

ENVIRONMENTAL WORK INSTRUCTION 3EN2.8

From: Chief Environmental Engineer

To: All Environmental Personnel

Subj: LOW-LEVEL RADIOACTIVE WASTE (LLRW) DISPOSAL PROGRAM

Ref: (a) OPNAVINST 6470.3  
(b) OPNAVINST 5100.8G  
(c) NAVSEAINST 5100.18A  
(d) DoD 4715.6-R  
(e) <http://www.osc.army.mil/dm/dmwweb/DODR.pdf>

Encl: (1) LLRW Process Flow Chart  
(2) Sample letter to RASO requesting technical assistance

1. PURPOSE: To establish a work instruction for disposal of LLRW.
2. CANCELLATION: SWDIV EWI #8 dated 9 December 1999.
3. APPLICABILITY: This work instruction is applicable to all projects administered by the SWDIV environmental business line that must dispose of low-level radioactive waste (LLRW).
4. BACKGROUND: LLRW resulting from radiological remediations at an IR or Base Realignment and Closure (BRAC) site must be disposed of through the Navy LLRW Program. Naval Sea Systems Detachment (NAVSEADDET) Radiological Affairs Support Office (RASO) provides program direction for all aspects of the Navy LLRW Program and serves as the point of contact between the Navy LLRW Program and the DoD Executive Agent for LLRW disposal, the Department of the Army (DA) Operations Support Command (OSC).

The Navy LLRW disposal program provides a means to minimize quantities of radioactive material (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 the Department of the Navy (DON) and DA for consolidation, processing, and disposition of LLRW. This ISSA is intended to yield cost savings and provide a positive method of controlling and recording individual LLRW shipments.

5. PROCEDURE:
  - a. To initiate disposal of LLRW, send a letter to NAVSEADDET RASO in Yorktown, VA requesting technical assistance. A sample letter is attached (Enclosure 2). Address all correspondence to:

Environmental Protection Manager  
NAVSEADDET RASO, NWS P.O. Drawer 260  
Yorktown, VA 23691-0260  
Tel: (757) 887-4692  
Fax: (757) 887-3235

- b. OSC manages the disposal of LLRW associated with remediation projects generated by the Navy, Marine Corps, or Coast Guard. Once RASO is notified, they will send a work number to OSC. The OSC point of contact is:

U.S. Army Operations Support Command  
AMSOS-IFS  
1 Rock Island Arsenal  
Rock Island, IL 61299-6000  
FAX COMM Number: (309) 782-2988  
FAX DSN Number: 793-2988

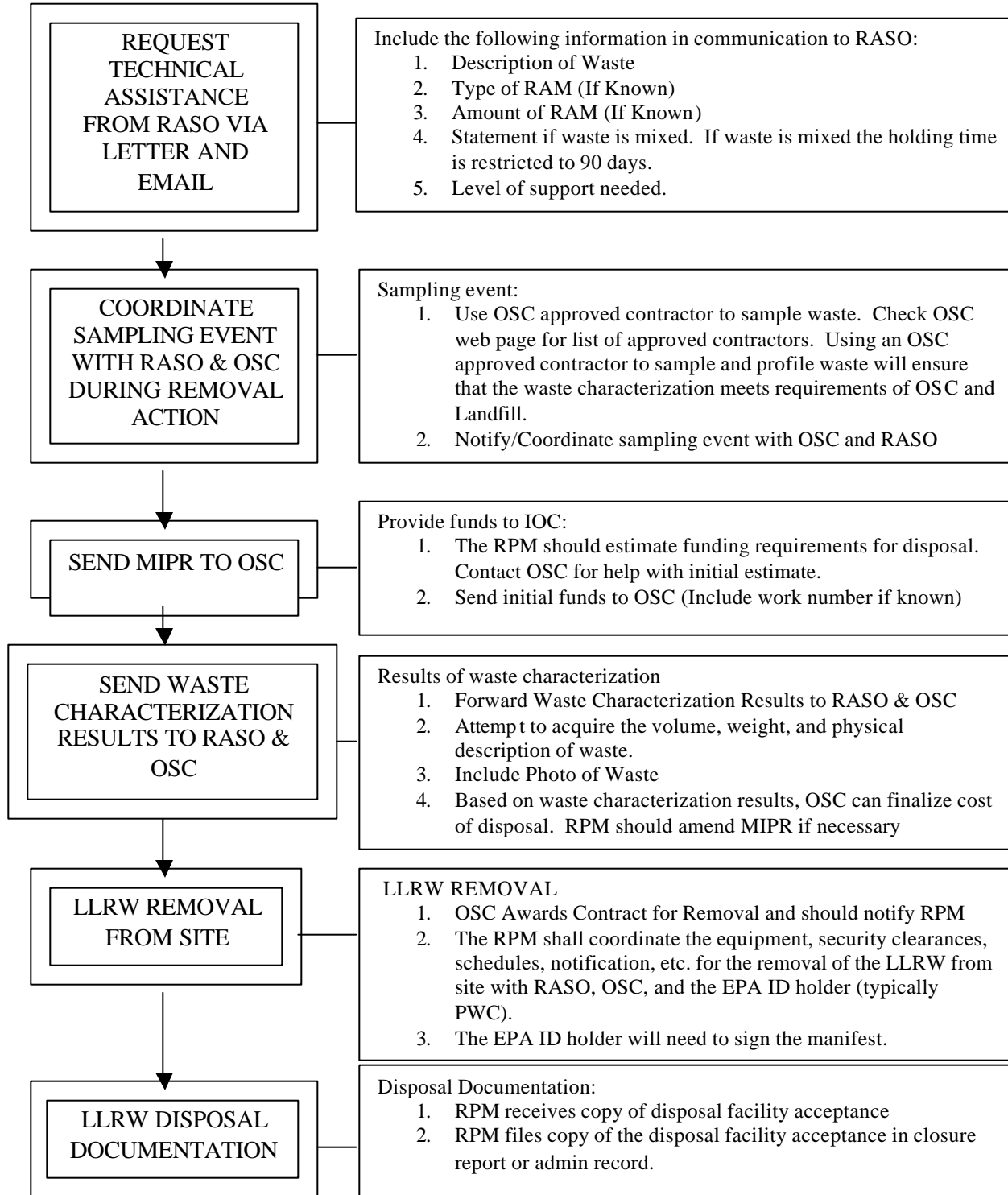
- c. To expedite the disposal process, the RPM can coordinate with RASO and OSC to sample and characterize the waste for acceptance into a disposal facility. Proper disposal of LLRW requires specific types of analyses run by approved laboratories. RASO should be able to help with the selection of a contractor that suits the needs of the project. Alternatively, OSC has developed a list of approved contractors that can be used to characterize the LLRW. This list of approved contractors is available on the OSC web page:  
<http://www.osc.army.mil/dm/dmwweb/indexdmw.htm>
- d. OSC's role in LLRW generated by SWDIV site remediation projects is funded via a Military Interdepartmental Purchase Request (MIPR). The OSC can help the RPM develop an initial cost estimate for disposal. Once an initial cost estimate is developed, the RPM should send these initial funds to OSC via MIPR.
- e. Forward the results of the waste characterization to RASO and OSC. In addition to the results of chemical analyses, provide as much information as possible regarding the volume, weight, and physical characteristics of the LLRW. A photo may be helpful.
- f. Based on the waste characterization results, OSC can finalize the cost of disposal. The RPM should amend the MIPR if necessary.
- g. OSC awards Contract for Removal and should notify RPM. The RPM is responsible for coordinating the equipment, security clearances, schedules, notification, etc. for the removal of LLRW from the site with RASO, OSC, and the EPA ID holder (typically PWC). The EPA ID holder will need to sign the waste manifest. Note: If the waste is only a radioactive waste and is not a hazardous or mixed waste, the OSC approved broker will sign (or co-sign) the radioactive waste manifest as an agent for the government.
- h. The disposal contractor sends the documentation of final disposal to OSC, RASO and the requestor (RPM).

- i. RPM should include a copy of the disposal facility acceptance in the closure report for inclusion in the administrative record, or if a closure report is not prepared, a copy of the disposal facility acceptance should be filed directly in the administrative record.

POC for additional information: D. Belton, X6-7617

(signed)  
WALTER F. SANDZA

**Process Name: LOW LEVEL RADIOACTIVE (LLRW) DISPOSAL PROGRAM**





SWDIV EWI #8  
3EN2.8  
28 NOV 2001

DEPARTMENT OF THE NAVY  
*NAME OF ACTIVITY*  
*ADDRESS*  
*CITY, STATE ZIP+4*

*Code/Serial*  
*Date*

From: *Title of activity head, name of activity, location when needed*  
To: Officer in Charge, Naval Sea Systems Command Detachment, Radiological  
Affairs Support Office (RASO)

Subj: LOW-LEVEL RADIOACTIVE WASTE DISPOSAL

1. Request disposition of the following:

<u>AMOUNT</u>	<u>ITEM(S)</u>	<u>NSN</u>	<u>ISOTOPE</u>	<u>QUANTITY</u>
12 ea.	Electron Tubes	5960-00-123-5467	Cs-137	.00137 uCi
2 ea.	Self-powered lighting exit sign	Unknown	H-3	20 Ci
42 ea.	Counterweights	1560-00-688-9341	DU	Unknown
1 ea.	Gauge	Unknown	Unknown	Unknown
25 ft <sup>3</sup>	Soil	N/A	Ra-226	25 pCi/g

2. All material is located in 55-gallon drums in building xyz, room 222, NAVSTA Somewhere.
3. Support services that will be provided at storage location. (Phone, FAX, restrooms, forklift, etc.)
4. Point of contact is Mr. D. Jones, DSN 423-9940, commercial (101) 353-0001, FAX (101) 353-0002, email jonesd@radwaste.navy.mil.

M. DISPOSING  
By direction