

HEALTH PHYSICS SOCIETY

Specialists in Radiation Safety

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January 31, 2023

Erhard W. Koehler Senior Technical Advisor, NS Savannah Maritime Administration, US Department of Transportation

Re: Programmatic Agreement for the NS Savannah

Dear Mr. Koehler:

Thank you for the opportunity to comment on the Programmatic Agreement (PA) for the NS Savannah. The Health Physics Society (HPS), a professional group dedicated to radiation safety, supports the concepts and plans described in the PA. Because the HPS and its members have a long association with the Savannah, the HPS respectfully requests to be added as a concurring party with the other organizations listed on page three of the PA.

HPS history of association with the NS Savannah goes back to its operational days. Members of the HPS served as radiation safety staff during the mid-operation refueling of the Savannah and its final defueling. They are also part of the current final decommissioning efforts. The NS Savannah staff had agreed to make the NS Savannah available for a tour during the national Health Physics Society, (HPS) meeting which was to have been held July 2020. That meeting had to be canceled because of Covid-19. It has been rescheduled for the upcoming July 2023 meeting.

From the HPS perspective, the operation of the NS Savannah represented a significant milestone in radiation safety, showing that a crew of civilian sailors could safely operate a ship with a nuclear reactor providing the steam for propulsion and auxiliary power while the remainder of the ship had conventional maritime machinery. The HPS strongly supports the goals of the PA, to remove only as much of the nuclear systems as necessary, to meet the radiation safety criteria for termination of the Nuclear Regulatory Commission license currently governing the ship.

We support the efforts to complete the decommissioning in a manner that preserves the ship as a historic exhibit and exemplar of the potential of nuclear power to be operated safely in the challenging environment of the open ocean. We believe that the PA provides a path forward for this to happen. We encourage you in your efforts to insure that the NS Savannah remains as intact as possible following decommissioning and license termination. We would like to be part of the planning process going forward by being included as a concurring party with the other organizations on page three of the PA.

Respectfully,

President

Health Physics Society