



DEPARTMENT OF THE NAVY

PORTSMOUTH NAVAL SHIPYARD
PORTSMOUTH, N.H. 03804-5000

IN REPLY REFER TO:
5090
Ser 105.5/626
21 October 1996

VIA FEDERAL EXPRESS

Ms Kymberlee Keckler
Remedial Project Manager
U.S. Environmental Protection Agency
Region I
JFK Federal Building
Boston, MA 02203-2211

Mr. Mark Lewis
Remedial Project Manager
Connecticut Department of Environmental Protection
Bureau of Water Management, Remediation Division
79 Elm Street
Hartford, CT 06106

Dear Ms. Keckler and Mr. Lewis:

Please find enclosed the changes to Volumes I and II of the report entitled "Draft Historical Radiological Assessment, Naval Submarine Base - New London" dated December 1994.

Changes presented in the Navy's March 6, 1996 response to U.S. Environmental Protection Agency's (EPA) letter dated June 2, 1995 regarding the Historical Radiological Assessment (HRA) are incorporated. However, it should be noted that further review has identified that Building 156 was never a site for the storage or use of radioactive material and therefore it was not added to Volume II of the HRA. This determination was made by the Navy Environmental Health Center.

Additional changes were also added to the HRA as a result of our meeting held on April 3, 1996 in which the EPA's outstanding issues were discussed. The agreed upon changes are as follows:

a. NAVSHIPYD PTSMH added an explanation as to why the perimeter monitoring TLD measurements show an apparent increase in levels over time but the perimeter and background TLD measurements are consistent.

CONTINUOUS IMPROVEMENT THROUGH TEAMWORK

b. NAVSHIPYD PTSMH added a statement that the Navy does interview key personnel assigned to NNPP radiological work during the annual audits.

c. NAVSHIPYD PTSMH added a statement to clarify that the consistency of radiological monitoring results of river water and bottom sediment between the State of Connecticut and Subase only apply to overlapping survey points. This was requested by the state.

d. NAVSHIPYD PTSMH added a statement to clarify that while carbon-14 is incorporated into all living organisms as discussed in Section 4.2.3, it does not "bioaccumulate" in the sense that it does not concentrate in any particular organs or organisms (as, for example, lead or radium does).

In addition, the Navy notes that base facilities identified in the HRA as having been released from radiological controls would nevertheless be reviewed, and resurveyed as necessary, should the base be slated for closure and turnover to the public, consistent with the practice when closing Charleston Naval Shipyard.

Please feel free to contact me at (207) 438-1283 if you have any additional questions.



J. A. BRANN
By direction of the
Commanding Officer

Encl: (1) Revised Pages of the Draft Historical Radiological Assessment, Naval Submarine Base New London (Volumes I and II)

Copy to: (w/o encl)
SUBASE New London (803), PTSMH NAVSHIPYD (105, 105.5) PTSMH NAVSHIPYD (NRRO - Reynolds), BUMED (MED-211), COMSUBGRU TWO (01EA), NAVFAC NORTHDIV (M. Evans)

(w/encl)
NAVSEA (07R)
NAVSEA (08R)