

## Executive Summary

The U.S. Nuclear Regulatory Commission (NRC) requested that the Oak Ridge Institute for Science and Education (ORISE) perform a radiation survey of the property at 430 North Main Street in Bristol, Connecticut. This property covers part of the footprint once occupied by the former Ingraham Clock Company, which used radium paint in the manufacturing of clocks and watches into the late 1950s. The original factory was torn down and the land has been redeveloped. The objective of this survey was to locate possible discrete sources of radium, if any, that would be associated with former Ingraham Clock Company operations.

ORISE performed the radiation survey on November 9, 2016, and did not identify elevated levels of radiation in accessible areas. Because no elevated levels of radiation were identified, ORISE concludes that discrete sources of radium are likely not present in surface soils. Based on these results, it was recommended that the NRC not pursue additional action at 430 North Main Street property.

## SITE STATUS REPORT

Property: Ingraham Clock Company  
430 N. Main Street  
Bristol, CT 06010

Docket Number: 03038980

Current Property Name(s): Rite Aid Pharmacy

Current Property Owner(s): Northside Square, LLC

Inspection Dates: November 9, 2016

Inspector(s): Orysia Masnyk Bailey/NRC, assisted by Nick Altic/ORAU

### 1.0 INTRODUCTION

The Energy Policy Act of 2005 amended section 11e.(3) of the Atomic Energy Act of 1954 to place discrete sources of radium-226 (Ra-226) under U.S. Nuclear Regulatory Commission (NRC) regulatory authority as byproduct material. The NRC is evaluating properties where our review of historical information has identified Ra-226 use. The property at 430 North Main Street in Bristol, Connecticut (CT), was identified as the former Ingraham Clock Company, a clock manufacturing facility, once operated during the period from 1884 to 1958 (ORNL 2015 and ATSDR 1999). The objective of the initial site visit was to determine if discrete sources of Ra-226 and/or distributed Ra-226 contamination are present, to identify the areas of highest contamination, to determine if there are any current health and safety concerns, and to determine if a scoping survey is needed.

Data collected during the November 9, 2016 site visit, which includes gamma radiation scans and exposure rate measurements, are used to plan future actions that may be needed to reduce the exposure to Ra-226 of current or future site occupants to levels that do not exceed the applicable regulatory requirement. It is important to note that destructive testing is not generally performed as described within NRC's procedures, Temporary Instruction 2800/043 "Inspection of Facilities Potentially Contaminated with Discrete Radium-226 Sources" (Agencywide Documents Access and Management System (ADAMS) Accession number ML16035A053).

### 2.0 PROPERTY DESCRIPTION AND INITIAL SITE VISIT CONSIDERATIONS

#### 2.1 Property Description and History

The site summary included in the "Historical Non-Military Radium Sites Research Effort Addendum" report (ORNL 2015) provides known site details about the type, form, history, potential locations and other information related to discrete sources of Ra-226 used at the site. The information provided in ORNL 2015 is supplemented by the Agency for Toxic Substances and Disease Registry (ATSDR) report (ATSDR 1999) that addresses radium dial clock companies located in the State of CT. The Ingraham Clock Company was founded in 1884 and occupied several buildings on North Main Street in Bristol, CT. In 1904, as a result of increased sales due to improvements in manufacturing and machinery, Ingraham replaced the original wooden buildings with brick ones. Clocks and watches with luminous radium paint were

manufactured in these buildings until production ceased in 1942 due to World War II. Production resumed again in 1946. In 1958, the company moved from North Main Street to Bristol's Redstone Hill Industrial Park (210 Redstone Hill Road) (ORNL 2015).

During the 1960s, the abandoned buildings at the North Main Street location were torn down as part of a redevelopment project. Extensive testing took place at the site prior to 1980, however neither the exact dates of testing nor the types of tests performed are known. Therefore, it is unknown if soil at the North Main Street location of the former Ingraham Company was tested for radium (ORNL 2015). At the time of site redevelopment, soil from the site was cleared for use as cover material at a Bristol landfill; a river running through the site was piped underground, and backfill was brought onto the site. As part of the redevelopment, residential and commercial properties were constructed at the North Main Street locations, including: (1) 430 North Main Street in the early 1980s; (2) 284 North Main Street in 1987; (3) 400 North Main Street in 1989-90; and (4) 420 North Main Street in 1990-91 (ORNL 2015). Historical maps indicate that the former factory buildings were fairly close to Main Street (i.e. the site perimeter). This report documents the initial site visit to the portion of the Ingraham property that is currently associated with 430 North Main Street.

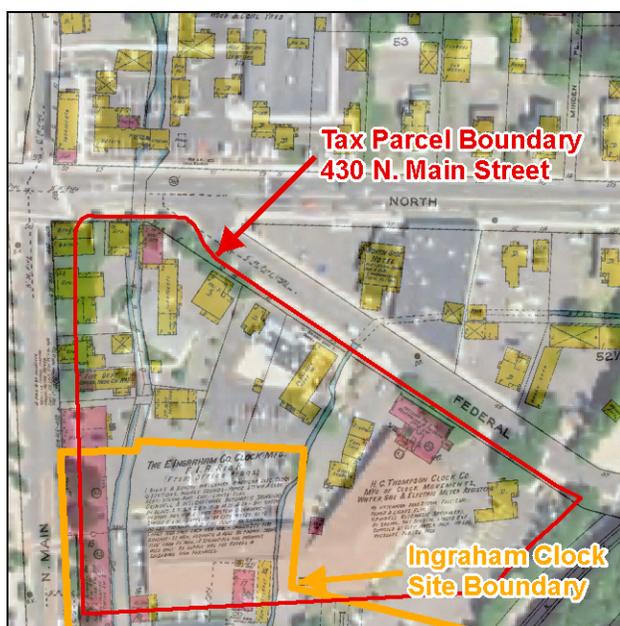


Figure 1. Map documenting the portion of the Ingraham Clock Factory site located at 430 North Main Street

## 2.2 Initial Site Visit Considerations

Based on the above history of the property and its redevelopment, NRC staff consider the likelihood of discrete sources of Ra-226 existing in current property structures to be negligible. Rather, were discrete sources of Ra-226 present, they would likely be in subsurface soils. As stated above, however, during redevelopment activities surface soils were transported off-site and backfill materials were brought in. Potential mixing between the backfill and remaining subsurface soils would likely further dilute any remaining discrete subsurface sources of Ra-226. The structures, pavement, and other obstructions on the property limited the area in which

initial surveys were performed. Instead, this initial site visit focused on the accessible land areas to try and identify any discrete Ra-226 sources in surface soil that may be indicative of Ra-226 in subsurface soil. The team focused its activities near the footprint of the former factory buildings.

### 3.0 SITE OBSERVATIONS AND FINDINGS

#### 3.1 Summary of Activities

The inspection team conducted an initial site visit at the 430 North Main Street property on November 9, 2016. A pre-inspection meeting was held with Mark Zimmerman (Updike, Kelley & Spellacy), representing the property owner, Tony D'Amato (property owner), Jeff Semancik (Connecticut Department of Energy and Environmental Protection [CT DEEP]), Mike Firsick (CT DEEP), Nick Altic (ORAU), and Jim Trapp and Orysia Masnyk Bailey (NRC).

Radiological surveys consisted of gamma radiation scans and exposure rate measurements. The gamma radiation scans were performed with a sodium iodide detector, which, as a rule-of-thumb, can respond to gamma-emitting radionuclides located in the top 15 to 30 centimeters (6 to 12 inches) of soil. The exposure rate measurements were performed with a gamma exposure rate meter, which measures ambient ionizing radiation fields to evaluate direct exposure from gamma-emitting radionuclides. Also, a gamma spectrum analyzer was available in case elevated radiation levels were identified. This type of analyzer is a radioisotope identification device that can allow users to determine if elevated gamma radiation levels are due to discrete Ra-226 materials in surface soil.

Surface scans focused on surface soil areas surrounding the perimeter of the site, which correlate to the areas of the former factory buildings. In general, the sodium iodide detector background responses ranged from about 6,500 to 10,000 counts per minute (cpm), depending on proximity to brick structures, asphalt, concrete, and landscaping. Exposure rates varied similarly depending on proximity to naturally occurring radioactive materials (NORM), with a consistent range from 3 to 7 microRoentgens per hour ( $\mu\text{R/h}$ ). Responses increased to 14,000 cpm and 10  $\mu\text{R/h}$  between the brick buildings on 430 and 420 N. Main Street. These results are expected between NORM in this configuration.

Table 3.1 presents the specific instruments used during the initial site visit.

<b>Table 3.1. Ingraham Clock Company Survey Instruments</b>			
<b>Radiation Type (units)</b>	<b>Detector Type</b>	<b>Detector (Number)</b>	<b>Ratemeter (Number)</b>
Gross gamma (cpm)	Sodium Iodide	44-10 (908) Calibrated 11/1/2016	2221 (590) Calibrated 8/19/2016
Gross gamma ( $\mu$ R/h)	Exposure Rate Meter	192 (1127) Calibrated 6/3/2016	N/A
Gamma Spectrum Analyzer (SAM-940)	Lanthanum Bromide	940 (864) Daily check source response	N/A

N/A = not applicable; ratemeter is not required.  
Number = equipment tracking number

### 3.2 Summary of Results

Figure 2 presents a summary of results from the initial site visit on November 9, 2016. Inspectors identified no anomalous gamma radiation measurements. Nor did they identify any discrete Ra-226 materials in surface soil at the accessed portions of the site. In addition, no records were identified that suggest discrete sources of radium exist after the property's redevelopment.

The limitations of the initial site visit were noted by the team in that surveys only accessed approximately 20% of the total site area. Most of the outdoor area was covered by structures, concrete, asphalt, cars, etc., restricting the ability to perform a complete site survey. Paved areas of the site parking lot were not surveyed as the depth and density of the asphalt would shield gamma radiation from a discrete source of Ra-226. The asphalt provided more shielding than soil, making identification of a potential discrete source more unlikely than if soil were the only shielding material. While the most likely location of Ra-226 material is in subsurface soil, there were no indications that subsurface contamination exists and sampling was not performed.

### 3.3 Summary of Dose Assessment Results

Because no radiation levels were detected above background and no discrete sources of radium were encountered a dose attributed to discrete radium sources could not be calculated.

## 4.0 OBSERVATIONS AND RECOMMENDATIONS

There was no indication from the areas surveyed that surface soil at 430 N. Main Street property, occupying a portion of the former Ingraham Clock Company, contains discrete sources of Ra-226 as determined by the following observations:

- Gamma radiation levels were consistent with background.

- The absence of observable gamma radiation anomalies suggests there are no discrete sources of Ra-226 present in surface soil.
- There was no historical evidence that discrete sources of Ra-226 are present following the 1960s facility demolition and the property's subsequent redevelopment and risk of potential contamination on the site is low and, if present, would most likely be found at a significant depth in the subsurface soil.

Therefore, the recommendation to the NRC staff is that a more detailed scoping survey is not necessary at this time and NRC staff should not pursue additional action at the 430 N. Main Street property.

## 5.0 REFERENCES

ATSDR 1999. *Public Health Implications of Radiation Contamination at Former Clock Factories Located in Bristol (Hartford County), New Haven, (New Haven County), Thomaston (Litchfield County), and Waterbury (New Haven County), Connecticut*, prepared by the Connecticut Department of Public Health under Cooperative Agreement with The Agency for Toxic Substances and Disease Registry, U.S. Department of Health and Human Services, January 29. (Agencywide Documents Access and Management System [ADAMS] Accession No. ML17038A052).

NRC 2016. *Inspection of Facilities Potentially Contaminated with Discrete Radium-226 Sources*, Temporary Instruction 2800/043, U.S. Nuclear Regulatory Commission, Office of Nuclear Material Safety and Safeguards, Washington, D.C., October. (Agencywide Documents Access and Management System [ADAMS] Accession No. ML16035A053).

ORNL 2015. *Historical Non-Military Radium Sites Research Effort Addendum*, "Ingraham Clock Company: Site Summary," Pages 73-81, Oak Ridge National Laboratory, Oak Ridge, Tennessee, November 24. (Agencywide Documents Access and Management System [ADAMS] Accession No. ML16291A488).

<b>SITE: Ingraham</b>	<b>AREA: 430 N. Main St.</b>	<b>DATE: 11/09/16</b>	<b>TIME: 9:00 – 11:00</b>
<b>SURVEYOR(S): Nick Altic</b>		<b>PURPOSE: Site Visit</b>	

<b>TYPE</b>	<b>INSTRUMENT</b>	<b>DETECTOR</b>	<b>BACKGROUND</b>
Gamma	2221 #590	44-10 #908	*
Gamma	192 #1127	N/A	*
N/A	N/A	N/A	N/A

**N/A** Sub-section of site with generally higher exposures up to 14,000 cpm and 10  $\mu$ R/h between red brick walls.

\* Background readings varied depending on proximity to red brick buildings and ground materials such as concrete, asphalt, and natural media (e.g., landscaping). Surveyors noted no radiological anomalies.



Figure 2. Survey Result for the 430 N. Main Property