August 19, 2005

Mr. Wayne Norton
President
Connecticut Yankee Atomic Power Company
362 Injun Hollow Road
East Hampton, CT 06424-3099

SUBJECT: ISSUANCE OF AMENDMENT NO. 202 TO FACILITY OPERATING LICENSE NO. DPR-61 - CONNECTICUT YANKEE ATOMIC POWER COMPANY, HADDAM NECK PLANT

Dear Mr. Norton:

The Commission has issued the enclosed Amendment No. 202 to Facility Operating License No. DPR-61 for the Connecticut Yankee Atomic Power Company, Haddam Neck Plant (HNP). This amendment is in response to your application dated December 1, 2004, as supplemented on May 5, 2005, and is effective immediately.

The amendment revises the HNP License to reflect changes to HNP's License Termination Plan (LTP). The amendment consists of changes to the LTP to: (1) incorporate the use of a basement fill model in lieu of a buried debris model to calculate the future groundwater dose for buried concrete, and (2) revise the surface contamination release limits to allow for surface decontamination release levels for more piping sizes than are currently specified.

A copy of the related Safety Evaluation Report is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly *Federal Register* notice.

Sincerely,

/RA/

Daniel M. Gillen, Deputy Director
Decommissioning Directorate
Division of Waste Management
and Environmental Protection
Office of Nuclear Material Safety
and Safeguards

Docket No.: 50-213

Enclosures:
1. Amendment No. 202 to DPR-61
2. Safety Evaluation Report

cc: Connecticut Yankee Atomic Power Company Service List

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DATE	7/28/05	7/28/05	8/1/05	8/2/05

OFC	OGC	DWMEP:DD
NAME	STreby	DGillen
DATE	8/17/05	8/19/05

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CONNECTICUT YANKEE ATOMIC POWER COMPANY

DOCKET NO. 50-213

HADDAM NECK PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 202
License No. DPR-61

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment by Connecticut Yankee Atomic Power Company (the licensee) dated December 1, 2004, as supplemented by letter dated May 5, 2005, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 Code of Regulations (CFR) Chapter I;

   B. The facility will be maintained in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the rules and regulations of the Commission;

   D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the regulations of the Commission and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment.

   Paragraph 2.C.2 of Facility Operating License No. DPR-61 is hereby amended to read as follows:

   (2) Technical Specifications

   The Technical Specifications contained in Appendix A, as revised through Amendment No. 202 are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

   The first sentence of paragraph 2.C.7 of Facility Operating License No. DPR-61 is hereby amended to read as follows:

Enclosure 1

(7) License Termination Plan (LTP)

The License Termination Plan dated August, 2004, as revised in December 2004 and May 2005 (Revision 3), is approved by NRC License Amendment No. 202.

3. The amended license is effective as of its date of issuance and shall be implemented within 60 days of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Daniel M. Gillen, Deputy Director
Decommissioning Directorate
Division of Waste Management
and Environmental Protection
Office of Nuclear Material Safety
and Safeguards

Attachment: Changes to the License

Date of Issuance: August , 2005

SAFETY EVALUATION BY THE OFFICE OF
NUCLEAR MATERIAL SAFETY AND SAFEGUARDS
RELATED TO AMENDMENT NO. 202 TO FACILITY OPERATING LICENSE NO. DPR-61
CONNECTICUT YANKEE ATOMIC POWER COMPANY
CONNECTICUT YANKEE NUCLEAR PLANT
DOCKET NO. 50-213

1. INTRODUCTION

1.1 SUMMARY OF LICENSEE REQUEST

On November 25, 2002, the U.S. Nuclear Regulatory Commission (NRC) amended the Connecticut Yankee Atomic Power Company (CYAPCO) facility operating license by adding a new License Condition 2.C.(7) to the CYAPCO license. This license condition incorporates the NRC approved "License Termination Plan Revision 1" (LTP) (Ref. 1) into the CYAPCO license for the Haddam Neck Plant (HNP) and allows the licensee to make certain changes to the approved LTP without prior NRC review or approval.

By letter, dated December 1, 2004 (Ref. 2), as supplemented by a May 5, 2005 letter (Ref. 3), CYAPCO submitted a revision to the LTP (Attachment 4 to Ref. 2) and requested that NRC amend CYAPCO's operating license. Specifically, CYAPCO is requesting a revision to License Condition 2. C.(7), to specify the proposed LTP revision.

In the revision, CYAPCO proposes to modify the dose modeling used to calculate future ground water dose resulting from buried concrete and to incorporate additional surface contamination release limits for buried pipe. It proposes to change from the current "Buried Concrete Debris Model" to a "Basement Fill Model," and revise the surface residual release limits for various piping sizes. This review first discusses the new "Basement Fill Model," as the piping revisions also use components of this model to calculate the surface residual release limits. That discussion is followed by a discussion the piping revisions.

The "Basement Fill Model" is for buried concrete, structures, and other components - (see the source term discussion below) and attempts to relate surface or volumetric residual radioactivity to dose from groundwater pathways. The general conceptual model is that the residual radioactivity will leach from the surface of the concrete into the surrounding soil. The residual radioactivity is partially adsorbed to the soil particles and is partially present in groundwater. The residual radioactivity in the water will be withdrawn, through a well, by a user for irrigation and drinking water.

The major differences between the current model and the proposed model are:

(1) the current model uses an assumption of instantaneous release of the entire inventory to the soil, while the proposed model, primarily, assumes a diffusion-based release from the concrete;

(2) the distribution coefficients used to partition the residual radioactivity in the soil are based on concrete for the current model and use site-specific values from backfill soil for the proposed model.

Using the proposed "Basement Fill Model," CYAPCO calculated the contributions to future groundwater dose from the containment building and various footings to remain behind, based on current characterization data and assumed final remediation goals. The estimated dose from all sources is approximately 0.01 mSv/y (1 mrem/y). CYAPCO will recalculate the dose from all sources, after the final status survey of the buried concrete, and include this in the final future groundwater dose estimate [i.e., Equation 5-7 in Chapter 5 of the approved LTP].

1.2 BACKGROUND

When the HNP LTP was approved by the NRC in November of 2002, the general plan (and associated dose model) for the decontamination and final status survey of the HNP site assumed that:

- Structures that contained residual radioactivity would be decontaminated to the LTP required derived concentration guideline (DCGLs) and a Final Status Survey (FSS) would be conducted. After any independent verification surveys conducted by the NRC and resolution of any NRC inspection comments on the FSS, the building could be demolished and the concrete debris used to backfill any basement that remains.

- The dose model for an area filled with concrete debris included a component of the total dose that corresponded to the leaching of radionuclides from contaminated concrete into the groundwater surrounding the concrete debris. This portion of the dose model assumed that all of the radioactivity contained on the concrete would leach from the debris and reach equilibrium with the concrete and groundwater instantaneously. The site structure that resulted in the lowest DCGL using this approach was the containment. In this case, the containment was assumed to be filled to 3 feet below grade with contaminated concrete.

CYAPCO has now changed the above decommissioning approach for the HNP site. The current plan is to demolish and remove all concrete and structural materials from the site that are above the four foot below the plant grade level for most structures. This material will be removed from the site to an appropriate disposal facility depending on its radioactivity and hazardous material characteristics. For certain selected structures, such as the Primary Auxiliary Building and the Waste Disposal Building, all concrete and structural materials including that in the deep basement, will be removed from site and disposed as waste, and not recycled or used as backfill. For building basements and footings that remain, the radionuclide content will be assessed and the potential dose contribution after release of the area from the NRC license will be included with any other dose pathways in demonstrating that the area meets the License Termination Rule criteria of 25 mrem/yr plus as low as reasonablely achievable (ALARA).

Through this approach, a smaller quantity of concrete and structural debris that could contain residual levels of radioactive material would be buried onsite, and a greater quantity of material will be sent to an approved disposal facility. The CYAPCO analysis shows that, even with the increase in allowable concentrations in a small area of the containment basement, the total quantity of residual radioactivity allowed to remain onsite after completion of current decommissioning activity is lower then that in the November 2002 LTP.

1.3 PROPOSED DECOMMISSIONING APPROACH

The original plan for decommissioning of the HNP was to demolish structures to an elevation corresponding to three feet below grade. As a result of lessons learned during the remediation of structures at other decommissioning facilities and the characterization of the HNP containment concrete, CYAPCO intends to pursue a more aggressive remediation strategy of removing additional interior below grade concrete from inside the containment building. CYAPCO intends to demolish structures, including the containment building structure to an elevation corresponding to four feet below grade and to remove the containment building interior below grade concrete down to the containment steel liner. This results in less contaminated concrete surface area and less potential for the need to pursue remediation of contamination in cracks and crevices. Removing concrete down to the liner also leaves a smoother surface that enhances the detection capability of survey instruments during the performance of the FSS.

As part of this demolition strategy, CYAPCO will leave the containment liner in place for the portion that is below four feet below grade. CYAPCO is now proposing not to remove the remaining activated concrete inventory below the containment liner which makes up approximately 5% of the total contaminated containment interior concrete volume. This remaining activated concrete is located primarily in the walls and floor of the In-Core Instrumentation (ICI) Sump from the sump floor up to the former location of the bottom of the Neutron Shield Tank (NST), behind the steel liner. CYAPCO analysis shows that removal of this activated concrete would be unnecessarily costly, resource intensive and hazardous.

The activated concrete activity concentrations from the ICI Sump are higher than the Concrete Debris DCGLs approved in the current LTP. If this activity concentration inventory were used in the current LTP dose model, the future groundwater dose from the concrete would increase. Rather than assume that 100% of the activity in the concrete is released instantly, a conservative release rate has been calculated for this Basement Fill Model. When the release rate is related to groundwater concentration and dose using the Basement Fill Model, a larger activity concentration is allowed to remain in a limited area of the subsurface structures.

However, using future groundwater dose values calculated in the analysis contained in this amendment request, the total activity to remain at the site is lower than that allowed in the current LTP.

CYAPCO has requested, an additional change to the LTP which would establish additional allowable surface contamination levels for buried pipe to be released. These additional residual values are for the various piping sizes which may be encountered during decommissioning.

The proposed decommissioning strategy has been evaluated for its effect upon the final state of the site and associated impacts on dose assessment, survey design and environmental assessment. CYAPCO has evaluated the dose significance of leaving a small area of the containment with higher concentrations than the Concrete Debris DCGLs contained in the current LTP and has concluded that the dose to the critical group, the resident farmer, is within the NRC's dose-based radiological criteria for license termination.

2.0 EVALUATION

2.1 Source Term

The proposed action will leave subsurface concrete structures in place, after being backfilled with soil. The concrete structures are largely intact concrete slabs, which may contain activated rebar. For the containment building, the steel liner will remain in place. Additionally, there is a small amount of embedded piping that will remain, that could contribute to the future ground water concentration. One additional source is the activated piping under the In-Core Instrumentation (ICI) Sump area.

The proposed model uses a diffusion-based release model to estimate the leaching of residual radioactivity from concrete. This is likely to be a much more realistic, yet still conservative, evaluation of the release rate from the underground structures. The model uses the most conservative diffusion rate data from tests on concrete for H-3, Co-60, Sr-90, Cs-137, and Eu-152. For other radionuclides, CYAPCO has a process to estimate the release based on finding a similar yet more conservative surrogate. The surrogate is selected from the current list by choosing the radionuclide in Tables 15-20 that has a higher diffusion coefficient and lower retardation (distribution) coefficient than the radionuclide of concern. The staff finds this approach to be reasonable and appropriate.

The model assumes that the measured inventory is uniformly distributed in the concrete. Using this assumption, CYAPCO calculated the cumulative fractional release from the concrete structure into the surrounding soil, assuming a semi-infinite media, and using an analytic solution. From staff review of core samples at another site for a similar amendment, actual distribution plots of activity in activated concrete tend to be log-normal with the peak concentrations being several centimeters into the concrete. The situation at Haddam Neck is likely to be similar. The use of a uniform inventory will overestimate the release rate and is, therefore, conservative. The use of a semi-infinite media ignores the depletion effects and will slightly overestimate the release rate of most radionuclides. Tritium (H-3) releases at a rate that would cause the model to greatly overestimate the release rate at later times, however, the licensee understands and accepts this conservatism in using the analytic solution. The staff finds this approach to be reasonable and appropriate.

The rebar in the concrete will have different concentrations of radionuclides than the concrete, specifically higher levels of iron and cobalt. In addition, release from the rebar is generally controlled by corrosion processes. The majority of the rebar will be surrounded by several inches of concrete, which will effectively minimize the potential increased release rates. However, to avoid needing to create a detailed analysis of corrosion and potential preferential flow through cracks within the concrete, CYAPCO has committed to using the higher of the measured concentrations for rebar or concrete for the entire concrete/rebar mixture. This is a conservative assumption and the staff finds the approach acceptable.

Both the containment liner and the ICI sump piping are activated metals with surface contamination. Rather than model the corrosion and other processes that may delay release of the material to the surrounding soil, CYAPCO has assumed that all residual radioactivity is released in the first year to the soil. CYAPCO has committed to remediating the surface contamination levels for the containment liner down to the administrative limit on surfaces, based on the building occupancy DCGLs already approved in the LTP. For the embedded piping, CYAPCO, similarly, will remediate the surfaces to the administrative limit prior to backfilling and assumes that the entire inventory is released to the backfill in the first year. The staff finds these approaches to conservatively overestimate the release, but acceptable for showing compliance with 10 CFR 20 Subpart E.

2.2 Basement Fill Model

To calculate the groundwater concentration resulting from the leaching of residual radioactivity from the concrete and other sources, the model uses a simple mixing cell approach. CYAPCO has assumed that the released radionuclides will all be mixed into one of two common "basements." For most of the concrete surfaces, including the containment and many footings, all the activity is assumed to be released into the containment void fill area - regardless if the surface is in contact with containment void. The remainder of the footings will use the same approach and volume estimates to calculate the groundwater concentration.

Specifically, the model calculates the maximum water concentration in the basement fill for each radionuclide. CYAPCO, using the time-dependent release rates and radionuclide decay rates, calculated the maximum activity that could be present in the basement. This maximum activity was then partitioned between the soil phase and the water phase by the use of K_d factors for the basement fill. The water activity was then divided by the water volume in the backfill assuming a porosity of 30%. To calculate dose, CYAPCO will use the approved ground water DCGLs to convert from concentration to dose. Build-up effects in the surface soil from extended pumping are considered to be minimal and are, therefore, ignored.

The staff finds this approach to be similar to other approaches previously approved for other sites. It is a conservative estimate as it assumes that all surfaces release into the same volume and that each radionuclide is at its maximum concentration in ground water. The staff finds this approach to be reasonable to bound the dose from the buried concrete and associated structures.

2.2.1 Additional Characterization Information to be Collected

In Table 7 of their amendment request, CYAPCO identifies the need to collect additional core samples to confirm assumptions made in the determination of activity inventory for the remaining activated concrete and liner material. The staff will review the additional activated concrete and liner characterization information, during in-process inspections, to ensure that the outstanding data support CYAPCO's current activity inventory estimates.

The results of this sampling or assessment, along with existing data, will then be used as input to the calculation of future groundwater dose using the basement fill model. NRC staff agrees with the licensee's proposed approach for calculating future ground water dose.

2.2.2 Final Status Survey

The changes in the method of calculating the future groundwater dose component of the LTP compliance equation necessitates changes to the surveys required as part of the FSS. The final status survey requirements for metal surfaces such as the containment liner and embedded piping are contained in the current LTP and are unchanged in this revised approach except that only the Building Occupancy DCGLs will be used. NRC approval of these changes to the LTP is not required but they are included in the licensee's proposed amendment. NRC staff finds these changes acceptable.

2.3 Buried Piping Revisions

For the revised buried piping limits, CYAPCO used the proposed "Basement Fill Model" to calculate DCGLs for the inner surfaces of the piping, prior to grouting. The approach taken is similar to the presently approved LTP, as the buried piping DCGLs were based on the assumptions in the "Buried Concrete Debris Model." The main difference is that the proposed change also includes a set of DCGLs that are dependent on the radius of the pipe.

CYAPCO assumed a unit concrete concentration of 37 Bq/kg (1 pCi/g) to derive DCGL values for the volumetric concentration assuming the pipes were grouted and the surface contamination was well mixed with the grout. The scenario assumes that the metallic surface of the piping no longer exists at the time of license termination. These DCGL values were normalized to correspond to 0.01 mSv/y (1 mrem/y). These volumetric DCGLs are then converted to surface DCGLs based on the radius of the pipe.

The staff finds the approach to be similar to the previously approved general approach for buried piping. The assumption for the grout and residual radioactivity being well mixed is likely to be unconservative as the grouting process is likely to leave the majority of the residual radioactivity on the exterior edge of the concrete plug. However, the assumption that the metallic piping, in its entirety, is instantaneously removed from the system is a larger conservatism. Considering the relatively small distance of piping and the surface DCGLs corresponding to 0.01 mSv/y (1 mrem/y), the use of the model to derive radius-dependent surface concentration values for the piping is found to be acceptable by the staff.

3.0 STATE CONSULTATION

In accordance with NRC regulations, the State of Connecticut was notified of the proposed issuance of the amendment and had no comments.

4.0 ENVIRONMENTAL CONSIDERATIONS

On November 3, 2002, the NRC published a Finding of No Significant Impact based on an Environmental Assessment (67 FR 67212) related to approval of the Connecticut Yankee LTP. The primary scope of the EA was the determination of the adequacy of the radiation release criteria and the adequacy of the final status survey as presented in the LTP. Based on the EA, the NRC concluded that there are no significant environmental impacts and approval of the LTP does not warrant the preparation of an Environmental Impact Statement.

Section 1.5 of the LTP requires that Connecticut Yankee request NRC approval for any change to the LTP that results in an increase in a DCGL, as specified in Section 6 of the LTP. Connecticut Yankee's amendment request proposes a modified dose model, a corresponding DCGL change for buried concrete to remain on site after decommissioning, and incorporation of additional surface contamination release limits for buried pipe. The staff has reviewed the amendment request and concludes that the revised concrete remediation strategy does not significantly revise the radiation release criteria or final status survey plan. The NRC staff has also determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. Thus, the staff concludes that the EA published on November 4, 2002, bounds the environmental considerations related to the proposed amendment, and no additional EA is required.

5.0 CONCLUSIONS

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; (2) such activities will be conducted in compliance with the Commission's regulations; and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

6.0 LIST OF CONTRIBUTORS

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7.0 REFERENCES

1. Connecticut Yankee, 2002. "Connecticut Yankee Atomic Power Company License Termination Plan." Rev. 1, August 22, 2002, Connecticut Yankee Atomic Power Company, East Hampton, CT, ADAMS Accession No. ML022490120.

2. Connecticut Yankee, 2004. “Haddam Neck Plant License Amendment Request, Use of a Basement Fill Model (Revising the Buried Debris Dose Model), and a Revision to Surface Contamination Release Limits for Various Piping Sizes.” Connecticut Yankee Atomic Power Company, East Hampton, CT, ADAMS Accession No. ML043780179.

3. Connecticut Yankee, 2005. “Haddam Neck Plant, Supplemental Information, License Amendment Request,” Connecticut Yankee Atomic Power Company, East Hampton, CT, ADAMS Accession No. ML051320281.