

Remediation Response  
 U.S. Environmental Protection Agency  
 Washington, DC 20460

Dear Mr. Lustig:

This letter is to inform you that the U.S. Nuclear Regulatory Commission has determined that the United Technologies, Pratt & Whitney, Middletown, Connecticut facility meets the conditions for release for unrestricted use, and intends to remove this site from NRC's Site Decommissioning Management Plan (SDMP). As the enclosure, SECY-95-237, dated September 18, 1995, indicates, these actions are being taken following site remediation, and after record reviews and radiological surveys indicated that the site meets the current NRC requirements for release for unrestricted use.

NRC Region I staff has coordinated remediation and surveying activities with the State of Connecticut and the U.S. Environmental Protection Agency, Region I (Ms. Carolyn Casey, Project Manager, (617) 223-5508), which has been evaluating disposal of non-radioactive hazardous materials on the site.

The enclosure provides detailed information on NRC's action. As indicated, the NRC project manager for this site is Mark C. Roberts, at NRC Region I. If you have any questions, please call him at (610) 337-5094 or the site project monitor, William R. Laha, at NRC Headquarters at (301) 415-6756.

Sincerely,

ORIGINAL SIGNED BY  
 Carl J. Paperiello, Director  
 Office of Nuclear Material Safety  
 and Safeguards

Enclosure: As stated

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**POLICY ISSUE**  
**(Information)**

September 18, 1995

SECY-95-237

**FOR:** The Commissioners

**FROM:** James M. Taylor  
Executive Director for Operations

**SUBJECT:** REMOVAL OF UNITED TECHNOLOGIES, PRATT & WHITNEY, MIDDLETOWN,  
CONNECTICUT, FACILITY FROM THE SITE DECOMMISSIONING  
MANAGEMENT PLAN

**PURPOSE:**

To inform the Commission that remedial action has been completed at the formerly licensed Pratt & Whitney site in Middletown, Connecticut. The staff plans to release the site for unrestricted use-with the exception of areas currently used in conjunction with license SMB-151; and to remove the site from the Site Decommissioning Management Plan (SDMP) within ten days of this paper.

**BACKGROUND:**

In SECY-90-121, the original SDMP, and in subsequent revisions to the SDMP (SECY-91-096, -92-200, -93-179, -94-213, and -95-209), the staff identified approximately 50 sites that warranted special oversight by the Nuclear Regulatory Commission to ensure timely and safe remediation of residual radioactive material in excess of the current NRC criteria for release for unrestricted use. One of these sites is the United Technologies, Pratt & Whitney facility in Middletown, Connecticut.

Contact: Mark C. Roberts, RI  
(610) 337-5094

NOTE: TO BE MADE PUBLICLY AVAILABLE IN  
5 WORKING DAYS FROM THE DATE OF THIS PAPER

Enclosure

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Research and development activities with radioactive material were initiated at the Middletown site by the U.S. Air Force, in 1957. In 1961, the Air Force authorized the U.S. Atomic Energy Commission (AEC) to conduct contract activities with radioactive material at the site. In 1963, the AEC assumed responsibility for active operations from the Air Force. In 1966, Pratt & Whitney's parent company bought the facility and commenced activities under AEC License No. 06-00550-03. That license was terminated in 1971 at the request of the licensee, after remediation of contamination in a series of hot cells in Building 450 and acceptance of the licensee's final survey. Building 450 was not used again until early 1992, when Pratt & Whitney identified cobalt-60 (Co-60) and cesium-137 (Cs-137) contamination in the hot cells in excess of current NRC release-for-unrestricted-use criteria. Also in early 1992, in reviewing terminated licenses, License No. 06-00550-03 was identified as requiring further staff review, because the license files did not seem to have sufficient documentation to allow the staff to conclude that the site met present NRC criteria. The staff added the facility to the SDMP in 1992, to ensure a timely and effective cleanup. Radioactive contamination has now been remediated, and record reviews and radiological surveys indicate that the site meets the current NRC requirements for release for unrestricted use. The site will be removed from the SDMP list.

The detailed history of the site is provided in Attachment 1. Attachment 2 discusses details of the site characterization and remedial activities. The staff has coordinated remediation and surveying activities with the State of Connecticut and the U.S. Environmental Protection Agency (EPA), which has been evaluating disposal of non-radioactive hazardous materials on the site.

#### DISCUSSION:

Surveys performed by the licensee's contractor, Radiation Safety Associates, Inc., indicate that all floor, ceiling, and wall surfaces now meet the criteria for acceptable surface contamination found in NRC's "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of Licenses for Byproduct, Source or Special Nuclear Material" (May 1987). Non-removable surface contamination in excess of maximum levels (estimated to be less than 0.0074 Megabecquerels (0.2 microcuries) of Cs-137) was left in an inaccessible, small-diameter pipe penetration at the base of a hot cell wall and covered with 0.91 meters (3 feet) of concrete.

Residual concentrations of radioactive material in soil samples from the hot cell pits, beneath the concrete floor, and from the EPA Resource Conservation and Recovery Act Facility Investigation are consistent with the NRC criteria identified in the "Action Plan to Ensure Timely Cleanup of Site Decommissioning Management Plan Sites" (57 FR 13389-13392), and the requirement that, if more than one radionuclide is present, the sum of the ratios of the individual concentrations to their respective concentration limits may not exceed unity. Exposure rates measured in Building 450, in other buildings on the site where radioactive materials were used, and in outside areas, also meet the exposure rate criterion in the Action Plan.

As discussed in Attachment 2, under "Characterization," exposure rates exceeding these criteria were measured in the vicinity of source material (thoriated nickel) possessed under NRC License No. SMB-151 and materials containing unimportant quantities of source material (ceramic tile, zirconium oxide plasma spray powder, and grit-blasting media), but these levels are not relevant to the past operations with byproduct material. The possession and use of these materials are in compliance with NRC regulations and license conditions.

Region I staff performed confirmatory radiological measurements on the concrete floors and walls of the hot cell pits during remediation so that the hot cell pits could be filled with concrete. All results met NRC criteria for release for unrestricted use. In subsequent inspections, the staff performed confirmatory radiological measurements in the vicinity of Building 450, and in other buildings and areas of the site where radioactive materials were used, stored, or incinerated. These results also met NRC criteria for release for unrestricted use.

#### CONCLUSIONS:

Region I staff inspected or observed site characterization and remediation activities on at least six separate occasions. Based on the results of the remedial actions taken by Pratt & Whitney, the staff review of the docket files and radiological survey reports, and the results of NRC confirmatory measurements, the staff concludes that decommissioning has been satisfactorily completed at the United Technologies, Pratt & Whitney site in Middletown, Connecticut. NRC staff has transmitted a copy of the final inspection report and confirmatory survey to the State of Connecticut, Bureau of Air Management, Monitoring and Radiation Division, and to EPA Region I. The staff has placed a notice in the Federal Register (60 FR 39193, dated August 1, 1995) stating that the site appears to meet NRC guidelines for release for unrestricted use, and that NRC plans no further actions on the site and intends to remove the site from the SDMP. No comments have been received. In addition, the staff has notified EPA and the State of Connecticut of NRC's intent to remove the site from the SDMP.

It is the staff's intention to send a letter to Pratt & Whitney (Attachment 3), within ten days from the date of this paper. The letter will state that the Middletown, Connecticut, site meets current NRC requirements for release for unrestricted use, with the exception of areas used in connection with license SMB-151, and that NRC plans no further action in regard to the activities previously conducted with radioactive material under AEC License No. 06-00550-03 and various contracts, as discussed in this paper. (This paper does not relate to currently licensed activities conducted at the site under NRC License No. SMB-151.)

The Commissioners

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COORDINATION:

The Office of the General Counsel has reviewed this paper and has no legal objection.

  
James M. Taylor  
Executive Director  
for Operations

Attachments:

1. Site History
2. Characterization and  
Remediation Activities
3. Draft letter to Pratt & Whitney  
(Removal from SDMP)

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## SITE HISTORY PRATT & WHITNEY-MIDDLETOWN, CONNECTICUT

The Middletown, Connecticut site covers an area of approximately 570 hectares (1400 acres) and includes about 30 buildings with approximately 650,000 m<sup>2</sup> (7 million ft<sup>2</sup>) of floor space. Radioactive material has been used at this site, currently owned and operated by United Technologies, Pratt & Whitney, since the 1950's. The Federal Government acquired the site from private owners between 1955 and 1957. The Pratt & Whitney Corporation operated the site under contract to the U.S. Air Force, beginning research and development operations in May 1957. The research was originally directed toward the development of components for nuclear-powered aircraft. At that time, the facility was designated the Connecticut Aircraft Nuclear Engine Laboratory (CANEL) and the Connecticut Advanced Nuclear Engineering Laboratory (also CANEL).

In October 1961, the Air Force permitted the U.S. Atomic Energy Commission (AEC) to use the site and then transferred control of the site to the AEC in August or September 1963. Under AEC direction, Pratt & Whitney conducted research and development activities with radioactive materials in numerous buildings on the site. In 1965, the site was reported as excess to the General Services Administration and was subsequently sold, in August 1966, to the United Aircraft Corporation (then the parent company of Pratt & Whitney).

In June 1966, the AEC issued License No. 06-00550-03, to Pratt & Whitney, authorizing the possession of "...any byproduct, source, or special nuclear material..." in the form of "...contaminated facilities and equipment." Subsequent amendments to this license added various specific byproduct materials and designated certain buildings on the site as authorized locations for the use of radioactive material. One of these amendments authorized possession of 1110 terabecquerels (TBq) (30,000 curies) of cesium-137 (Cs-137) and 22,200 TBq (600,000 curies) of cobalt-60 (Co-60). Activities with radioactive material primarily were conducted in seven hot cells in Building 450. Pratt & Whitney ceased active operations in the hot cells in December 1969. At the time of the shutdown, residual contamination levels of up to  $5.1 \times 10^5$  Bq ( $3.2 \times 10^7$  disintegrations per minute (dpm))/100 cm<sup>2</sup> and exposure rates of up to 42 Roentgens per hour (R/hr) remained in some areas of the hot cells. In October 1970, Pratt & Whitney contracted for remediation of the facility. Remediation was completed in March 1971 and Pratt & Whitney submitted a decontamination report to the AEC and requested termination of the AEC license. After review of the decontamination report and completion of some type of confirmatory survey, the AEC terminated the license on June 21, 1971.

Although Building 450 was the primary location where radioactive material was used, information from the records indicates that radioactive material was used, or may have been used, in many other buildings on the site. There were no records of final or confirmatory surveys of these buildings sufficient to conclude that the areas were free of residual contamination in excess of Nuclear Regulatory Commission criteria for release for unrestricted use.

Building 450 was virtually unused from 1971 through early 1992, when Pratt & Whitney decided to raze portions of the building and renovate the remaining portion into a parts and fixtures storage facility. Based on the history of the building, Pratt & Whitney performed a radiological survey of the facility. Residual Cs-137 and Co-60 contamination in excess of current NRC criteria for release for unrestricted use was identified in the building by Pratt & Whitney's radiological contractor, Radiation Safety Associates, Inc. (RSA) and documented in a June 1992 report.

In 1992, it was unclear whether NRC or the Department of Energy (DOE) was responsible for overseeing the remediation of the facility, because some of the contamination likely originated while the site was operated under contract with the AEC. Based on the available information, it was determined that the NRC would oversee the remediation of Building 450 and the assessment of the radiological status of the remainder of the facility. Pratt & Whitney's contractor submitted a decommissioning plan that was reviewed and commented on by Region I. Although no license was issued for the remediation, Pratt & Whitney and its contractor agreed to decommission the facility in accordance with 10 CFR Parts 19 and 20 and Region I comments. Pratt & Whitney also agreed to conduct radiological surveys of other site buildings where radioactive materials may have been used during past government contract and licensed operations. The staff added the Pratt & Whitney site to the Site Decommissioning Management Plan, later in 1992, to ensure that cleanup was conducted in a timely and effective manner.

Concurrent with the remediation of radioactive contamination in Building 450 and the radiological survey of many of the remaining buildings on the site, the U.S. Environmental Protection Agency (EPA) Region I was evaluating disposal of non-radioactive hazardous materials on the site. As part of this evaluation, EPA Region I reviewed a large volume of historical records, concerning the site, provided to EPA by Pratt & Whitney. These records contained information concerning past operations with radioactive materials and were subsequently provided to NRC Region I. NRC staff used the information gained from the review of these records to select areas to be included in the confirmatory survey of the site.

As part of the EPA evaluation, many boreholes and monitoring wells have been placed in the vicinity of known hazardous material disposal areas and other areas of concern. To address concerns regarding potentially buried radioactive materials, RSA performed radiological analyses on many of the soil samples gathered during the placement of the boreholes and monitoring wells. The data from these analyses were provided to the NRC staff.

## CHARACTERIZATION AND REMEDIATION ACTIVITIES PRATT & WHITNEY-MIDDLETOWN, CONNECTICUT

### CHARACTERIZATION

Pratt & Whitney's contractor, Radiation Safety Associates, Inc. (RSA), performed a detailed survey of Building 450. Cesium-137 (Cs-137) and cobalt-60 (Co-60) contamination was identified in the hot cells. The contractor also identified lower levels of contamination in source storage cells, liquid waste discharge tanks, and the fan room. Contamination in all these areas was not readily removable and consisted of contaminated concrete or contamination fixed onto metal surfaces. Borings through the original concrete slab, in the former laundry and hot cell operator areas, indicated no soil contamination in the soil beneath the slab. Surveys conducted on the piping leading to the liquid waste discharge tanks identified two pipes with internal fixed contamination. A survey of the hot-process sewer line leading from the waste discharge tanks also identified non-removable, spotty contamination, in excess of Nuclear Regulatory Commission criteria. Surveys conducted on the piping leading to the leach field of the sanitary sewer system did not identify radiation levels in excess of background. Radiation measurements performed on the ground surfaces above the leach field were also at background levels. Water samples taken from monitoring wells near Building 450 did not indicate any detectable radionuclide concentrations.

Pratt & Whitney's contractor also surveyed every building present at the site during contract or licensed operations, except for Building 155. (However, Building 155 was surveyed during the NRC confirmatory survey and found to be free of radioactive contamination.) The surveys identified two contaminated components of one of the ventilation systems in Building 150. They were in storage and had not been used for some time. The surveys also identified a number of locations and items in the buildings where radiation exposure rates exceeded the NRC criteria; however, these elevated exposure rates were caused by the presence of naturally occurring uranium and thorium in material such as welding rods, ceramic tile, zirconium oxide plasma spray powder, and grit-blasting media, or thoriated nickel from activities authorized under NRC License No. SMB-151, an active license issued to Pratt & Whitney. Buildings constructed after termination of License No. 06-00550-03 were not included in the final survey because there has not been any radioactive material used in or moved into these buildings.

Pratt & Whitney's environmental contractor collected a large number of surface and subsurface soil samples in support of the Resource Conservation and Recovery Act (RCRA) Facility Investigation conducted by Environmental Protection Agency (EPA) Region I. Soil samples were collected in the vicinity of known hazardous material disposal areas, in other onsite areas of concern, and adjacent to the Connecticut River (down-gradient of the disposal areas and areas of concern). RSA analyzed approximately 1800 soil samples by gamma

spectrometry. Six of these samples had detectable concentrations of Cs-137 (maximum 0.059 Bq (1.6 pCi)/g); however, all results were less than the NRC release criterion (0.56 Bq (15 pCi)/g). Co-60 was not detected in any of the samples. Mixed wastes (a combination of radioactive waste and EPA hazardous waste) have not been identified on this site.

## REMEDIATION

Remediation of radioactive contamination in Building 450 and removal of the hot-process sewer piping were conducted from July 1992 through December 1992. Removal of contamination on the concrete walls and floors and on metal surfaces was accomplished by a variety of scabbling, brushing, and grit-blasting techniques. Carbon dioxide pellet blasting was also used. Approximately 370 meters (1200 feet) of the hot-process sewer line were removed and remediated. Sections of the hot-process sewer line left in place have non-removable contamination levels averaging less than 1.6 Bq (100 disintegrations per minute (dpm))/100 cm<sup>2</sup>, well within the unrestricted release criterion of 83 Bq (5,000 dpm)/100 cm<sup>2</sup> for beta-gamma emitters. Non-removable internal contamination (maximum 330 Bq (20,000 dpm)/100 cm<sup>2</sup>) in excess of the criterion for release for unrestricted use was measured on a 1.3-meter (4.3 foot) section of small-diameter pipe penetration in one of the hot cell walls. This pipe was left in place because it was 1 meter (3.3 feet) below the level of the floor and could not readily be removed. The area was later filled with concrete. The staff has concluded that it is unlikely to result in doses, to any individual, that are greater than those expected from surface contamination of the current guideline values. Also, the half-lives of Cs-137 and Co-60 (30 years and 5.3 years, respectively) are sufficiently short so that this contamination will reach criterion levels within 13 years. Contaminated concrete and a small amount of contaminated soil were excavated from the area beneath the sump pits in four of the seven hot cells because there was evidence of a loss of integrity of the four sumps. Sumps in the other cells were found to be intact.

A final RSA radiological survey of the facility included contamination measurements of the interior and exterior of the hot cells, the fan room, the source storage cells, and the waste discharge tank vault. Soil samples were collected from beneath the concrete floor of the four hot cells where the floor was breached at the sumps and also from holes drilled through the slab beneath the laundry and operator areas. The hot-process sewer line that was left in place and connecting manholes were also surveyed.

RSA removed all radioactive waste generated as a result of the Building 450 remediation and the decontamination of the hot-process sewer piping and had it transported, for disposal, to the licensed low-level waste burial site in Richland, Washington, before the closing of that site to out-of-compact waste at the end of 1992. The contaminated ventilation system components removed from Building 150 were also disposed of as radioactive waste. Approximately 13 m<sup>3</sup> (450 ft<sup>3</sup>) of radioactive waste were shipped for disposal.

## COMPARISON OF RESULTS WITH NRC GUIDELINES

Surveys performed by the licensee's contractor indicate that all floor, ceiling, and wall surfaces now meet the criteria for acceptable surface contamination found in NRC's "Guidelines for Decontamination of Facilities and Equipment Prior to Release for Unrestricted Use or Termination of Licenses for Byproduct, Source or Special Nuclear Material" (May 1987). The criteria for Co-60 and/or Cs-137 are no more than 83 Bq (5000 dpm)/100 cm<sup>2</sup> (average) and 25 Bq (15,000 dpm)/100 cm<sup>2</sup> (maximum) for total contamination and 17 Bq (1000 dpm)/100 cm<sup>2</sup> for removable contamination. Non-removable contamination in excess of 25 Bq (15,000 dpm)/100 cm<sup>2</sup> (estimated to be less than 0.0074 Bq (0.2 µCi) of Cs-137) was left in an inaccessible, small-diameter pipe penetration at the base of a hot cell wall and covered with 0.91 meters (3 feet) of concrete.

Residual concentrations of radioactive material in soil samples from the hot cell pits, beneath the concrete floor, and from the EPA RCRA Facility Investigation satisfy the NRC criteria for Cs-137 (0.56 Bq (15 pCi)/g) and Co-60 (0.29 Bq (8 pCi)/g) and the requirement that if more than one radionuclide is present, the sum of the ratios of the individual concentrations to their respective concentration limits may not exceed unity. These criteria are consistent with the "Action Plan to Ensure Timely Cleanup of Site Decommissioning Management Plan Sites" (57 ER 13389-13392).

Exposure rates measured in Building 450, in other buildings on the site where radioactive materials were used, and in outside areas meet the exposure rate criteria (exposure rates not to exceed 5 microrentgens/hour above natural background) identified in the Action Plan. As discussed under "Characterization," exposure rates exceeding this criteria were measured in the vicinity of source material (thoriated nickel) possessed under NRC License No. SMB-151 and materials containing unimportant quantities of source material (ceramic tile, zirconium oxide plasma spray powder, and grit-blasting media), but these levels are not relevant to the past operations with radioactive materials. The possession and use of these materials are in compliance with NRC regulations and license conditions.

Region I staff performed confirmatory radiological measurements on the concrete floors and walls of the hot cell pits during remediation so that the hot cell pits could be filled with concrete. All results met NRC criteria for release for unrestricted use. In subsequent inspections, the staff performed confirmatory radiological measurements in the vicinity of Building 450, and in other buildings and areas of the site where radioactive materials were used, stored, or incinerated. These results also met NRC criteria for release for unrestricted use.

License No. 06-00550-03 (Retired)

David A. McCarthy  
Cases and Combustors Product  
Center Manager, Middletown  
Pratt & Whitney  
Aircraft Road  
Middletown, Connecticut 06457

**SUBJECT: REMOVAL OF THE PRATT & WHITNEY, MIDDLETOWN,  
CONNECTICUT, FACILITY FROM THE NRC SITE DECOMMISSIONING  
MANAGEMENT PLAN**

Dear Mr. McCarthy:

I am responding to your correspondence dated April 27, 1995, requesting that the U.S. Nuclear Regulatory Commission release the Middletown site for unrestricted use and remove the site from the Site Decommissioning Management Plan. We have reviewed your reports from the radiological surveys and analysis of soil samples and conducted our own radiological survey. We conclude that all areas of the facility, with the exception of authorized areas where licensed material is used or stored in accordance with NRC License No. SMB-151--an active license issued to Pratt & Whitney--meet the criteria for release for unrestricted use discussed in the "Action Plan to Ensure Timely Cleanup of Site Decommissioning Management Plan Sites" (the Action Plan) (57 FR 13389-13392) and NRC's current soil contamination criteria developed by the NRC staff and applied on a case-by-case basis. Further remedial action is not required.

As noted in the Action Plan, this is the Commission's final action on the referenced license. NRC will not require any additional decommissioning in response to future NRC criteria or standards, unless additional contamination, or noncompliance with the Decommissioning Plan submitted to NRC in June 1992, is found, indicating a significant threat to public health and safety.

Attachment 3

Pratt & Whitney

-2-

Thank you for your cooperation in this matter. Please contact me at (610) 337-5252 if you have any questions. I trust that this reply responds to your request.

Sincerely,

John D. Kinneman, Chief  
Site Decommissioning Section  
Division of Radiation Safety  
and Safeguards

cc:

Scott Singer, Plant Engineer  
Pratt & Whitney  
Aircraft Road  
Middletown, Connecticut 06457

David Alberghini, Environmental Project Engineer  
Pratt & Whitney  
400 Main Street M/S 105-11  
East Hartford, Connecticut 06108

Mr. Steven Lustig, Director  
 Office of Emergency and  
 Remediation Response  
 U.S. Environmental Protection Agency  
 Washington, DC 20460

Dear Mr. Lustig:

This letter is to inform you that the U.S. Nuclear Regulatory Commission has determined that the United Technologies, Pratt & Whitney, Middletown, Connecticut facility meets the conditions for release for unrestricted use, and intends to remove this site from NRC's Site Decommissioning Management Plan (SDMP). As the enclosure, SECY-95-237, dated September 18, 1995, indicates, these actions are being taken following site remediation, and after record reviews and radiological surveys indicated that the site meets the current NRC requirements for release for unrestricted use.

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The enclosure provides detailed information on NRC's action. As indicated, the NRC project manager for this site is Mark C. Roberts, at NRC Region I. If you have any questions, please call him at (610) 337-5094 or the site project monitor, William R. Lahs, at NRC Headquarters at (301) 415-6756.

Sincerely,

Carl J. Paperiello, Director  
 Office of Nuclear Material Safety  
 and Safeguards

Enclosure: As stated

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