



# STATE OF CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION



June 18, 2003

John Conant  
Senior Project Manager  
ABB Prospects, Inc.  
CEP 880-1403  
2000 Day Hill Road  
Windsor, Connecticut 06095-0500

Docket No.: 165-422B/0302-17100

Dear Mr. Conant:

I would like to take this opportunity to thank you for meeting with the Connecticut Department of Environmental Protection (DEP) on June 11, 2003. At the meeting, you requested input from DEP to assist you in developing Derived Concentration Guidance Levels (DCGL's) using the Resident Farmer Scenario that would be acceptable to the DEP. Without as a specific written proposal with the appropriate technical analysis from Combustion Engineering, the DEP cannot approve input parameters to the RESRAD Code other than the default parameters. At a minimum, the DEP Division of Radiation requires the following conditions on input parameters for *all* dose-modeling scenarios.

- 1.) The receptor that is to be exposed and the corresponding dose conversion factors must match. For example, a child receptor must include age dependent dose conversion factors. If you use the age independent dose conversion factors in the RESRAD Code, you must model a standard adult.
- 2.) The liquid intake for all receptors must be at least 2.0 liters total per day. Of the 2.0 liters, at least 0.4 liters per day must be of milk and 1.0 liter per day must be of water. The other 0.6 liters per day may be distributed between milk and water to ensure a total of 2.0 liters per day.
- 3.) All input parameters submitted to the DEP must be identical to input parameters submitted to other regulatory agencies unless DEP has granted a written waiver granting a variance for a specific input parameter.
- 4.) To meet the radiological remediation standard developed by the DEP in conjunction with the Department of Public Health (DPH), the developed DCGL, may not give the average member of the critical group greater than 19 millirem/year total effective dose equivalent, plus As Low As Reasonably Achievable (ALARA). This action is consistent with and authorized by § 22a-133k-2(1)(3) and is necessary to ensure that the risk posed by sources of ionizing radiation does not exceed the cumulative excess lifetime cancer risk accepted by the DPH. This equates to a 10<sup>-5</sup> lifetime cancer risk.

( Printed on Recycled Paper )

79 Elm Street • Hartford, CT 06106 - 5127

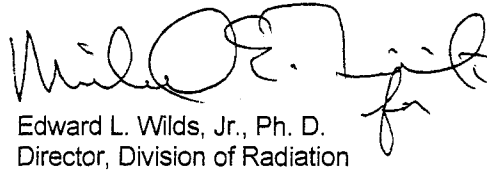
<http://dep.state.ct.us>

An Equal Opportunity Employer

This should not be considered an inclusive listing of comments but rather a minimum of what the DEP believes is needed toward developing acceptable DCGL's in the short time frame you proposed using the Resident Farmer Scenario. Additional comments from the DEP should be expected on your Resident Farmer Scenario after you submit a written proposal with the appropriate technical supporting documentation.

If there are any questions please feel free to contact the Mr. Michael Firsick of Division of Radiation at 424-3029.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward L. Wilds, Jr.", with a stylized flourish at the end. The signature is written over the printed name and title.

Edward L. Wilds, Jr., Ph. D.  
Director, Division of Radiation

ELW:MF/js