



December 27, 2007

License No. 06-00217-06
Docket No. 030-03754

L-3

Ms. Laurie Kauffman
U.S. Nuclear Regulatory Commission, Region I
475 Allentown Road
King of Prussia, PA 19406-1415

Subject: **Partial Site Release**

Reference: Letter, J. F. Conant (ABB) to L. Kauffman (NRC), dated September 13, 2007

Dear Ms. Kauffman:

ABB Inc. (ABB) would like to revise a request made in its recent Final Status Survey Report submission (Reference). The original request was to terminate ABB's license for all portions of the CE Windsor Site (Site) except the previously designated FUSRAP areas. Recent discussions with the NRC have indicated that there are concerns regarding this request, since it would eliminate buffer zones around areas identified for remediation. This revision changes the delineation of area for license termination in order to add appropriate buffer zones and address additional questions regarding the potential for cross-contamination between remediation zones and "clean" areas.

ABB is requesting release of approximately 365 acres of the 613-acre Site. Attachment 1 contains ABB's revised request and justification for this partial site release, which includes a modified figure delineating the Site areas to be released. This request also includes details regarding administrative, physical, and radiological controls to prevent cross-contamination from areas of remediation activities to portions of the Site designated for license termination.

ABB requests that the NRC perform confirmatory surveys at the earliest possible time in order to facilitate the beginning of redevelopment activities. ABB plans to begin redevelopment field activities at the CE Windsor Site as early as April 2008.

If there are any questions or comments regarding this matter, please contact me at (860) 285-5002, or by E-mail at john.conant@us.abb.com.

Sincerely,

ABB INC.

John F. Conant
Senior Project Manager

2007 DEC 31 PM 12: 20

RECEIVED
REGION 1

Enclosure

xc: Peter Souza (Windsor Town Manager)
Charles Petrillo (Town of Windsor)
James Schmidt (NRC Region I)
Edward Wilds (CTDEP)

FULL COST RECOVERY ACTION

TAC NO. U01669

ABB Inc.

141519

NMSS/RGN1 MATERIALS-002

Attachment 1
Request for Partial Site Release

Request for Partial Site Release at the CE Windsor Site

The CE Windsor Site has been under active decommissioning since 2001. A majority of the property is clear and prepared for release from Nuclear Regulatory Commission (NRC) licensure. Currently, the entire property is listed as the location of use on the license. ABB requests that the NRC release a portion of the property from the license for unrestricted use and redevelopment.

The CE Windsor Site (Site) is located at 2000 Day Hill Road, Windsor, in Hartford Country, Connecticut. The Site encompasses approximately 613 acres. ABB is requesting the release of 365 acres of the Site from licensure for unrestricted use. The remaining 248 acres will remain under NRC jurisdiction for completion of decommissioning and eventual license termination for unrestricted use. Figure 1 provides the Partial Site Release (PSR) boundary with coordinates of the corners. The legal description of the Site boundary is on record with the Town Clerk's office. The approved Decommissioning Plan (DP) includes site specific derived concentration guideline levels (DCGLs) that are designed for the entire property. Therefore there are no potential issues related to potential dose and license termination from a partial site release.

The 248 acre parcel (referred to as the "controlled area") is contained within the PSR boundary. This area includes the central portion of the Site and will remain under NRC licensure. Access to this portion of the Site will be controlled as necessary during decommissioning activities and operations. Restricted areas will be established and maintained in specific portions where decommissioning activities and operations are occurring.

Portions of the controlled area have been decommissioned with Final Status Surveys (FSS) performed. For areas included in Building Complexes, 2, 5, 6A, and 17, the NRC has accepted FSS reports. The FSS report for the remaining potentially impacted areas except those previously designated as FUSRAP are included in the submittal dated September 13, 2007. Some portions of these building complex areas will remain within the controlled area under active license in order to provide staging areas, buffer zones, and access to the remaining areas for decommissioning.

The 365 acre parcel to be released from NRC licensure is primarily comprised of non-impacted areas along the Windsor Site property boundary along with some areas that were part of the decommissioning activities that have been completed. As evidenced by FSS results, there is no residual radioactivity above unrestricted release criteria in the area proposed for release. ABB will implement controls to prevent soil from the PSR area from being removed from the Site prior to approval of this request by the NRC unless there is no detectable residual radioactivity above background. Furthermore, no additional radioactive material will be used or stored in the released area. Radioactive material generated during the subsequent decommissioning process will be handled and managed in a manner to prevent cross-contamination of the released area.

ABB will implement controls in addition to existing protocols, plans and procedures in order to maintain separation of these two portions of the Site. This will include administrative, physical, and radiological controls for vehicular and personnel access. In addition, perimeter monitoring will be utilized to provide early detection capabilities as well as to demonstrate compliance with dose limits for members of the public. ABB will put into practice a Decommissioning Boundary Control Plan prior to commencement of decommissioning or redevelopment activities to provide a guidance document as well as a summary of these controls.

ABB will provide information regarding the controlled area of the Site to personnel through Site announcements and strategic signage. In addition, more detailed discussions will be held with the property manager, maintenance and security staff. This will include information such as the location of the controlled area perimeter, who is authorized to access the area, how access is granted, and potential impacts from the remaining decommissioning activities. Similar information will be provided to decommissioning staff and contractors as part of site-specific training. Updates will be provided as decommissioning activities progress or changes to the controls or process occur.

The controlled area perimeter, and thus the PSR area as well, will be identified by monuments or other difficult to remove markers at the PSR corners indicated in Figure 1. In some locations, fencing will be installed in order to maintain a barrier to personnel and vehicular traffic if conditions warrant. Physical barriers (e.g., locked gates) will be used to limit access to the controlled area at non-routine access locations. Other access points through the controlled area perimeter will have a combination of physical barriers and staffed check points to allow authorized personnel and equipment access. Routine inspections for verification of integrity of monuments, barriers, and fencing will be routinely performed.

Decommissioning activities within the controlled area will be managed in such a manner as to prevent cross-contamination. These controls will include existing, fugitive dust emissions, storm water runoff, and soil erosion control measures. These controls were successfully utilized during previous decommissioning activities for similar areas under the approved DP. The existing Radiation Protection Program (for decommissioning) will be maintained, which includes radiological work permits (RWPs), air monitoring, radiological surveys, postings, and control points. ABB will continue to perform monitoring, sampling, contamination control, and airborne surveys in and around the boundaries of radiological work areas. Records of where decommissioning activities were performed and/or licensed material was stored will be maintained to assist with eventual license termination.

Controls such as the Site's red tag/green tag program and entry/exit survey reports will be used to identify decommissioning equipment authorized for use within the controlled area, and to identify equipment authorized for unconditional release. Conveyances of radioactive, hazardous, and mixed waste will be transported in accordance with federal Department of Transportation (DOT) and state regulations and requirements.

Environmental monitoring (EM) will continue to be performed to evaluate for radioactivity potentially being released from the controlled area. The environmental monitoring program in place at the Site provides additional assurance that decommissioning operations are not a significant pathway for mobilization of radionuclides in the environment. The EM program includes routine measurements for radiological contaminants of concern in soil, water, and sediment. Another part of EM is the use of environmental TLDs to monitor potential dose to the general public. Additional monitoring locations will be included both inside and outside the controlled area to provide targeted monitoring near areas for the remaining decommissioning activities. As an additional step, air monitoring will be performed at strategic locations along the perimeter of the controlled area near active decommissioning locations during localized activities. This enhanced EM program will provide an early warning of any potential issues as well as verification that dose limits to members of the public have been maintained.

These physical and administrative controls will effectively establish a controlled area perimeter within the Windsor Site property area for the remaining decommissioning activities. These controls will mitigate cross-contamination from the controlled area to the portion released and provide early warning of potential migration from the controlled area.

ABB's PSR approach is consistent with NRC regulations and exceeds the approved DP for the CE Windsor Site. Decommissioning activities within the 365 acre parcel to be released are complete. The FSS is complete and demonstrates that this portion of the Site meets the criteria for release for unrestricted use. This approach will allow ABB to continue decommissioning in the controlled area without cross-contamination and provide a clear path forward for redevelopment and beneficial re-use of a major portion of the Site. This action supports ABB's overall goal of eventual full license termination for unrestricted use of the entire CE Windsor Site.

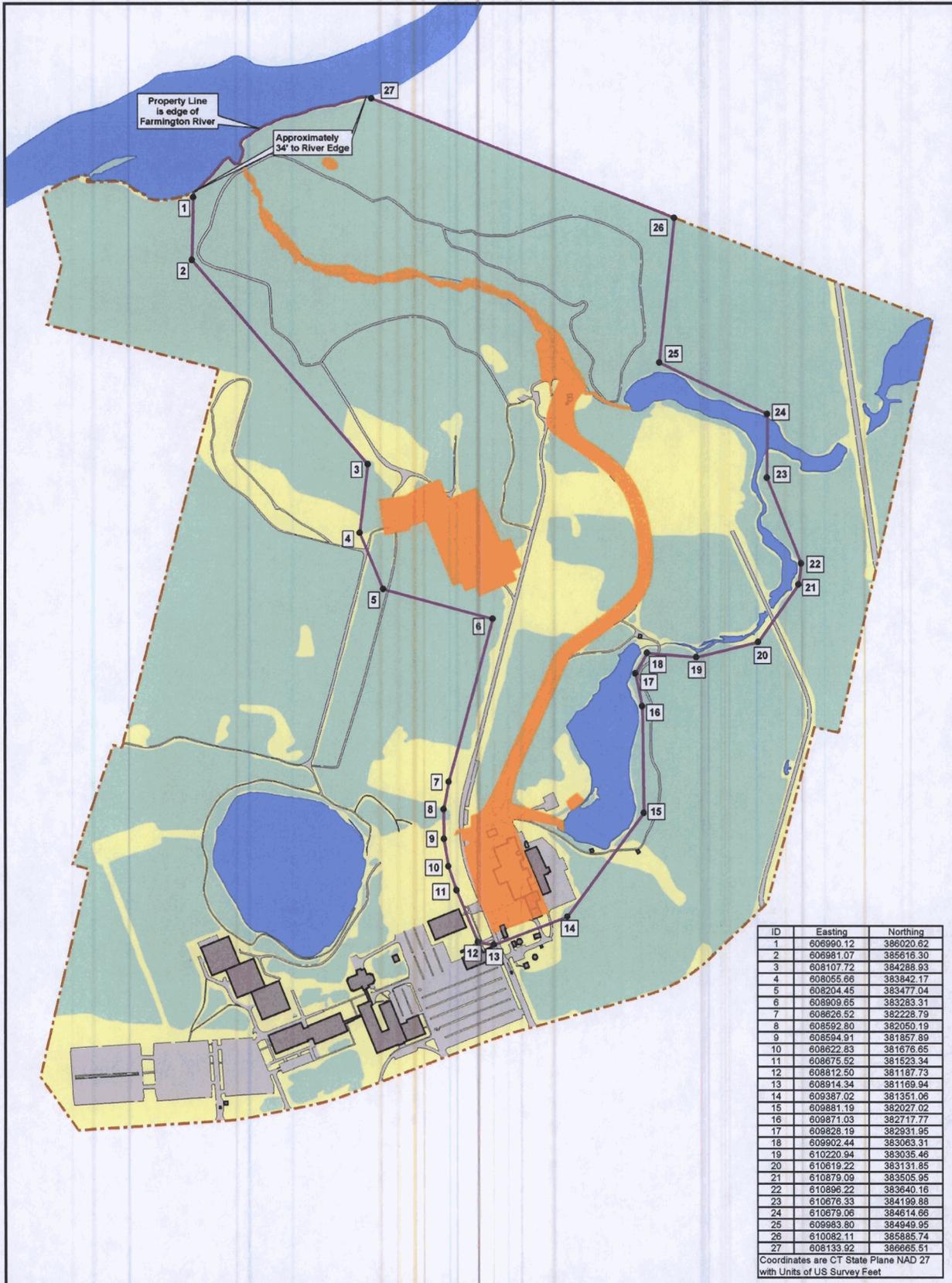


Figure 1
Partial Site Release Boundary

Legend

- Partial Site Release Corners
- Partial Site Release Boundary Line
- Remaining Areas (Decommissioning)
- - - Site Boundary
- Existing Building
- Water
- Road
- Building
- Forest
- Open
- Water
- Road

0 300 600 Feet

Prepared/Date: BRP 12/20/07 Checked/Date: HTD 12/20/07

This is to acknowledge the receipt of your letter/application dated

12/27/2007, and to inform you that the initial processing which includes an administrative review has been performed.

NOTIFICATION 06-00217-06
There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

Please provide to this office within 30 days of your receipt of this card

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned **Mail Control Number** 141519.
When calling to inquire about this action, please refer to this control number.
You may call us on (610) 337-5398, or 337-5260.

NRC FORM 532 (RI)
(6-96)

Sincerely,
Licensing Assistance Team Leader