Mr. Thomas Thompson Senior Health Physicist U. S. Nuclear Regulatory Commission, Region I Nuclear Materials Section B Commercial and R&D Branch 475 Allendale Rd. King of Russia, PA 19406

Dear Mr. Thomas Thompson,

March 12,2009

As part of a reorganization goal and site closing, Invitrogen Corporation (formerly Protometrix, An Invitrogen Company) is requesting to decommission its 688 East Main Street, Branford, Connecticut 06405 facility and terminate its specific research and development NRC license number 06-30693-01, Docket no. 030-35868. As you are aware, Invitrogen plans to vacate the currently leased facility at 688 East Main Street, Branford, Connecticut on March 31,2009.

In an effort to initiate the decommissioning process, a thorough historical review and site characterization of the licensed radioactive materials received, used and/or stored in the two small radioactive materials laboratories, hotlab #1 and hotlab #2, and associated waste storage area were conducted. This review spanned the entire duration of the NRC license number 06-30693-01, from September 10,2002 to present at its 688 East Main Street, Branford, Connecticut 06405 facility.

Invitrogen received approval for its original NRC License Application on September 10, 2002 and began working with radioactive materials involving minimal tracer studies. On October 3,2002, the first radioactive materials shipment, 0.50 milliCuries of phosphorus-33, was received and used. All uses of licensed materials were terminated by mid-January 2009 following the last shipment of licensed radioactive material received, January 7,2009 of 0.25 mCi of phosphorus-33. Small quantities of commercially pre-labeled radioiodine-125 was only briefly ordered, received and used in hotlab #1 only during the period between January 17,2006 and April 3,2006. Therefore, greater than 10 half-lives have elapsed since radioiodine-125 was last used and stored in hotlab #1. In addition, all unsealed radionuclides were purchased and/or received in the bound, nonvolatile form, from vendors.

Upon review of the license history and possession limits, very low levels of radioisotopes having a half-life greater than 65 days, specifically, a total of 7.545 millicuries of tritium and 0.05 mCi of carbon 14 were received, used and/or stored at 688 E. Main St. Branford

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Connecticut 06405 spanning its entire NRC license period to present. Licensed materials having a half-life less than 65 days, specifically, a total 95.70 mCi of Phosphorus-33, 1.25 mCi of Phosphorus-32 and 6.87 mCi of radioiodine-125 were also ordered and received during the entire license period, September 10,2002 through February 28,2008. Sulfur-35 was never ordered or received at this licensed Branford, CT facility. Further, no sealed sources of licensed materials were ordered or received at this facility. Therefore, the NRC license limits were never exceeded during use or storage from September 10,2002 through January 7,2009.

Further, the inventory records indicate that a total quantity of 50 uCi of carbon-14 was received for the entire history of the license. Therefore, the amount used, 7.125 uCi (14.25% of the total received), combined with the residual amount of radioactivity remaining in the stock vial, 42.875 uCi, was ultimately disposed of with the waste vendor totaling 50 uCi. If we assume that 10% of the amount used, 0.7125 uCi, was either ingested or inhaled, no member of the general public would have received greater than a total effective dose equivalent (TEDE) of 25 mrem (NRC limits). (see references below)

The inventory records also indicate that a total quantity of 7.491 mCi of tritium was received for the entire history of the license. The amount used 0.5897 mCi (7.9% of the total received), combined with the residual unused amount of radioactivity remaining in the stock vial, 6.9013 mCi, was ultimately disposed of with the waste vendor totaling 7.491 mCi. If we assume that 10% of the amount used, ) 0.050 mCi, was either ingested or inhaled, no member of the general public would have received greater than a total effective dose equivalent (TEDE) of 25 mrem (NRC limits). (see references below)

ICRP 67, "Age-Dependent Doses to Members of the Public From Intake of Radionuclides: Part 2 Ingestion Dose Coefficients"

ICRP 71, "Age-Dependent Doses to Members of the Public From Inake of Radionuclides: Part 4 Inhalation Dose Coefficients

Although the facility is approximately, 13,787 square feet, very small quantities (primarily uCi levels) of licensed radioactive byproduct materials were restricted to and only used within two small designated laboratories (please see diagram, attachment 1). The low level radioactive waste storage closet was immediately adjacent to and accessible within hotlab #1 via a locked door. More specifically, licensed materials were used, stored and secured in either hot lab #1 or hot lab #2 with card key access only. The following licensed materials were used in Hot lab #1 tritium (3H), radioiodine-125, carbon 14, phosphorus 33, phosphorus 32. Hot lab #2 was only used for phosphorus-33, and it was surveyed and closed out approximately 2 years earlier in August 2007. Therefore, greater than 10 half-lives have elapsed since phosphorus-33 was last used and stored in hotlab #2.

Further, a review of the following records was performed at part of the overall decommissioning process. Specifically, a review of research protocols, description of the property, facilities and equipment, RSO and/or authorized user radiation safety surveys,

purchase orders and receipt of licensed by-product materials, radioisotope inventories, transfers of radioisotopes, radiation safety training, emergency response or spill history, waste storage and disposal records was conducted.

Further, there were no spills that occurred in the radioactive materials hot lab at the Branford, Connecticut site. Any minor radioactive contamination detected during routine work or during radiation safety surveys was promptly decontaminated to levels well below the NRC's release guidance criteria listed in NUREG 1556, volume 7, 1999, appendix Q, NRC license requirements, Regulatory Guide 8.23 limit, and/or less than or equal to 200 dpm/100 cm2, along with documentation. Radioactive materials use and storage was performed in the approved radioactive materials research laboratory hot lab number one and hot lab number two only and according to the procedures listed in the NRC license.

Planning for the decommissioning process began in January 2009. During February 2009, extensive decommissioning radiation safety surveys of the entire facility were initiated and performed by teams of Invitrogen authorized user personnel. RSO confirmatory radiation surveys were subsequently performed. The results of the final decommissioning surveys were well below the NRC's release guidance criteria listed in NUREG 1556, volume 7, 1999, appendix Q, NRC license requirements, Regulatory Guide 8.23 limit, and/or less than or equal to 200 dpm/100 cm2.

On February 20,2009, and March 10,2009, radioactive waste shipments were conducted to remove all remaining radioactive materials from the Branford Connecticut site. The exterior surfaces of all radioactive waste drums were surveyed with a GM survey meter and wipe tests. The results were indistinguishable from background. In addition, there were no sanitary sewer disposals of liquid radioactive waste in either of the two designated hot lab sinks. A final decommissioning radiation safety survey was performed of the pathway that followed the approved vendors exit of the building during transportation of the sealed radioactive waste containers to their truck (i.e. path of egress). Radiological surveys indicated there was no residual radioactive contamination present. The building remained in the secured state.

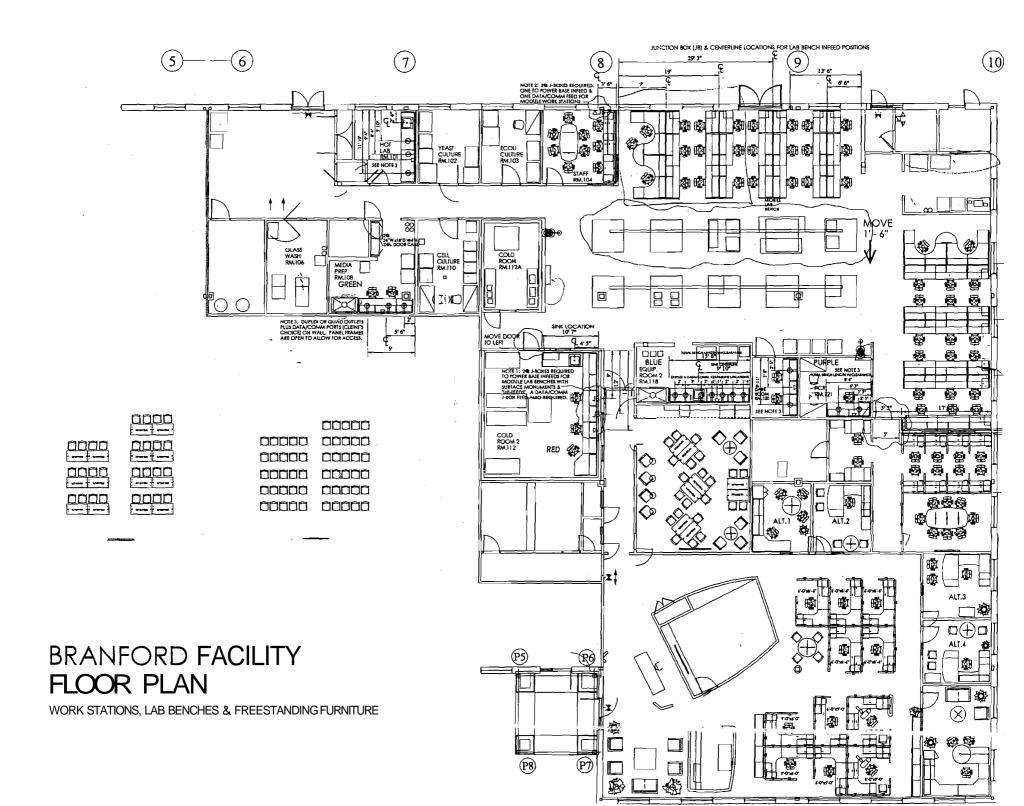
If you require additional information or any have questions, please contact Mr. Greg Waterbury at (203) 848–1104 until March 31,2009 or (203) 605-0559 ongoing. In addition, you may also contact Mr. Leif Olsen at 760-268-8696, EH&S Manager, RSO, Invitrogen - Part of Life Technologies, Corporate Headquarters, 5781 Van Allen Way, Carlsbad, CA 92008 for further correspondence after March 31,2009. The NRC radiation safety program, decommissioning and related documents for the 688 East Main Street, Branford, Connecticut 06405 facility will be sent to and subsequently maintained by Mr. Leif Olsen on March 31, 2009. Since there is an urgency associated with this license amendment request, any consideration you can give us in expediting the above request would be greatly appreciated.

Thank you,

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Mr. Greg Waterbury Facilities Manager and Radiation Safety Officer. Invitrogen Corporation. 688 East Main St. Branford, Connecticut 06405

CC: Mr. Barry Schweitzer, Ph.D., Management Representative



Page 1 of 1

From: Origin ID: RSPA (203) 848-1104 Greg Waterbury Life Technologies 688 East Main Street Branford, CT 06405	Ship Date: 12MAR09 ActWgt 0.5 LB CAD: 5131137/INET9011 Account#: S			
SHIP TO: (610) 337-5075 BILL SENDER	<b>Ref</b> # 10085018.62711			
Mr. Thomas Thompson	Invoice # PO #			
US Nuclear Regulatory Commission 475 ALLENDALE RD	Dept #			
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This is to acknowledge the receipt of your letter/application dated

<u>3/12/2009</u>, and to inform you that the initial processing which 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.

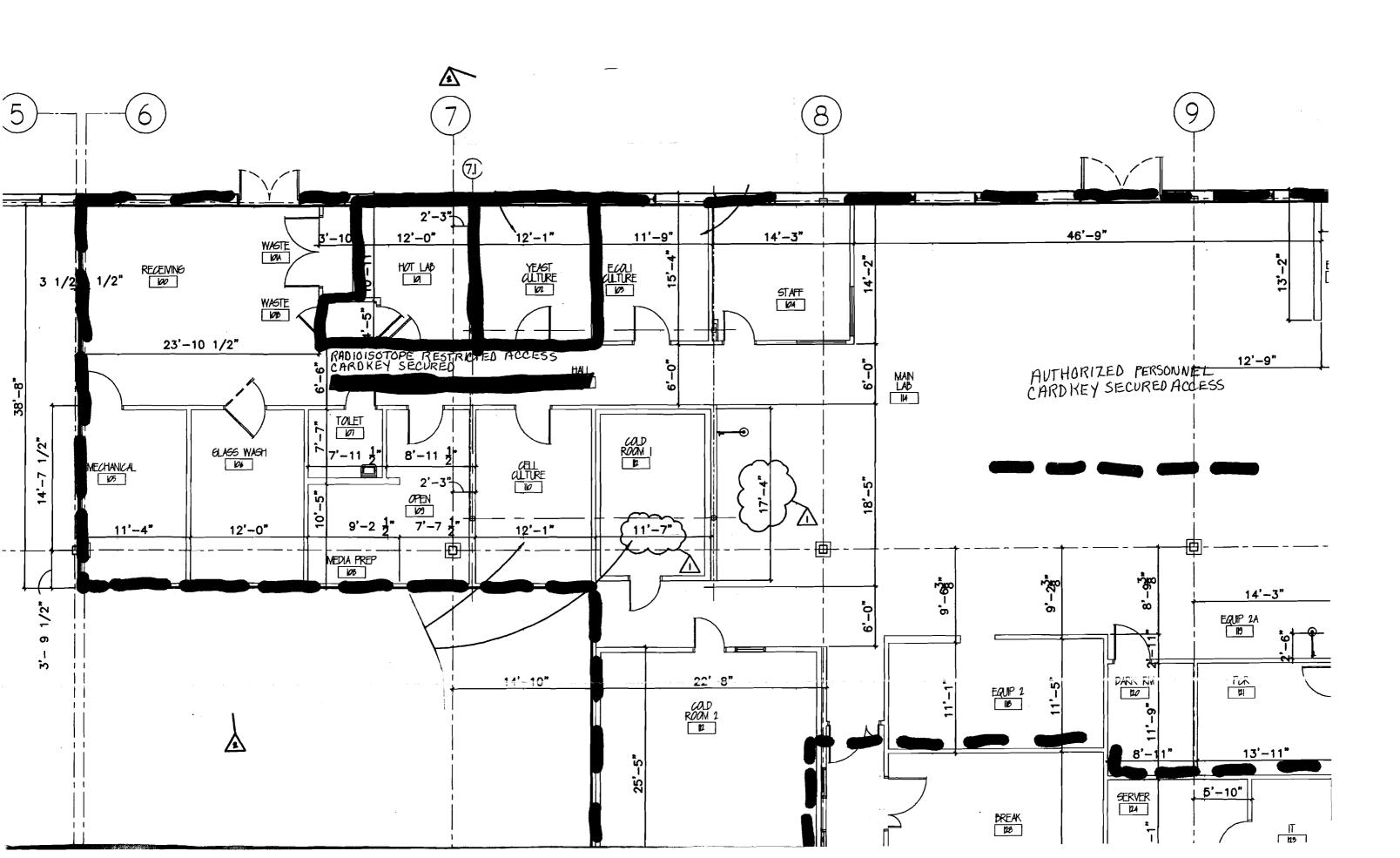
Please provide to this office within 30 days of your receipt of this card

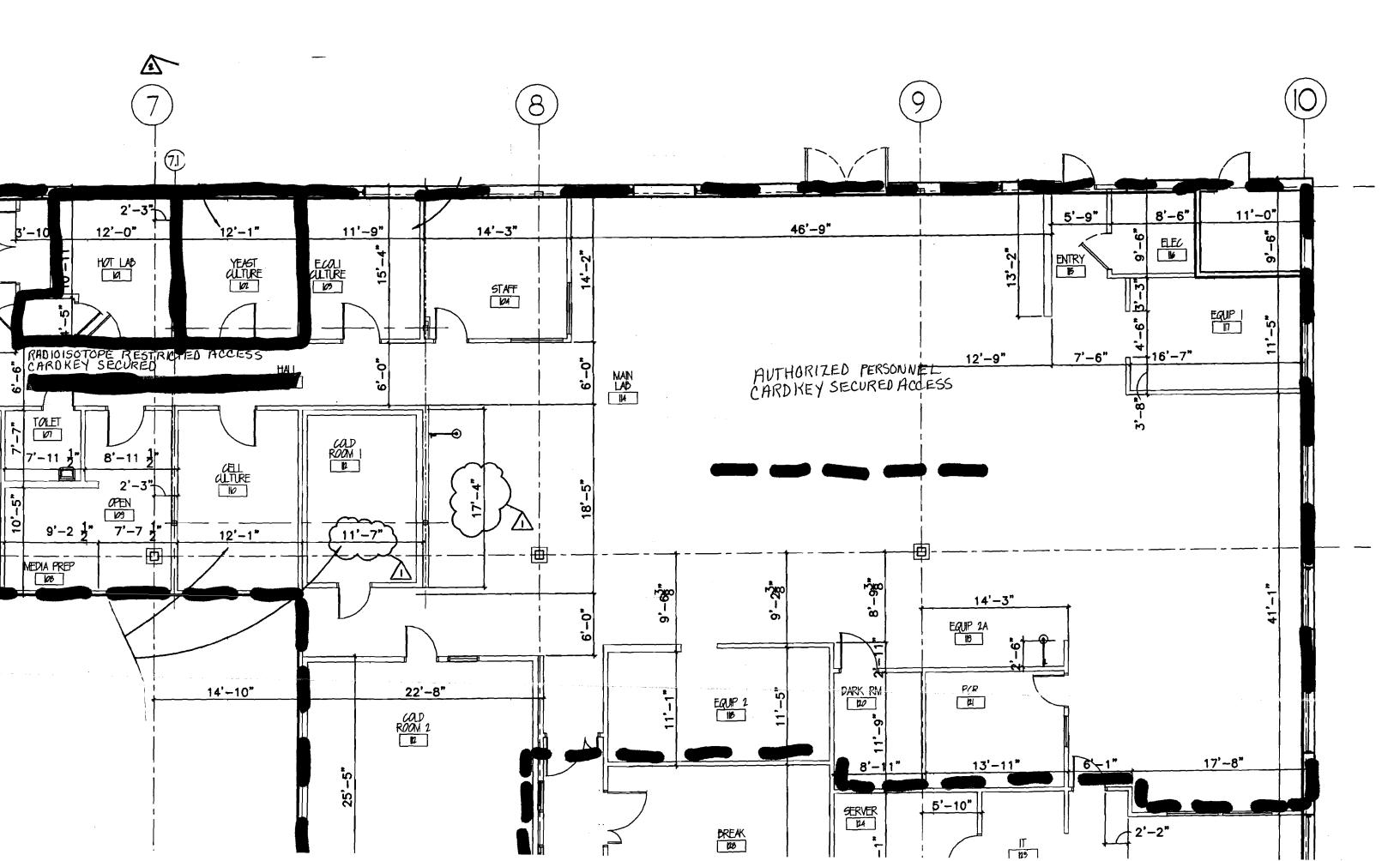
A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

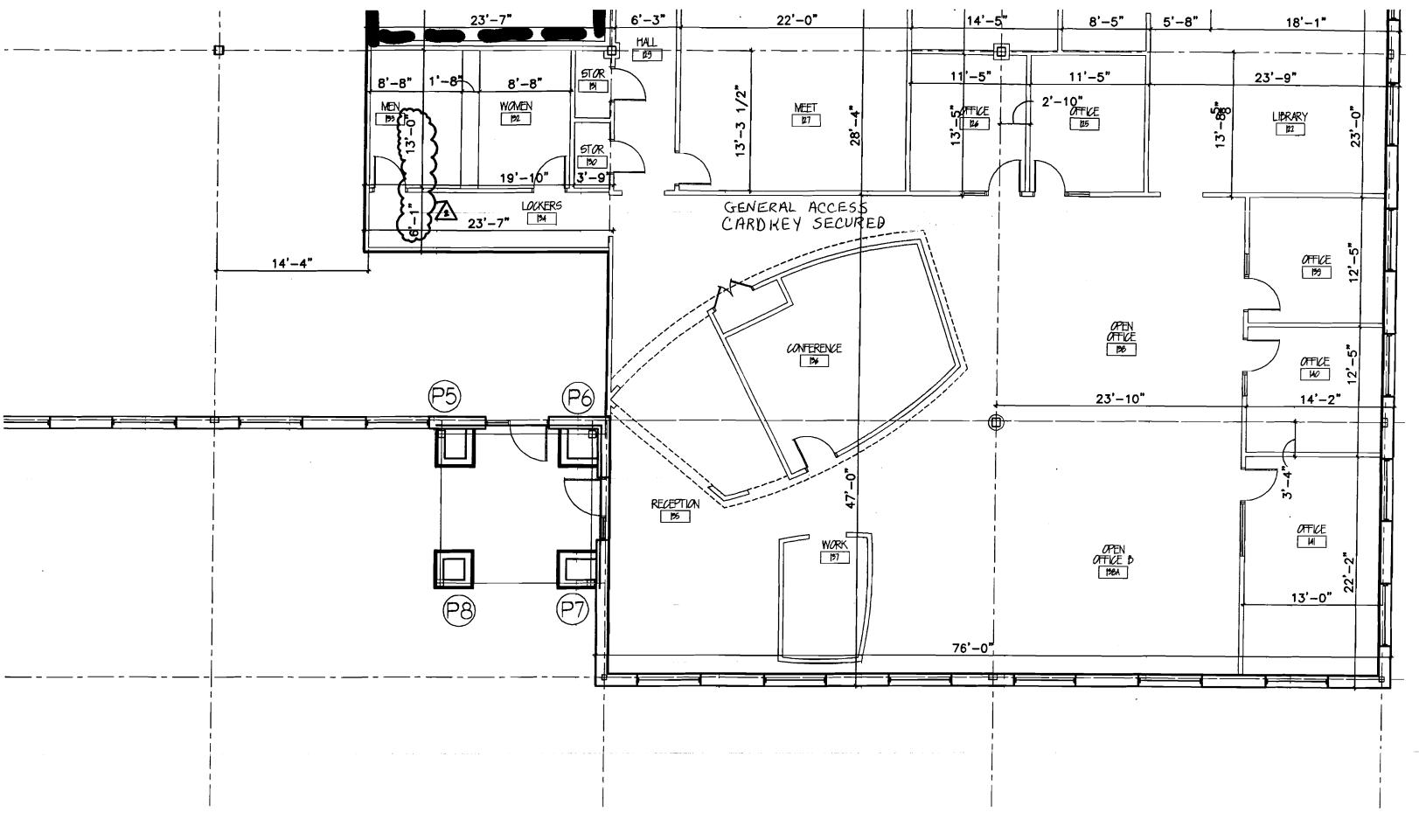
143541 Your action has been assigned Mail Control Number \_ When calling to inquire about this action, please refer to this control number. You may call us on (610) 337-5398, or 337-5260.

NRC FORM 532 (RI) (6-96)

Sincerely, Licensing Assistance Team Leader





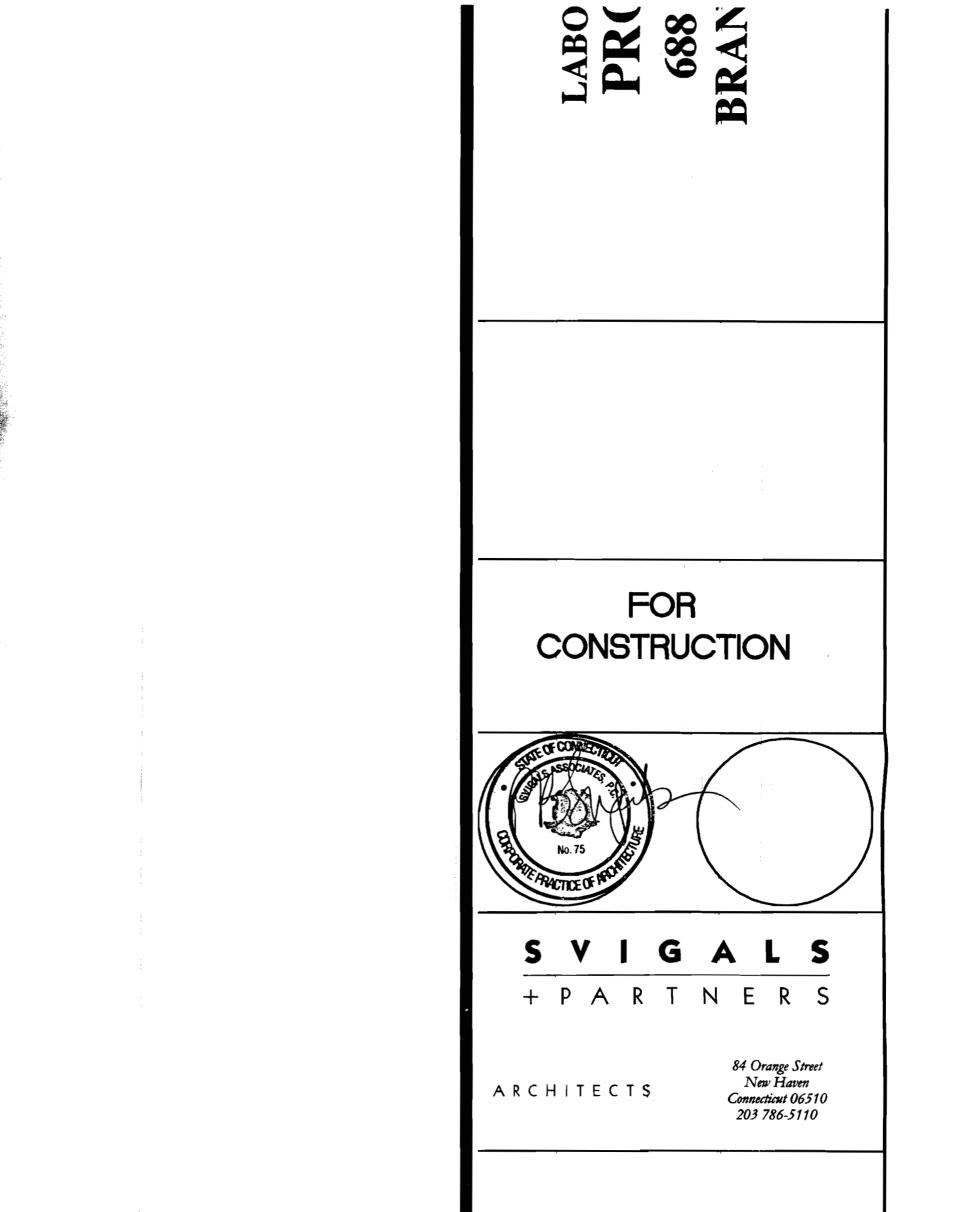




## LABORATORY AND OFFICE FOR PROTOMETRIX, INC. 688 EAST MAIN STREET BRANFORD, CONNECTICUT

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