

From: [Kauffman, Laurie](#)
To: [Van Nortwick, James W. \(GE Corporate\)](#)
Subject: SECOND REQUEST FOR ADDITIONAL INFORMATION REGARDING FINAL STATUS SURVEY PLAN FOR THE FORMER UNITED NUCLEAR CORPORATION NAVAL PRODUCTS SITE IN NEW HAVEN, CT
Date: Friday, June 26, 2020 12:38:00 PM

Dear Mr. Van Nortwick:

This is in reference to your response to NRC Request for Additional Information and revised Final Status Survey Plan, Revision 1 [Agencywide Documents Access and Management System (ADAMS) Accession Number ML20153A469], and Final Status Survey Plan, letter dated March 11, 2020, [ADAMS Accession Number ML20078J548], for the Former UNC Naval Products Facility in New Haven, CT. In order to continue our review, we need the following additional information:

1. Regarding response #4, the transect width stated in the FSSP, along with the typical surveyor scan width (approximately 1 m), would not yield 100% scan coverage, as required for a Class 1 survey unit. The scan MDCs presented in MARSSIM are based on specific set of scanning conditions and source geometry. Namely, that the sensitivity used in the scan MDC calculation is based on the detector centered above a hypothetical cylindrical source (scan MDCs provided in MARSSIM are based on a source area of 0.25 m²). Without 100% scan coverage, the field conditions of the scans will not match the assumed conditions under which the scan MDCs were calculated. Per our discussion, please re-evaluate and revise transects.
2. Regarding response #5, area factors are site-specific, based on the conceptual site model, and are developed using modeling software such as RESRAD. As you are aware, area factor tables provided in NUREG-1757 are for example purposes and not for final status survey applications. Per our discussion, please provide additional information to illustrate how 'elevated' areas will be managed.

We will continue our review upon receipt of this information. In order to continue prompt review of your application, we request that you submit your response within 30 calendar days from the date of this email.

An electronic version of the NRC's regulations is available on the NRC Web Site at: www.nrc.gov. Additional information regarding use of radioactive materials may be obtained on the NRC Web Site at: <http://www.nrc.gov/materials/miau/mat-toolkits.html>. This site also provides the link to the toolbox for updated information on the revised regulations for naturally-occurring and accelerator-produced radioactive materials (NARM).

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Thank you for your cooperation.

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