



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

August 3, 2018

Bryan Olson, Director  
Office of Site Remediation & Restoration  
USEPA Region 1 - Mailcode OSRR07-5  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912

**SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION INVOLVEMENT WITH THE U.S. ENVIRONMENTAL PROTECTION AGENCY'S REMEDIATION OF PORTIONS OF THE FORMER WATERBURY CLOCK COMPANY SITE IN CONNECTICUT**

Dear Mr. Olson:

This letter provides the U.S. Nuclear Regulatory Commission's (NRC) intended approach with respect to NRC-regulated activities at portions of the former Waterbury Clock Company site in Waterbury, Connecticut. The NRC's goal is to avoid duplicative programs related to protection from radiation at the former Waterbury Clock Company site as it is under the NRC's statutory authority and EPA's Brownfields program.

The Waterbury Clock Company site is a complex of buildings partly owned by New Opportunities (NOW), a non-profit community action organization with social programs intended to eliminate poverty. Previously, the Connecticut Department of Energy and Environmental Protection and private contractors performed radiological surveys of portions of the former Waterbury Clock Company site; these surveys indicated the presence of radium-226 (Ra-226), an NRC-regulated nuclear material.

While the NRC has jurisdiction over this site because of the presence of Ra-226, the NRC staff understands that EPA Region 1's Brownfields program is currently involved with remediation at the former Waterbury Clock Company. Specifically, the portions of the former Waterbury Clock Company at 0 Cherry Avenue, 39 Cherry Avenue, 177 Cherry Street, and 215 Cherry Street are part of EPA's Brownfields program through Connecticut's Voluntary Cleanup Program. Additionally, the NRC staff understands that EPA is also currently involved, until 2020, in remediation activities at 39 Cherry Avenue through a grant to the Naugatuck Valley Council of Governments (NVCOG), which will oversee assessment and remediation activities. While the subsequent NVCOG resolution providing funds to NOW only discusses areas "at and around" the 39 Cherry Avenue portion of the Waterbury Clock Company site, the NRC staff understands that EPA will have continued involvement at all four of addresses of the Waterbury Clock Company listed above.

Given this site is part of the Brownfields program and the desire to avoid duplicative programs under the NRC's authority and EPA's Brownfields program, the NRC believes that the most effective and efficient approach for its involvement is to rely on the ongoing EPA and NVCOG Brownfields activities for the Ra-226 material present. However, as discussed previously with EPA staff, the NRC plans to take a monitoring approach to the remediation efforts, as directed by

the NRC Commission in Staff Requirements Memorandum—SECY-17-0026, “Policy Considerations and Recommendations for Remediation of Non-Military, Unlicensed Historic Radium Sites in Non-Agreement States” (Agencywide Documents Access and Management System [ADAMS] Accession No. ML17250A841), and as further detailed in SECY-17-0026 (ADAMS Accession No. ML17130A783). This monitoring approach would allow remediation to continue under the Brownfields program while the NRC remains informed of the ongoing activities.

As part of the planned monitoring approach, the NRC staff would review the pertinent Brownfields documents, perform independent dose assessments, and, dependent on facility conditions, perform site observations and independent confirmatory surveys to ensure that the NRC’s dose criteria for unrestricted release of 25 millirem per year under Title 10 of the *Code of Federal Regulations* (10 CFR) Section 20.1402 is not exceeded. Additionally, service providers involved in radiological cleanup activities would still fall under NRC oversight as the service provider would be required to work under an NRC license or under an Agreement State license, through reciprocity with the NRC.

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 ADAMS. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Please let us know if you have any concerns with this approach. Additionally, if you have any questions, you may also contact Mr. Stephen Koenick, Chief of the Materials Decommissioning Branch within the Division of Decommissioning, Uranium Recovery and Waste Programs in the Office of Nuclear Materials Safety and Safeguards at (301) 415-6631, 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. 03038961, 03038963,  
03038964, and 03038966

cc:  
Rick Dunne, Executive Director  
Naugatuck Valley Council of Governments  
49 Leavenworth Street, 3rd Floor  
Waterbury, CT 06702

B. Olson

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