



October 28, 2015

J6

03034689

Attn: Dennis Lawyer
U.S. Nuclear Regulatory Commission
Region I
2100 Renaissance Blvd, Suite 100
King of Prussia, PA 19406

REC'D 11 05 15 AM 11 52

Re: Termination of License No. 06-23863-01

Dear Mr. Dennis Lawyer,

Please find below Breitling USA's responses to your email dated October 20, 2015.

1. I, Sebastien Amstutz, Vice President of Breitling USA, have reviewed the documentation prepared by Colin Simmons for the termination of our repair license, No. 06-23863-01. I have reviewed the NRC form 314 and our request for the termination of this license; I can confirm that all of the information indicated on this form is accurate.

2a. Breitling has not possessed any unsealed materials with a half-life greater than 120 days. Any tritium products we have had in our facility have been kept in a sealed DOT container and have been disposed of via a licensed waste management broker.

2b. Since the inception of our license No. 06-23863-01, Breitling has never had a report of contamination, at either our current address of 206 Danbury Rd in Wilton, Connecticut or at our previous address, 2 Stamford Landing, Suite 210 in Stamford, Connecticut.

3. Please find attached the invoice we received from Chase Environmental Group Inc. stating that they have successfully transported and disposed of our waste material at the Alaron Corporation facility in Wampum, Pennsylvania.

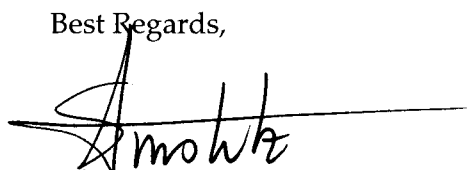
4. We had previously provided our final survey, which was performed by Energy Solutions LLC on December 19, 2014. From that date, our remaining waste was sealed in a DOT container until June 19, 2015, at which time the waste was transported by Chase Environmental Group Inc.

588975
NMSS/RGN1 MATERIALS-002

BREITLING USA

We trust that the information above will be sufficient enough to go forward with our request to terminate our repair license No. 06-23863-01. Please let us know if you will need any further information to successfully terminate this license. Thank you very much for your assistance.

Best Regards,

A handwritten signature in black ink, appearing to read 'S. Amstutz', with a long horizontal line extending to the right across the signature.

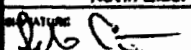

Sebastien Amstutz
Vice President

C.C. Colin Simmons
After Sales Service Representative

NRC FORM 540 UNIFORM LOW-LEVEL RADIOACTIVE WASTE MANIFEST SHIPPING PAPER		6. SHIPPER- NAME AND FACILITY Chase Environmental Group, Inc. 11450 Watterson Court Louisville, KY 40299		SHIPPER ID # N/A X COLLECTOR PROCESSOR		7. NRC FORM 540 AND 541A PAGE 1 ___ PAGE(S) NRC FORM 541 AND 541A OF ___ PAGE(S) NRC FORM 542 AND 542A 1 PAGE(S) ADDITIONAL INFORMATION None PAGE(S)		8. Manifest Number (Use this number on all continuation pages) AL-2015-161	
1. EMERGENCY TELEPHONE NUMBER (INCLUDE AREA CODE) 800-424-9300		USER PERMIT NUMBER T-KY003-L15		SHIPMENT # N/A		GENERATOR TYPE (SPECIFY)		9. CONSIGNEE-NAME AND FACILITY ADDRESS Alaron Corporation 2138 State Route 16 Wampum, PA 16157	
ORGANIZATION Chemtec WSDS #: CHEN01RAD		CONTACT Seb Cannata		TELEPHONE # 860-306-0185		Contact Mike Ollowski Telephone Number (include area code) 724-535-5777		Date 6-24-15	
2. IS THIS AN "EXCLUDED USE" SHIPMENT? [] YES [x] NO		3. TOTAL NUMBER OF PACKAGES IDENTIFIED ON THIS MANIFEST 1		6. CARRIER NAME AND ADDRESS SJ Transportation Co., Inc. PO Box 189 Woodstown, NJ 08096		EPA ID # NJ0071629976		SIGNATURE-Authorized consignee acknowledging waste receipt <i>[Signature]</i>	
4. DOES EPA REGULATION PART 161 REQUIRE A MANIFEST ACCOMPANY THIS SHIPMENT?		[] YES [x] NO		EPA MANIFEST NUMBER NA		CONTACT Kevin Elder		TELEPHONE # 866-769-2741	
SIGNATURE <i>[Signature]</i>		DATE 6/19/15		AUTHORIZED SIGNATURE <i>[Signature]</i>		TITLE Willy Yee		DATE 6/19/15	
10. Certification This is to certify that the herein-named materials are acceptable for disposal, are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the Commission.									
HM	11. U.S. DEPARTMENT OF TRANSPORTATION DESCRIPTION (including proper shipping name, hazard class, UN ID number, and any additional information)	12. DOT LABEL "RADIOACTIVE"	13. TRANSPORT INDEX	14. PHYSICAL AND CHEMICAL FORM	15. INDIVIDUAL RADIONUCLIDES	16. TOTAL PACKAGE ACTIVITY IN MBq	17. LSA/SCO CLASS	18. TOTAL WEIGHT OR VOLUME m ³	19. UN ID NUMBER OF PACKAGE
X	UN2011 Radioactive material, excepted package-articles, 7 One drum with watch hands and faces for disposal	NA	NA	Solid/Oxide	H-3	6.35E+04	NA	0.019	AL-CT-W-15-327
RECEIVED									
US DOT ERG #161 JUN 24 2015 Breitling USA					Generator Certification Statement: The constituents of the waste manifested herein are known to the generator. There are no EPA RCRA, pathogenic or other hazards present other than those specifically listed on the Form 541. Willy Yee <i>[Signature]</i> 6/19/15 Print name Signature Date				

15-0409

CONSIGNEE ORIGINAL (MUST ACCOMPANY WASTE IN TRANSIT)

NRC FORM 540 UNIFORM LOW-LEVEL RADIOACTIVE WASTE MANIFEST SHIPPING PAPER		5. SHIPPER- NAME AND FACILITY Chase Environmental Group, Inc. 11450 Watterson Court Louisville, KY 40299		SHIPPER ID # N/A <input checked="" type="checkbox"/> COLLECTOR PROCESSOR		# EPA FORM 540 AND 541A PAGE 1 ___ PAGE(S) # EPA FORM 541 AND 541A OF ___ PAGE(S) # EPA FORM 542 AND 542A ___ PAGE(S) ADDITIONAL INFORMATION: <u>None</u>		8. Manifest Number (Use this number on all continuation pages) AL-2015-161	
1. EMERGENCY TELEPHONE NUMBER (INCLUDE AREA CODE) 800-424-9300		USER PERMIT NUMBER T-KY003-L15		SHIPMENT # N/A		GENERATOR TYPE (SPECIFY) Aleron Corporation 2138 State Route 16 Wampum, PA 16157		Contact Mike Ollowski Telephone Number (include area code) 724-635-5777	
ORGANIZATION: Chemtrac WSDS #: CHEN01RAD		CONTACT Seb Cannata		TELEPHONE # 880-306-0195		9. CONSIGNEE-NAME AND FACILITY ADDRESS Aleron Corporation 2138 State Route 16 Wampum, PA 16157		Date _____	
2. IS THIS WASTE LOW LEVEL RADIOACTIVE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		3. TOTAL NUMBER OF PACKAGES IDENTIFIED ON THIS MANIFEST 1		6. CARRIER NAME AND ADDRESS SJ Transportation Co., Inc. PO Box 169 Woodstown, NJ 08098		EPA ID # NJD071629976		10. Certification This is to certify that the herein-named materials are acceptable for disposal, are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the Commission.	
4. IS THIS WASTE A MIXTURE OF RADIOACTIVE AND NON-RADIOACTIVE MATERIALS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		EPA MANIFEST NUMBER NA		CONTACT Kevin Elder		TELEPHONE # 856-760-2741		SIGNATURE 	
11. U.S. DEPARTMENT OF TRANSPORTATION DESCRIPTION (including proper shipping name, hazard class, UN ID number and any additional information)		12. DOT LABEL "RADIOACTIVE"		13. TRANSPORT INDEX NA		14. PHYSICAL AND CHEMICAL FORM Solid/Oxide		15. INDIVIDUAL RADIOACTIVITY H-3	
HM X UN2911 Radioactive material, excepted package-articles, 7 One drum with watch hands and faces for disposal		16. TOTAL PACKAGE ACTIVITY IN MBq 8.35E+04		17. IBA/SCO CLASS NA		18. TOTAL WEIGHT OR VOLUME (m³) 0.019		19. ID NUMBER OF PACKAGE AL-CT-W-16-327	
US DOT ERG #161 Bretting USA		Generator Certification Statement: The constituents of the waste manifested herein are known to the generator. There are no EPA RCRA, pathogenic or other hazards present other than those specifically listed on the Form 541. <div style="display: flex; justify-content: space-between;"> <div> Willy Yee Print name </div> <div>  Signature </div> <div> 6/19/15 Date </div> </div>							

CONSIGNEE ORIGINAL (MUST ACCOMPANY WASTE IN TRANSIT)

NRC FORM 541 US NUCLEAR REGULATORY COMMISSION UNIFORM LOW-LEVEL RADIOACTIVE WASTE MANIFEST CONTAINER AND WASTE DESCRIPTION	1. MANIFEST TOTALS SPECIAL NUCLEAR MATERIAL (grams)						2. MANIFEST NUMBER AL-2018-161
	NUMBER OF PACKAGES 1	NET WEIGHT VOL. (m3) 0.019	NET WEIGHT (kg) 8	U-233 NP	U-235 NP	Pu NP	
	ACTIVITY (MBq/mCi)						3. SOURCE (kg) 0.00E+00
	ALL NUCLIDES 6.36E+04 MBq 1.72E+03 mCi		TRITIUM 6.36E+04 1.72E+03	C-14 NP	Tc-99 NP	I-129 NP	
	4. SHIPPER NAME Chase Environmental Group SHIPPER ID NUMBER N/A						
3. PAGE 1 OF 1 PAGE(S)						4. SHIPPER NAME Chase Environmental Group SHIPPER ID NUMBER N/A	

DISPOSAL CONTAINER DESCRIPTION							WASTE DESCRIPTION FOR EACH WASTE TYPE IN CONTAINER							14 WASTE CLASS A-1 STABLE A-2 UNSTABLE B-1 CLASS B B-2 CLASS C	
6 CONTAINER IDENTIFICATION NUMBER/ OPERATOR NUMBER	8 CONTAINER DESCRIPTION (See Note 1)	7 VOLUME (m3)	9 WASTE AND CONTAINER WEIGHT (kg)	10 SURFACE RADIATION LEVEL (µSv/h)	13 SURFACE CONTAMINATION (Bq/100 cm ²)		11 PHYSICAL DESCRIPTION			14 CHEMICAL DESCRIPTION		15 RADIOLOGICAL DESCRIPTION			
					ALPHA	BETA	11 WASTE DESCRIPTION (See Note 2)	12 Approximate waste quantity (m3)	13 SOLVENT SOLUBILITY/ STABILIZATION MEDIA (See Note 3)	14 CHEMICAL FORM/ CHEMICAL AGENT	15 WEIGHT % CHEMICAL AGENT (if > 0.1%)	15 RADIOLOGICAL DESCRIPTION (See Note 4) (Nuclide, MBq, mCi)			
AL-CT-W-18-327 1494	4	0.019	8	<6.0	<3.67E-6	<3.67E-5	3B	0.019	100	Oxide/NP	NP	H-3	6.36E+04	1.72E+03	NA
												Package total	6.36E+04	1.72E+03	

NOTE 1: Container Description Codes. For stability/waste regarding disposal in approved structural overpacks. The numerical code must be followed by "OF".

NOTE 2: Waste Descriptor Codes. (Check up to three which preclude by volume)

NOTE 3: For stabilization media that meet disposal site structural stability requirements. For numerical code must be followed by "S". For stabilization media, the words (verbal) and formal name must also be provided in item 15. (See 102-10.2 (C) (2) (ii) (2) (D))

1 Wooden Drum or Crate 2 Metal Drum 3 Plastic Drum or Pail 4 Metal Drum or Pail 5 Metal Tank or Liner 6 Concrete Tank or Liner 7 Polyethylene Tank or Liner 8 Fiberglass Tank or Liner	6 Drum/Crate 10 Gas Cylinder 11 Bulk, Unstabilized Waste 12 Unstabilized Composites 13 High Integrity Container 14 Other (describe in item 8 or additional page)	20 Corrosive 21 Unreactive Ash 22 Soil 23 Gas 24 Oil 25 Organic Liquid 26 Filter Media 27. Miscellaneous Fiber 28 SFA or Waste Material	29 Corrosive Sludge 30 Carbon or Exchange Media 31 Areas for Exchange Media 32 Mixed Bed Ion Exchange Media 33 Organic-based Equipment 34 Organic Liquid (Excess Oil) 35 Shippers or Filters 36 Spilled Solvent/Sludge 37 Part of Piping	38 Expanded Beams/Sludge Containers 39 Compressible Foam 40 Miscellaneous Fresh 41 Animal Carcass 42 Biological Material (Excess Animal Carcass) 43 Adjusted Sludge 44 Other (describe in item 11 or Additional Page)	Sorption 45 Speed Dry 46 Caustic 47 Floor Dry 48 Superfine 49 H ₂ O 50 Salt-T-Salt 51 Salt-N-Oil	46 Phos 47 Phos 48 Phos 49 Phos 50 Phos 51 Phos 52 Phos 53 Phos 54 Phos 55 Phos 56 Phos 57 Phos 58 Phos 59 Phos 60 Phos 61 Phos 62 Phos 63 Phos 64 Phos 65 Phos 66 Phos 67 Phos 68 Phos 69 Phos 70 Phos 71 Phos 72 Phos 73 Phos 74 Phos 75 Phos 76 Phos 77 Phos 78 Phos 79 Phos 80 Phos 81 Phos 82 Phos 83 Phos 84 Phos 85 Phos 86 Phos 87 Phos 88 Phos 89 Phos 90 Phos 91 Phos 92 Phos 93 Phos 94 Phos 95 Phos 96 Phos 97 Phos 98 Phos 99 Phos	88 Other (describe in item 11, or additional page) 89 Other (describe in item 11, or additional page) 90 Other (describe in item 11, or additional page)
---	---	---	--	---	--	--	--

NRC FORM 642 (5-1989)		U.S. NUCLEAR REGULATORY COMMISSION		1 WASTE COLLECTOR/PROCESSOR				2 MANIFEST NUMBER			
UNIFORM LOW-LEVEL RADIOACTIVE WASTE MANIFEST MANIFEST INDEX AND REGIONAL COMPACT TABULATION List all original "PROCESSED WASTE" before "COLLECTED WASTE"				NAME Chase Environmental Group, Inc.				SHIPPER USE ONLY			
				IDENTIFICATION NUMBER T-KY003-L15							
				SHIPPING DATE 8/19/2015				PAGE 1 OF 1 PAGE(S)			
4	5	6	7	8	9	10	11 AS PROCESSED/COLLECTED TOTAL				
GENERATOR IDENTIFICATION NUMBER	GENERATOR NAME PERMIT NUMBER AND TELEPHONE NUMBER	GENERATOR FACILITY ADDRESS	PREPROCESSED WASTE (OR ORIGINAL) VOLUME (m3)	WASTE CLASSIFICATION (OR ORIGINAL) VOLUME (m3)	WASTE CODE	STATE	A. SOURCE MATERIAL (kg)	B. GRADE (g)	C. ACTIVITY (MBq)	D. VOLUME (m3)	
1494	Broiling USA 203-762-1180 x348	208 Danbury Rd. Wilton, CT 06897	0.019	NA	C	CT	0.00E+00	NP	8.35E+04	0.019	
TOTALS OF ALL PAGES (NRC FORMS 642 AND 642A)											
							0.000	0.000	8.35E+04	0.019	