

October 8, 2008

Ms. Elizabeth Southerland, Director
Division of Assessment and Remediation
Office of Superfund Remediation
and Technology Innovation
U.S. Environmental Protection Agency
M.S. 5204P
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

SUBJECT: RESPONSE TO RECOMMENDATIONS REGARDING THE
DECOMMISSIONING OF THE ABB INCORPORATED SITE
IN WINDSOR, CONNECTICUT

Dear Ms. Southerland:

I would like to thank the U.S. Environmental Protection Agency (EPA) for providing its views on the decommissioning of the ABB Incorporated (ABB) site in Windsor, Connecticut, in your letter dated September 16, 2008. The U.S. Nuclear Regulatory Commission (NRC) consulted with EPA about the ABB site because the licensee's proposed derived concentration guideline levels (DCGLs) for certain radionuclides exceed the soil concentration values in Table 1 of the 2002 "Memorandum of Understanding (MOU) between NRC and EPA on Consultation and Finality on Decommissioning and Decontamination of Contaminated Sites."

In your letter you stated:

In EPA's view, if the licensee is unable to meet the Table 1 soil values, NRC should consider the use of a more restricted land use and appropriate institutional controls. In addition, NRC should consider determining if the use of site-specific parameters was justified in modeling at this site.

The NRC staff reviewed the licensee's proposed decommissioning plan (DP) and has concluded that the proposed cleanup levels for soil in the DP do not pose an adverse impact to public health and safety, or the environment. The NRC staff determined that the licensee provided adequate information to justify a residential/industrial scenario as the most likely land use in the foreseeable future. Thus, the NRC staff concluded that a residential/industrial scenario is the appropriate land use for demonstrating compliance with the requirements in Title 10 of the Code of Federal Regulations (CFR), Part 20, Subpart E. It should be noted that the DCGLs were derived from the licensee's commitment to meeting an annual dose limit of 19 millirem per year, which is more conservative than the standards prescribed in 10 CFR 20.1402, "Radiological Criteria for Unrestricted Use," of 25 millirem per year. In addition, the calculated DCGL values were based on the more conservative residential-farmer scenario, and past remediation activities conducted by the licensee in other areas of the site have resulted in residual concentrations well below the approved DCGLs. Because we believe these measures are adequately protective, NRC will not adopt EPA's recommendations in your September 16, 2008, letter. Nonetheless, following site remediation activities, NRC staff will review the information in the Final Status Survey (FSS) reports and compare the levels of residual radioactivity against the MOU trigger levels. If the FSS measurements exceed the trigger levels in the MOU, we will contact your office pursuant to the MOU.

E. Southerland

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If you have any questions regarding this letter or the decommissioning activities at the ABB site, please contact Dr. Keith I. McConnell, Deputy Director, Decommissioning and Uranium Recovery Licensing Directorate, at (301) 415-7295.

Sincerely,

/RA/

Larry W. Camper, Director
Division of Waste Management
and Environmental Protection
Office of Federal and State Materials
and Environmental Management Programs

Docket No.: 030-03754; 070-01100
License No.: 06-00217-06; SNM-1067

cc: See next page

E. Southerland

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