



DEPARTMENT OF THE NAVY
OFFICE OF THE SECRETARY
1000 NAVY PENTAGON
WASHINGTON DC 20350-1000

DCN 5200

13 July 2005

The Honorable Anthony J. Principi
Chairman
Defense Base Closure and Realignment Commission
2521 South Clark Street, Suite 600
Arlington, VA 22202

Dear Chairman Principi:

This is in response to Mr. Bob Meyer's 12 July 2005 inquiry concerning accounting for costs associated with potential nuclear radiation sites.

The inquiry asked, "How were costs associated with decontaminating and decommissioning and potential radiation sites included in the decision process? Were the costs included in the Cost to Complete Environmental Restoration or in the one time cost of Waste Management?"

These costs were included in the one-time cost estimates for BRAC, not in the waste management and environmental compliance cost estimates, since they are related to shutdown costs and confirming the facility is acceptable for unrestricted use.

The Navy's standard for radiological closure of a nuclear-capable facility is to perform surveys and sampling to "prove the negative." We have substantial knowledge of existing site conditions due to our extensive routine monitoring. We perform closure surveys to verify these conditions to the satisfaction of all parties so the site can be radiologically released for unrestricted future use. For example, the Navy has extensive and relatively recent experience in closing facilities that performed complex radiological work, including nuclear refuelings, and releasing them for unrestricted future use with respect to radioactivity: Charleston and Mare Island Naval Shipyards between 1993 and 1996, and the former SIC Prototype nuclear reactor plant (used for training sailors) in Windsor, Connecticut (completed in 2001). EPA and the states were fully involved throughout these processes. An example of how the Navy does business is the fact that during the verification survey, sample, and remediation process to release Charleston and Mare Island Naval Shipyards, the total amount of Naval Nuclear Propulsion Program radioactivity found in the environment that required cleanup was only two to three microcuries at each facility, about the amount of radioactivity in a single home smoke detector.

Our experience provides a firm basis for developing estimates to close facilities that did similar radiological work and which have similar radiological histories. Actual costs for radiologically closing Charleston and Mare Island are most relevant for closing shipyards and Naval bases, and were used for comparison to determine realistic closure

cost estimates for other potentially closing facilities. The resulting one-time costs were included in the BRAC totals that were used in the decision-making process.

As an example, for SUBASE New London, the total was \$9.95M: \$3.44M for surveys and sampling, \$3.28M for facility dismantlement, and \$3.23M for radiological waste disposal. The survey total was based on release of 624,832 square feet for the Naval Nuclear Propulsion Program (NNPP), and 269,073 square feet for general radioactive material (G-RAM; all Navy non-NNPP applications of radioactivity, such as medical or historical radium use). As another example, for Portsmouth Naval Shipyard, the total was \$150M: \$26M for surveys and sampling, \$83.7M for facility dismantlement and shipping reusable equipment elsewhere, and \$40.3M for waste disposal. The survey total was based on release of 4,859,068 square feet for the Naval Nuclear Propulsion Program, and 51,202 square feet for general radioactive material (G-RAM).

I trust this information satisfactorily addresses your concerns. If we can be of further assistance, please let me know.

Sincerely,



Anne Rathmell Davis
Special Assistant to the Secretary of the Navy
for Base Realignment and Closure