

(USAF, 2001a). The HSP is intended to provide enough information to site personnel to prevent and minimize personal injuries, illnesses, and physical damage to equipment, supplies, and property. The HSP contains a code of safe practices for oversight activities on this project. Contractors performing heavy equipment operations would be required to submit activity hazard analyses covering work means and methods and the anticipated hazards and controls.

4.2 Radiological Impacts

Occupational doses to decommissioning workers are expected to be low and well within the limits of 10 CFR part 20. No radiation exposure to any member of the public is expected, and public exposure would therefore also be less than the applicable public exposure limits of 10 CFR part 20. In addition, the licensee would install a security fence around each training site to control access and prevent unauthorized, untrained or unprotected personnel from entering the site. Therefore, the environmental impacts from the proposed action are expected to be small.

Short and long-term impacts to human health due to radiological exposure are not expected. These include the potential release to the environment of airborne effluents, which may contain low-levels of radioactive contamination during certain activities such as excavation, packaging and waste transportation. NRC regulation 10 CFR part 20 specifies the maximum amounts of radioactive materials that a licensee can release from a site in the form of either airborne or liquid effluents. The licensee has described in the DP, the controls established when these activities are being conducted. The controls include the use of light water spray to control the emissions of dust and work area particulate sampling. Site controls would be implemented to prevent unauthorized, untrained, or unprotected personnel from entering the site, to limit the spread of contamination, and to reduce the radiation exposures to safe ALARA levels. A radiation safety program would be implemented to protect site workers.

The licensee performed analysis of collected soil samples, scanning measurements and used historical information to classify soil survey units. The licensee calculated concentration guidelines for surface contamination of soils in the impacted areas of the training sites using RESRAD code, version 6.1. The DCGLs would define the maximum amount of residual

contamination in soils that would satisfy the NRC's regulations in 10 CFR part 20, subpart E, "Radiological Criteria for License Termination." The NRC would not approve the DP unless it met the 25 mrem for unrestricted release criteria and the doses would be bounded by 25 mrem.

Additionally, the interior surfaces of the bunkers would be cleaned and tested to determine if the remaining contamination level is acceptable. Demolition and disposal of these buildings would be performed if the contamination cannot be removed. Additionally, the licensee has established action levels that would ensure effluent releases generated during decommissioning activities, such as scabbling or demolition, are below the levels allowed by 10 CFR part 20. The NRC would require the USAF to comply with the regulations established in 10 CFR part 20, to ensure the doses would be bounded by 25 mrem.

4.3 Cumulative Impacts

The NRC has evaluated whether cumulative environmental impacts could result from an incremental impact of the proposed action when added to other past, present, or reasonably foreseeable future actions in the area. The proposed NRC approval of the DP, when combined with known effects on resource areas at the site, are not anticipated to result in any cumulative impacts at the site.

5.0 Monitoring

The licensee has described in the DP the controls established when activities are being conducted which may have the potential of releasing airborne effluents to the environment. The USAF would implement an environmental air monitoring program. Daily air monitoring would be performed to quantify the amount of alpha radiation being generated by invasive (e.g., clearing, grubbing, excavating and loading) decommissioning activities. The controls established include the use of ambient air and exposure monitoring and monitoring of personnel. The NRC would require the USAF to comply with the regulations established in 10 CFR part 20, which specifies the maximum amount of radiological materials that a licensee can release from a site in the form of either airborne or liquid effluents. The licensee has established action levels that would ensure that effluent releases during decommissioning activities are below the levels allowed in 10 CFR part 20. The licensee has committed to implementing a health physics program

for the protection of the workers and the environment.

6.0 Conclusions

Based on its review, the NRC staff has concluded that the environmental impacts associated with the proposed action are not significant, and therefore, do not warrant denial of the license amendment request. The NRC staff believes that the proposed action would result in minimal environmental impacts. The staff has determined that the proposed action of decommissioning Site OT-10 to the remediation levels would result in reduced residual contamination levels at Kirtland AFB training sites, enabling release of the areas for unrestricted use and termination of the area from the Air Force Master Materials License, is the appropriate alternative for selection.

7.0 Agencies and Persons Consulted

The NRC staff has prepared this environmental assessment (EA) with input from the State of New Mexico's Office of Cultural Affairs, by letter dated April 9, 2002, and the U.S. Fish and Wildlife Service, by letter dated March 28, 2002. By letter dated February 7, 2002, after considering the documentation submitted by the licensee concerning the location of the decommissioning project, the State of New Mexico's Natural Heritage Program determined that there were no records of special interest species affected by the referenced project. In its letter, the State of New Mexico's Office of Cultural Affairs indicated that the proposed action would not adversely affect any historic properties. The U.S. Fish and Wildlife Service, indicated in its letter, that the described action would have no effect on listed species, wetlands, or other important wildlife resources. The staff provided a draft of this EA to the State of New Mexico for review. This EA was revised to reflect the State's input where appropriate. Accordingly, it has been determined that a finding of no significant impact is appropriate.

The Department of the Air Force's request for the proposed action was previously noticed in the **Federal Register** on 66 FR 33579, on Friday, June 22, 2001, along with a notice of opportunity to request a hearing and an opportunity to provide public comment on the action and its environmental impacts.

The Department of the Air Force's request for the proposed action and other related documents are available for inspection at NRC's Public Electronic Reading Room at <http://www.nrc.gov/NRC/ADAMS/index.html>. The DP may be found in ADAMS at