

December 27, 2007

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Docket No. 70-1100 License No. SNM-1067

Licensing Assistant Section Nuclear Materials Safety Branch U.S. Nuclear Regulatory Commission, Region I 475 Allendale Road King of Prussia, PA 19406-1415

Subject: Application for Renewal of NRC License SNM-1067

Ladies and Gentlemen:

ABB Inc. (ABB) requests approval of the enclosed application for renewal of NRC License No. SNM-1067. By this submittal, ABB understands that it has met requirements for timely submittal as described in the NRC's "Notice of Expiration" letter to ABB Inc., dated October 11, 2007, and that the current License No. SNM-1067 remains in full effect until final action is taken on this application. This application reflects the current conditions and ABB's mission for the Combustion Engineering (CE) Site.

Please find the completed NRC Form 313, "Application for Materials License", dated December 27, 2007. The information for Items 5 - 11 has been included on separate paper with this submittal. Several license application revisions, necessary for current conditions, are described in Enclosure I of this submittal. Enclosure II includes the existing complete License Renewal Application for SNM-1067, including the several revision pages needed for renewal.

Some of the revisions referenced above are important to support ABB's CE Windsor Site decommissioning effort being conducted under ABB's NRC License No. 06-00217-06. ABB, therefore, would appreciate expedited processing of this application by the NRC. If there are any comments or questions concerning the enclosed documents, please do not hesitate to contact the Radiation Safety Officer, Heath Downey, at (207) 939-5560, or me at (860) 285-5002 or by E-mail at john.conant@us.abb.com.

FULL COST RECOVERY ACTION TAC NO. _______

Enclosures

xc: Laurie Kauffman (NRC Region I) Charles Petrillo (Town of Windsor) James Schmidt (NRC Region I) Edward Wilds (CTDEP) Sincerely,

ABBJNC.

John F. Conant Senior Project Manager

14 15 18 NMSS/RGN1 MATERIALS-002

ABB Inc.

www.abb.us

	APPROVED BY OMB: NO 3150-0120 EVDIDEE: 40/21/2000
U.S. NUCLEAR REGULATORY COMMISSION	Estimated burden per response to comply with this mandatory collection request: 4.4
10 CFR 30, 32, 33,	hours. Submittal of the application is necessary to determine that the applicant is
34, 35, 36, 39, and 40	Send comments regarding burden estimate to the Records and FOIA/Privacy Services
	Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001,
ADDUCATION FOR MATERIAL S LICENSE	Information and Regulatory Affairs, NEOB-10202, (3150-0120), Office of Management
APPLICATION FOR MATERIALS LICENSE	and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NBC may not
	conduct or sponsor, and a person is not required to respond to, the information
INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUI	DE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION.
SEND TWO COPIES OF THE ENTIRE COMPLETED AFFLICATION TO T	
APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:	IF YOU ARE LOCATED IN:
DIVISION OF INDUSTRIAL AND MEDICAL NUCLEAR SAFETY	ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS	APPLICATIONS TO:
WASHINGTON, DC 20555-0001	MATERIALS LICENSING BRANCH
	U.S. NUCLEAR REGULATORY COMMISSION, REGION III
ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:	LISLE, IL 60532-4352
ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA,	ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS,
KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISI AND, SOLITH	LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA. TEXAS.
CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA,	UTAH, WASHINGTON, OR WYOMING, SEND APPLICATIONS TO:
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LICENSING ASSISTANCE TEAM	NUCLEAR MATERIALS LICENSING BRANCH
DIVISION OF NUCLEAR MATERIALS SAFETY	U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
475 ALLENDALE ROAD	ARLINGTON, TX 76011-4005 0700
KING OF PRUSSIA, PA 19406-1415	
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PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR MATERIAL IN STATES SUBJECT TO U.S.NUCLEAR REGULATORY COMMISSION JURISDICT	REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED
1. THIS IS AN APPLICATION FOR (Check appropriate item)	2. NAME AND MAILING ADDRESS OF APPLICANT (Include ZIP code)
A. NEW LICENSE	
	ABB Inc.
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APPLICATION FOR MATERIAL LICENSE ITEMS 5 - 11

Item	Response	Description Attached
5.	RADIOACTIVE MATERIAL	
	a Element and mass number:	License Renewal
	Licitient and mass number.	Application
		Part I, Section 1.4
	b. Chemical and/or physical form:	License Renewal
	Irradiated and/or contaminated debris or residues, low	Application
	level radioactive waste (LLRW)	Part I, Section 1.4
	c Maximum amount which will be possessed at any one time.	License Renewal
	$700 \text{ grams of } \text{U}^{235}$	Application
		Part I, Section 1.4
6.	PURPOSE FOR WHICH LICENSED MATERIAL WILL	
	BE USED	
	The authorized activities for the licensed material are limited to	License Renewal
	packaging, repackaging, evaluation, storage, handling, and	Application
	transportation of waste (LLRW).	Part I, Section 1.5
]_	INDIVIDUALS RESPONSIBLE FOR RADIATION	
7.	SAFETY PROGRAM AND THEIR TRAINING	
	EXPERIENCE	
1	The Radiation Safety Officer (RSO) is responsible for	License Renewal
	definition, implementation, and supervision of radiological	Application
	safety and protection procedures.	Part I, Sections 2.1 & 2.2
8.	TRAINING FOR INDIVIDUALS WORKING IN OR	
		License Renewal
	The licensee provides training for personnel working with	Application
	licensed material commensurate with the task/job hazards.	Part I Section 2.5
9.	FACILITIES AND EOUIPMENT	
	The remaining facilities associated with usage of radiological	
	material at the site no longer house active operations and are in	
	the process of decommissioning. The remaining facilities	I D I
	include:	License Kenewal
	• Building 3. Primary licensed activities involved LLRW	Application Port II Section 6.4
	storage.	Part II, Section 6.4
	• Building 6. Activities included radioactive liquid waste	
	processing and LLRW storage.	
10.	RADIATION SAFETY PROGRAM	
	Radiation Monitoring Instruments	
		License Renewal
	Written procedures will be implemented and maintained for	Application
	calibration and operation of radiation monitoring instruments.	Part IL Section 9.0
	Calibration will be performed by written procedure or by	
	authorized service provider.	

APPLICATION FOR MATERIAL LICENSE ITEMS 5 - 11

Item	Response	Description Attached
	Material Receipt and Accountability	
	Written procedures will be implemented and maintained for safely opening packages that meet the requirements in 10 CFR 20.1906.	
	 Written procedures will be implemented and maintained for licensed material accountability and control to ensure that: License possession limits are not exceeded; Licensed material in storage is secured from unauthorized access or removal; Licensed material not in storage is maintained under constant surveillance and control; and Records of receipt, transfer, and disposal of licensed material are maintained. 	License Renewal Application Part II, Section 9.1
	Operating and Emergency Procedures Written procedures will be implemented and maintained for safe use and emergencies.	
	Procedures may be revised if:	
	 The changes are consistent with the procedures submitted with the license application; The changes are reviewed and approved by licensee management and the RSO; Licensee staff is trained in the revised procedures before they are implemented; The changes do not degrade the effectiveness of the program. 	License Renewal Application Part II, Section 9.1
	Leak Tests	Not Applicable
	Sealed sources are not authorized under this license.	
	Surveys Radiological surveys will be implemented following written procedures consistent with the types and quantities of materials in use.	License Renewal Application Part I, Section 3.2.7
11.	WASTE MANAGEMENT	
	During decommissioning activities, the licensee will generate LLRW. All licensed LLRW shall be disposed of in accordance with the requirements of 10 CFR Part 20 Subpart K.	License Renewal Application Part I, Section 4.1.1

Enclosure I

Description of Proposed Changes

Description of Proposed Changes

This license renewal application proposes to make administrative and minor technical revisions to update the license to the contemporary status of the CE Windsor Site.

- Page 1-1, Section 1.2, 6th line: Change "CEP 880-1406" to "CEP 880-1911" to update mailing address for license correspondence.
- Page 1-2, Section 1.4, Form: Change "Residues (LLRW)" to "Irradiated and/or contaminated debris, or residues (LLRW)" to be consistent with NRC License No. 06-00217-06.
- Page 1-2, Section 1.4: Add "Licensed material may only be possessed, used or stored within the license boundary limits of ABB's NRC License No. 06-00217-06 at the Windsor Site." ABB has requested a partial site release under NRC License No. 06-00217-06 at the Windsor Site and this change will keep this license (SNM-1067) consistent with the other.
- Page 1-3, Footnote: Change "The Specified Storage Areas are defined as: 1) locked C-vans or trailers and 2) Building 3 and its immediate environs." to "The Specified Storage Areas are defined as areas approved by the Radiation Safety Officer." Since Building 3 will be dismantled as part of decommissioning, the current storage location will not be available in the future. This change will allow the necessary flexibility during decommissioning operations as storage areas will need to move during the course of decommissioning.
- Page 6-9, Figure 6-3: Updated the figure to revise the property boundary on the western side of the site.

Enclosure II

License Renewal Application

(For Information, Not A Part Of License Application) WINDSOR SPECIAL NUCLEAR MATERIALS LICENSE NO. SNM-1067 LIST OF EFFECTIVE PAGES

Pages	Date	Pages	Date
		Chapter 4	
	······	4-1	06/30/05
		4-2	06/30/05
		Chapter 5	
		5_1	02/01/07
		<u> </u>	02/01/01
License Application Title Page		Part II Title Page	12/27/07
	12/27/07	Chapter 6	
Table of Contonts	<u> </u>	61	02/01/07
		6-2	02/01/07
	01/06/06	6-3	02/01/07
	02/01/07	6-4	02/01/07
		6-5	06/30/05
Part I Title Page		6-6	06/30/05
		6-7	03/31/00
iv	12/27/07	6-8	03/31/00
		6-9	12/27/07
Chapter 1		·····	
		Chapter 7	
1-1	12/27/07		
1-2	12/27/07	/ /-1	06/30/05
1-3	12/27/07	Chapter 9	
Chapter 2			
		8-1	06/30/05
2-1	02/01/07	8-2	06/30/05
2-2	04/16/97	8-3	06/30/05
2-3	04/16/97	8-4	02/01/07
2-4	04/14/00		
2-5	06/30/05	Chapter 9	
Chapter 2			00/00/05
Chapter 3		9-1	06/30/05
3-1	06/30/05	Chapter 10	
3-2	06/30/05		
3-3	01/06/06	10-1	03/31/00
3-4	02/01/07		
3-5	04/16/97	Chapter 11	
3-6	06/30/05		
3-7	04/16/97	11-1	04/16/97

SNM-1067

LICENSE RENEWAL APPLICATION

PARTS I & II

ABB INC. 2000 Day Hill Road Windsor, Connecticut 06095-0500

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- 8.2 (Deleted)
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- 9.1 PROCEDURES
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- 10.0 OCCUPATIONAL RADIATION EXPOSURES
- 11.0 ENVIRONMENTAL SAFETY

SNM-1067

LICENSE RENEWAL APPLICATION

PART I - LICENSE CONDITIONS

PART I - LICENSE CONDITIONS

1.0 STANDARD CONDITIONS AND SPECIAL AUTHORIZATIONS

1.1 NAME

ABB Inc. is incorporated in the State of Delaware with a principal office at 501 Merritt 7, Norwalk, CT. The location where licensed activities are conducted is at 2000 Day Hill Road in Windsor, CT.

1.2 LOCATION

The mailing address for all license correspondence is:

ABB Inc. 2000 Day Hill Road Windsor, CT 06095-0500

Attn: John F. Conant CEP 880-1911

1.3 LICENSE NUMBER

Activities are covered by NRC License SNM-1067; Docket 70-1100.

,

1.4 POSSESSION LIMITS AND LOCATION

ABB Inc. requests authorization at its Windsor Site for the following quantities of radioactive materials:

	Material	<u>Form</u>	<u>Quantity</u>	Location
(1)	Uranium enriched to any weight percent ²³⁵ ປ	Irradiated and/or contaminated debris, or residues (LLRW)	700 gms ²³⁵ U	Specified Storage Areas

Licensed material may only be possessed, used or stored within the license boundary limits of ABB's NRC License No. 06-00217-06 at the Windsor Site.

1.5 AUTHORIZED ACTIVITIES

The activities carried out with Special Nuclear Material (SNM) at the Windsor Site are limited to activities involving LLRW as follows:

Specified Storage Areas* - Packaging, repackaging, evaluation, storage, handling, and transportation of waste from prior operations for the purpose of SNM control. These activities pertain to the material under Item 1 of Section 1.4.

1.6 (Deleted)

*The Specified Storage Areas are defined as areas approved by the Radiation Safety Officer. Analyses may be made, under License No. 06-00217-06, on samples of waste.

2.0 ORGANIZATION AND ADMINISTRATION

2.1 ORGANIZATION RESPONSIBILITIES AND AUTHORITY FOR KEY POSITIONS IMPORTANT TO SAFETY

2.1.1 (Deleted)

2.1.2 Radiation Safety Officer (RSO)

ABB, Inc. management is responsible for safe operation under this license. The Radiation Safety Officer is responsible for defining and implementing procedures related to radiological safety. Procedures address safety criteria, monitoring, and training necessary to ensure the protection of employees, the public and the environment.

The Radiation Safety Officer is responsible for supervising the radiological protection team. The radiological protection team performs radiological surveys, air sampling, and radiological safety job coverage. If the Radiation Safety Officer believes an operation to be unsafe, he or she has the authority to halt that operation, and to restart such operation.

2.2 PERSONNEL EDUCATION AND EXPERIENCE REQUIREMENTS FOR KEY POSITIONS IMPORTANT TO SAFETY

2.2.1 (Deleted)

2.2.2 Radiation Safety Officer

The minimum qualifications for this position are a bachelor's degree in one of the sciences or engineering or its equivalent with two (2) years experience in health physics.

2.3 (Deleted)

2.4 APPROVAL AUTHORITY FOR PERSONNEL SELECTION

The personnel for key positions important to safety who are involved in activities within the scope of this application are approved by a higher level of management than the position of concern.

2.5 TRAINING

Training for personnel working with licensed material is provided commensurate with the hazards faced by the worker. The training program defines training requirements for in-house workers, contractors, and visitors. Personnel will not work unsupervised with licensed material prior to completion of the minimum training requirements.

Topics that are included in personnel training programs for persons working with licensed material include:

- (1) Procedures for the storage, transfer, and use of radioactive materials.
- (2) Health protection problems associated with exposure to the types of radioactive materials and radiation that are encountered.
- (3) Precautions or procedures to minimize exposure.
- (4) The purposes and functions of protective devices and/or equipment employed.
- (5) The need to observe the applicable provisions of Nuclear Regulatory Commission regulations and licenses for the protection of personnel from exposures to radiation or radioactive material, especially for the purpose of ensuring the worker has the ability to recognize and mitigate the hazards to which he is exposed.

- (6) The responsibility of the worker to promptly report to the Licensee management any condition which may lead to or cause a violation of Nuclear Regulatory Commission regulations and licenses or unnecessary exposure to radiation or to radioactive material.
- (7) The appropriate response to warnings made in the event of an unusual occurrence or malfunction that may involve exposure to radiation or radioactive material.
- (8) The radiation exposure reports which workers may request (as referenced in 10 CFR § 19.13).

Training methods include lecture, classroom participative training, programmed instruction, challenge testing, on-the-job training, or other training methods as appropriate. The effectiveness of training shall be suitably demonstrated; e.g., by written, oral or practical examination, or other suitable methods. The adequacy of each individual's training shall be evaluated on a biennial basis, and retraining shall be provided as appropriate.

2.6 OPERATING PROCEDURES

Activities involving licensed materials are conducted in accordance with approved written procedures and radiation work permits. Health physics activities shall be conducted in accordance with written procedures approved by the RSO and reviewed for potential update on a biennial basis.

2.7 INTERNAL INSPECTIONS

Inspections are performed to determine if operations are being conducted in accordance with applicable license conditions and written procedures. Annual inspections cover radiological and environmental safety and are conducted based upon a written plan.

Qualified personnel having no direct responsibility for the operation being inspected are used as inspectors to ensure unbiased and competent results. The annual inspection for radiological safety shall be performed by an individual with at least two years experience in applied health physics. Items requiring corrective action are documented in a report distributed to the Senior Project Manager. Follow-up actions will be documented.

2.8 INVESTIGATIONS AND REPORTING

Abnormal occurrences are investigated and reported to the Senior Project Manager. Reports to the Nuclear Regulatory Commission are made in accordance with specific conditions of this application and the applicable Federal Regulations. The level of investigation and the need for corrective action are determined based on the severity of the incident.

2.9 RECORDS

Records pertaining to health and safety, abnormal occurrences, inspections, employee training, personnel exposures, and routine radiation and contamination surveys are retained to demonstrate compliance with the conditions of this application and the applicable Federal, State and local regulations. Such records are retained for at least two years, unless otherwise specified in the governing regulations.

3.0 RADIATION PROTECTION

3.1 SPECIAL ADMINISTRATIVE REQUIREMENTS

3.1.1 ALARA Commitment

The Licensee has a strong commitment to the ALARA philosophy. In support of this commitment, the Radiation Safety Officer periodically reviews safety related activities, including abnormal occurrences and the implementation of ALARA policies. The following policies are implemented for work at the site:

- (1) The key ALARA objective is to minimize exposure to radioactive material for the public, the environment, and the workers at the Windsor site.
- (2) In the interest of limiting exposures to the public, the objective is to have minimal effluents from the activities under this license.
- (3) The preferred method of limiting intake is the use of engineering controls. Engineering control of intake is achieved with ventilation control as described in Section 3.2.3, and, when engineering controls are not adequate, intake is limited by the use of respiratory protection as described in Section 3.2.8.

3.1.2 Radiation Work Permit

Work with licensed materials is covered by Radiation Work Permits (RWP). The Radiation Safety Officer (RSO), or his designee (with a minimum of 2 years experience in applied health physics with material similar to that authorized by this license), approves RWPs. RWPs specify applicable radiological controls for the activity, such as special radiological equipment, special personnel monitoring devices, protective clothing or air sampling requirements. Radiation Protection Technicians are responsible for ensuring the proper implementation of radiation work permits. RWPs which remain open for more than a month are reviewed on a monthly basis to ensure the controls are effective; RWPs which are no longer needed are closed.

3.1.3 Annual Report

The Radiation Safety Officer shall submit to the Senior Project Manager an annual report that reviews the employee radiation exposures to determine:

- (1) if there are any upward trends developing in personnel exposures;
- (2) if personnel exposures might be lower under the concept of As Low As Reasonably Achievable (ALARA); and
- (3) if equipment for personnel exposure control is properly used, maintained, and inspected.

This report may be a part of the annual inspection and shall include the review of other required audits and inspections performed during the past 12 months and review of the data from the following areas as applicable: employees exposure (internal and external), bioassay results, and unusual occurrences.

3.2 TECHNICAL REQUIREMENTS

3.2.1 Control of Licensed Material

Access to licensed material is controlled.

The Licensee shall separate ²³⁵U into batches no larger than 350 gms contained ²³⁵U and shall maintain a minimum separation of 12 feet between batches.

3.2.2 Protective Clothing and Personnel Monitoring Requirements

Protective clothing, when required, is prescribed by the applicable radiation work permit, or at the direction of the Radiation Safety Officer.

Personnel exiting contaminated areas are required to survey themselves after removing protective clothing to ensure that they are free of contamination. Emergency evacuations are an exception to the personnel survey requirement.

3.2.3 Ventilation Requirements

Airborne effluents generated from operations involving licensed material, other than operations potentially involving trace amounts of licensed material, shall be controlled as necessary, in accordance with good health physics practices. When ventilation systems are required, they are designed and maintained to limit the spread of contamination into the environment. Exhaust from systems will be sampled, monitored and controlled pursuant to 10 CFR 20.1502.

3.2.4 Instrumentation

Instruments used for radiation detection and measurement have capabilities as follows (more than one instrument may be utilized to cover the specified range):

Alpha/Beta Counting Systems:	1 DPM to $1x10^5$ DPM (disintegrations
	per minute)
Alpha Survey Meters:	10 CPM to $1x10^5$ CPM (counts per minute)
Gamma Survey Meters:	1 uR/h to 50 mR/h (microrem/millirem per hour)

Radiation detection instruments are calibrated annually and after each repair that would affect accuracy.

3.2.5 Radiation Exposure

The intake of radioactive material shall be monitored for individuals likely to receive in excess of 10% of the applicable Annual Limit on Intake (ALI). Soluble uranium intake shall be limited to less than 10 milligrams per week per individual. Work activity restrictions shall be imposed when an individual reaches 50% of the applicable limit; i.e., 0.5 ALI (1,000 DAC hours) and 5 milligrams per week for soluble uranium. A diagnostic study to evaluate intakes shall be started at these action levels.

Exposure to radiation shall be monitored for individuals likely to receive, in one year from sources external to the body, in excess of 10% of the occupational dose limits of 10 CFR 20. The personnel monitoring device will be a thermoluminescent dosimeter (TLD). TLDs shall be processed for dose reading on at least a quarterly basis by a National Voluntary Laboratory Accreditation Program (NVLAP) accredited dosimetry processor. The action level for investigation and possible work restrictions shall be 1 rem for deep dose equivalent (DDE) on an annual basis.

Total Effective Dose Equivalent for occupational exposures shall be calculated in accordance with 10 CFR 20 using a combination of personal lapel air sampling data, personnel radiation exposure data and/or bioassay measurement data.

The primary method of calculating Committed Effective Dose Equivalent is by using personal lapel air sampling results. Personal lapel monitors shall be counted on a daily basis when in use for this purpose.

3.2.6 Bioassay Program

If a respiratory protection program is utilized or personnel are likely to receive greater than 10% ALI such that monitoring is required, then a bioassay program shall be maintained for confirmation and evaluation of intakes. If a bioassay program is required, then bioassay assessments of intakes shall be performed on an annual basis, or, for personnel exposed to soluble uranium, bioassay assessment shall be on a monthly basis. Bioassay assessment may also be used to perform the diagnostic study at the action levels of Section 3.2.5.

3.2.7 Contamination Surveys

Contamination surveys are performed at a minimum of once per week in loose surface contaminated areas where work involving radioactive materials may be in progress. Surveys in step-off pad areas in use are performed on a daily basis. Contamination surveys are performed on a quarterly basis in clean areas designated by the RSO, based on their potential to become contaminated. Surveys conducted in support of work performed under a Radiation Work Permit (RWP) may be used to meet the survey requirement.

3.2.8 Respiratory Protection

To the extent practicable, process or other engineering controls will be used to control the concentration of radioactive material in air. When it is not practicable to apply these controls to limit the concentration of radioactive material in air to values below those that define an airborne radioactivity area, other controls will be implemented to limit intake, which could include use of respiratory protection equipment. Respiratory protection will be consistent with 10 CFR 20.

3.2.9 Materials and Equipment Released for Unrestricted Use

Release of equipment and materials from restricted areas to clean areas on-site or unrestricted areas shall be in accordance with the 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," dated April, 1993.

3.2.10 Nonexempt Sealed Source Control

(This section is deleted. There are no sealed sources under this license application.)

4.0 ENVIRONMENTAL PROTECTION

4.1 EFFLUENT CONTROL SYSTEMS COMMITMENTS

4.1.1 Low-Level Radioactive Waste

Low level radioactive wastes (LLRW) will be packaged in accordance with applicable regulations and delivered to a carrier for transport to an approved waste processor and/or disposal facility.

LLRW packages awaiting shipment to a processor or disposal facility may be temporarily stored for up to one year on site. LLRW packages in such temporary storage will be checked quarterly for integrity and exterior contamination. LLRW storage areas shall be appropriately posted and LLRW shall be secured from unauthorized removal. Prior to being placed into storage, packages will be checked for exterior contamination and labeled as radioactive material and, for SNM, as to ²³⁵U content. LLRW packages may be stored for up to fifteen years as interim storage provided they are protected from the elements. Interim LLRW storage shall be in the Specified Storage Areas defined in Section 1.5. LLRW in interim storage will be checked annually for integrity and exterior contamination.

Records will be maintained of the contents of the LLRW packages. All packages will be stored on raised platforms (e.g., built in or portable pallets) or legs and stacking will be limited to three (3) high. When placed into storage, the packages shall be sealed in a manner which precludes casual entry (e.g., by the use of steel clips or strapping) until final sealing is accomplished prior to shipment to the processor or disposal facility. Containers containing liquid wastes shall not be stored outside, shall be segregated from solid waste containers (e.g., stocked separately) and shall be appropriately labeled.

4.1.2 Liquid Effluents

There are no liquid effluents.

4.1.3 <u>Airborne Effluents</u>

Airborne effluents are monitored in accordance with Section 3.2.3.

4.2 ENVIRONMENTAL MONITORING PROGRAM

The only materials authorization requested in this application is for residual material in the form of Low Level Radioactive Waste. The effectiveness of the controls over this material will be monitored under the Windsor Radioactive Materials License No. 06-00217-06. Section 10.2 of the Application for this License describes the environmental monitoring program.

5.0 DECOMMISSIONING FUNDING PLAN

The Licensee reaffirms that, upon terminating activities involving materials authorized under license SNM-1067, the premises where the licensed activities were carried out will be decommissioned in a manner that will protect the health and safety of the public in accordance with 10 CFR 70.25. ABB Inc. financial assurance instruments for SNM-1067 were submitted to the NRC as follows:

Standby Letter of Credit:

Letter, J. Conant (ABB) to L. Kauffman (NRC), dated February 23, 2005.

Standby Trust Agreement:

E-mail, E. B. Lyon (ABB) to L. Kauffman (NRC), dated March 1, 2005.

Decommissioning Funding Plan:

Letter, J. Conant (ABB) to L. Kauffman (NRC), dated June 27, 2005.

Certificate of Financial Assurance:

Letter, J. Conant (ABB) to L. Kauffman (NRC), dated June 28, 2005.

SNM-1067

LICENSE RENEWAL APPLICATION

PART II - SAFETY DEMONSTRATION

License No. SNM-1067 Docket No. 070-01100

PART II - SAFETY DEMONSTRATION

6.0 OVERVIEW OF OPERATIONS

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6.2 OPERATING OBJECTIVE

The operating objectives are as follows:

- (1) Perform the activities involving waste from prior operations as described in Section 1.5.
- (2) Perform testing and analyses to support the operational activities.

6.3 SITE DESCRIPTION

The Windsor site is located in north central Connecticut (Figure 6-1). The site is approximately 600 acres along the section of the Farmington River known as the Rainbow Reservoir in the town of Windsor, Connecticut (Figure 6-2).

6.4 LOCATIONS OF BUILDINGS ONSITE

The locations of buildings on the Windsor site are shown in Figure 6-3.

6.5 HISTORY OF LICENSE

Combustion Engineering first applied for this license to process low enriched uranium in 1968. License SNM-1067 was then issued for a period of 5 years by the U.S. Atomic Energy Commission (AEC). The license has been renewed at approximately 5 year intervals since then.

6.6 HISTORY OF LICENSED ACTIVITIES IN BUILDINGS ON SITE

License SNM-1067 was initially issued in 1968 to allow use of low enriched uranium special nuclear material and source material in Building 17 for the purpose of commercial nuclear fuel manufacturing. Later, Building 21 was added as a warehouse and shipping and receiving building. Such activities continued in the Building 17/21 Complex until September 1993, when commercial nuclear fuel manufacturing ceased, and decommissioning of those buildings was initiated. In 1996, the decommissioning of Building 17 was deferred to allow the building to be used for processing of equipment returned from reactor sites and contaminated with byproduct material.

In Buildings 1/1A and 2A licensed activities included the storage of source material.

In Building 2, licensed activities have consisted of storage of sealed test rods containing SNM and mechanical testing using sealed simulated fuel rods containing source material. In addition, archived special nuclear material had, in the past, been stored in Building 2.

In Building 3/3A, the primary licensed activities involved the use of sealed sources and sealed testing specimens (e.g., for x-ray measurements).

The primary licensed activities performed in Building 5 have been past developmental fuel manufacturing and the laboratory activities previously associated with the current license application.

In Building 6, activities involving SNM have been radioactive liquid waste processing and low level radioactive waste storage.

In Building 16, the primary licensed activities were the use of sealed sources and source material handling.

In Building 18, the primary licensed activities have been hydraulic loop testing using sealed simulated fuel rods containing source material.

By letter to the NRC dated April 16, 1997, ABB submitted an "Amendment Request to Downgrade License No. SNM-1067." The purpose of this Request was to move all authorized buildings, operations and materials, with the exception of Building 21 and SNM waste from prior operations, to the ABB Broad Scope License 06-00217-06. This Request was approved by the NRC by letter dated September 30, 1997. Building 21 decommissioning continued and was removed from the license as an authorized place of use by NRC letter dated October 29, 1997.



Licensed Facility Location within Connecticut



(Not to Scale)

Figure 6-2

Licensed Facility Location – Local Area





Location of Buildings on the Windsor Site



License No. SNM-1067 Docket No. 070-01100 Date: 12/27/07 Page: 6-9

7.0 FACILITY DESCRIPTION

7.1 (Deleted)

7.2 FIRE PROTECTION

Under this license application, there are no facilities that require fire protection and no activities that may potentially initiate emergency response action.

8.0 ORGANIZATION AND PERSONNEL

The Windsor radiation safety personnel organization structure is depicted in Figure 8-1.

8.1 FUNCTIONS OF KEY PERSONNEL

The function, responsibilities and authorities of key personnel important to safety are described in Part I, Section 2.1 of this application. This section provides descriptive information for the remaining "Facility" personnel. With the exception of the Radiation Safety Officer, any or all of these positions may or may not be filled, depending on activities being conducted under this License.

8.1.1 Radiation Safety Engineer

The Radiation Safety Engineer is responsible for assisting the Radiation Safety Officer in the many facets of his duties. This includes procedure development, radiation work permit development, radiological control planning, etc. When deemed qualified, the Radiation Safety Engineer may be delegated as the Radiation Safety Officer.

8.1.2 Health Physics Technicians

Health physics technicians ensure that the radiological controls requirements established by the Radiation Safety Officer are carried out; this includes monitoring of radiation exposures.

8.2 (Deleted)

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Figure 8-1

Personnel Organization Senior Project Manager ABB Inc. "CORPORATE" "FACILITY" Radiation Safety Officer Health Physics Technician(s)

9.0 RADIATION PROTECTION PROCEDURES AND EQUIPMENT

9.1 PROCEDURES

Operations involving licensed materials are conducted in accordance with written procedures and/or radiation work permits. Radiation work permits are approved by the Radiation Safety Officer or his designee (e.g., Radiation Safety Engineer).

9.2 INSTRUMENTS

Alpha/Beta counting systems are used for radiation detection and measurement. The Alpha/Beta counting systems are calibrated annual and checked daily when in use through background and efficiency checks.

Gamma spectroscopy systems are also used for radiation detection and measurement. Operational integrity of the gamma spectroscopy systems is verified by gamma energy and efficiency calibration checks.

Radiation sources used in the instrument calibrations are NIST certified.

10.0 OCCUPATIONAL RADIATION EXPOSURES

With cessation of the uranium processing operations the potential for a release of radioactive material is greatly diminished. The Licensee will continue its emphasis on exposure control to minimize intake of uranium. The indicators used include the following:

- (1) Shallow Dose Equivalent: Shallow Dose Equivalent is the external dose to the skin.
- (2) Total Effective Dose Equivalent (TEDE): TEDE is the sum of the deep dose equivalent and committed effective dose equivalent.
- (3) Airborne Radioactivity: A measure of the concentration of radioactivity in the ambient work place air. It is measured through the use of air sampling equipment and expressed in units of μCi/ml (Bq/m³).
- (4) Contamination: This is a measurement of the amount of uranium surface contamination in the work environment, expressed in units of dpm/100cm².

When thermoluminescent dosimeters (TLD) are used as monitoring devices, they are processed on at least a quarterly basis by an accredited dosimetry processor.

11.0 ENVIRONMENTAL SAFETY

The effectiveness of the controls over the licensed material will be monitored as described in Section 4.2 of this application.

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

includes an administrative review has been performed.

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.

141518 Your action has been assigned Mail Control Number 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