



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

May 11, 2017

New Opportunities Incorporated
Ms. Toni Hirst, Chief Administrative Officer
232 North Elm Street
Waterbury, CT 06702

SUBJECT: FORMER WATERBURY CLOCK COMPANY 1, 3, 4, 6, AND 7 – RESULTS OF INITIAL SITE VISIT AND REQUEST FOR CONFIRMATION OF VOLUNTARY CONTROLS

Dear Ms. Hirst:

I am writing to provide you with the U.S. Nuclear Regulatory Commission's (NRC's) results of its November 29 - December 1, 2016, initial site visit and December 16-18, 2016, follow-up radon testing of your property at 232 N. Elm Street, Waterbury, Connecticut. The results are summarized below and are discussed in further detail in the enclosed report.

During NRC staff's initial site visit, the staff conducted radiation surveys within accessible areas in the main structures and occupied office spaces. The surveys focused on potentially contaminated areas identified in previous surveys. When elevated radiation was identified, contamination measurements were collected at the location with the maximum gamma radiation response. Measured radiation levels were compared with natural background and with the acceptable radiation standards as described in NRC's inspection procedure, Temporary Instruction 2800/043 (TI) (Agencywide Documents Access and Management System (ADAMS) Accession Number ML16035A053). We conducted additional measurements to test for removable contamination in areas where elevated radiation levels were identified.

As discussed during the visit, the NRC staff found some of the exposure rate measurements on the fifth floor of your building (Phase I Office Suite at the eastern end) and fourth floors of your building (Phase 1 Room 426 and Phase II, Fatherhood Office) to be in excess of the threshold for considering controls as established in the NRC's TI. These measurements indicate that, with conservative assumptions, a member of the public occupying these areas for periods of 8 hours or greater per day (for 5 days a week over a year) could receive a dose in excess of NRC's public dose limit of 100 millirem per year (mrem/yr) in Title 10 of the *Code of Federal Regulations* (CFR) at 20.1301.

However, it is NRC staff's understanding from a conversation with you during the site visit, that no one occupies the fifth floor, Phase I Office Suite at the buildings eastern end and that the fourth floor areas identified are occupied for 7 hours per day. Further, you have discussed with NRC staff your intention to maintain the limited access to the fifth floor Phase I Office Suite at the eastern end of the building and will not increase the occupancy time within the areas identified on the fourth Floor. The limited radon sampling, performed on December 16 - 18, 2016, did not reveal elevated readings, except for the Phase I fifth floor Office Suite at the eastern end (which is currently unoccupied).

The NRC's survey results confirm the results collected in previous independent surveys performed on your site. Our survey of your site does not constitute complete characterization of the site; additional work is necessary to determine the full extent of contamination and the cleanup required to meet NRC's unrestricted use limit of 25 mrem/yr (10 CFR 20.1402). It is recommended that you consider hiring a service provider licensed by the NRC (or NRC Agreement State) to guide you on next steps. Additional radium contamination may be discovered when previously unsurveyed areas of the building are evaluated. As outlined in the enclosed Site Visit Report, longer-term integrated measurements of radon to assess annual exposures are also recommended at the locations identified with slightly elevated radon concentrations.

Based on the current use of the areas with elevated radium contamination and the agreed upon voluntary controls (i.e., limited access to Phase I fifth floor Office Suite at the east end; less than 8 hour-a-day occupancy in Phase I Room 426 and Phase II Fatherhood Office), the NRC Staff concludes that there are no immediate health and safety concerns at this site, provided these voluntary controls remain in effect. **Please respond to this letter within 30 business days confirming the controls already in place, detailing any additional controls you plan to put into place, and planned communications you will make to your employees.**

As previously discussed with you, site cleanup is the responsibility of the site owner. The NRC is currently evaluating a number of policy issues associated with the remediation of non-military sites contaminated with radium. We will be in further contact with you as decisions on these policy matters are reached by the Commission.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>

We will be contacting you in the near future to answer any questions you may have regarding this letter. Additionally, you may also contact Mr. Theodore Smith, Acting Chief, Materials Decommissioning Branch, Division of Decommissioning, Uranium Recovery and Waste Programs, Office of Nuclear Materials Safety and Safeguards, at (301) 415-6721 or Mr. Richard Chang, Project Manager, at (301) 415-5888.

Sincerely,

/RA/

John R. Tappert, Director
Division of Decommissioning, Uranium Recovery
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

Docket Nos.: 03038966, 03038964, 03038963,
03038961, and 03038960

Enclosure: Site Visit Report

REGISTERED LETTER – RETURN RECEIPT REQUESTED

SUBJECT: FORMER WATERBURY CLOCK COMPANY 1, 3, 4, 6, AND 7 – REPORT OF RESULTS OF RADIOLOGICAL SURVEYS DATED MAY 11, 2017

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