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Subject or Title

Response to IDPH letter addressed to Nicholas Kieler, RSO dated 12/20/02 requesting explanation of the basis for determining SEC buildings meet dose limit criteria

Author/Oriinator

Daniel Snyder

Company

American Ordnance

Date

1/16/03

Recipient (s)

Donald Flater

Company (-ies)

IDPH BRH

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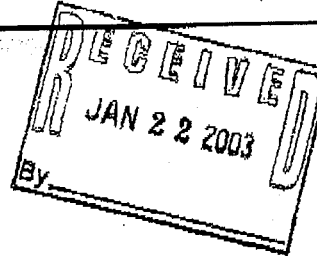
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16 January 2003

SF03-0003/L

Due 1/25
Cmnd? Q



Donald A. Flater, Chief
Bureau of Radiological Health
401 SW 7th Street, Suite D
Des Moines, Iowa 50309-4611

Dear Mr. Flater:

Subject: Iowa Department of Public Health (IDPH) Letter Addressed to Mr. Nicholas M. Kieler, RSO dated 20 December 2002

We received your letter requesting information relative to potential radiation hazards at the IAAAP. Please be assured that American Ordnance LLC (AO) is fully committed to providing a safe and healthful work environment for all employees, contractors, and visitors.

Detailed below are our responses to your four inquiries.

Item #1: A list of all buildings that were occupied by the Atomic Energy Commission (AEC) and are currently used by American Ordnance (AO).

Response: These facilities are listed on the attached Table 1.

Item #2: If the buildings in #1 are designated as unrestricted areas, the calculations or measurements used to determine that exposures in these buildings meet the criteria of Iowa Administrative Code (IAC) 641-40.27(136C), "Compliance with dose limits for individual members of the public."

Response: Attached Table 1 also provides the results of a recent contamination and gamma survey conducted by the Oak Ridge National Laboratory (ORNL). All ORNL results indicate that radiological exposures for any individuals in these areas would be well below the IAC 641-40.26(136) and IAC 641-40.27(136) criteria. ORNL did not study the three buildings in Yard L that are listed on Table 1; however, AO is planning to conduct additional radiological surveys of buildings L-01, L-02, and L-03. The results of this survey will be available in 60 days. Currently, these buildings are utilized for inert storage. In the past, Buildings L-01 and L-02 have stored depleted uranium sabots and penetrators for incoming and outgoing shipments. We have conducted radiological surveys and swipe tests of these buildings for depleted uranium contamination. The results indicated that there is no depleted uranium contamination. The additional surveys are being conducted by AO in response to a USACE FUSRAP Final Preliminary Assessment dated December 2001. Results will be furnished to IDPH.

Donald A. Flater, Chief
Bureau of Radiological Health
16 January 2003
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Item #3: If the buildings in #1 are designated as restricted areas, statement that the proper warning signs are present and proper dosimetry is used.

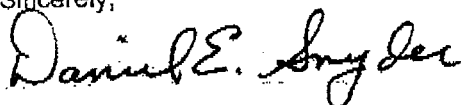
Response: The only building that is designated as restricted is 1-85-2. It is so designated not because of past Atomic Energy Commission (AEC) presence, but because of current contract work for the U. S. Army involving the demilitarization of old ammunition containing depleted uranium components. This program follows very strict health and safety guidelines that are described in our Iowa Radioactive Materials License #0290-1-29-SM1. All radiation safety safeguards are in place for this operation. The facility is secured with high security locks; the operational bays are identified with the proper signage "Radiation - Caution Radioactive Materials"; a minimum of five (5) operators per shift are required to wear optical stimulated dosimetry (OSD's); a minimum of five (5) operators per shift are required to have a bioassay. All personnel that enter and exit this facility during operations are required to perform personal radiation surveys utilizing a Ludlum Model #12 with a 44-9 pancake (alpha, beta & gamma) probe. Each month during operations, a radiation survey is conducted utilizing gamma detection instrumentation. Each month during operations, a contamination survey is conducted by obtaining swipes from several pre-determined locations to verify removable contamination locations and to verify that clean-up procedures are being followed.

Item #4: If the data requested in #2 are not available or the controls listed in #3 are not in place, a plan, which includes a completion date, for insuring compliance with the exposure controls required by IAC 641-40.

Response: All data for #2 is available and all controls listed in #3 are in place. The only other action planned is the surveys of 3 buildings in L Yard. Results will be furnished to IDPH by March 16, 2003.

If questions, concerns, or additional comments are required, please contact Nicholas M. Kieler, RPO (319) 753-7434, Butch Hicks, ARPO (319) 753-7402, or Dan Snyder at (319) 753-7013.

Sincerely,



Daniel E. Snyder
AMERICAN ORDNANCE LLC
Manager
Environmental, Safety & Health

DES/MGH/lch

Enc. As stated above

AMERICAN ORDNANCE LLC
17575 STATE HIGHWAY 79
MIDDLETOWN, IA 52638

TABLE 1

LISTING OF IAAAP BUILDINGS USED BY AEC AND CURRENTLY USED BY AO, TO INCLUDE
RADIOLOGICAL SURVEY RESULTS

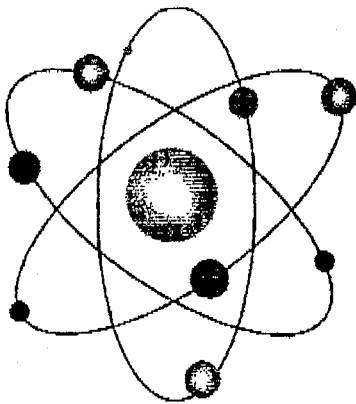
Building No.	Contamination Results	Radiation Survey (uR/h) *
1-13 ✓	ND	7 - 13
1-18 ✓	ND	7 - 11
1-19-1 ✓	ND	7
1-19-2 ✓	ND	7
1-19-3 ✓	ND	7
1-19-4 ✓	ND	7
1-19-5 ✓	ND	5
1-19-6 ✓	ND	6
1-19-7 ✓	ND	6
1-63-7 ✓	ND	10 - 14
1-66-1 ✓	ND	21
1-66-2 ✓	ND	8
1-85-2	Bldg. excluded from survey due to active operations as described in AO ltr SF03-0003.	Bldg. excluded from survey due to active operations as described in AO ltr SF03-0003.
1-100-2 ✓	ND	7
1-148 ✓	ND	7 - 9
C-1 ✓	ND	<5.7
C-2 ✓	ND	<5.7
C-3 ✓	ND	<5.7
L-1	TBD **	TBD **
L-2	TBD **	TBD **
L-3	TBD **	TBD **

Reference: "Results of the Indoor Radiological Survey of the Iowa Army Ammunition Plant, Middletown, Iowa"; draft issued November 2000; Work performed by the Measurement Applications and Development Group; Prepared by the Oak Ridge National Laboratory (Oak Ridge National Laboratory - ORNL/TM-2000/305).

ND - non detected
TBD - to be determined

* General coverage with floor monitor and NaI gamma detector. Static measurements with GM pancake beta-gamma detector and ZnS alpha meter.

** Radiological survey and swipe tests conducted by AO in January 1998 indicated no radiological contamination, and readings well below IAC criteria. Further testing will be conducted, however, in response to USACE FUSRAP Preliminary Assessment, December 2001 report.



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Bureau of Radiological Health
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Telecopy Message

Date: 24 JAN 03 Time: 1350
To: Lou DeOrco FAX No.: 314-260-3941
From: DAN McGhee

Number of pages sent following this cover sheet: 3

Special instructions or comments: "THE" letter

Note: If you do not receive all of the pages, or if any of the pages are illegible, please contact us.

Contact Person: DAN McGhee
Telephone: 515-7250305
Division: EP/HP/BRH

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