

U.S. Nuclear Regulatory Commission
Docket No. 030-03754
July 8, 2009

Safety Evaluation Report
for ABB Inc.'s Revised Decommissioning Plan for their CE Windsor, CT, Facility
U.S. Nuclear Regulatory Commission Materials License No. 06-00217-06

Background

Decommissioning activities at the 612-acre CE Windsor Site (the Facility) located in Windsor, Connecticut, have been ongoing under an U.S. Nuclear Regulatory Commission (NRC) approved decommissioning plan (DP) since 2004. The original DP for the Facility was submitted by ABB Inc. (ABB, or the Licensee) to the NRC as part of an amendment request letter dated October 15, 2003. This DP provided the decommissioning information necessary for site-wide remediation, license termination and unrestricted release for the Facility with the acknowledgement that during the decommissioning, certain buildings and areas that contained commingled or exclusive radioactive material, which fell under the Formally Utilized Sites Remedial Action Program (FUSRAP), would be remediated by U.S. Army Corps of Engineers (USACE) rather than the Licensee. On June 1, 2004, the NRC amended License No. 06-00217-06 to authorize use of the original DP to support impacted area remediation and eventual unrestricted release of the entire site. As part of the amendment that approved site-wide use of the DP, a Safety Evaluation Report was prepared and issued by the NRC staff.

In a letter dated December 31, 2008, ABB submitted Revision 1 to the CE Windsor Site Decommissioning Plan (revised DP) and requested that NRC incorporate the revised DP into NRC License No. 06-00217-06. ABB's stated objective was to update the existing approved DP to reflect the current status of completed decommissioning activities and to describe the remediation activities to be conducted by ABB under NRC oversight for select FUSRAP areas located within the Facility. The authority for ABB to remediate the FUSRAP areas under NRC oversight was established by a letter from the NRC to USACE on August 15, 2007.

This Safety Evaluation Report provides an assessment of the decommissioning activities included or changed in the revised DP that were not addressed in the original DP. These activities are principally related to remediation of select FUSRAP areas. The intent of the Safety Evaluation Report is to assure that the changes reflected in the revised DP are evaluated and determined to be safe.

Evaluation

Section 1.0 Executive Summary

The staff has reviewed the information in the "Executive Summary" section of the revised DP as it relates to the changes in the original DP using the guidance in NUREG-1757, "Consolidated NMSS Decommissioning Guidance", Volume 1, Section 16.1 (Executive Summary) and as compared to the status of the Licensee's decommissioning activities at the Facility to date. Based upon this review, NRC staff has determined that ABB has provided a revised overview and summary of the existing Facility conditions and planned

decommissioning activities to support an adequate understanding by the NRC staff and members of the public.

The “Executive Summary” section of the revised DP was changed to reflect that certain buildings and areas of the Facility which fall under FUSRAP which were originally to be remediated by the USACE, will now be remediated by the Licensee. These areas include the Building 3 and 6 Complexes, industrial/radiological waste lines associated with these complexes, the Equipment Storage Yard, the Woods Area, the Drum Burial Pit, and the Clamshell Pile. Remediation of these areas will include removal of structures including floor slabs and footings, removal of impacted underground piping systems and utilities, and removal of soils impacted above the site-wide soil derived concentration guideline levels (DCGLs) established in the original DP. At the conclusion of the decommissioning activities, the only remaining impacted structure will be the south end of Building 3 or the Building 3 High Bay. This section identified that this version of the DP does not address the remediation of two remaining impacted FUSRAP site areas: the Site Brook and the adjacent Debris Piles. The remediation of these areas will be addressed as part of a future DP revision that will be submitted to the NRC for review. The Executive Summary also identifies a single, non-FUSRAP related area, called the Burning Grounds, which will be re-remediated. This area was remediated and released for unrestricted use by the NRC in 1989; however, the revised DP provides for the re-remediation of this area to meet current NRC unrestricted release standards.

Also included in the Executive Summary was a brief status of decommissioning activities completed to date. As of the December 2008, the Licensee reported that Building Complexes 2, 5, 6A and 17 have been fully remediated and that the final status surveys have been completed and accepted by the NRC. On January 22, 2009, the NRC authorized unrestricted release of 365 contiguous acres of the site that all of these areas with the exception of Complex 2. Unrestricted release was not requested for this area by the Licensee due to its proximity to the FUSRAP areas yet to be remediated.

Section 2.0 Facility Operating History

The staff has reviewed the information in the “Facility Operating History” section of the revised DP as it relates to the changes in the original DP using the guidance in NUREG-1757, “Consolidated NMSS Decommissioning Guidance”, Volume 1, Section 16.2 (Facility Operating History). Based upon this review, NRC staff has determined that ABB has provided sufficient revised information to aid the NRC staff in evaluating the Licensee’s determination of the radiological status of the Facility and the Licensee’s planned decommissioning activities, and to ensure that the decommissioning can be conducted in accordance with NRC requirements.

The “Facility Operating History” section of the revised DP was not significantly changed from the original DP. The Licensee provided the status of completed remediation and conduct of final status survey for Building Complexes 2, 5, 6A and 17 and a description of past activities conducted in Building 3 and Building 6. Building 3 was originally designed and constructed as a navy nuclear fuels manufacturing facility. These activities ceased in 1961 and the structure was decontaminated and renovated for use in fossil fuel research and development. Building 6 was used exclusively for radiological liquid waste processing until 1995.

Section 3.0 Facility Description

The staff has reviewed the information in the “Facility Description” section of the revised DP as it relates to the changes in the original DP using the guidance in NUREG-1757, “Consolidated NMSS Decommissioning Guidance”, Volume 1, Section 16.3 (Facility Description). Based upon this review, NRC staff has determined that ABB has provided sufficient information to describe the site location, general population distribution, the current and likely future land use, surface and groundwater hydrology, and the revised impact on protected species.

The “Facility Description” of the revised DP was unchanged from the original DP except that the anticipated future land use was changed to include the potential for residential use and the Licensee’s evaluation of potential impacted endangered species was updated to reflect a current assessment.

As described in the revised DP, it is still anticipated that the future uses of the Facility after successful decommissioning and unrestricted release will be commercial or light industrial; however, given the current community growth and the current land development strategy of the local municipality, the Licensee indicated that future residential development on portions of the Facility is possible. The staff compared the change in the anticipated land use to include residential areas to the previously approved soil DCGLs to ensure that the requirements of the Memorandum of Understanding (MOU) on “Consultation and Finality on Decommissioning and Decontamination of Contaminated Sites” between the NRC and the U.S. Environmental Protection Agency (USEPA) was appropriately implemented. On June 16, 2008, the NRC initiated Level 1 consultation with USEPA for the Facility because the previously approved soil DCGLs exceeded the trigger levels in the MOU for the residential land use scenario.

The revised DP indicated that the Licensee contacted the U.S. Fish and Wildlife Services (USFWS) and the Connecticut Department of Environmental Protection during 2007 regarding updates to the identification of impacted species. The updated responses indicated that the presence of the Eastern box turtle (*Terrapene carolina*) is the only species that will be potentially impacted as part of the remaining remediation activities. The NRC staff received notification from USFWS on June 8, 2009, that confirmed that the existing Federal endangered species identified in the revised DP were still accurate.

4 Radiological Status of the Facility

The staff has reviewed the information in the “Radiological Status of the Facility” section of the revised DP as it relates to the changes in the original DP using the guidance in NUREG-1757, “Consolidated NMSS Decommissioning Guidance”, Volume 1, Section 16.4 (Radiological Status of the Facility). Based upon this review, the NRC staff has determined that ABB has described the types and amounts of radioactive contamination at the Facility to allow the NRC staff to evaluate the potential safety issues associated with remediating and decommissioning the remainder of the Facility, whether the remediation activities and radiation control measures proposed by the licensee are appropriate for the type of radioactive material present at the facility, whether the waste management practices are appropriate, and whether the licensee’s cost estimates are plausible, given the amount of contaminated material that will need to be removed or remediated.

The “Facility Operating History” of the revised DP was changed to remove the contamination status of those areas where remediation had been completed and to add detailed descriptions of the new areas, principally FUSRAP areas, where remediation is now planned. The new areas for which descriptions were provided include the Building 3 Complex, the Building 6 Complex, industrial/radiological and sewage waste lines, the Woods Area, the Drum Burial Pit, the Clamshell Pile, the Equipment Storage Yard, and the Burning Grounds. For each of these areas, the Licensee provided a description of the size of the area or building, the historical use of the area that resulted in the contaminants, the contaminants involved, and the contamination levels identified as part of the previous site investigations. The table below provides a summary of this information.

Table of Areas to be Remediated

Area	Size	Past Use	Principal Isotopes Present	Max. Contamination Level (pCi/gm)	Max. Surface Contamination Levels (dpm/100 cm ²)
Building 3	48,200 sq. ft.	Navy fuel fabrication unit until 1961	Uranium	1,423 (paint) 1,152 (Concrete surface) 23 (concrete core)	124,000
Building 6	2, 750 sq. ft.	Liquid radiological waste dilution and pumping facility until 1995	Uranium Co-60	9,879 (sludge) 1,239 (paint) 438 (concrete surface) 11.6 (concrete core) 56 (sludge) 1.3 (concrete surface) <1 (concrete core))	5,000 (beta emitters) 5,000 (beta emitters)
Building 3 and 6 Complex (footprint)	6 acres	Land area used for Buildings 3 and 6	Uranium	3,700 (soil)	Not Applicable
Sanitary Waste Lines	3500 linear feet	Support sanitary system	Uranium	30 (sludge)	Not Applicable
Industrial/Radiological Waste Lines	7,000 linear feet	Liquid/radiological waste disposal	Uranium	97,000 (sludge)	Not Applicable
Woods Area	7 acres	Radioactive waste storage	Uranium	110,236 (soil)	Not Applicable
Drum Burial Pit	1 acre	Radioactive waste disposal	Uranium	16,000 (soil)	Not Applicable
Clamshell Pile	450 sq. feet	Waste disposal	Uranium	1,392 (shells)	Not Applicable
Equipment Storage Yard	0.2 acres	Waste storage	Uranium	842 (soil)	Not Applicable
Burning Grounds	2 acres	Waste disposal	Ra-226 Th-232	3 (soil) 8 (soil)	Not Applicable

The staff noted that the surface water and ground water sections of the revised DP were unchanged from the original DP. The staff determined that the activities delineated in the revised DP do not involve remediation of surface water areas, are not likely to impact surface or ground waters, and the existing ground water monitoring program on site will continue to be implemented during the planned decommissioning activities.

Section 5.0 Dose Modeling Evaluations

The staff has reviewed the dose modeling analysis as it relates to the changes in the original DP. This review involved determining the acceptability of the previously approved site-wide soil DCGL for the FUSRAP areas because the proposed future land use was revised to include residential use; determining the acceptability of the proposed site-specific building DCGLs to be used for the Building 3 High Bay; and determining if the use of screening level DCGLs is appropriate for the re-remediation of the Burning Grounds area. This review was conducted according to guidance provided in NUREG-1757, "Consolidated NMSS Decommissioning Guidance", Volume 2, Sections 5.1 and 5.2. Based upon this review, the staff concludes that the dose modeling provided in the revised DP and associated reports is reasonable and is appropriate for the exposure scenarios under consideration. In addition, the dose estimate provides reasonable assurance that the dose to the average member of the critical group is not likely to exceed the 25 millirem annual dose criterion in 10 CFR 20.1402. This conclusion is based on an assessment relative to the acceptability of the previously approved soil DCGLs for the FUSRAP areas, the Licensee's modeling effort used to determine the building DCGLs along with the independent analysis performed by the staff, and a determination that the use of the soil screening DCGLs were acceptable for use at the Burning Grounds.

The staff found that the site-wide soil DCGLs of 557 picocuries per gram (pCi/gm) and 5 pCi/gm for total enriched uranium and Co-60, respectively, were acceptable for use with the remaining FUSRAP area remediation and decommissioning activities. These DCGLs were 1) originally calculated using the NRC accepted RESRAD, Version 6.0, computer code, 2) were developed using the conservative "residential farmer" scenario, and 3) were derived to keep at or below the peak annual dose to the average member of the critical group of 19 millirem, which is below the 25 millirem radiological criteria of 10 CFR 20.1402. The Licensee used the dose value of 19 millirem to meet the requirements of the Connecticut Department of the Environment. Because the "residential farmer" scenario is more restrictive than the residential scenario that corresponds to the revised future land use for the Facility following unrestricted release, the previously approved site-wide soil DCGL remains appropriate for use with the revised DP.

The staff found that the basis for the building DCGLs to be used for the Building 3 High Bay was appropriate and acceptable. The licensee utilized RESRAD-Build, Version 3.4, to calculate the site-specific building DCGLs of 20,148 disintegrations per minute per 100 square centimeters (dpm/100 cm²) for total uranium and 6980 dpm/100 cm² for Co-60, which correspond to a maximum annual dose of 19 millirem to the average member of the critical group, that is below the 25 millirem radiological criteria of 10 CFR 20.1402. The staff concurred that the scenarios used by the licensee to derive the DCGLs, the building renovation/demolition scenario for uranium and the occupational scenario for Co-60, were reasonable and the site specific parameters used by the Licensee in the computer code were adequately justified.

The staff found the licensee's request to use the NRC screening soil DCGLs for the re-remediation of the Burning Grounds to be acceptable. The proposed values of 1.1 pCi/gm and 0.6 pCi/gm for Th-232(+C) and Ra-266 (+C), respectively, were formally published as acceptable screening values in Appendix B to NUREG-1757, Volume 1, "Consolidated NMSS Decommissioning Guidance", which may be used to meet the 25 millirem radiological criteria of 10 CFR 20.1401. These screening values were calculated by the NRC staff with the DandD computer code using conservative default parameters with the residential farmer scenario. The licensee confirmed that use of the screening values continues to support the 19 millirem dose threshold established by the Connecticut Department of Environmental Protection. DCGLs Consistent with the requirements of Section 6.6 of NUREG-1757, Volume 1, the staff determined that use of the screening soil DCGLs are acceptable for use in the Burning Grounds re-remediation since the contamination remaining in the area is generally within the top six inches of surface soil, the unsaturated zone and groundwater are initially free of contamination the area, and the vertical saturated hydraulic conductivity at the Burning Ground area is greater than the infiltration rate as evidenced by no standing water in the area.

6.0 Planned Decommissioning Activities

The staff has reviewed the information in the "Planned Decommissioning Activities" section of the revised DP as they relate to the changes in the original DP using the guidance in NUREG-1757, "Consolidated NMSS Decommissioning Guidance", Volume 1, Section 17.1 (Planned Decommissioning Activities). Based upon this review, the NRC staff has determined that ABB provided sufficient information to allow the NRC staff to evaluate the licensee's planned decommissioning activities to ensure that the decommissioning can be conducted in accordance with NRC requirements.

The "Planned Decommissioning Activities" section of the revised DP includes a description of plans for remediation of the Building 3 and 6 Complexes and for the remediation of subsurface piping systems/utilities and soils. Remediation will include decontamination of buildings, demolition of all structures within the complexes to ground surface except for the Building 3 High Bay, removal of floor slabs and footings 3 feet below ground surface, removal of all underground utilities and any soils under the utilities impacted above the DCGLs, and conducting a final status survey. The remediation techniques are unchanged from those that were successfully used to remediate Building 2, 5, 6A and 17 as described in the original DP. The staff noted that commitments made as a result of licensee responses to requests for additional information provided during the review of the original DP were integrated into the revised DP.

Section 7.0 Project Management and Organization

The NRC staff has reviewed the information in the "Project Management and Organization" section of the revised DP as it relates to changes in the original DP using the guidance in NUREG-1757, "Consolidated NMSS Decommissioning Guidance", Volume 1, Section 17.2 (Project Management and Organization) and has reviewed the conduct of decommissioning at the Facility to date. Based on this review, the NRC has determined that the licensee has provided sufficient information to allow the NRC staff to evaluate the licensee's decommissioning project management organization and

structure to determine if the decommissioning can be conducted safely and in accordance with NRC requirements.

The "Project Management and Organization" section of the revised DP was not significantly changed from the original DP except for the addition of a nuclear materials manager who will be assigned responsibility for maintaining the special nuclear material inventory. The use of this project management structure was successfully used to support remediation activities to date.

Section 8.0 Radiation Safety and Health Program

The staff has reviewed the information in the "Radiation Safety and Health Program" section of the revised DP as it relates to the changes in the original DP using the guidance in NUREG-1757, "Consolidated NMSS Decommissioning Guidance", Volume 1, Section 17.3 (Radiation Safety and Health Program) and has reviewed the conduct of decommissioning activities at the Facility to date. Based upon this review, the NRC staff has determined that ABB has adequately described the workplace contamination control, air sampling, respiratory protection, internal and external exposure controls, instrumentation, and nuclear criticality safety programs in sufficient detail to allow the NRC staff to conclude that the programs can continue to be conducted in accordance with NRC requirements.

The "Radiation Safety and Health Program During Decommissioning" section of the revised DP was not significantly changed from the original DP except that the licensee's responses to formal requests for additional information related to the original DP approval were included in the revised DP and the Licensee proposed that the criticality monitoring requirement not be required for packaged waste meeting the fissile exempt requirements of 10 CFR 71.15. Under the Licensee's proposal, criticality monitoring would not be required for waste generated and packaged during remediation of the FUSRAP areas, provided that the waste met the specific concentration requirements to be classified as fissile exempt. For the FUSRAP areas at the Facility, the fissile exempt requirement corresponds to a U-235 packaged waste concentration of not greater than 1080 pCi/gm. Because packaged material meeting the 10 CFR 71.15 requirements is by definition exempt from further control as fissile material, the staff found the licensee's proposal acceptable. The use of the existing radiation safety and health program was successfully used to support remediation activities to date.

The Licensee estimated that the highest annual dose likely to be received by a construction worker remediating the FUSRAP areas is about 2 millirem per year. The basis for this estimate is a worker working for six months per year in the vicinity of soil having an enriched uranium concentration of about 451 pCi/gm. The basis for this estimate is derived from the RESRAD model using the construction worker scenario. This value is consistent with estimates determined by the NRC staff.

Section 9.0 Environmental Monitoring and Control Program

The staff has reviewed the information in the "Environmental Monitoring and Control Program" section of the revised DP as it relates to the changes in the original decommissioning plan using the guidance in NUREG-1757, "Consolidated NMSS Decommissioning Guidance", Volume 1, Section 17.4 (Environmental Monitoring and Control Program) and based on the decommissioning activities completed at the Facility

to date. Based upon this review, the NRC staff has determined that ABB has provided sufficient information for the staff to conclude that the licensee's program is adequate to support compliance requirements of 10 CFR Part 20.

The "Environmental Monitoring and Control Program" section of the revised DP was not changed from the original DP. No airborne or liquid effluent releases are planned during the remaining decommissioning activities. However, if effluent releases should occur, the licensee will employ procedures and process controls to ensure that adequate sampling and monitoring of effluents are performed, and effluent releases meet the criteria in 10 CFR 20, Appendix B. Based upon a review of the activities described in the revised decommissioning plan, the staff determined that there continues to be no credible potential pathway for public exposure to airborne or liquid releases due the anticipated remediation activities.

Section 10.0 Radioactive Waste Management Program

The staff has reviewed the information in the "Radioactive Waste Management Program" section of the revised DP as it relates to the changes in the original DP using the guidance in NUREG-1757, "Consolidated NMSS Decommissioning Guidance", Volume 1, Section 17.5 (Radioactive Waste Management Program). Based on this review, the NRC staff has determined that the licensee's programs for management of radioactive waste generated during the planned decommissioning operations ensure that waste will be managed in accordance with NRC requirements and in a manner protective of the public health and safety.

The "Radioactive Waste Management Program" section of the revised DP was changed to include provisions to mix decommissioning soils and debris in order to meet the uranium concentration requirements of the waste disposal facility acceptance criteria and the fissile exempt packaging criteria. This item was reviewed by the NRC staff and it was determined that this practice is acceptable because only existing waste will be included as part of the mixing process and the mixing will not result in a change in the waste classification.

Section 11.0 Quality Assurance Program

The staff has reviewed the information in the "Quality Assurance Program" section of the revised DP as it relates to the changes in the original DP using the guidance in NUREG-1757, "Consolidated NMSS Decommissioning Guidance", Volume 1, Section 17.6 (Quality Assurance Program). Based upon this review, the NRC staff has determined that the licensee's quality assurance program is sufficient to ensure that information submitted to support decommissioning of its facility should be of sufficient quality to allow the staff to determine if the licensee's planned decommissioning activities can be conducted in accordance with NRC requirements.

The "Quality Assurance Program" section of the revised DP was not changed from the original DP. No significant problems were identified relative to the use of the quality assurance program during the conduct of decommissioning activities completed by the licensee to date.

Section 12.0 Facility Radiation Surveys

The staff has reviewed the information in the "Facility Radiation Surveys" section of the revised DP as it relates to the changes in the original DP using the guidance in NUREG-1757, "Consolidated NMSS Decommissioning Guidance", Volume 2, Section 4 (Facility Radiation Surveys) and has reviewed the Licensee's decommissioning performance at the facility to date. Based upon this review, the NRC staff has determined that ABB's survey program is adequate to support continued safe conduct of work during the remediation activities and to provide sufficient information to support a determination by the NRC staff whether the radiological status of the Facility is suitable to meet the unrestricted release criteria of radiological criteria of 10 CFR 20.1401.

The "Facility Radiation Surveys" of the revised DP was not changed from the original DP. The Licensee will continue to use the material release guidance provided in Regulatory Guide 1.86. Prior to the conduct of the final status surveys for remediated areas, the Licensee will submit detailed final status survey plans that will be reviewed and approved for use by the NRC staff. The design of the final status surveys will be in accordance with the MARSSIM program as detailed in NUREG-1575, "Multi-Agency Radiation Survey and Site Investigation Manual (MARSSIM)". The MARSSIM process provides for the use of the unity rule to address the presence of multiple contaminants in an area. No significant problems were identified with the Licensee's radiation survey program during the conduct of decommissioning activities completed by the licensee to date.

Section 13.0 Financial Assurance

The staff has reviewed the information contained in the licensee's financial assurance documents submitted separately from the revised DP using the guidance in NUREG-1757, "Consolidated NMSS Decommissioning Guidance", Volume 3, Part II (Financial Assurance). Based upon this review, the NRC staff has determined that ABB has adequately estimated the cost to conduct the planned decommissioning activities and established adequate financial assurance instruments to assure adequate funding during the balance of the decommissioning process.

The licensee provided revised decommissioning financial assurance documents to support implementation of the revised decommissioning plan. These documents included a Decommissioning Funding Plan dated September 19, 2008; the Certification of Financial Assurance dated January 9, 2009; the Letter of Credit dated December 9, 2008; and the Standby Trust Agreement dated January 9, 2009.

Conclusion

The staff has concluded that the revised decommissioning plan provided by ABB for the conduct of decommission activities at the CE Windsor Site, if fully implemented, will result in 1) compliance with applicable regulatory requirements, 2) safe conduct of the planned decommissioning activities, and 3) the generation of sufficient, appropriate information to allow the NRC staff to determine if the site is suitable for unrestricted release in accordance with 10 CFR 20.1402. As a result, the revised DP is acceptable for use at the CE Windsor Site.

References

1. NRC letter and safety evaluation report to Combustion Engineering, Inc. authorizing unrestricted release of the woods area (Burning Grounds) dated August 10, 1989;
2. ABB letter to NRC dated October 15, 2003, "Application for Amendment of Materials License 06-00217-06" dated October 15, 2003 (ADAMS Accession Nos. ML033080245, ML033080248, and ML033080252);
3. Enclosure II to ABB letter dated October 15, 2003 "CE Windsor Site Decommissioning Plan, October 15, 2003" (ADAMS Accession Nos. ML033080254, ML033080258, ML033080273, ML033080279, ML033080310, and ML033080313);
4. Enclosure III to ABB letter dated October 15, 2003 "CE Windsor Site Derivation of Site-Specific DCGLs, September 2003" (ADAMS Accession Nos. ML033080318, ML033080320, ML033080327, ML033080334, ML033080341, ML033080346, ML033080352, ML033080356, and ML033080366);
5. "Environmental Assessment of the Proposed Decommissioning Plan for the ABB Prospects, Inc. Windsor, Connecticut Facility" dated May 20, 2004 (ADAMS Accession No. ML041400413);
6. "Safety Evaluation Report for ABB Prospects Inc. Site Wide Decommissioning Plan for their Windsor, CT Facility", dated June 1, 2004 (ADAMS Accession No. ML041400387);
7. NRC letter to the USACE dated August 15, 2007, "Proposed Process to Decommission and Cleanup the ABB Windsor Site" (ADAMS Accession No. ML072210979);
8. ABB letter to NRC dated February 28, 2008, "Subject: Environmental Information Report" (ADAMS Accession Nos. ML080850764, ML080850789);
9. ABB letter to the NRC dated December 31, 2008, "Application for Amendment of Materials License 06-00217-06" (ADAMS Accession Nos. ML090160123, ML090160128, ML090160370, and ML090160378);
10. ABB letter to NRC dated September 19, 2008, "Additional Information for Decommissioning Funding Plan" (with attached redacted Decommissioning Funding Plan, Revision 2, September 2008) (ADAMS Accession Nos. ML082800445 and ML082800448);

11. Attachment 4 to ABB letter dated December 31, 2008, "CE Windsor Site Decommissioning Plan, Revision 1, December 2008" (ADAMS Accession Nos. ML090160381, ML090160388, and ML090160396);
12. Attachment 5 to ABB letter dated December 31, 2008. "CE Windsor Site Development of Building DCGLs, Revision 0, December 2008" (ADAMS Accession Nos. ML090160458, ML090160469, ML090160478, and ML090160487).
13. "Notice of Availability of Environmental Assessment and Finding of No Significant Impact for License Amendment to Materials License No. 06-00217-06, for Remediation of Portions of a Site in Windsor, Connecticut" (Federal Register: July 2, 2009, Volume 74, Number 126, Page 31770-31772)