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November 16, 2018

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

Br. 2
03035316

REC RG 111918M0713

RE: NRC Radioactive Materials License No. 06-30556-01, Amendment No. 08:
Notification of License Implementation at the Former National Urban Security Technology
Laboratory and Predecessor Organizations Located at 201 Varick Street, New York, NY.

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 approximately 475 liner feet of internally
contaminated pipe and associated support waste located on the fourth and fifth floors of
the building.

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

610659
NMSS/RGN1 MATERIALS-002

LICENSE USE DETAILS PROVIDED PER CONDITION #18A
201 Varick Street, New York, NY. 4th & 5th Floors

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

The owner (US Government) has approximately 475 feet of piping that may contain internal radiological contamination that is remaining from legacy operations of the National Urban Security Technology Laboratory and other predecessor laboratories including the USDOE Environmental Measurements Laboratory.

Previously from 2010 - 2014, Cabrera was hired by the Department of Homeland Security to perform a remediation of the laboratories and utilize cost saving measures to include ALARA assessments of sections of pipe that were deemed inaccessible at that time. A sample collected of the pipe scale inside the remaining piping identified no free liquids from former lab standards/solutions were encountered. The remaining solids have settled into the pipe scale and are considered embedded into several layers of the interior surface.

Table 1 below has a complete list of isotopes that Cabrera are most likely to encounter during removal of any remaining contaminated piping.

Table 1 – Expected Radionuclides of Concern

Nuclide	Half-Life
Ni-63	100.1 yr.
Ra-226	1,600 yr.
Cs-137	30.17 yr.
Sr/Y-90	28.6 yr.
Tc-99	21.3E4 yr.
Th-232	1.4E10 yr.
U-235	7.04E8 yr.
U-238	4.47E9 yr.
Pu-238	87.75 yr.
Pu-239/240	2.41E4 yr.

The potential exists for other nuclides with atomic numbers up to 94 to have been historically present at the site in samples and standards evaluated by past lab users. The listed radionuclides are considered the predominate radionuclides likely to be encountered based on past assessments and earlier remediation efforts on the 5th Floor. Isotopes with half-lives of less than 6 months are not likely to be present at the site in significant and are not included in the list. Using available results data, Cabrera previously estimated the total waste activity to be less than 100 millicuries.

2) Specification of the Site Location

Former National Urban Security Technology Laboratory and Predecessor Organizations Located on the 4th and 5th floors of 201 Varick Street, New York, NY.

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

Cabrera will assume licensed control over the pipe, contents remaining within each pipe and the immediately surrounding area during this project.

All piping to be dismantled, sized, and surveyed is either exposed or penetrates drywall and is easily accessible. Pipe along the ceiling will be accessed with an aerial lift. Once the aerial lift is positioned adjacent to the pipe to be inspected, one person will hold the drain pipe in place while another person will cut the pipe using a chain break, portable band saw or an electric reciprocating saw. Engineering controls (e.g., HEPA vacuums, pipe capping, laydown coverings, and catches/enclosures) will be available for use as needed to minimize potential airborne radioactivity and control the spread of contamination to other areas of the building.

Sections of removed piping will be reduced and consolidated at a length not to exceed 3 feet so they may fit into 55-gallon drums for disposal; a total of approximately 158 sections of piping (475 linear feet) are expected to be generated during this effort.

Previous dose assessments performed by Cabrera HPs determined the expected dose for the piping removal activity to be less than 25 mrem. Regardless of expected dose to Cabrera trained radiological workers, radiological surveys will be performed by the SRSL to assess airborne radioactivity, radiation levels, and removable surface contamination during remediation in accordance with the Cabrera Rad Protection Program. Unrestricted release surveys of materials, tools, and equipment will be limited to those brought by Cabrera.

All waste generated will be consolidated as reasonable, inventoried and drummed during this evolution. Cabrera will maintain control over the waste until it is transferred over to the waste transportation contractor. The planned disposal contractor is Waste Control Specialists, in Andrews, TX.

4) Estimated Project Start Date and Duration.

Site operations will proceed on Monday, December 3, 2018 with an expected 1-2-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

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



ACKNOWLEDGEMENT - RECEIPT OF CORRESPONDENCE

Name and Address of Applicant and/or Licensee

Cabrera Services, Inc.
Attn: Michael S. Winters, CHP
50 Founders Plaza
Suite 207
East Hartford, CT 06108

Date

11/30/2018

License Number(s)

Notification - 06-30556-01

Mail Control Number(s)

610659

Licensing and/or Technical Reviewer or Branch

Commercial, Industrial, R&D, & Academic Branch

This is to acknowledge receipt of your: ☒ Letter and/or ☐ Application Dated: 11/16/2018

The initial processing, which included an administrative review, has been performed.

☐ 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:

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