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RECEIVED

October 15, 2007

U.S. Nuclear Regulatory Commission, Region I 475 Allendale Road King of Prussia, PA 19406-1415 ATTN: Dennis R. Lawyer, Health Physicist Mail Control No 140908

RE: NRC License Termination (License No. 06-30667-02)

03036257

Dear Dr. Lawyer:

Please find CuraGen Corporation's response to the queries in your letter dated September 24, 2007 below (query in bold text; CuraGen response in normal text).

1) As stated in NUREG-1757 Volume 1, Rev.2, Consolidated NMSS Guidance, Decommissioning Process for Materials Licensees, please provide a copy of the written confirmation from Radiac Research Corporation of Brooklyn that they have received your materials.

The requested copy of the written confirmation from Radiac Research Corporation of Brooklyn of final radiaoactive waste removed from 322 East Main Street is provided in Attachment 1 (shipping manifest, disposal record and receipt of materials). Removal of the scintillation counter and Faxitron was performed by ALL Sciences (see Attachment 2).

- 2) As stated in NUREG-1757 Volume 1, Rev.2, Consolidated NMSS Guidance, Decommissioning Process for Materials Licensees, please provide the name and address where any future correspondence may be sent if necessary The requested name and address for future correspondence is Timothy Shannon, M.D., CuraGen Corporation, 322 East Main Street, Branford, CT 06405.
- 3) Prior to termination of a license, 10CFR 30.35(g), 30.36(k)(4) and 30.51 require that you submit to the NRC certain records. Please submit the following records, or explain why such records are not applicable.



a. For unsealed materials with half-lives greater than 120 days, records for disposal made pursuant to 10 CFR 20.2002 (alternate disposal procedures, including burial authorized prior to January 28, 1991), 20.2003 (disposal to the sanitary sewerage system), 20.2004 (incineration of wastes), 20.2005 (disposal of specific wastes including liquid scintillation cocktail and animal tissue) and 20.2103(b)(4), evaluation of effluent releases.

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Records for disposal of materials with half-lives greater than 120 days are not applicable as all radioactive waste was removed by contracted shipping from the premises. CuraGen did not dispose of radioactive wastes by burial, to the sanitary sewage system, by incineration, nor use radioactive animal tissue. Additionally, liquid scintillation fluids were also removed by shipment from the premises.

b. Records important for decommissioning as described in 30.35(g), 40.36(f) and 70.25(g). Examples of such records include but are not limited to: records of contamination, identifying the radionuclides, quantities and concentrations; as-built drawings and modifications of structures and equipment in restricted areas and locations of inaccessible contaminations such as buried pipes; a single list, updated at least every 2 years, of areas to which access is limited for the purpose of radiation protection (restricted areas); and records related to the provision of financial assurance.

Records of the decommissioning report are provided in Attachment 3. No radioactive contamination remains at 322 East Main Street, Branford, CT 06405.

4) In support of an environmental assessment related for the release of your facility:

a) Describe the type of building use such as "general office and laboratory"

Building: mixed general office and laboratory

- b) Describe the surrounding area, such as "residential", "industrial", "commercial", "mixed residential/commercial", etc. Surrounding area: mixed residential/commercial
- c) Describe the general type of activities authorized on the license such as "laboratory procedures typically performed on bench tops and in hoods".

Activities authorized: laboratory procedures preformed on bench tops, hoods and incubators such as tritiated thymidine uptake.

No licensed radioactive material or source equipment remains at the licensed facility.

If you have any questions or require any additional information, please contact me at (203)871-4288.

Sincerely,

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William La Chille

William LaRochelle, Ph.D. Acting Radiation Safety Officer Director of Oncology

Enclosures

Attachment 1 - Shipping manifest, disposal record and receipt of materials Attachment 2 - ALL Sciences receipt of radioactive source containing equipment Attachment 3 - Decommissioning Report

#1									Ĺ	LURAGEN	
FORM 540 UNIFORM LOW-LE		AC RESEARCH CORP. E	CURAGEN 322 EAST N	R NAME AND FACILITY CORP. MAIN STREET D, CT 06405		SHIPPER I.D. NUMBER NA COLLECTOR PROCESSOR	7. FORM 540 AND 540A FORM 541 AND 541A FORM 542 AND 542A ADDITIONAL INFORM	ATION	OF 1 PAGE(S) 1 PAGE(S) None PAGE(S) None PAGE(S)	8. MANIFEST NUMBEI (Use this number on pages) 77234-R	
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FOR CONSIGNEE USE ONLY				20.							
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US ECOLOGY PERMIT NO					<u></u>						

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FORM 541 (10-56)

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RWSD No.

RADIAC RESEARCH CORP.

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261 KENT AVENUE **BROOKLYN, NEW YORK 11211** 718 - 963-2233 FAX 718 - 388-5107

No.

DATE BLDG, NO. ROOM NO. DEPT. NO.

RADIOACTIVE WASTE DISPOSAL RECORD

COMPANY/INSTIT	UTION (11P	AGEN	

	С	ONTAINERS	NUMBER	· · ·		TYPE	P/U	DEL
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	·····					30 Gallon Dry		
						30 Gallon A/P		
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• • • • • •	•					55 Gallon Dry		
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I hereby certi	fy that the abov	e listed radioacti	ve wastes are pr	operly describ	ed, packaged	De Reg LSV		
marked and la Terms and Co	abeled, in accord	lance with D.O.T	. Regulations a	nd RADIAC'S	General 1	Cases 1 Gallon		
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CUSTOMER R	1	· · · · · · · · · · · · · · · · · · ·	<u></u>	EMAUNU	- muo-	55 Gallon Liners		
ISOTOPE	ACTIVITY	ISOTOPE	ACTIVITY	-		Security Seals	1	
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	1	1	L			Miscellaneous		
ID #	Site #	Expiratio	n Date	Instru	ment			
		COPY - OFFICE	CANARY - CUS	TOMER PI	NK - BILLING	YELLOW - DUPLICATE		

8/22/2007

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A.L.L. Sciences

39 Meadowridge Dr. Shelton, CT. 06484

To Whom It May Concern,

ALL Sciences has taken physical possession of the following items. They are no longer located at 322 East Main Street in Branford, CT.

Wallac Trilux Scintillation Counter - SN # 4502 308
 Faxitron - SN# 2318A00264

These units will be resold and the proper authorities will be notified as to their respective locations.

Sincerely, Leif Tregger Jr. A.L.L Sciences (203) 623-2999

peal Date: 8/22/07 Х

RADIOLOGICAL ASSESSMENT REPORT

CuraGen Corportaiton 322 East Main Street Branford, CT 06405

July 16, 2007

Performed by Radcor, LLC 345 Laurelwood Drive Salem, CT 06420 (860) 887-1538

EXECUTIVE SUMMARY

On July 2 and July 3, 2007, a radiological assessment for the purpose of decommissioning was performed of the CuraGen Corporation facility located at 322 East Main Street, Branford, Connecticut. This assessment was conducted by Radcor, LLC of Salem, Connecticut.

After performing a radiological assessment and decontamination of the use and storage areas designated by the licensee, it is the opinion of Radcor, LLC that the areas assessed do not present any significant radiological hazard to facility personnel, the public, or the environment, and that these areas may be released for unrestricted use.

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SCOPE

Radcor, LLC of Salem, Connecticut was contracted to perform a radiological assessment of selected areas of the CuraGen Corporation (hereinafter referred to as CuraGen) facility located at 322 East Main Street, Branford, Connecticut. This facility is licensed by the Nuclear Regulatory Commission (NRC) for the possession and use of radioactive materials for research and development under license No. 06-30667-02.

FACILITY DESCRIPTION

The facility at 322 East Main Street consists of a 52,000 square foot, steel-framed, brick, threestory medical research facility located on approximately 3.5 acres. CuraGen leases all but 400 square feet of this facility. Licensed material use and storage was limited to three (3) adjacent rooms of the facility, with a total area of approximately 300 square feet.

CuraGen had ceased working with licensed material prior to the assessment. Radioactive material had been removed from the facility for disposal by Radiac Research Corporation of Brooklyn, New York.

Since it is the intent of CuraGen to terminate their NRC license, the areas where licensed radioactive material had been used and/or stored were to be surveyed in order to allow the facility to be released for unrestricted use. Floor plans of the facility are provided in Appendix A to this report.

Site Conditions at Time of Final Survey

The areas that were assessed had been vacated prior to the radiological assessment.

Identity of Potential Contaminants

CuraGen is licensed for the possession and use of hydrogen-3, carbon-14, phosphorus-32, phosphorus-33, and sulpher-35. According to facility personnel, only H-3 and C-14 had been used at the facility. This work was limited to designated areas of the facility.

The last reported use of loose licensed material at the facility was in October of 2004.

RELEASE CRITERIA

The applicable release criteria were based upon Appendix Q of NUREG-1556, Vol. 7, "Consolidated Guidance about Materials Licenses: Program–Specific Guidance About Academic, Research and Development, and Other Licenses of Limited Scope." The criteria used are presented in Table 1 below.

	cceptable buildee con	tuninution Devens	
NUCLIDES	AVERAGE (dpm/100 cm ²)	MAXIMUM (dpm/100 cm ²)	REMOVABLE (dpm/100 cm ²)
H-3, C-14	5,000 βγ	15,000 βγ	1,000 βγ

1

Table 1. Acceptable Surface Contamination Levels

These chosen values will ensure that the annual total effective dose equivalent (TEDE) to any individual after the site is released for unrestricted use will not exceed 25 millirem above background, in accordance with 10 CFR 20.1402.

ASSESSMENT PERSONNEL

A professional health physicist, Mr. David J. Durkee, performed the radiological assessment. Mr. Durkee's resume is included as Appendix B to this report.

INSTRUMENTATION

Table 2 lists the instruments used in the performance of the surveys, along with other parameters and detection sensitivities for the instrumentation, and survey techniques. All instruments used had been calibrated using NIST-traceable standards. The calibration isotopes used for these instruments included H-3, C-14, and/or Cs-137. Minimum detectable activities were calculated in accordance with the Manual for Conducting Radiological Surveys in Support of License Termination, NUREG/CR-5849 and the Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM), NUREG-1575. These calculations are included as Appendix C.

Operational and background checks were performed at least once each day of instrument use.

Type of	Instrum	entation	Bkgd.*	2π [*] Eff &	Detection
Measurement	Detector	Meter		Cal Isotope	Sensitivity
Surface scans - β	Gas Prop. Det. Ludium model 43-68	Count-rate meter ^b Ludlum mod. 2241-2	260 cpm	7.1% C-14	4,577 dpm/100 cm ²
Integrated meas. of surfaces - β	Gas Prop. Det. Ludlum model 43-68	Count-rate meter ^b Ludlum mod. 2241-2	260 cpm	7.1% C-14	1,094 dpm/100 cm ²
Smears, β/γ	Packard 1600TR	(same as detector)	9 cpm 8 cpm 20 cpm (wide)	40% H-3 75% C-14 75% (wide)	42 dpm/100 cm ² 21 dpm/100 cm ² 31 dpm/100 cm ²
Exposure rates	Scintillation	Bicron Microrem LE	3 – 6 µrem/h	NA	1 μrem/h

Table 2. Instrumentation for Radiological Surveys

*Nominal Values

^bMonitoring audible signal

^dInstrument on slow response, positioned until steady reading obtained

SURVEY PROCEDURES

Survey planning and procedures were based upon the Manual for Conducting Radiological Surveys in Support of License Termination, NUREG/CR-5849 and the Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM), NUREG-1575. Actual procedures are described below.

CuraGen Corporation

Area Classification

Areas in which licensed materials were used and/or stored, as determined by CuraGen personnel, were designated as Affected Areas for the purpose of this assessment. The rooms where licensed material were used/and stored were designated Area 311B. This area consisted of two (2) small laboratory areas and one (1) small radioactive waste storage closet.

All other areas were designated Unaffected Areas.

A facility floor plan clearly identifying the above referenced area has been included as Attachment A to this report.

Reference Grids

The Affected Areas were gridded at approximately 1-meter intervals, up to a height of 2 meters. Unaffected Areas were not gridded.

Dose-equivalent Measurements

A survey was performed within the designated areas for general area photon radiation levels. Photon dose-equivalent rates were measured at 1 m above the floor using the gamma scintillation instrument identified in Table 2. Recorded measurements in Affected Areas were spaced at approximately one measurement per 4 m^2 .

Surface Activity Measurements

Removable Contamination Measurements

In the Affected Areas, wipe samples for removable contamination were taken in each grid area (every 1 m^2 of lower surfaces and walls up to a height of 2 meters). Samples were also obtained from areas where activity would have been likely to collect (i.e., sink drain, horizontal surfaces, inside cabinets, etc.).

In Unaffected Areas, wipe samples were obtained just outside the Affected Area. Samples were not obtained from other Unaffected Areas.

Surface Scans for Total Contamination

Scanning is an initial evaluation technique performed by moving the detection device over a surface at a constant speed and at a fixed distance above the surface to identify areas having elevated radiation levels. Areas thus identified are followed up by integrated measurements.

Instrumentation used for scanning is listed in Table 2. Scanning speeds did not exceed 1 detector-width per second. Audible indicators were used to help identify locations having elevated (>1.25 times ambient) levels of direct radiation.

Scanning of surfaces to identify locations of residual surface and near-surface activity was performed according to the following schedule:

- <u>Affected Area Surfaces:</u> 100% of accessible lower surfaces (all floors, countertops, cabinets and walls up to 2 meters above the floor);

- <u>Unaffected Area Surfaces</u>: Spot check of lower surfaces just outside Affected Area.

Background Level Determinations

Background count rates were determined initially for the building interior by taking measurements in different unaffected locations near the Affected Areas.

Sample Analysis

Wipe samples for removable contamination were analyzed for beta/gamma activity using the Liquid Scintillation Counter (LSC) specified in Table 2. The wide channel was used so that any potential radioactive contamination would be identified.

Data Interpretation

Data conversions and evaluations were performed following guidance specified in NUREG/CR-5849. Measurement data were converted to units of dpm/100 cm² (surface activity) for comparison with guidelines. Average values for survey levels were determined and compared with established release criteria.

Records

A copy of the survey documentation is enclosed as Appendix D to this report.

SURVEY FINDINGS AND RESULTS

Background Levels

Background count rates for the instrumentation used are listed in Table 2.

Dose-equivalent Measurements

No areas in excess of normal background levels were identified at the facility.

Surface Activity Measurements

Removable Contamination Measurements

A total of 155 wipes samples were obtained and analyzed. Wipe samples did not identify any area of activity in excess of the minimum detectable activity.

Surface Scans and Integrated Measurements

Surface scans of the Affected Areas identified one (1) area to be in excess of normal background levels. An area of approximately 100 cm^2 on the floor in front of the bio-safety cabinet was found to be contaminated to a level of 14,225 dpm/100 cm² (C-14). This area was decontaminated to a level indistinguishable from normal background levels.

No areas in excess of normal background levels were identified in Unaffected Areas.

SUMMARY

On July 2 and July 3, 2007, a radiological assessment for the purpose of decommissioning was performed of the CuraGen Corporation facility located at 322 East Main Street, Branford, Connecticut. This assessment was conducted by Radcor, LLC of Salem, Connecticut.

After performing a radiological assessment and decontamination of the use and storage areas designated by the licensee, it is the opinion of Radcor, LLC that the areas assessed do not present any significant radiological hazard to facility personnel, the public, or the environment, and that these areas may be released for unrestricted use.

David J. Durkee Health Physicist, RRPT

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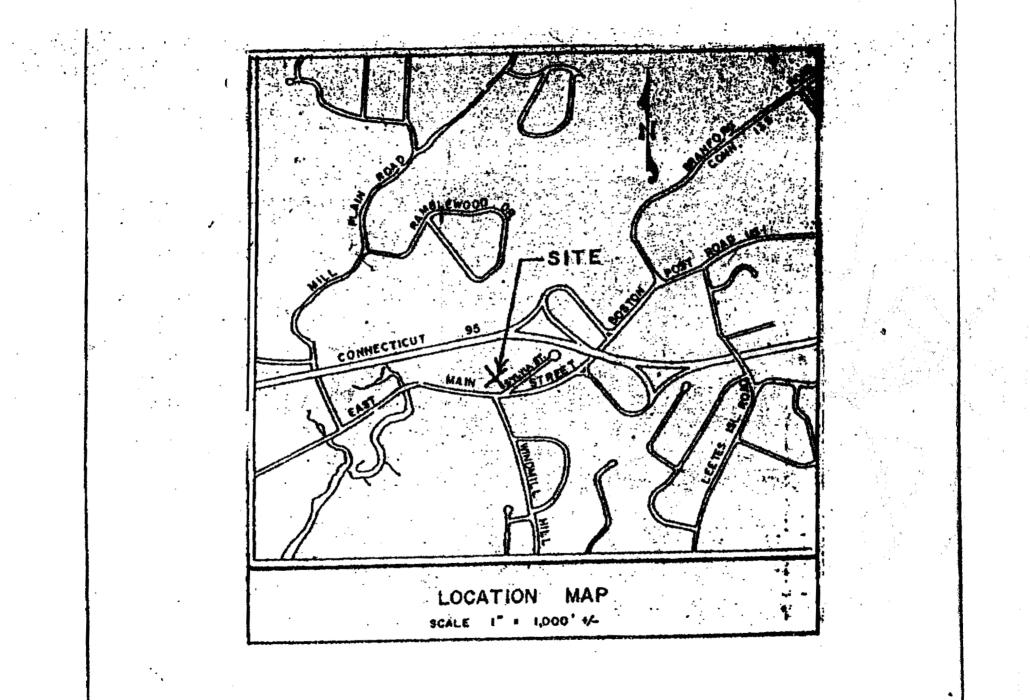
Appendix A

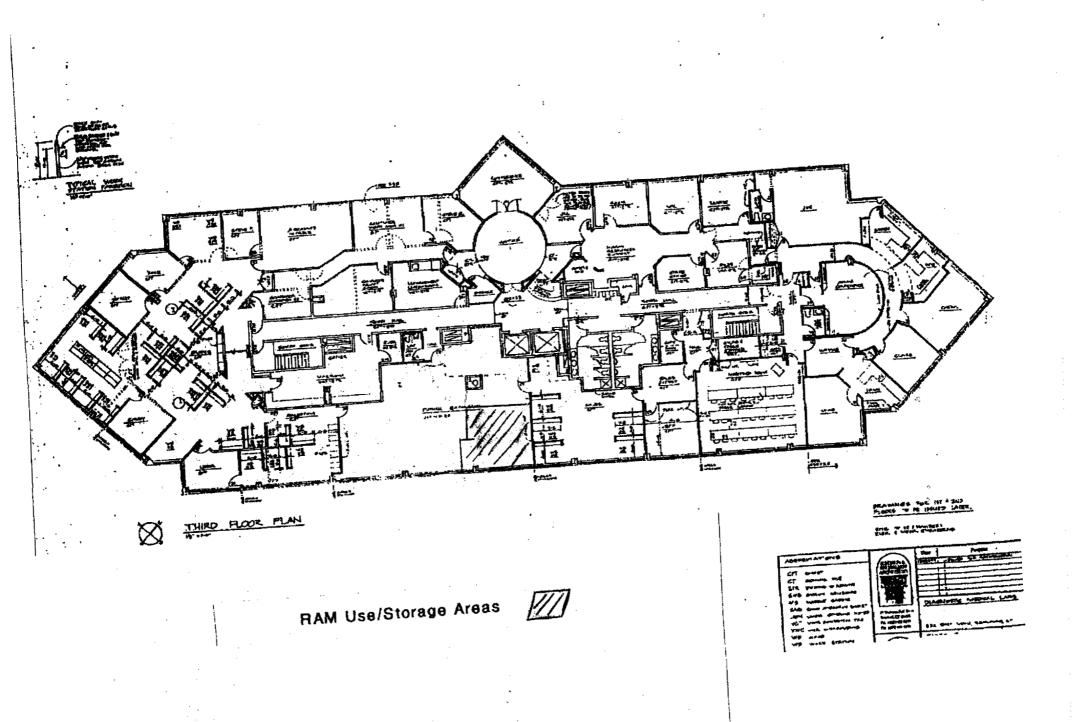
Floor Plans

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Appendix **B**

Resume

RADCOR, LLC

345 Laurelwood Drive Salem, CT 06420 (860) 887-1538

David J. Durkee

EDUCATION:

Regents College, NY. - B.S. Technology (Nuclear/Health Physics) University of Phoenix, AZ. - A.A. Nuclear Technology Health Physics Technician Level I Basic - Radiation Safety Associates, Inc. Health Physics Technician Level II - Radiation Safety Associates, Inc. Respiratory Protection at Nuclear Facilities - Radiation Safety Associates, Inc. Environmental Monitoring for Radioactivity - Oak Ridge Associated Universities. Liquid Scintillation and Gamma Spectrum Analysis - Rutgers University Health Physics Audits - Radiation Safety Associates, Inc.

<u>Navy</u>

Naval Nuclear Power School (24 wks) Nuclear Prototype Training Unit (26 wks) Engineering Laboratory Technician School Machinist Mate "A" School Diesel Operator/Maint. School Scuba Diver School Advanced Auxiliary Package Course Quality Assurance Inspector School

EXPERIENCE:

December 1996 to Present

Radcor, LLC, Salem, Connecticut

Health Physicist/Owner. Responsible for providing radiological consulting services to general industry, academic institutions, and companies involved in research and development. These services include: development and presentation of professional training; performance of program audits; performance of radiological surveys, decontamination and decommissioning; development of license applications, amendments and safety procedures; radiation protection program oversite; and, regulatory compliance. Served as the Radiation Safety Officer for ExxonMobil Research and Eng. Co., Paulsboro, New Jersey.

March 1994 to December 1996

Radiation Safety Associates, Inc., Hebron Connecticut

Vice President-Technical Services. Responsible for the preparation of job proposals and operating budgets; making technical and manpower recommendations; supervising workers at job sites; performing technical evaluations as required; writing, editing, and developing course materials, working procedures and technical articles; and, performed duties as a health physicist.

Responsible for oversite of various site decontamination/decommissioning projects. These involved: the development of decommissioning plans; hiring and oversite of workers; hands-on performance of radiological surveys and site decontamination efforts; and the development and submittal of final reports.

Instructor for the following professional training courses: Fundamentals of Radiological Protection; Health Physics Technician Level I and II; Radiation Safety Officer; Radiation Safety Officer Refresher; and, Basic Radiation Worker.

Assistant Editor of *Radiation Protection Management*, the Journal of Applied Health Physics. Assistant RSO and Quality Control Officer for a radioanalytical laboratory.

October 1991 to March 1994

Radiation Safety Associates, Inc., Hebron, Connecticut

Health Physicist. Responsible for providing consulting services to the nuclear industry; general industry; local, state, and federal governments; and academic institutions. These services included performing audits, radiological surveys, instrument calibrations, site decontamination services, writing license applications and amendments, maintaining radiological safety programs, providing technical advice and performing training.

September 1983 to October 1991

United States Navy, Submarine Qualified. Served on-board two nuclear-powered submarines. Qualified as Leading Engineering Laboratory Technician, Engineroom Supervisor, Quality Assurance Inspector, Duty Section Leading Mechanic and Ship's Diver.

Supervised and performed chemistry and radiological controls on reactor plant primary and secondary systems. Sampled primary coolant and secondary water chemistry and analyzed results to detect abnormal trends and out of specification conditions. Established and certified radiologically controlled areas, conducted radiation and contamination surveys, evaluated man-rem exposure and processed radioactive waste. Calibrated and operated radiation detectors and chemistry analytical equipment.

Directed the day-to-day efforts of five junior Laboratory Technicians. Awarded a Navy Achievement Medal for being "the driving force behind a dramatic turnaround in the professionalism of the (Reactor Laboratory) division." Instituted a training program that significantly upgraded the level of knowledge of the division.

Drafted detailed work procedures and quality assurance work packages for nuclear and non-nuclear maintenance efforts. Performed in-process inspections to verify that materials and procedures met required specifications.

PROFESSIONAL ACTIVITIES:

Registered Radiation Protection Technologist (NRRPT) Plenary Member, Health Physics Society

PUBLICATIONS

"NRC License Application, Renewal, or Amendment for Byproduct Material" RSO Magazine, 1:6: pp. 25-30; Nov/Dec, 1996.

"Personal Whole-Body Dosimetry" RSO Magazine, 1:4: pp. 26-28; Jul/Aug, 1996.

"Prenatal Radiation Exposure," RSO Magazine, 1:2: pp. 12-13; Mar/Apr, 1996.

"Loose Contamination Survey Methods," RSO Magazine, 1:1: pp. 19-20; Jan/Feb, 1996.

Steinmeyer, K. Paul, David J. Durkee and Paul R. Steinmeyer. *Mathematics Review for Health Physics Technicians*. Hebron, CT: RSA Publications, 1994. (393 pages).

Appendix C

Minimum Detectable Activity Calculations and Calibration Information

The equations used for determining the MDAs are as follows:

Variables:MDA = Minimum Detectable Activity in dpm/100 cm2 R_b = Background count rate in cpm $t = Counting time when t_b = t_s$ τ = Detector time constant in minutesE = Detector efficiency in cpm/dpmA = Active detector area in cm2X = Multiple of background audibly discernable to tech. as increase

MDA for surface scans using Ludlum Model 43-68:

 $MDA = (X)(R_b) \div (E)(A/100)$

 $MDA = (1.25)(260 \text{ cpm}) \div (0.071)(100/100) = 4,577 \text{ dpm}/100 \text{ cm}^2$

MDA for integrated measurement using Ludlum Model 43-68:

 $MDA = [2.71 + 4.65\sqrt{(R_b)(t)}] \div (t)(E)(A/100)$

 $MDA = [2.71 + 4.65\sqrt{(260 \text{ cpm})(1 \text{ min.})]} \div (1 \text{ min.})(0.071)(100/100) = 1,094 \text{ dpm}/100 \text{ cm}^2$

MDA for counting 100 cm² wipe samples on LSC:

MDA = $[2.71 + 4.65\sqrt{(R_{b})(t)}] \div (t)(E)$

MDA (For H-3) = $[2.71 + 4.65\sqrt{(9 \text{ cpm})(1 \text{ min.})}] \div (1 \text{ min.})(0.4) = 42 \text{ dpm}/100 \text{ cm}^2$

MDA (For C-14) = $[2.71 + 4.65\sqrt{(8 \text{ cpm})(1 \text{ min.})}] \div (1 \text{ min.})(0.75) = 21 \text{ dpm}/100 \text{ cm}^2$

MDA (Wide) = $[2.71 + 4.65\sqrt{(20 \text{ cpm})(1 \text{ min.})}] \div (1 \text{ min.})(0.75) = 31 \text{ dpm}/100 \text{ cm}^2$

Instrument Calibration Information

Bicron MicroRem. Calibrated by RSCS (CTI) of Stratham, NH on 1/2/07.

Ludium Model 2241-2 with 43-68. Calibrated by RSCS (CTI) of Stratham, NH on 9/13/06.

Packard 1600TR. Calibrated using manufacturer's standards on 1/8/07.



Calibration Certificate ID Number: B466Y9319-0

Customer: David J Durkee Radcor, LLC. 345 Laurelwood Drive Salem, CT 06420Instrument Bicron Model MicroRem Serial Number B466Y

Test 1 Test 2 Test 3 Mean	Results
4.00 mrem/hr 4.00 mrem/hr 4.00 mrem/hr	Satisfactory

Range	Target Value	As Found	As Left
X1000	160 mrem/hr	150 mrem/hr	150 mrem/hr
X1000	40 mrem/hr	40 mrem/hr	40 mrem/hr
X100	16 mrem/hr	15 mrem/hr	15 mrem/hr
X100	4 mrem/hr	4 mrem/hr	4 mrem/hr
X10	1.6 mrem/hr	1.6 mrem/hr	1.6 mrem/hr
X10	0.4 mrem/hr	0.4 mrem/hr	0.40 mrem/hr
X1	160 µrem/hr	150 µrem/hr	150 µrem/hr
X1	40 µrem/hr	40 µrem/hr #	40 µrem/hr #
X0.1	16 µrem/hr	15 µrem/hr #	16.5 µrem/hr #
X0.1	4 µrem/hr	3 µrem/hr # *	4 urem/hr #

Readings with * indicate ranges where As-Found readings are >20% of Target value. Readings with ** indicate As-left readings are >10% of Target value Readings with # indicate ranges where pulser was used.

MTE Instrument Typ		Model	CalDueDate
Pulser	Ludi	um 500-4 SN: 66151	01/03/2007
Outer Physical Check: <i>Pass</i> Internal Check: <i>Pass</i> Geotropism Check: <i>Pass</i>	Mechanical Zero: <i>Pass</i> Tap Test: <i>Pass</i>		

Calibrated by:

Chil MG Review:

Calibration Date: 01/02/2007 Expires: 01/02/2008

Atmospheric Conditions - Temperature: 76°F Humidity: 25% Barometric Pressure: 29.73°hg This calibration was performed by RSCS Inc. using a NIST Traceable radiation source, in conformance to the following standards: ANSI N323A (1997). RSCS New Hampshire Radioactive Material License Number: 381R. RSCS calibration services are performed in accordance with the RSCS Radiation Protection Program Manual and Standard Operating Procedure 2.4. This calibration certificate shall not be reproduced except in full without the express written consent of RSCS, inc

5		7			Certificate : 1377517289-0		
C	Radco 345 La	J Durkee or, LLC. nurelwood , CT 0642	Drive	Luc	t rument dium Model 2241- r <u>obe Model</u>	2	Serial Number 137751 Serial Number
				Lu Precision C	idlum 43-68		140899
	Test 1		Test 2	Test 3	M	ean	Results
Ľ	15.90 Kcpm		16.00 Kcpm	15.90 Kcpm		Kcpm	Satisfactory
1		- et al an all an all all	New York Concerns of the States of the State				
	Range	<u> </u>	Target Value	Accuracy C		1	As Left
	X100		640 Kcpm		cpm #		644 Kcpm #
	X100		160 Kcpm		cpm #		165 Kcpm #
	X10 X10		64 Kcpm	64 Ko			64 Kcpm #
·	X10		16 Kcpm 6.4 Kcpm		(cpm #		15.9 Kcpm # 6.42 Kcpm #
	X1		1.6 Kcpm		cpm #		1.6 Kcpm #
Rei	adings with # indicate ran	iges where p	pulser was used.	re >20% of Target value, R			
	Probe Model & SN 43-68 140899 43-68 140899 MTE Instru	iges where j	pulser was used. Isotope C-14 Cl-36	Efficiency 0.0707 C/D 0.1788 C/D	NIST C-14 (S	Source ID SN: 488-10-9) (SN: 8933)	Geometr On Flat Surface On Flat Surface CaliDueDate
	Probe Model & SN 43-68 140899 43-68 140899 MTE Instru	iges where j	pulser was used. Isotope C-14 Cl-36	Efficiency 0.0707 C/D 0.1788 C/D	NIST C-14 (S CI-36	Source 1D SN: 488-10-9)	Geometr On Flat Surface On Flat Surface
	Probe Model & SN 43-68 140899 43-68 140899 MTE Instru	iges where i ument Typ liser Pass Pass	pulser was used. Isotope C-14 CI-36 Pe Tap Te	Efficiency 0.0707 C/D 0.1788 C/D 	NIST C-14 (S Cl-36 vdel	Source 1D SN: 488-10-9) (SN: 8933)	Geometr On Flat Surface On Flat Surface CaliDueDate
	Probe Model & SN 43-68 140899 43-68 140899 MTE Instru Pu Outer Physical Check: Internal Check:	iges where i ument Typ liser Pass Pass	pulser was used. Isotope C-14 Cl-36 Tap Tr ing Det 2	Efficiency 0.0707 C/D 0.1788 C/D 	NIST C-14 (S CI-36 del 4 SN: 66151 Electronics Check	Source 10 SN: 488-10-9) (SN: 8933) S A 1	Geometr On Flat Surface On Flat Surface CalDueDate 01/03/2007 s Found As Left
	Probe Model & SN 43-68 140899 43-68 140899 MTE Instru Pu Outer Physical Check: Internal Check: Comments: Calibra	iges where i ument Typ liser Pass Pass	pulser was used. Isotope C-14 CI-36 Pe Tap To	Efficiency 0.0707 C/D 0.1788 C/D Mc Ludium 500 est: Pass	NIST C-14 (S CI-36 del 4 SN: 66151 Electronics Check	Source 10 SN: 488-10-9) (SN: 8933) S A 1	Geometry On Flat Surface On Flat Surface CalDueDate 01/03/2007 s Found As Left 662 Volts 1662 Volts bration Date: 09/13/200
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	Probe Model & SN 43-68 140899 43-68 140899 MTE Instru Pu Outer Physical Check: Internal Check: Comments: Calibra	iges where i ument Typ liser Pass Pass	pulser was used. Isotope C-14 Cl-36 Tap Tr ing Det 2	Efficiency 0.0707 C/D 0.1788 C/D Mc Ludium 500 est: Pass	NIST C-14 (S CI-36 del 4 SN: 66151 Electronics Check	Source 10 SN: 488-10-9) (SN: 8933) S A 1	Geometry On Flat Surface On Flat Surface CalDueDate 01/03/2007 s Found As Left 662 Volts 1662 Volts bration Date: 09/13/200
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Atmospheric Conditions - Temperature: 77*F Humidity: 36% Barometric Pressure: 25.70*hg This cellibration was performed by RSCS inc. using a NIST Traceable radiation source, in conformance to the following standards: ANSI N323A (1997). RSCS New Hampshire Radioactive Material License Number: 381R, RSCS cellibration services are performed in accordance with the RSCS Radiation Protection Program Manual and Standard Operating Procedure 2.4. This calibration certificate shall not be reproduced except in full without the express written consent of RSCS, Inc

Appendix D

Survey Documentation

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SURVEY FORM

lob Locatio	n: C	LAG	now coefol		RANFORD	a		Page: $1 \text{ of } 13$ Date: $7/2/07$			
Survey Purt	nose:	De	commission	ING SILB			5	Date. 1001			
Performed I	Ву:	<u> </u>	DNID	J.RK.25		Signature					
Inst. No. 1 (Pn	nt Inst. No. 2 (Model	/SN)	D Inst. No. 3 (Model/SN)					
PACKARD IN	acr. T	n.#	401915	Losum more	2241-2#1	37751		yrem LE # Byling			
Detector (M				Detector (Model/S	SN)			Model/SN)			
INTERI				Lusim 43-1	140 × 140	899	11.52%				
Efficiency:	40%	4-31	15% OTHINS	Efficiency: 7,	20 C-14		[10090			
Type Rad.:				Type Rad.:	?		Type Rad				
		_	korow	Bkgd.: 260	an			4-5 yringt			
Cal. Due:			-	11	113/07			1/2/08			
		1	~ <u>/0</u> ^		·			Comments			
Number	Tir	ne	1	Location	Inst. Used		l Activity v/100 cm ²)	Comments			
1	08	20	BACKORAN	á.	1		Zocpm				
2			CONTER		1	· ·	12				
3	† †		(ourter		- 1		20	•			
4			Courton		1		12				
5			Sink		1		0	<u> </u>			
6	1-1		SINK DR	Ain	1		0				
7			FAULOT		1		27	·			
. 8			UPPERW		1		1				
9			UPPER W		1		0				
10	-		UPPOR W		1		6				
11	+		UPON 1		1		0	<u> </u>			
12	1	1	UPPonw		1		0				
13	1-	1	BOTTOM !		1		5				
14		1		SHEEF	1		4				
15			SHEEF		1		3				
16		T	Siter		1		0				
17			10P SHEL		1		1				
18		1	709 SHEL		1		_0				
19	\top	1-		- CAGUET	1		13	· · · · · · · · · · · · · · · · · · ·			
20		T		- ABINET	1		0				

Page: 2 of 13 Date: 712/07

Number	Time	Location	Inst. Used	Total Activity (dpm/100 cm ²)	Comments
21	1	FRONT OF CABINET	1	0	· ·
22_		INSIDE TOP SHELF	1	0	
23		WSIDE BUTTOM SHOUF	1	7	
24		SIDE OF CABINET	1	0	
25		Lavor until	1	8	
26		LOWER WALL	1	5	
27		Floor	1	3	
28		HOOR	1	0	
29		Hoor	1	0	····
30		Floor	1	0	
31		Hoor	1	11	
32		floor	1	11	
33		floon	1	0	
34		Fron	I	1	
35		Acor.	1	5	
36		HOOR	1	0	
37		Hook	1	5	
38		Aloca_	1	0	
39		Mon whi	1	0	
40		Inuna wal	1	9	
41		Ullon wall	1	9	
42		Lowor world	1	0	
43		UPAOR way 1	1	0	
44		LOWER WAN	1	0	
45		UXPOR WAN/	1	7	
46		Lower work	1	3	<u> </u>
41		UPPOR WALL	1	9	
48		Lower wall	1	0	

¥.

Page: <u>3</u> of <u>13</u> Date: <u>7/2/07</u>

Number	Time	Location	Inst. Used	Total Activity (dpm/100 cm ²)	Comments
49		UPASA WAI	1	3	
		LOWER WAL	1	O	
57		UPAER WANI	1	5	
52		LOWER WAI	1	0	· · · · · · · · · · · · · · · · · · ·
53		UPPOR Doors	1	0	
54		Lawon Door	1	15	
55		Hour	1	3	
50		MOOR	1	5	
57		BID SAFETY CARSHUT (AS) TOP Frus	1		
58		BSC SHISH OUT	1	5	<u> </u>
53		BSC OJBIDE RIGHT SIDE	1	0	
60		BSC ONTSIDE LEFT SIDE	1		
61		BSC OUBIDE SIDES/BJ FRUT	1	4	
62		BSC CONTOR	1	0	
63		BSC LOFT SIDE	1	0	
64		BSC TOP	1	0	
65		BSC BACK	1	7	
66		BSC RIGHT SIDE	1	4	
67		BSC INSIDE SASH	1	0	
68		NONT HOSE	1	4	
69		CanJon	1	4	
70		Courter.	1	7	
71		(outell	1	11	
72		UPPER WAN	1		
73		UPPOR UMI	1	0	
24		SIDE OF CABINIT	i	7	
25		LOWER WALL	1	0	
76	V	UpperRushi	1	0	

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Page: <u>4</u> of <u>13</u> Date: <u>7/2/07</u>

Number	Time	Location	Inst. Used	Total Activity (dpm/100 cm ²)	Comments
77		FRONT OF DEAMORS	1	0	
78		TOP DEAMOR	1	0	
79		Dermin	1	0	
80		DRAWA	1	0	·
8		BOTTOM DUAWOR	1	//	
82		SIDE OF CABINET	1	0	
83		Lawer war)	1		
84		Lower with	1	<u> </u>	
85		Lowon war	1	9	· · · · · · · · · · · · · · · · · · ·
86		UPPore wall	1	D	
87		UPPOR WANI	1	5	
88		Utlon whil	1	8	
89		Lower wall	1	5	
90		Lower want	1	0	· · ·
91		FRINK OF DRANDAS	1	13	
92		TOP DRAWER	1	3	
93		DRAWOR	1	15	
9y		BOTTEM DEMUST	1	12	· · · · · · · · · · · · · · · · · · ·
95		SIDE OF CASINGT	1	0	·
96		SIDE OF GABINEDS	1	<u> </u>	
97		FRINT OF CABINT	1	7	
98		USING CABINET TOP SHORF	1	0	
99		INSIDE CABINUT BOT. SHILE	1 1	3	
100		UPPOR FRONT HOOD	1	0	
101		SINOS (news Itas)	1	8	
102		AJBIAE SASH	1	1	
103		HOOD LIP	1	5	· · · · · · · · · · · · · · · · · · ·
104			1	9	

Page: <u>5</u> of <u>13</u> Date: <u>7/2/07</u>

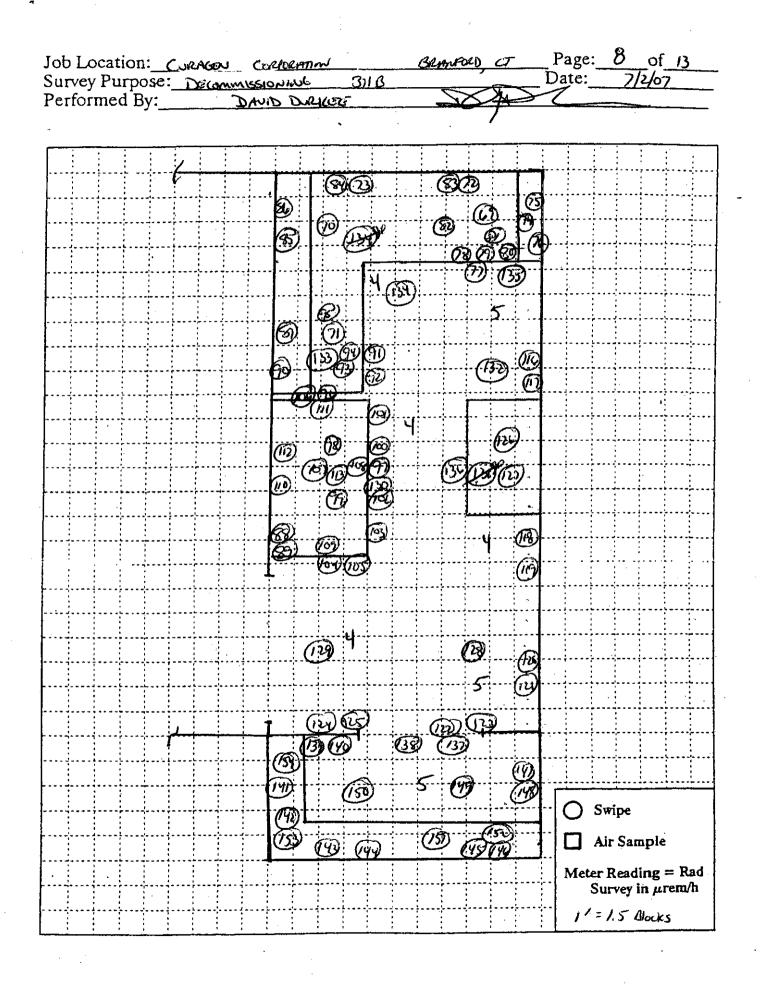
Number	Time	Location	Inst. Used	Total Activity (dpm/100 cm ²)	Comments
105		SIDE OF CABLET	1	4	
106		OUTSIDE MODS RIGHT SIDE	1	0	
107		HOOD CONTOR	1	3	
108		INSIDE SASH	1	3	
109		LEFT SIDE (IN)	1	0	
110		BACK (IN)	1	4	
111		RIGHT SIDE (IN)	1	4	
112		HOOD Flow PATH	1	0	
113		HOD DUCT	1	D	
114		BOTTOM SITEZF	1	5	
115		TOP SHEAF	1	8	
)/6		UPORLANI	1	5	
117		Lown man	1	0	
118		WPOR wANI	1	0	
117		LOWER MAN	1	0	
120		UPPOR WMI	1	//	
121		LOUDR WAN	1	8	
122		UPPOR DOOR	1	1	
123		Louve Dave	1	0	
124		ulper way	1	0	
125		LOWER WATI	1	1	
126		MAGLE TOP	1	0	
127		SHOF DIBLE	1	0	
128		Moon	1	1	
129		Moon	1	9	
130		Floor	1	4	
131		FROR	1	· · · · · · · · · · · · · · · · · · ·	
132	\mathbf{V}	flor	1	0	

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Page: 6 of 13Date: 7/2/07

Number	Time	Location	Inst. Used	Total Activity (dpm/100 cm ²)	Comments
133		Moon	1	0	
134		Masn	1	4	
135		Place	1	4	
136		Plan	1	5	· · · · · · · · · · · · · · · · · · ·
[137		uppon Dave	1		
138		Lowon Doon	1	7	
139		Uppon wall	1	6	
140		Course want	1	0	
141		offor wan	1	0	·····
142		LOWER WAIL	1	0	
143		UP POTE WANI	1	5	
144		Lowen wal	1	7	
145		UPPOR WANI	1	1	
146		Lowon anal	1	0	
147		UNPOR WAN	1	5	
148		LOWER WAR	1.	5	
149		MOOR	1	3	
150		Moor	1	0	· · · · · · · · · · · · · · · · · · ·
157		Bottom Straf	1	0	
152		TOLUHELF	1	3	
153		TO SHELF	I	1	· · · · · · · · · · · · · · · · · · ·
67		BOTTOMSHALF	1	0	
13/07 155	1000		1	4	
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19 1.00 17 5.00 30.00 33.05 6.99 40.563 519.
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26 1.00 11 5.00 24.00 20.29 7.08 66.607 507.
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49	1.00	11	CPMB 3.00	CPMC 22.00	DPM1 21.59	DPM2		tSIE FLAG
50	1.00	12	4,00	18.00	22.85	4.20	40.813	
51	1.00	11	7.00	24.00	18.87	5.56	35.912	527.
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54	1.00	19	8.00	31.00	35,07	11,15	45.151	470. 525.
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58	1.00	10	9.00			12.83	70,704	
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61	1.00	9	8.00	23.00	13.68	11.31	51.077	
62	1.00	10 17	8.00	20.00	15.97	11.89	82.836	
63	1.00	13	0.00	19.00	26.95	0.00	16.544	
64	1.00	## ~ ·	11.00	16.00	2.78	15.58	101.42	
65	1.00	11	9.00	25.00	17.31	12.78	70.861	505.
66	1.00	7	9.00	23.00	8.53	12,84	112.85	
67	1 . OO	9	4.00	18.00	16.54	5.61	40,989	
68	1.00	1.6	4.00	23.00	39.28	6.98		344.
69	1.00	9	7.00	23.00	14,49	10.09	75.937	
70	1.00	9	11.00	25,00	11.14	16.06	59.465	
71	1.00	1.5	11.00	58 °00	24.87	16.35	79.756	
72	1.00	6	9.00	21.00	6.27	12.90	116.31	
73	1.00	12	3 " OO	17.00	23,43	4.14	44.084	
74	1.00	1.5	8.00	25.00	26.55	11.19	70,760	
75	1.00	9	7.00	19.00	14.55	10.39	81.052	
76	1.00	7	6.00	16.00	10.83	8,76	63.397	
77	1.00	10	4,00	18,00	18.82	5.65	64.888	509,
78	1.00	11	4.00	17.00	21.00	5.65	38.520	508.
79	1.00	6	4.00	19.00	10.06	5.60	30.816	523.
80	1.00	10	6.00	17.00	17.34	8.49	51,260	509.
81	1.00	12	10.00	<u>58°00</u>	18.74	14.16	88.348	509.
82	1.00	13	4.00	20.00	25.07	5.57	40.691	523.
83	1.00	7	6.00	21.00	10.83	8.67	60.990	484.
84	1.00	7	6.00	17.00	10.82	8.80	67.657	469.
85	1.00	6	11.00	27.00	4,90	15.63	101,40	506.
86	1.00	6	6.00	19,00	8.63	8.52	150.07	506.
87	1.00	9	8.00	24,00	13.65	11.84	56.269	460.
88	1.00	1.6	4.00	26.00	31.73	5.60	42.211	
89	1.00	1.2	10.00	24.00	18.77	14.30	84.683	
90	1 . OO	12	4.00	18.00	23.11	5.63	37.417	
91	1.00	Ģ	13.00	30.00	9.92	18,50	86.816	
92	1.00	12	7.00	22.00	20,85	9.82	126,80	
93	1.00	16	8.00	31.00	28.75	11.21	49.554	
94	1.00	17	2.00	29.00	35.39	2.77	21.372	
95	1.00	10	4,00	19.00	18,59	5.57	36.227	
96	1.00	8	8.00	21.00	11.54	11.19	55.373	
97	1.00	8	14,00	25.00	7.05	19.88	83,168	
<u>98</u>	1.00	7	8.00	17.00	9.36	11,28	103,56	
99	1,00	9	5.00	22.00	16.02	7.15	28.087	
100	1,00	7	8.00	17.00	9,40	11.18	81.213	
101	1,00	1 i	11.00	26.00	15.83	15,54	102,79	
102	1,00	11	6.00	21.00	19.71	8,61	54.192	
103	1.00		9.00	24.00	12.80	13.21	91.93	
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108	1.00	14	5.00	22.00	28.40	7.53	41.284 443.
108	1.00	8 3	10.00	22.00	10.11	14.04	125.64 521.
10^{-1}	1.00	5 12	8.00	18.00	0.41	11.47	104.03 495.
	1.00		9.00	23.00	19.48	12.73	48.838 509. E4 897 Et0
111 112	$1.00 \\ 1.00$	10 5	8.00	23.00	15,86 7.96	11.32	54.927 510. 74.722 420.
113	1,00		4.00 5.00	$11.00 \\ 19.00$		6.19	
114			7.00	24.00	$11.80 \\ 21.09$	7.99 10.00	
115	1.00		9.00	24.00			
116	1.00		7.00	24.00	26.03 14,50	12.75 10.11	
117	1.00		-5,00	15.00		7.24	
118			7.00	19,00	12.22	10.42	
119	1.00			19.00			
120	1.00		00.8			8,40	
121			11.00 7.00	28.00	15.14	16.99	
122	1.00			26.00		10.00	
123	1,00		9.00			12.78	
124	1,00		4.00 3.00			5.67	
125	1.00			17.00		4.24	
	1.00	6				15.84	
126	1.00		7.00			9.93	
127	1.00		5.00	19.00		6.99	
128	1.00		7,00	21.00	24.05	10.53	
129	1.00	12	10.00	27.00	18.80	14.83	
130	1.00	10	6.00	23.00		9.22	
131	1.00	8 9	7.00	21.00	12.19	10.53	
132 133	1.00	, 1 1	5.00 3.00	20.00		7.28	
134	1.00 1.00	14		20.00 23.00		4.48	
135	1.00		7.00	23.00	26.12	10.34	
136	1.00	11 13	7.00	24.00	19.55 23.57	11.01	
137	1.00	11	6.00 9.00	24.00 25.00	17.27	8.34	
138	1.00	17	5.00	25.00		12.62 6.90	
139	1.00		4.00	11.00	3.52	5.73	52,506 495.
140	1.00		4.00	20.00	2.93	11.24	84.664 521.
141		-					98.399 512.
142	1.00 1.00	8	5.00 6.00	17.00 19.00	13.70	7.05	54.035 520.
143	1.00	t O	10,00	24.00	15.10	8.42	116.36 493.
144	1.00	16	7.00	25.00	14.34 29.74	14.35 9.92	85.357 505.
145	1.00	12	6.00	21.00	27.74		49,666 500.
146	1.00	12	6.00	20.00	21.62	8.54 8.43	51,806 517.
							30,073 505,
$\frac{147}{148}$	1.00 1.00	15 13	4.00 8.00	24.00 24.00	29.81 22.77	5.65 11.67	37,909 474.
149							73,408 469.
	1.00	13	6.00	22.00	24.56	8.79	
150	1.00	75	2.00	19.00	13.78	2,82	72,582 507. 40 880 484
151	1.00		9.00 15.00	18.00	4.04	12.92	60,990 494, 04 147 1 00
152	1.00	6	15.00	22.00	1.50	21.57	96.147 4 92. 101 10 510
153	1.00	6 1 1		21.00	4,99	15.56	101.12 512.
154	1.00	11	7.00	20.00	18.59	9.72	67.767 533.

pge 12 8 13

SYSTEM NORMALIZED C14 IPA DATA PROCESSED ~ 03-Jul-2007 08:29 C14 Eff (0-156 keV) = 95.81 %

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Ε

Frotocol #:10 Name:swipe Region A: LL-UL= 0.0-12.0 Lcr= Region B: LL-UL=12.0-156. Lcr= Region C: LL-UL= 0.0-2000 Lcr= 03-Jul-2007 11:05 0 Bkg= 0.00 %2 Sigma=0.50 %2 Sigma=0.00 %2 Sigma=0.00 0 Bkg= 0.00 0 Bkg= 0.00 Time = 1.00 QIP = tSIE ES Terminator = Count Conventional DPM Nuclide 1 = 289524Nuclide 2 = 129197S# TIME CPMA CPMC CPMB DPM1 DPM2 SIS tSIE FLAG 1.00 23.00 4 10.00 4.08 90.453 915. 155 Jag 11.81

i