UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

April 7, 2008

Docket No. 03003754 License No. 06-00217-06
Control No. 141686

John F. Conant
Senior Project Manager
ABB Incorporated
2000 Day Hill Road
Windsor, CT 06095

SUBJECT: ABB INCORPORATED, REQUEST FOR ADDITIONAL INFORMATION CONCERNING APPLICATION FOR AMENDMENT TO LICENSE, CONTROL NO. 141686

Dear Mr. Conant:

This is in reference to your letter dated January 29, 2008, requesting to amend Nuclear Regulatory Commission License No. 06-00217-06 . Specifically, you have requested the approval of a revised decommissioning plan (DP) to support decommissioning activities for the FUSRAP areas of the Windsor Connecticut site. In order to continue our review, we need the following additional information:

1) The revised DP includes provisions to allow for unconditional release of the southern part of Building 3. While section 1.5 of the revised DP references the approved site-specific soil derived concentration guideline levels (DCGLs), it does not specify the dose-based surface contamination DCGLs that will be used for this structure and other remaining surfaces following remediation.

   Please provide the surface contamination DCGLs that will be used to support unconditional release of the facility. If you intend to use the screening DCGLs described in section 6.6.5 of NUREG 1757, Volume 1, Rev. 2., please provide justification why the basis for use of the screening DCGLs is applicable for use at your site. If you intend to use site-specific surface contamination DCGLs, please provide the dose modeling information used to derive the values as described in NUREG-1757.

2) The revised DP includes provisions for the supplemental remediation of the Burning Grounds previously released by the NRC in 1989. Instead of calculating site-specific DCGLs for the Ra-226 and Th-232 identified at this location, you specified that you will use the NRC screening values as the remediation criteria for this area.

   Please specify the values for the screening values that you intend to use for this location and confirm that you understand that all of the radiological contaminants remaining at this location will be assessed using the unity rule considering both the site specific and screening DCGLs as applicable.

3) On September 13, 2007, ABB submitted a final status survey (FSS) report of the Windsor site, excluding the FUSRAP areas, to the NRC and requested that the surveys be used to support removal of these areas from the NRC license. This request was amended on December 27, 2007, to effectively exclude those areas of the Windsor site that immediately surround the FUSRAP areas yet to be remediated. As a result, many of the areas which have already been remediated and were included in the September 13, 2007, submission will not be removed from the NRC license until the FUSRAP remediation is complete. These surveys may not be relevant in the future since they may be negatively impacted by the activities described in the revised DP.

   Please provide a description of the mechanism(s) that will be used to assure the FSS reports submitted to the NRC for these areas accurately reflect the impact of the proposed revised DP activities. Any proposed mechanisms must include the collection of detailed records of decommissioning activities in and around these areas that can be used to demonstrate that the original FSSs are still valid. Conversely, you can agree to conduct new FSSs for these areas after site remediation is complete.

4) Section 4.5 of the revised DP provides a description of a post-remediation radiological groundwater monitoring program expected to be used at the site. Based upon a December 27, 2007, letter, ABB has requested a partial site release for about half of the Windsor site. Since the potential exists for the revised DP activities to impact groundwater in some of the areas being considered for partial site release, which is expected be completed before the completion of the remaining remediation activities, implementation of this radiological groundwater monitoring program is considered prudent.

   Please provide a radiological groundwater monitoring plan that will be used to demonstrate that activities described in the revised DP do not impact those areas expected to be released from the NRC license as requested. This plan should include the proposed monitoring sites, frequency of monitoring, a potentiometric map of the selected monitoring wells, and nuclides to be assessed.

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Nuclear Materials; Medical, Academic, and Industrial Uses of Nuclear Material;** then **Regulations, Guidance, and Communications.** You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 7:00 a.m. to 8:00 p.m. EST, Monday through Friday (except Federal holidays).

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 141686. If you have any technical questions regarding this deficiency letter, please call me at 610-337-5276.

Sincerely,

Original signed by James Schmidt

James Schmidt
Health Physicist
Decommissioning Branch
Division of Nuclear Materials Safety

cc:
Heath Downey, Radiation Safety Officer, Mactec
Michael Firsick, Connecticut Department of Environmental Protection
Amir Houhestani, NRC HQ
Mark Otis, U.S. Army Corps of Engineers

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