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September 6, 2018

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Regional Administrator
U.S. Nuclear Regulatory Commission
Region I
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713
ATTN: Director, Division of Nuclear Materials Safety

REC RG 1 09 07 18 PM 10:07

03035316

RE: NRC Radioactive Materials License No. 06-30556-01, Amendment No. 08:
Notification of License Implementation at the Goodrich Corporation.

Cabrera Services Inc. (Cabrera) is providing this written notification of its intent to utilize NRC Radioactive Material License No. 06-30556-01, Amendment No. 08 in support of operations at a temporary job site. Enclosures include:

- The specific information required by Cabrera's NRC License Condition No. 18A including details of the approach to remove and dispose of three legacy containments that were used in the coating process utilized at the Goodrich facility
- The Memorandum of Understanding (MOU) between Goodrich and Cabrera

If you should have any questions regarding this notification or the planned work activities, please contact me at (352) 610-2150.

Regards,

Michael S. Winters, CHP
Radiation Safety Officer

Enclosure

609878

NMSS/RGN1 MATERIALS-002

LICENSE USE DETAILS PROVIDED PER CONDITION #18A
Thorium Coating Chamber Removal for Goodrich Corporation
(September 2018)

1) Estimated Type, Quantity, and Physical/Chemical Form(s) of Material

The owner has three small paint spray containments, totaling approximately fifteen-square meters (m^2) in interior surface area, in storage. The containments were historically used to apply thoriated coatings to unspecified small components. Scoping surveys performed by Cabrera in 2015 identified background radiation levels (5-7 microrem per hour [urem/h]) in the general work area and; up to 60 urem/h observed within the containments. Direct surface contamination measurements identified both alpha and beta emitting radionuclides present within the containments emanating from buildup of excess coating (overspray) observable on approximately 20% of interior surfaces. Limited initial field gamma spectroscopy screening measurements identified technologically enhanced naturally occurring radioactivity (i.e., thorium-232 [Th-232] and associated daughter products as the primary sources of radioactivity. Based on total impacted area of the containment interior ($\sim 3 m^2$) and associated maximum interior surface contamination survey result (~ 950 disintegrations per minute per square centimeter [dpm/cm²]), the currently estimated total activity present is 13-microcuries.

2) Specification of the Site Location

The Goodrich facility is in Danbury, CT. The physical address is 100 Wooster Heights Rd, Danbury, CT.

3) Description of Project Activities including Waste Management and Disposition.

The containments are currently under the control of the owner and are stored in two separate buildings with limited access by Goodrich employees. Cabrera will assume licensed control over each containment and the immediately surrounding area during this project. Each containment will be wrapped in a durable plastic material to ensure that thorium coating residuals located within the chambers remain secure.

After packaging the containments and addressing any visual thorium paint residuals, Cabrera will conduct residual radioactivity measurements on floor surfaces beneath and immediately around each containment with hand-held alpha-beta sensitive detectors. Ten reference area measurements will be collected from a building of similar construction that was not impacted by radioactive materials such that the average and standard deviation of gross alpha and gross beta background ranges are established for subsequent concrete under assessment. A minimum of two visually biased and ten unbiased direct gross alpha and gross beta measurements will be taken in the work area after any suspected residuals have been addressed and the chambers removed. If any measurement exceeds the Background Threshold Value (BTV) (i.e., the mean plus three standard deviations of the Reference Area measurements), additional remediation and biased measurements will be conducted until any identified elevated residuals have been addressed. Once all areas that



were identified during the assessment are addressed, Cabrera will complete a survey to record the as left conditions and return control of the areas back to the Owner.

Cabrera will take control of all waste generated from the removal of each containment. After all waste is packaged in appropriate containers, Cabrera will have the waste transported to the US Ecology facility in Grand View Idaho for disposal.

Cabrera will maintain controls in all work areas in accordance with our procedures and corporate radiation safety plan for the duration of the project. Based on review of past chamber characterization data, personnel doses are not expected to exceed 10 CFR 20.1502 thresholds for individual monitoring. Confirmatory external/internal dose monitoring will be conducted during critical field activities to confirm assumptions. Materials, tools and equipment utilized during this project will be controlled and surveyed for unrestricted use consistent with our license procedures and documented.

4) Estimated Project Start Date and Duration.

Site operations will proceed on Monday, September 24, 2018 with an expected 3-4-week duration.

5) Identification of, and Information on How to Contact, Key Project Personnel.

Michael Winters, CHP
Radiation Safety Officer
Mobile/Office: (352) 610-2150
Email: mwinters@cabreraseservices.com

Mike Plonski, RRPT
Site Radiation Safety Lead/Authorized User
Office: (860) 569-0095
Mobile: (860) 794-6915
Email: mplonski@cabreraseservices.com

Wade Miller, RRPT
Site Radiation Safety Lead/Authorized User-Alternate
Mobile: (843) 309-7872
Email: wmiller@cabreraseservices.com

**MEMORANDUM OF UNDERSTANDING
BETWEEN GOODRICH CORPORATION, A UTC AEROSPACE SYSTEMS COMPANY,
AND CABRERA SERVICES, INC.
FOR
REMOVAL AND DISPOSAL OF LEGACY
EQUIPMENT AT 100 WOOSTER HEIGHT ROAD**

Date: July 31, 2018

To: Mr. Ryan Hannan, RSO, UTC
Aerospace

From: Michael S. Winters, RSO, Cabrera Services

Subject: Licensing Interface: Removal and Disposal of Thorium Paint Containing
Coatings Chambers at the Wooster road location.

The purpose of this memo is to define the interface between two NRC licensees during investigation work at Goodrich Corporation, a UTC Aerospace Systems Company, having a place of business at 100 Wooster Heights Road, Danbury CT 06478 ("UTC Aerospace"). Cabrera Services, Inc. (CABRERA) NRC License Number 06-30556-01 Condition 13 requires a written agreement between the licensee and the customer if both hold a license issued by the NRC or Agreement State. This agreement does not establish any new requirements or rights on parties not subject to this agreement. Specifically this MOU fulfills License Condition 13 of the CABRERA license.

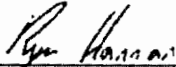
The licensees, UTC Aerospace and CABRERA, will be involved with removal and disposal of previously characterized thorium paint containing containments at the Site. The work is scheduled to occur during August 2018. Both licensees are committed to safety throughout performance of the work.

CABRERA will provide radiological controls during work evolutions associated with the removal, packaging, loading and disposal of the legacy thorium containing paint chambers. This includes clean-up response support in the event of an on-site accident..

CABRERA will provide all remedial support for surrounding areas that have been deemed impacted in the form of minor decontamination but not limited to the removal of surfaces as needed.

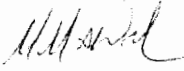
CABRERA will provide all personnel, equipment and materials to perform surveys of as left conditions of areas that contained legacy thoriated paint and equipment used during the coatings process.

This memo represents a licensing interface agreement between UTC AEROSPACE and CABRERA. Future modifications, if any, will be likewise documented.



Mr. Ryan Hannan, RSO, UTC Aerospace

7/31/18
Date



Michael S. Winters, RSO, Cabrera Services, Inc.

8/28/18
Date



ACKNOWLEDGEMENT - RECEIPT OF CORRESPONDENCE

Name and Address of Applicant and/or Licensee Michael S. Winters, CHP Radiation Safety Officer Cabrera Services, Inc. 50 Founders Plaza Suite 207 East Hartford, Connecticut 06108	Date September 12, 2018
	License Number(s) 06-30556-01
	Mail Control Number(s) 609878
	Licensing and/or Technical Reviewer or Branch Commercial, Industrial, R&D, and Academic Branch

This is to acknowledge receipt of your: Letter and/or Application Dated: 09/06/2018

The initial processing, which included an administrative review, has been performed. Notification
 Amendment Termination New License Renewal

There were no administrative omissions identified during our initial review.

This is to acknowledge receipt of your application for renewal of the material(s) license identified above. Your application is deemed timely filed, and accordingly, the license will not expire until final action has been taken by this office.

Your application for a new NRC license did not include your taxpayer identification number. Please complete and submit NRC Form 531, Request for Taxpayer Identification Number, located at the following link: <http://www.nrc.gov/reading-rm/doc-collections/forms/nrc531.pdf>
Follow the instructions on the form for submission.

The following administrative omissions have been identified:

Your application has been assigned the above listed MAIL CONTROL NUMBER. When calling to inquire about this action, please refer to this control number. Your application has been forwarded to a technical reviewer. Please note that the technical review, which is normally completed within 180 days for a renewal application (90 days for all other requests), may identify additional omissions or require additional information. If you have any questions concerning the processing of your application, our contact information is listed below:

Region I
U. S. Nuclear Regulatory Commission
Division of Nuclear Materials Safety
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(610) 337-5260, (610) 337-5313,
(610) 337-5398, (610) 337-5239