U.S.NRC
United States Nuclear Regulatory Commission
Protecting People and the Environment

Hunter's Point Naval Shipyard

1.0 Site Identification

Type of Site: Complex Decommissioning Site
Location: San Francisco, CA
License No.: N/A
Docket No.: N/A
License Status: N/A
Project Manager: Richard Chang

2.0 Site Status Summary

Hunter's Point Shipyard (HPS) is located along the San Francisco Bay in southeastern San Francisco, California. The U.S. Navy acquired the site in 1940 and it became a U.S. Navy base employing thousands of people. Building, repair, and maintenance of ships for the U.S. Navy were primary activities during World War II. Radioluminescent device handling, maintenance, and disposal occurred in the shipyard. Later, the U.S. Navy established the Naval Radiological Defense Laboratory (NRDL) in 1946 at HPS to study the effects of and to develop counter measures from nuclear weapons. NRDL operated until 1969 and conducted studies related to ship shielding, radioactive waste for deep-sea disposal, animal research, radiation detection instrumentation development, and other laboratory studies. NRDL also decontaminated and disposed of some ships involved in nuclear weapons tests in the Marshall Islands. During operations at HPS, the shipyard site grew in size to approximately [500 ac] by filling parts of the San Francisco Bay bordering the HPS. The site currently consists of approximately 866 acres, 446 of which are under water.

The first use of radioactive materials at HPS predated the issuing of licenses by the Atomic Energy Commission (AEC). The AEC is the predecessor of the U.S. Nuclear Regulatory Commission (NRC), which was established in 1974. Prior to 1954, AEC issued only authorizations or permits for controlled uses of radioactive material. After 1954, AEC licenses were issued to HPS and NRDL for use of radioactive materials. In the shipyard, multiple AEC licenses were issued for use of radioactive materials. The AEC licenses for NRDL were for a broad spectrum of radioactive materials for research. Radioactive materials specific to nuclear weapon testing used at HPS and NRDL are exempted from AEC, or NRC, licensing by the Atomic Energy Act of 1946. For closure of the NRDL in 1969, a license was issued by AEC for decommissioning activities. AEC licenses for the shipyard and NRDL were terminated in the 1970's. Before termination of the licenses, extensive radiological surveys confirmed that radiological standards in effect at the time for unrestricted use were met. Following the termination of licenses, the AEC and NRC ceased exercising regulatory authority at the HPS.

In 1974, HPS was deactivated, and the site was placed on industrial reserve and portions of the site were leased to industry. In 1986, both hazardous chemical and low-level radiological contamination were identified at HPS. In 1989, the U.S. Environmental Protection Agency (USEPA) placed the site on the National Priorities List under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). In 1991, the Base Realignment and Closure Program of U.S. Department of Defense designated HPS for closure. The U.S. Navy is now in the process of managing the cleanup of HPS under the CERCLA process with the objective of transferring the property to the City of San Francisco for redevelopment.

The Navy believes that the AEC-licensed material would likely be commingled with, and indistinguishable from, the atomic weapons testing material, because both types of material were used by NRDL research. According to the Navy's 2004 Historical Radiological Assessment, the AEC-licensed material has the potential to exist base-

wide in the storm drain lines, sanitary sewer lines, and septic systems, as well as in some buildings and one of the landfills. Under Superfund law, the military service that operated a base also is responsible for implementing the cleanup under CERCLA. The Navy's cleanup at Hunters Point is done with independent oversight by USEPA and state regulatory agencies under a Federal Facilities Agreement signed in 1992. Six parcels (B, C, D, E, E-2, and F) have been identified to facilitate investigation and cleanup activities. A seventh parcel, Parcel A, was released for unrestricted use in 2004 and transferred to the City of San Francisco. The overall objective of the Navy's remediation is unrestricted release for Parcels C and D and major portions of Parcels B and E-2. Plans currently under review also propose restricted release for the fill area of Parcel B and the existing landfill on Parcel E-2. For these restricted release areas, both institutional controls and engineering controls are planned. The current approach would result in a layered system of governmental controls including: City government ownership; legal controls using a restrictive covenant that involves the Navy, City, and State; and CERCLA-required oversight and enforcement through the Five-Year Review process conducted by the Navy and EPA.

3.0 Major Technical or Regulatory Issues

In 2007, the U.S. Navy requested clarification whether NRC was going to exercise regulatory authority over the residual radiological contamination identified in 1986 and later years. Rather than exercising its regulatory authority for the licensable radioactive material assumed to be present, the Commission decided in June 2008 (SRM-SECY-08-0077) that NRC would rely on the ongoing Navy remediation under the CERCLA process and EPA independent regulatory oversight. The NRC staff would take a limited involvement approach to stay informed throughout the Navy's remediation. The staff would stay informed by reading selective documents and conducting an annual site visit and progress meetings with the Navy, EPA, State agencies, and City of San Francisco. NRC would reserve the option of commenting to EPA if necessary to justify the continued reliance on the CERCLA process and EPA oversight. The staff is particularly following the plans and ongoing activities associated with the restricted areas mentioned above.

For the past six years since NRC's decision in 2008, NRC has conducted its annual activities to stay informed about the Navy's remediation process and issues. Based on the results of these activities, NRC decided to continue with its approach to rely on the CERCLA process and EPA's independent oversight.

4.0 Estimated Date For Closure

N/A

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