



January 6, 2011

Ms. Judith Joustra  
Chief, Decommissioning Branch  
Division of Nuclear Material Safety  
U.S. Nuclear Regulatory Commission, Region I  
475 Allendale Road  
King of Prussia, PA 19406-1415

06-00217-06  
03003754

**Subject: ABB Decommissioning Plan Revision 2 Schedule**

Reference: A. Letter, J. F. Conant (ABB) to J. Nicholson (NRC), dated February 26, 2010  
B. Letter, J. F. Conant (ABB) to J. Nicholson (NRC), dated August 6, 2010

Dear Ms. Joustra:

ABB has become very concerned with the schedule for approval of its Decommissioning Plan Revision 2 ("DP"), initially submitted as Reference A and then revised and resubmitted as Reference B to capture responses to NRC questions. This DP describes the final stage of cleanup at the CE/ABB Site in Windsor, Connecticut. The original plan was to complete all reviews and achieve an approved DP by year-end 2010, so as to allow construction work on the Site Brook and Debris Piles adjacent to the brook to start by March 2011 and be fully completed within a single construction season.

There are factors relevant to expediting the DP approval process, or finding a way to initiate work under the current DP prior to approval of DP Rev 2. Due to the sensitive environmental nature of the Site Brook, additional measures must be taken to minimize disturbance of ecological habitats. Remediation will take longer due to the limitations of access with steep banks along both sides of the brook and safety being a primary concern. Special plant material will be needed for restoration in the wetland areas and is required to be planted by September to allow time to take root before the winter. In addition to the ecosystem restoration requirements, an expeditious approval is important to allow reasonable time to bid and award contracts under an approved DP. The combination of these factors will cause the decommissioning activities in Site Brook to take virtually all of the shortened construction season in 2011.

ABB's Radiation Safety Officer ("RSO"), Heath Downey and I have been in good communication with the NRC's John Nicholson, especially since his return from special assignment in early November. At that time, it appeared to ABB that the NRC had no new technical inquiries that would delay completing the approval process. However, the State of Connecticut Department of Environmental Protection ("CTDEP") raised an issue regarding radon to the NRC that I believe Mr. Nicholson may have briefed you on. As I'm sure you know, the issue raised by the State is one that the NRC previously has addressed for the industry, and to which the ABB DP conforms. The CTDEP also advised ABB of its concern with radon. Since then, ABB has met with the CTDEP and responded to their concern. ABB believes that the CTDEP is satisfied with an ABB solution that would not require any change to the DP as it stands currently within the NRC, thus paving the way to completing the approval process.

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Unfortunately, ABB and the NRC now have lost valuable time from the regulatory approval process, which could readily impact ABB's construction season and possibly push brook remediation activities into a second construction season if formal DP approval by the NRC is delayed past March. An unfortunate complication was John Nicholson's special assignment away from the Region and the limited resources available during that time in NRC Region I. Thus, completion of the DP approval process has taken longer than anticipated. ABB respectfully requests that the NRC Region expedite the approval process to the fullest extent possible, such that ABB will be able to complete all physical Site remediation work, as well as final status surveys and final brook ecosystem restoration in 2011, leaving all of 2012 for completion of final status reviews and license termination.

Although this action is important to ABB for a safe and final closure of the Site with license termination, the Town of Windsor has been participating actively and has great interest in redevelopment of the Site, especially with the current financially challenging times and a new potential for tax revenues becoming available to it.

ABB continues its commitment to a safe and compliant worksite and has and will shut down work where safety or compliance is not assured. Since it began remediating the entire Site in 2002, ABB and its contractors have experienced only one OSHA recordable incident and only a few minor first aid cases, which were mostly insect stings/bites, in well over 300,000 man-hours of work. There has not been a NRC violation in fifteen years.

ABB greatly appreciates your consideration of this request and will provide any additional information necessary in order to support expediting and finalizing the approval process for the Windsor DP. If there are any questions concerning this urgent request, please contact me at (860) 418-0370, or by email at [john.conant@us.abb.com](mailto:john.conant@us.abb.com).

Sincerely,



John F. Conant  
Senior Project Manager

JFC/et

xc: John Nicholson (NRC Region I)  
Charles Petrillo (Town of Windsor, Director of Health Services)  
Peter Souza (Town of Windsor, Town Manager)  
Edward Wilds (CTDEP, Director, Division of Radiation)