no longer a useful purpose.
- (3) Property contaminated with radioactive material to the extent that decontamination is economically unfeasible.
- (4) Radioactive residue from decontamination operations.



#### OPNAVNOTE 5100 7 April 1992

(5) Animal tissue contaminated with radioactive material except as noted below.

NOTE: Before the items listed in (a) (1) and (a) (2) above are declared LLRW, every attempt shall be made to have them returned to the manufacturer or transferred to another activity or facility that has a use for and is authorized to possess the material. They should be declared waste only after such actions are unsuccessful.

- b. For the purposes of this program, LLRW does <u>NOT</u> include:
- (1) 0.05 microcuries, or less, of Hydrogen-3 or Carbon-14 per gram of medium used for liquid scintillation counting.
- (2) 0.05 microcuries, or less, of Hydrogen-3 or Carbon-14 per gram of animal tissue, averaged over the weight of the entire animal.
- (3) Excreta from individuals undergoing medical diagnosis or therapy with radioactive material.
- (4) Radioactive material which is held for disposal by decay-in-storage or transferred to a commercial contractor authorized to receive the material for disposal by decay-in-storage.

## 7. Responsibilities

- a. The Deputy Chief of Naval Operations (Logistics) (OP-04) is the resource sponsor for the program. The NRSC, chaired by Director, Environmental Protection, Safety and Occupational Health Division (OP-45) administers the program and shall:
- (1) Be the sole point of contact with LLRW regional compacts, and state, federal and foreign agencies regarding Navy LLRW policy for radioactive materials within the scope of this notice.
- (2) Be the routine point of contact between DON and the Nuclear Regulatory

Commission (NRC) concerning disposal of NRC licensed material.

- (3) Provide guidance and resources to the program manager for execution of the LLRW program.
- b. COMNAVSEASYSCOM (SEA-06GN) is the program manager and shall:
- Issue directives governing the program for disposal of LLRW.
- (2) Provide management oversight of the operation of the LLRW disposal program.
- c. Naval Sea Systems Command Detachment, Radiological Affairs Support Office (NAVSEADET RASO) is designated as the technical support center for execution of the program and shall:
- Manage the daily routine operation of the LLRW disposal program.
- (2) Provide authorization and specific written instructions to Navy and Marine Corps activities for each LLRW disposal transaction.
- (3) Develop and maintain current operating procedures for disposal of classes of LLRW.
- (4) Be the Navy agent for administration and operation of the ISSA with DOA.
- (5) Maintain permanent records of each Navy and Marine Corps LLRW disposal transaction.
- (6) Provide SEA 06GN and OP-45 with quarterly statistical summary of the LLRW disposal program and estimates of LLRW volume awaiting disposal.
- d. Commanding Officers and Officers in Charge shall:



- (1) Dispose of LLRW only through this program unless an alternate method is authorized in the applicable Navy Radioactive Materials Permit or by OP-45. Existing contracts for disposal of LLRW may continue in effect until complete.
- (2) Dispose of LLRW only under authorization from NAVSEADET RASO.
- (3) Comply with instructions and guidance issued by NAVSEA 06GN and NAVSEADET RASO for every LLRW disposal action.
- 8. Action. Navy and Marine Corps activities shall:
- a. Institute actions with the technical support center NO LATER THAN 1 SEPTEMBER 1992 to arrange for disposal of all stored LLRW in accordance with this notice.
- b. Dispose of all other LLRW by coordination with the technical support center as it is generated, rather than storing LLRW until large volumes are accumulated. LLRW should not routinely be accumulated or stored for periods greater than ninety days. LLRW shall not be shipped to SEA 06GN or NAVSEADET RASO.

S. F. LOFTUS Deputy Chief of Naval Operations (Logistics)

Distribution: SNDL Parts 1 and 2 MARCORPS Codes PCN 71000000000 and 7100000100





## DEPARTMENT OF THE NAVY



NAVY ENVIRONMENTAL HEALTH CENTER 2510 WALMER AVENUE NORFOLK, VIRGINIA 23513-2617

> 6470 Ser 31np/ 1552 JAN 3 0 1992

From: Commanding Officer, Navy Environmental Health Center

To: Distribution List

Subj: LOW LEVEL RADIOACTIVE WASTE (LLRW) DISPOSAL PROGRAM

Encl: (1) NAVSEA DET RASO Yorktown VA 271400Z Jan 92

- 1. Enclosure (1) announces an interservice support agreement with the U.S. Army, to allow Navy use of Army resources and the Defense Consolidation Facility (DCF) for disposal of low level radioactive waste. The Naval Sea Systems Command Detachment, Radiological Affairs Support Office (NAVSEA DET RASO), Yorktown, VA has been tasked with the execution of the Navy LLRW disposal program using Army resources and the DCF.
- 2. Paragraphs 2.A and 2.B of enclosure (1) define what is and is not considered LLRW for purposes of this program. Radioactive material that is held for decay-in-storage or transferred to a commercial contractor authorized to receive the material for disposal by decay-in-storage as authorized by your Navy Radioactive Material Permit is <u>not</u> considered LLRW for purposes of this program.
- 3. It is anticipated that for routine disposal actions, the only cost incurred by your Command will be for transportation of the LLRW to the Defense Consolidation Facility located in South Carolina.
- 4. On 1 January 1993 there will be a significant increase in the disposal costs for LLRW charged to the Navy. Depending on your location you may have to store LLRW for an undetermined period of time after 1 January 1993. Therefore you shall dispose of all LLRW at your Command prior to 1 January 1993 using the Navy LLRW disposal program.
- 5. Paragraph 2.D of enclosure (1) states the requirements for requesting disposal of LLRW from NAVSEA DET RASO. A copy of all requests for disposal of LLRW shall be sent to the Navy Environmental Health Center (NAVENVIRHLTHCEN).
- Point of contact at NAVENVIRHLTHCEN is LCDR G. I. Snyder, MSC, USN (NEHC 31), DSN: 564-4657, Commercial: (804) 444-4657, Ext. 413.





Subj: LOW LEVEL RADIOACTIVE WASTE (LLRW) DISPOSAL PROGRAM

7. Point of contact at NAVSEA DET RASO is Mr. Richard W. Loman, DSN: 953-

4692, Commercial: (804) 887-4692.

G. I. SNYDER By direction

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ADMINISTRATIVE MESSAGE

PRIORITY

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FM NAVSEADET RASO YORKTOWN VA//DO//

TO CMC WASHINGTON DC CINCLANTFLT NORFOLK VA//JJJ// COMNAVRESFOR NEW ORLEANS LA//JJJ// COMNAVSECGRU WASHINGTON DC//JJJ// BUPERS WASHINGTON DC//JJJ// NAVCIVPERSCEN WASHINGTON DC//JJJ// COMNISCOM WASHINGTON DC//JJJ// COMNAVINTOUM WASHINGTON DC//JJJ// NAVPGSCOL MONTEREY CA//JJJ// NAVOBSY WASHINGTON DC//JJJ// NAVIRSA PHILADELPHIA PA//JJJ// NTISA SAN DIEGO CA//JJJ// NAVINRELACT WASHINGTON DC//JJJ// USNA ANNAPOLIS MD//JJJ// NAVIACSUPPACT WHITE OAK MD//JJJ// COMINEWARCOM CHARLESTON SC//JJJ// MNAVOCEANCOM BAY ST LOUIS MS//JJJ// JMNAVCOMTELCOM WASHINGTON DC//JJJ//

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INFO CNO WASHINGTON DC//45//

NAVENVIRHLTHCEN NORFOLK VA//JJJ//

UNCLAS //N05104//

MSGID/GENADMIN/RASO//
SUBJ/LOW LEVEL RADIOACTIVE WASTE (LLRW) DISPOSAL PROGRAM//
REF/A/DOC/NAVSUPINST 5101.9B/-//
RMKS/1. AN INTERSERVICE SUPPORT AGREEMENT (ISSA) HAS BEEN FINALIZED
WITH THE U.S. ARMY TO ALLOW NAVY USE OF ARMY RESOURCES AND THE
DEFENSE CONSOLIDATION FACILITY (DCF) FOR DISPOSAL OF LLRW. DISPOSAL

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HAS BEEN PREVIOUSLY HANDLED THROUGH REF A. OPNAV IS SPONSORING A NEW LLRW DISPOSAL PROGRAM AND ASSIGNED NAVSEADET RASO AS THE ACTIVITY TASKED WITH EXECUTION OF THE PROGRAM. THIS PROGRAM WILL MAXIMIZE CONSOLIDATION AND COMPACTION OF LIKE LLRW TO SHARPLY REDUCE VOLUME. AND RESULTANT BURIAL COSTS. THE PROGRAM IS THE ONLY AUTH DISPOSAL PROGRAM FOR NAVY AND MARINE CORPS ACTIVITIES WITH THE EXCEPTION OF THE NAVY NUCLEAR PROPULSION PROGRAM AND THE NAVY NUCLEAR WEAPONS PROGRAM WHICH SHALL MAINTAIN THEIR RESPECTIVE PROGRAMS FOR DISPOSAL OF LLRW.

- 2. A FORTHCOMING OPNAY NOTICE CANCELS REF A AND FORMALIZES RESPONSIBILITIES AND ACTIONS REQUIRED. IN THE INTERIM, THE FOLL INFO REGARDING THE PROGRAM IS PROVIDED:
  - A. FOR PURPOSES OF THIS PROGRAM LLRW IS DEFINED AS:
- (1) SURPLUS, UNNANTED OR UNSERVICABLE DEVICES COMMODITIES, INSTRUMENTS AND ARTICLES READILY IDENTIFIABLE AS CONTAINING RADIOACTIVE MATERIAL (RAM).
- (2) PROPERTY CONTAMINATED WITH RAM TO THE EXTENT THAT DECONTAMINATION IS NOT ECONOMICALLY FEASIBLE.
- (3) THE RADIOACTIVE RESIDUE OF DECONTAMINATION OPS OR THE USE OF UNSEALED SOURCES.
  - (4) RAM FOR WHICH THERE IS NO LONGER A USEFUL PURPOSE.
  - (5) ANIMAL TISSUE CONTAMINATED WITH RAM.
  - B. FOR PURPOSES OF THIS PROGRAM LLRW DOES NOT INCLUDE:
- (1) 0.05 MICROCURIES OR LESS, OF HYDROGEN-3 OR CARBON-14 PER RAM OF MEDIUM USED FOR LIQUID SCINTILLATION COUNTING.
- (2) U.O5 MICHOCURIES, OR LESS, OF HYDROGEN-3 OR CARBON-14 PER GRAM OF ANIMAL TISSUE, AVERAGED OVER THE WEIGHT OF THE ENTIRE ANIMAL.
- (3) EXCRETA FROM INDIVIDUALS UNDERGOING MEDICAL DIAGNOSIS OR THERAPY WITH RAM.
- (4) RAM WHICH IS HELD FOR DISPOSAL BY DECAY-IN-STORAGE OR TRANSFERRED TO A COMMERCIAL CONTRACTOR AUTH TO RECEIVE THE MATERIAL FOR DISPOSAL BY DECAY-IN-STORAGE.
- C. CENTRALIZED FUNDING HAS BEEN PROVIDED TO COVER ACTUAL BURIAL COSTS. IT IS ANTICIPATED THAT FOR ROUTINE DISPOSAL ACTION THE ONLY COST INCURRED BY THE INDIVIDUAL COMMANDS WILL BE FOR TRANS OF THE LLRW TO THE DCF. EXTREMELY LARGE, COSTLY CLEAN-UP OPS MAY BE DETERMINED TO BE THE RESPONSIBILITY OF THE INDIVIDUAL ACTIVITY.
- D. ALL REQUESTS FOR DISPOSAL OF LLRW SHALL BE MADE TO NAVSEADET RASO BY OFFICIAL COMMAND CORRES OR MESSAGE. NAVSEADET RASO WILL REVIEW AND PRIORITIZE REQUESTS, ISSUE NAVY/MARINE CORPS DISPOSAL AUTH NUMBERS AND PROVIDE PACKAGING AND TRANS INST AND THE ACTUAL LABELS AND COMPLETED PAPERWORK FOR THE DISPOSAL ACTION. IN MOST CASES, THE ONLY ADMIN REQUIREMENTS FOR THE REQUESTING ACTIVITY WILL BE TO SIGN THE SHIPPING DOC PROVIDED BY NAVSEADET RASU AND MAKE MANDATORY TELEPHONIC NOTIFICATION WHEN MATERIAL IS ACTUALLY SHIPPED.
  - E. UNDER NO CIRCUMSTANCES WILL LLRW BE SENT TO NAVSEADET RASO.
- F. FOR LARGE ACTIONS REQUIRING EXTENSIVE PACKAGING OF THE MATEIRAL, NAVSEADET RASO PERS WILL PROVIDE ON-SITE ASSISTANCE OR WILL ARRANGE FOR CONTRACTOR SUPPORT THROUGH THE U.S. AMRY LLRW DEFICE.

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- 3. COMMANDS WITH MATERIAL FOR DISPOSAL SHOULD SUBMIT REQUESTS FOR DISPOSAL ACTION ASAP TO NAVSEADET RASO. SUBMISSIONS SHOULD IDENTIFY THE MATERIAL AS COMPLETELY AS POSSIBLE INCLUDING ITEM, ISOTOPE. ACTIVITY AND NSN IF APPLICABLE. COMMANDS WHICH HAVE ALREADY. SUBMITTED REQUESTS FOR DISPOSITION INSTRUCTIONS ARE ADVISED THAT THEY NEED NOT RESUBMIT AS THEIR ORIGINAL REQUESTS ARE ON FILE AND WILL BE HANDLED ASAP.
- 4. IN IDENTIFYING MATERIAL ON-HAND, COMMANDS ARE CAUTIONED NOT REPEAT NOT TO OPEN SEALED CONTAINERS MARKED AS CONTAINING RAM WITHOUT ASSISTANCE OR APPROVAL OF NAVSEADET RASO. THIS PRECAUTION IS NECESSARY TO LESSEN THE CHANCE OF AN INADVERTENT CONTAMINATION INCIDENT.
- 5. EFFECTIVE 1 JAN 93, THERE WILL BE SIGNIFICANT INCREASES IN DISPOSAL COSTS CHARGED TO THE NAVY. DEPENDING UPON LOCATION, SOME GENERATORS MAY BE REQUIRED TO STORE LLRW FOR AN UNDETERMINED PERIOD OF TIME. OUR GOAL IS TO DISPOSE OF ALL LLRW CURRENTLY ON-HAND PRIOR TO 1 JAN 93. THEREFORE, REQUEST YOU PROVIDE WIDEST POSSIBLE DISSEMINATION OF THE ABOVE INFO TO ALL COMMANDS/ACTIVITIES WITHIN YOUR CLAIMANCY ASAP.
- 6. NAVSEADET RASO MAILING ADDRESS: OFFICER IN CHARGE, NAVAL SEA STEMS COMMAND DETACHMENT, RADIOLOGICAL AFFAIRS SUPPORT OFFICE, RKTOWN, VA 23691-5098. POC, MR. RICHARD W. LOWMAN, A/V 953-4692, COMM (804) 887-4692, TELEFAX (804) 887-3235 (COMM ONLY).//

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