



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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Gina McCarthy
Commissioner

August 10, 2005

Chairman Anthony J. Principi
 2005 Base Realignment and Closure Commission
 2521 S. Clark Street, Suite 600
 Arlington, VA 22202
 Washington, DC

BRAC Commission

AUG 15 2005

Received

Dear Chairman Principi:

As a follow up to the meeting Team Connecticut had with BRAC Staff on August 2, 2005, and at the request of Governor M. Jodi Rell, I am writing to you today to share critical information regarding radiological assessment and contamination at Naval Submarine Base New London.

First and foremost, the Connecticut Department of Environmental Protection (CTDEP) wants to make it clear that it agrees that the Naval Nuclear Propulsion Program (NNPR) has maintained very strict controls over radioactive materials under its management since its formation. Given the strict controls in place at the NNPP, the information CTDEP submitted to BRAC did not estimate any significant increase in the clean up costs associated with NNPP activities.

Recent research conducted by the CTDEP Division of Radiation over the past few months has however, raised serious concerns that have not been resolved about potential contamination that may have occurred as a result of radioactive material usage in other programs at the New London base. For example:

- In the 1940's, the Sub Base conducted radium dial painting activities at multiple locations with three employees, at least one of which was a full time position. This activity maintained at least 25 grams of radium dial paint in its inventory.
- In 1945, radium contamination was identified in the normal waste stream.
- In 1951, Navy personnel at the Sub Base were experiencing difficulty with the proper use of a 250-milligram capsule of radium for hull radiography. It was identified that the individual responsible for this work and the associated problem with the radioactive source "had been at sea for 17 years and upon returning to the base was given this assignment which was completely foreign to any training he had previously received."
- In 1961, an Atomic Energy Commission Inspection Report found two violations, one of which was "No records were maintained of surveys conducted to determine compliance with the requirements of 10 CFR 20 in violation of Section 20.401(b), Records of surveys, radiation monitoring, and disposal."

This documentation clearly suggests that unlike the NNPR, there has been a serious lack of controls relative to the usage of radioactive materials commonly known as "G-RAM" in other programs. Given the Navy's failure to provide vital historical information on the uses and disposition of radioactive materials beyond those associated with the Naval Nuclear Propulsion Program, it seems only reasonable to conclude that a complete assessment in accordance with the process known as Multi-Agency Radiological Survey and Site Investigation Manual (MARSSIM) is necessary before any reasonable estimate can be made of the radiological contamination on the site and the associated clean up costs.

Yours truly,

A handwritten signature in black ink, appearing to read "Gina McCarthy", written over a horizontal line.

Gina McCarthy
Commissioner

CC: Gov. M. Jodi Rell
Hal Tickle
Jim Hanna
Gary Miller