



August 22, 2011

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

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REGISTRATION

Reference: Letter, J. F. Conant (ABB) to J. Joustra (NRC) dated August 16, 2011

Subject: **Verification of Site Brook**

Dear Ms. Joustra:

The Reference letter refers to a teleconference held August 11, 2011, when we discussed NRC decommissioning verification of the ABB/CE Windsor, CT Site ("Site") brook among numerous other topics. Following up on that discussion, I wanted to elaborate on the topic of government verification, especially concerning the narrow window of opportunity that exists and why.

Remediation of the Site Brook poses challenges normally not encountered during typical soils work. In the case of Site Brook, restoration is time critical due to a limited planting season, and provisions in three permits governing this work. These permits, The Inland Wetland and Watercourse Permit from the Town of Windsor, the General Programmatic 404 Permit from the United States Army Corp of Engineers, and the Water Quality Certificate from the Connecticut Department of Energy and Environmental Protection require that we work from the upstream to downstream areas in sequence. Consequently, an FSS upstream must be completed before a downstream remediation can be initiated. There are also other requirements.

The nature of the restoration generally precludes the possibility of follow-up FSS work or government verification in the spring or summer of 2012, for example by ORISE. This limitation is caused by two factors: 1) intrusion into the Brook for invasive surveys will harm the required plantings and reintroduction of aquatic species and 2) the restoration materials will effectively shield and hide the underlying sediment from attempts to do a survey of the residual sediments.

Consequently, any FSS verification deemed appropriate by regulatory agencies should be completed before ABB starts restoration of target areas. The window for doing this is limited to several days, since leaving the stream bed dry for long periods would inhibit plant growth, would

ABB Inc.

Ms. Judith Joustra, Chief

Page 2

August 22, 2011

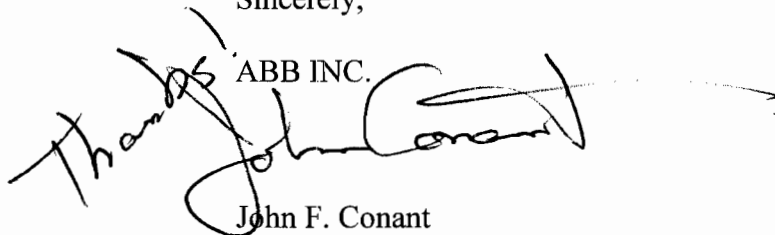
be inconsistent with the spirit of permit requirements, and would delay the beginning of remediation in downstream areas, all of which contribute to timely completion of the Site Brook this year, thus avoiding damaging rework next spring.

I bring this to your attention because a government FSS verification process might be impacted if the NRC cannot be present during available verification windows. Due the uncertainty of the brook decommissioning process, it is difficult to precisely predict verification windows more than a week or two in advance, but ABB will provide as much notice as possible. Any effort you can make to ensure that government verification is satisfactory and to help assure that Brook restoration can be implemented timely would be greatly appreciated.

If there are any questions about this topic, please do not hesitate to contact ABB's Radiation Safety Officer, Heath Downey at (207) 939-5560, or me at (860) 687-4904 or by email at john.conant@us.abb.com.

Sincerely,

ABB INC.

Thanks!


John F. Conant

Director, Nuclear Engineering & Compliance

JFC/et

xc: John Nicholson (NRC Region I)
Charles Petrillo (Town of Windsor)
Edward Wilds (CTDEEP)