

U.S. NUCLEAR REGULATORY COMMISSION**Date:** June 1, 2012**TELEPHONE CONVERSATION RECORD****Mail Control
or Report No(s).**

N/A

License No(s).

SNM-368 (Terminated)

Docket No(s).07000371
(Retired)**Name of Licensee:**

UNC Naval Products (Formerly Licensed Facility)

Name of Participant(s):Henry (Hank) Siegrist, Corporate RSO, Cabrera Services, Inc.
Laurie Kauffman, Health Physicist, NRC Region I
Mark Roberts, Senior Health Physicist, NRC Region I**Telephone No.**

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Subject:(NOTE: This will be used as the
Documents Title in ADAMS)Discussion with Cabrera Services, Inc. regarding path forward for an addendum to the
current Decommissioning Plan with revised Derived Concentration Guidelines

In previous telephone calls, we discussed the action that General Electric (GE) and their contractor Cabrera Services, Inc. (Cabrera) would need to do to make changes to the 1998 Decommissioning Plan (DP) in order to successfully remediate certain areas of the formerly licensed UNC Naval site (UNC). GE/UNC had been unable to remediate these certain areas to the 30pCi/g total uranium cleanup criteria in their DP due to in-accessibility of the areas and concerns for undermining vertical support structures in the building.

Items Discussed on May 29, 2012:

- 1) In order to request a DP change, submit an addendum to the DP with the revised Derived Concentration Guidelines (DCGLs). Include a discussion on the exposure pathways and parameters used.
 - a. Cabrera: How should they transmit addendum and DCGL, with a letter?
 - i. NRC: We believe answer is yes - letter to transmit addendum.
- 2) Addendum to DP with revised DCGLs will not be treated as a license amendment because the UNC site is not a licensee, therefore a Federal Register Notice (FRN) to notice the submittal and provide an opportunity for hearing will not be required.
- 3) Also, an Environmental Assessment, Finding of No Significant Impact, and FRN will not be required because this action is not a Federal action because UNC is not a licensee.
- 4) NRC would ultimately document site cleanup in a safety evaluation document.
- 5) Discussed that the material under the building is building fill material and may not reflect the soils in the surrounding the area.
- 6) Discussed that the Connecticut Department of Energy and Environmental Protection (CT DEEP) might want

the water pathway turned on and resident farmer scenario used to compute the DCGL.

a. If GE does this, these parameters will drive the DCGL to approximately 25pCi/g, which will not provide a remedy.

7) GE/Cabrera to work with CT DEEP to come to common ground regarding scenario, water pathway, and parameters selection (e.g. soil Kd for uranium).

8) NRC also to work with CT DEEP to come to common ground on these same issues.

Action Required: Submit telecom into ADAMS Pkg ML051740240. Continue open and collaborative discussions with GE and CT DEEP. Wait for GE's decision and subsequent submittal of DP addendum and revised DCGLs.

Document Availability:

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LKauffman

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