

## Lawyer, Dennis

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**From:** Lawyer, Dennis  
**Sent:** Tuesday, October 20, 2015 2:02 PM  
**To:** Colin.simmons@breitlingusa.com  
**Subject:** Breitling USA, Inc., Request for Additional Information Concerning Application for a License Amendment, Control 588975

Dear Colin Simmons,

This is in reference to your letter received September 25, 2015, requesting to terminate Nuclear Regulatory Commission License No. 06-23863-01, Docket No. 03034689. In order to continue our review, we need the following additional information:

1. Your letter and NRC Form 314 should have been signed by a management representative rather than the After Sales Service Representative. Please submit a letter signed by a management representative (currently listed as Sebastien P. Amstutz) indicating that management has reviewed the application and concurs in the statements and representations contained therein.
2. Prior to termination of a license, 10 CFR 30.35(g), 30.36(k)(4) and 30.51 require that you submit to the NRC certain records. Please submit the following records, or explain why such records are not applicable.
  - a. for unsealed materials with half-lives greater than 120 days, records for disposal made pursuant to 10 CFR 20.2002 (alternate disposal procedures, including burial authorized prior to January 28, 1981), 20.2003 (disposals to the sanitary sewerage system), 20.2004 (incineration of wastes), 20.2005 (disposal of specific wastes including liquid scintillation cocktail and animal tissue), and 20.2103(b)(4), evaluations of effluent releases.
  - b. records important for decommissioning as described in 30.35(g). Examples of such records include but are not limited to: records of contamination, identifying the radionuclides, quantities and concentrations; as-built drawings and modifications of structures and equipment in restricted areas and locations of inaccessible contamination such as buried pipes; a single list, updated at least every 2 years, of areas to which access is limited for the purpose of radiation protection (restricted areas); and records related to the provision of financial assurance.

These records would be applicable to your current facility as well as your previous facility located at Two Stamford Landing, Suite 210, Stamford, Connecticut. No license will be terminated until the required records are received by the NRC. Records may be transferred to the U.S. Nuclear Regulatory Commission, Region I, 2100 Renaissance Blvd, Suite 100, King of Prussia, PA 19406-2713, or to the new licensee if licensed activities will continue at the same location under another Commission license.

3. Please provide documentation that Chase Environmental Group, Inc. received the waste from your site.
4. Surveys need to be taken after removal of the licensed material. It is unclear that the surveys taken December 19, 2014, were performed after the site had been decommissioned and all material transferred off site. Please provide the date when all material was removed from the site, or provide an additional closeout survey of the facility.

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office (Address below) and refer to Mail Control No. 588975. If you have technical questions regarding this letter, please call me at (610) 337-5366.

*Please note that you may not reply to this letter by return e-mail. Your reply must be in writing by letter, facsimile (610-337-5269), or signed letter attached to an email. If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application.*

Region 1 Office Mailing Address: Licensing Assistance Team, US Nuclear Regulatory Commission Region I, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406-2713.

Dennis Lawyer  
Health Physicist  
U.S. Nuclear Regulatory Commission  
Division of Nuclear Material Safety  
610-337-5366  
610-337-5269 (F)