



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

December 20, 2018

Mr. John Dellalana, President  
Rowley Spring & Stamping Corp.  
210 Redstone Hill Road  
Bristol, CT 06010

SUBJECT: PROPERTY AT 210 REDSTONE HILL-INGRAHAM CLOCK COMPANY-5 –  
FINAL REQUEST FOR INITIAL SITE VISIT AND TO PERFORM RADIOLOGICAL  
SURVEYS

Dear Mr. Dellalana:

I am writing to follow-up on the attempts made by the U.S. Nuclear Regulatory Commission (NRC) staff to contact you regarding our interest in the property at 210 Redstone Hill Road, Bristol, Connecticut. As discussed in our letter dated October 6, 2016,<sup>1</sup> our records indicate that the property was previously used by the Ingraham Clock Company in the manufacturing of clocks. It is possible that these clocks contained radium-226 (Ra-226), a radioactive isotope that, in certain quantities, may pose a risk to public health and safety. Ra-226 was commonly used in the painting of clocks in the early 1900's and is currently regulated by the NRC. However, it is important to note that by 1958, the date the Ingraham Clock Company moved to your property, Ra-226 use in timepieces had generally ended in the United States.

On October 28, 2016, the NRC staff contacted your staff and requested access to your property to survey it, but your staff declined that request. The NRC staff has subsequently attempted to contact you or your staff via e-mail and via phone starting on March 2, 2017, but has not been successful in gaining site access. It has been a few months since our last discussion regarding the NRC staff's request to survey your property, and I wanted to follow-up with you one last time regarding this request. However, if you are not the current owner of the property, please let us know.

The area of interest at the property is inside and outside the building that was previously used by the Ingraham Clock Company. As previously stated, we are requesting access to the property to perform radiological surveys and to collect samples to determine whether there is any residual contamination and to confirm that there is no concern for public health and safety. This testing will not damage your property and these tests will be conducted at no cost to you.

During a previous conversation with the NRC staff, your staff stated that they had reviewed an environmental report of the site before purchase and reviewed the historic business information on Ingraham Clock Company and could not determine if radium was ever present. If you have this environmental report, or any other environmental records, we would appreciate the opportunity to review them and determine an appropriate path forward.

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<sup>1</sup> Agencywide Documents Access and Management System (ADAMS) Accession No. ML16277A311.

If you would prefer either a teleconference or an in-person meeting with NRC staff to further discuss your property and our experience surveying similar properties, we can work to arrange this. However, this will be our final attempt to contact you to schedule the survey.

The enclosed Site Summary Report<sup>2</sup> provides all of the information that the NRC has concerning historical radium manufacturing at the property, which we found through a search of publicly available information and in information provided by the Connecticut Department of Energy and Environmental Protection. The enclosed Backgrounder provides more detail on the history of radium use and its potential health effects. The enclosed brochure provides an overview of the NRC.

In accordance with Title 10 of the *Code of Federal Regulations* Section 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 NRC's ADAMS. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

If, within one year following the date of this letter, you would like the NRC staff to perform this survey at the property, or if you have any questions concerning this letter, please contact Mr. Stephen Koenick, Chief, Low-Level Waste and Projects Branch, Division of Decommissioning, Uranium Recovery and Waste Programs, Office of Nuclear Materials Safety and Safeguards, at (301) 415-6631, or Mr. Richard Chang, Project Manager, at (301) 415-5888.

I hope that we can work together to resolve this issue and determine the current radiological status of the property.

Sincerely,

*/RA/*

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

Docket No.: 03038981

Enclosures:

1. Site Summary Report
2. Radium Backgrounder
3. U.S. Nuclear Regulatory Commission *Overview*

REGISTERED LETTER – RETURN RECEIPT REQUESTED

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<sup>2</sup> The enclosed Site Summary Report is a subsection of the *Historical Non-Military Radium Sites Research Effort Project Report*, that was prepared by Oak Ridge National Laboratory. The report can be found in ADAMS at Package Accession No. ML16287A522.

J. Dellalana

SUBJECT: INGRAHAM CLOCK COMPANY-5 – FINAL FOR INITIAL SITE VISIT AND TO  
PERFORM RADIOLOGICAL SURVEYS **DATE December 17, 2018**

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C. Grossman, NMSS

**ADAMS Accession No.: ML18169A412**

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