



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



February 7, 1994

Ms. Marie Miller
State Liaison Officer
U.S. Nuclear Regulatory Commission
475 Allendale Rd.
King of Prussia, PA 19406-1415
Re: Meeting between DEP and Combustion Engineering officials on
Jan. 25, 1994

Dear Ms. Miller:

The Bureau of Air Management, Monitoring and Radiation Division, has become involved with some issues involving Combustion Engineering and their use and disposal of radioactive material. DEP officials met with Combustion Engineering representatives briefly on Nov. 18, 1993 and for a longer period of time on Jan. 25, 1994. The January meeting was set up to discuss issues involving radioactive material and Combustion Engineering's discharge permits for buildings 3, 5, 17 and 21 held by the Connecticut DEP Bureau of Water Management, Permitting, Enforcement and Remediation Division. Comments and questions brought up by Combustion Engineering and DEP representatives during the meeting have led to the following concerns:

1. Per Combustion Engineering's NRC license, are effluents from building 3 floor drains and laboratory sinks expected to drain to building 6 effluent retention tanks prior to proceeding to one of the two 50,000 gallon industrial effluent tanks?
2. It is DEP's understanding that Combustion Engineering has applied to the Department of Energy (DOE) for economic and technical guidance to facilitate the remediation of certain buildings and property at the Combustion Engineering Windsor site. We have been tentatively told the NRC that the contaminated wooded area is under the cognizance of the DOE. During discussions with Combustion Engineering representatives, they indicated the DOE has not yet accepted any of the Combustion Engineering property under the Formally Utilized Site Remedial Action Programs (FUSRAP).

If this is correct, then who is the cognizant federal agency? Who becomes the cognizant federal agency if the DOE does not accept the contaminated wooded area and other areas under FUSRAP?

3. In NRC inspection No. 70-1100/92-03, it is noted "In addition, it has been determined that a site creek which leads to the

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Farmington River is contaminated with uranium and will require remediation."

Is the DOE the cognizant federal agency in this case?

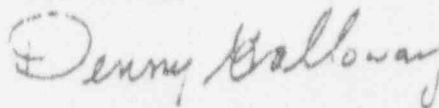
When will this area be remediated?

4. Is there any present danger to public health and safety or the environment with regard to the contaminated wooded area and the contaminated stream?

5. Mr. Jack Moulton of Combustion Engineering, indicated it could be another 10 years before any site remediation might take place for those areas. Combustion Engineering is attempting to get DOE resources. If this is correct, would the added time to remediation present any additional risk to the public or environment?

Your response to these concerns would be greatly appreciated.

Sincerely,



Denny Galloway
Supv. Radiation Control Physicist

enclosures:

Letter to Mr. Jack Moulton dated Feb. 2, 1994

List of questions from DEP Bureau of Water Management

QUESTIONS CONCERNING DRUM DISPOSAL AREA
COMBUSTION ENGINEERING, WINDSOR
CTDEP PERMITTING, ENFORCEMENT AND REMEDIATION DIVISION
2/2/94

When did Combustion Engineering first notify the Connecticut DEP and the Nuclear Regulatory Commission of the presence of a barrel disposal area at the site?

When were the drums buried?

Was it a one time event or an ongoing practice?

How many drums or other containers are buried?

Where is the disposal(s) site located?

Is the site physically secured from public access or disturbance?

What is the nature of the waste buried?

What is the mobility of these materials in the soil and groundwater?

Are the contents of all containers known? List the known contents.

Provide DEP with all analytical results available.

What type of containment does the radiation emitting material have other than the drums?

What type of drums were used?

Were any special measures taken to protect the integrity of the drums or to facilitate their recovery?

Is there any form of containment monitoring present?

Are groundwater monitoring wells in place?

Are groundwater monitoring wells being monitored?

What potential groundwater and surface water receptors are in the area?

Is the waste within the zone of influence of Combustion Engineering's process wells or Knoll's water supply well?

When will the federal evaluation of the disposal site be available?



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February 2, 1994

Mr. Jack Moulton
Senior Consultant
ABB Combustion Engineering Inc.
1000 Prospect Hill Road
P.O. Box 500
Windsor, CT 06095-0500

Dear Mr. Moulton:

In reference to our conference on January 25, 1994, some questions have arisen with the Department of Environmental Protection with regard to the buried radioactive waste at your facility. Below is a list of concerns regarding that waste.

- 1) The location/composition of the burial site:
 - a) Is there an estimated number of drums, what type containers, capacity, design, etc.?
 - b) What is the nature of waste, content of the drums?
 - c) What is the time frame of burial operations?
- 2) Burial site:
 - a) Is the burial area physically secured?
 - b) Are any measures taken to protect integrity of burial site?
 - c) Are any excavations of the site undertaken/planned?
 - d) Is formal documentation of burial data available; dates, curie content etc.?
- 3) Monitoring of the burial site:
 - a) Is there any containment monitoring present?
 - b) Are groundwater monitoring wells in place?
 - c) Are groundwater wells being monitored?
 - d) Are subsurface/surface radiation levels documented?

The Department of Environmental Protection requests that this information be provided in a timely manner. We wish to conduct a conference at your facility on February 10, 1994, at 10:00 a.m., to discuss this information. If you have any questions feel free to contact me at 566-5134.

Sincerely,

Kevin Scott
Radiation Control Physicist

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