



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 4, 2018

Mr. Brian Godwitz
95 Johnson WTB, LLC
95 Johnson Street
Waterbury, CT 06710

SUBJECT: LUX CLOCK COMPANY – RESULTS OF INITIAL SITE VISIT AND
RECOMMENDATIONS

Dear Mr. Godwitz:

I am writing to provide you with the U.S. Nuclear Regulatory Commission's (NRC's) results of its June 27-28, 2017, site visit to your property at 95 Johnson Street, Waterbury, Connecticut. As outlined in our letter to you dated October 6, 2016, (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16277A312), the NRC staff conducted a site visit to your property to: 1) determine if there are health and safety concerns to current property occupants or site visitors; and 2) identify the locations with the potential for contamination and gather information for a scoping survey plan, should it be needed. The results are summarized below and are discussed in further detail in the enclosed report.

During the staff's initial site visit, the staff conducted radiation surveys over approximately 50 percent of the floor area. The surveys, in part, focused on potentially contaminated areas identified in historic surveys. Our ability to access and survey the site was limited because significant portions of the site were being used for storage. In areas where we identified elevated radiation levels, we conducted additional measurements to test for transferable contamination. The NRC's survey results generally confirm the results collected in historical surveys performed at your site.

The NRC surveyed accessible areas of Floors 1, 2, the sub-basement, and 50 percent of the exterior land areas and found no radium. These results are consistent with historical surveys for Floors 1 and 2, and, therefore, we believe the results to be representative of the areas as a whole. The sub-basement and exterior land areas were not surveyed previously.

On Floor 3, the NRC surveyed approximately 75 percent of the floor area and identified radium at six discrete locations. All radium identified on the third floor was evaluated conservatively, assuming a residential use scenario (i.e., 5,770-hour annual occupancy) as established in the Dose Assessment Technical Basis Document for Potential Exposures to Discrete Sources of Radium-226 and Associated Contamination (ADAMS Accession No. ML17072A414). As conservatively modeled by the NRC, the radium identified does not exceed the NRC's dose limit of 25 millirem per year for unrestricted use in Title 10 of the *Code of Federal Regulations (10 CFR)*, Section 20.1402. However, access was severely limited on the western portion of the third floor space due to the storage of material on the floor.

On Floor 4, the NRC surveyed approximately 30 percent of the floor area and identified radium at 1 discrete location. Radium identified on the fourth floor was evaluated conservatively, assuming a residential use scenario. As conservatively modeled by the NRC, the radium identified does not

exceed the NRC's dose limit of 25 millirem per year for unrestricted use in 10 CFR 20.1402. However, access to a significant portion of the floor was severely limited due to the storage of material on the floor.

Because the western portion of third floor space and a significant portion of the fourth floor were inaccessible during the site visit, the surveying was limited, and a dose assessment for the inaccessible areas could not be made at this time. To ensure the health and safety of current or future occupants of these floors, the NRC is willing to return and perform a scoping survey of the western portion of third floor space and the entire fourth floor at no cost, provided we are able to access the entire third and fourth floors and can complete the surveys by March 2019. As part of any cleanup effort or reduction in use for these floors, you may wish to consult with an NRC or Agreement State licensed service provider to ensure that there is limited potential for radiological contamination to be spread.

Please be aware that activities at your site may also be subject to State requirements and standards.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of ADAMS. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

The staff will contact you in the near future to answer any questions you may have regarding this report, but if you have any immediate questions, please contact Mr. Stephen Koenick, Chief, Materials Decommissioning Branch, Division of Decommissioning, Uranium Recovery and Waste Programs, Office of Nuclear Materials Safety and Safeguards, at (301) 415-6631 or Mr. David Misenhimer, Project Manager, at (301) 415-6590.

Sincerely,

/RA/

John R. Tappert, Director
Division of Decommissioning, Uranium Recovery
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

Docket No. 03038982

Enclosure:

1. Site Visit Report

REGISTERED LETTER – RETURN RECEIPT REQUESTED

SUBJECT: LUX CLOCK COMPANY – RESULTS OF INITIAL SITE VISIT AND
RECOMMENDATIONS **DATED April 4, 2018**

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