



# NEW OPPORTUNITIES, INC.

*Helping People. Changing Lives. ~ Community Action Partnership*

*Corporate Address:*

232 North Elm Street – Waterbury, CT 06702

203.575.9799 ~ 203.755.8254 (fax)

---

Mr. Richard Chang  
Nuclear Regulatory Commission  
11545 Rockville Pike  
M.S. T8F5  
Rockville, MD 20852-2738

April 25, 2018

RE: Correspondence dated March 7, 2018  
Remediation and Forgoing of Licensing of Waterbury Clock Company - 7

Der Mr. Chang,

Please accept this letter as acknowledgement of receipt of a letter dated March 7, 2018 regarding the Remediation and Forgoing of Licensing of Waterbury Clock Company – 7, Docket Nos 03038960, signed by John R. Tappert, Director of Division of Decommissioning, Uranium Recovery and Waste Programs, Office of Nuclear Material Safety and Safeguards, hand delivered on March 21, 2018, by Todd J. Jackson Division of Nuclear Materials Safety for Region 1 and Raymond J. Powell, Decommissioning and Technical Support Branch, Division of Nuclear Materials Safety. Meeting with myself, and William Rybczyk from New Opportunities, Inc. and our legal counsel, M. Anne Peters Esq. from Carmody Torrance Sandak and Hennessey LLP to discuss the letter, answer questions and provide back round information was helpful. We were happy that the weather finally was agreeable for your trip to Waterbury!

Per the terms and conditions outlined in the letter, New Opportunities will:

- Continue to restrict access to the areas outlined in our letter to the NRC dated July 31, 2017 [ML17306A829], to ensure no exceedance of the public dose limit of 100 millirem per year, and maintain the site to prevent further dispersion of radiological material.
- Provide a remediation schedule and funding plan to the NRC. We are currently discussing with vendors the time frame and cost for developing the remediation and funding plan. Once we complete our inquiry into this, NOI will provide to the NRC a timeframe for completing these tasks.
- Permit the NRC to periodically visit, at the NRC's discretion, the site to ensure maintenance of controls and containment of radiological material.
- Inform the NRC if there is demolition, construction or renovation in the identified areas at 232 North Elm Street, 30 days in advance of scheduled work or if impracticable, as soon as possible.

- Work to remediate the site, in accordance with the requirements of Title 10 of the Code of Federal Regulations [CFR], Part 20, Subpart E, Radiological Criteria for License Termination within 5 years of March 7, 2018.
- Will utilize an NRC or Agreement-State-licensed provider for the remediation activities.
- Provide annual updates in March on the remediation efforts undertaken by New Opportunities.
- Inform any future site owner [in the event of a sale or transfer] or tenant [in the event of a lease[s] in the impact areas], prior to a sale, transfer, or lease of impact areas of the site, in writing of the radiological contamination, the need for remediation, the necessary controls and NRC's regulatory authority.
- Inform the NRC at least 30 days prior to the sale, transfer, or lease of the site or of a change in occupancy or use at the site.

I have been in communication with Jeff Semancik, Director, Radiation Division at the Connecticut Department of Energy and Environmental Protection. We spoke on the differences between the State and Federal clean-up standards and any regulatory stipulations/conditions that New Opportunities should be aware of in our development of a Remediation Schedule and Funding Plan. We agreed to share our documents with his Office. Our discussion also included the need for funding to perform the remediation, which as you are aware, is a major challenge for this site and the adjacent properties. [0 Cherry Avenue, 39 Cherry Avenue, 177 Cherry Street and 215 Cherry Street]

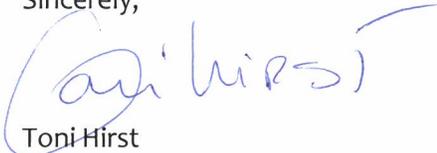
I would like to thank Mr. Powell for his email regarding the decontamination, decommissioning and environmental services cleanup plan and radiological survey plan for the former Benrus Clock Factory site in Waterbury. This information was helpful.

In our meeting we had discussed our interest in receiving any working papers or additional documentation from the field work that was done on site by Todd Jackson [NRC], Nick Altic and Teresa Brown – both from Oak Ridge associated universities. Could you please let us know if the NRC will be able to release this information to us or if it is available in ADAMS? The information may be useful to our contractors and, we hope, reduce our licensed service provider's fees.

New Opportunities, Inc. is a non-profit, public charity organization that relies on government and public grants to fund its operations. Public support, in the form of grants and contributions, accounts for a substantial percentage of our revenue. We do not have capital or other reserve funds and our total liabilities equal or slightly exceed our total assets. As such, while we can and will ensure that access to the subject areas is restricted to ensure that there are no exceedences of the public does limit of 100 millirem, it will be necessary for us to solicit and be awarded grant funds for any remediation work or studies that we undertake. New Opportunities will continue to seek potential sources of funding, first for the development of a remediation schedule and funding plan and then for the remediation itself. Without the availability of these funds, New Opportunities, Inc. will not be able to conduct any remediation activities on the site. As we discussed, any assistance that the NRC can provide in the identification of funding and/or advocacy for funding is appreciated.

If you need any additional information, please do not hesitate to contact me at 203.575.4211 or at [thirst@newoppinc.org](mailto:thirst@newoppinc.org).

Sincerely,



Toni Hirst  
Chief Administrative Officer

CC: Todd Jackson, NRC  
Raymond Powell, NRC  
M. Anne Peters, Esq. Carmody Torrance Sandak & Hennessey  
William Rybczyk, New Opportunities, Inc.  
James H. Gatling, PhD., New Opportunities, Inc.

Todd.Jackson@nrc.gov  
raymond.powell@nrc.gov  
apeters@carmodylaw.com  
wrybczyk@newoppinc.org  
jhgatling@newoppinc.org