



STATE OF MICHIGAN

DEPARTMENT OF NATURAL RESOURCES
LANSING

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April 22, 2003

Mr. Sam Nalluswami, Ph.D., P.E.
United States Nuclear Regulatory Commission
Facilities Decommissioning Section
Low-Level Waste Decommissioning Projects Branch
Division of Waste Management
Office of Nuclear Materials Safety and Safeguards
Mail Stop T-7F27
Washington, DC 20555

Dear Mr. Nalluswami:

SUBJECT: Revised Decommissioning Funding Plan for Tobico Marsh State Game Area Site
NRC Letter, *Michigan Department of Natural Resources' Bay County Tobico Marsh State Game Area Site Decommissioning Plan*, Dated March 20, 2003.

The Michigan Department of Natural Resources (MDNR) is responding to the NRC's letter dated March 20, 2003 concerning the statement that reads: "A revised decommissioning funding plan to include a Revised Cost Estimate for the preferred decommissioning approach in accordance with 10 CFR 40.36" [Financial Assurance and Recordkeeping for Decommissioning] for the Tobico Marsh SGA Site (Site) (License No. SUC-1581, Docket No. 040-09015. Attached is the revised decommissioning funding plan (DFP) for the preferred decommissioning option, as specified in the Decommissioning Plan dated February 28, 2003.

MDNR believes that the revised DFP addresses all of the required and relevant elements of 10 CFR 40.36. If there are any questions regarding the revised DP, please let me know as soon as possible so NRC can continue its review of the submitted Decommissioning Plan.

If you have any questions, please contact me.

Sincerely,

Denise Gruben, Manager
Design and Construction Section
Office of Land and Facilities
517-335-4036

Enclosure

cc: Ms. Claudia Craig, US NRC
Mr. Ed Kulzer, US NRC
Mr. Phil Mazor, WM
Mr. Rick Dunkin, Harding ESE
Mr. Jeff Lively, MACTEC
Mr. Robert Skowronek, MDEQ
Mr. Tim Bertram, MDEQ
Ms. Kelli Sobel, MDNR
Mr. David Freed, MDNR

**DECOMMISSIONING FUNDING PLAN
REVISION 1**

**TOBICO MARSH SGA SITE
Kawkawlin, Michigan**

PREPARED FOR:

MICHIGAN DEPARTMENT OF NATURAL RESOURCES



**MERA No. 090015
MACTEC ENGINEERING & CONSULTING OF MICHIGAN, INC.
PROJECT No. 50055**

APRIL 2003

DECOMMISSIONING FUNDING PLAN REVISION 1

TOBICO MARSH SGA SITE
Kawkawlin, Michigan

US NRC License Number SUC-1581
Docket Number 40-9015

Prepared for:

Michigan Department of Natural Resources
Facilities Management Section
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Project No. 50055

April 2003

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1.0 INTRODUCTION

This revision to the Decommissioning Funding Plan (DFP) is submitted by the Michigan Department of Nature Resources (MDNR) for the Tobico Marsh State Game Area site in compliance with 10 CFR Part 40.36. The revision contains adjustments to the funding estimates previously provided in the original DFP submission (ABB-ES, 1997) based on the decommissioning option proposed in the site Decommissioning Plan (DP) (MDNR 2003). The Plan was developed using the guidance provided in NUREG 1727 (NRC 2000) and Draft NUREG 1757, Vol. 3 (NRC 2002).

This DFP establishes the funding basis for estimating the cost to implement the DP for decommissioning the Tobico Marsh SGA site. The DFP consists of nine parts: Introduction, Facility Description, Decommissioning Criteria, Decontamination Methodology, Low-Level Waste, Restoration, Decommissioning Cost Estimates, Financial Assurance Method, and References.

2.0 FACILITY DESCRIPTION

The Tobico Marsh site is located on State of Michigan property in the Tobico Marsh State Game Area at:

2301 Two Mile and Beaver Roads
Bay County
Kawkawlin, MI 48631

The Tobico Marsh SGA site is comprised of approximately 3 acres that were once a portion of the larger Hartley and Hartley Landfill. The Hartley and Hartley landfill (including that portion now identified as the Tobico Marsh SGA site) is a former industrial waste disposal area in which magnesium-thorium slag containing low-levels of naturally-occurring residual radioactivity was also disposed.

Access to the Tobico Marsh SGA site is gained via a road through the adjacent SCA Landfill located to the south. The areas adjacent to the north, east, and west sides of the Tobico Marsh site are marshlands and have no roads or other improvements.

A clay cap and slurry wall encapsulating the waste disposal area on the site have been installed. During installation of the cap and slurry wall encapsulation features, a leachate collection system consisting of six leachate extraction wells, piping, and equipment were also installed. The LCTS was designed to address non-radioactive constituents by removing water from the cell, treating it, and discharging the treated water to a sanitary sewer system via a force main. A small building (the leachate collection and treatment system (LCTS) building) was also constructed on the site to house the equipment and control systems associated with the operation of the LCTS. The LCTS fluid piping and pumping controls systems were installed but were never operated and the LCTS system has been rendered inoperable. The LCTS building has been (and is presently) used to securely store small volumes of containerized low-level radioactive wastes derived from sampling and characterization efforts.

3.0 DECOMMISSIONING CRITERIA

This revision of the DFP has been prepared in support of the MDNR's proposed decommissioning option as described in the DP (MDNR 2003). MDNR has proposed that the site be released for unrestricted use in accordance with the criteria specified in 10 CFR 20.1402. The preferred decommissioning option is essentially a "no action" option in that it does not require the excavation of slag having measurable concentrations of residual thorium radioactivity from subsurface soils. Building, equipment, and material surfaces to be removed from the site will be surveyed to demonstrate compliance with the surface activity limits identified in the DP (Table 1) and derived from the NRC's Regulatory Guide 1.86 (NRC 1974).

Table 1 Acceptable Surface Contamination Levels, (dpm/100cm²)

Radiation Type	Removable	Total, Average	Total, Maximum
Alpha or Beta	200	1000	3000
Surface radioactivity levels derived from U.S. NRC RegGuide 1.86 (NRC 1974)			

The DFP previously submitted to the NRC by the MDNR was based on the assumption that complete removal of the licensed radioactive material might be required (MDNR 1997). As a result, the cost estimate provided in Revision 0 of the DFP served as a bounding estimate and the basis for the financial assurance vehicle issued by the MDNR.

The previous cost estimate projected that the costs of site characterization would be approximately 2.5 million dollars, and that the cost of complete removal and disposal of the thorium bearing slag materials would be approximately 10 million dollars. With characterization work now completed, approximately 3.5 million dollars have been expended to date.

Decommissioning activities that remain to be completed, considering the proposed decommissioning option are relatively minor, involving:

- the removal of the LCTS building and decontamination slab;
- the termination of existing LCTS system piping below the ground surface;
- local repairs to the clay cover as a result of the LCTS building and piping system tasks;
- a post-closure gamma radiation survey over the site; and
- documentation describing the final radiological status of the site.

3.2 *Records*

Records of the decommissioning process and results will be preserved for at least two years, or as required by current regulations.

3.3 *General Assumptions*

The following general assumptions were used in the preparation of this revision of the DFP and cost estimate for decommissioning the Tobico Marsh SGA site.

- This DFP assumes the availability of a Low-Level Waste (LLW) disposal facility at reasonable cost, and that contractual arrangement with an approved LLW disposal facility, packaging, manifesting, and transportation in accordance with U.S. Department of Transportation (DOT) regulations will be provided by a licensed waste broker.
- The preferred option in the site DP is approved.
- Work will be performed in compliance with procedures applicable to the decommissioning activity and in conjunction with the DP.
- Work inside radiologically controlled areas (e.g., radiation, or contamination areas) will be performed using approved radiation work procedures.
- Radiation Safety Personnel will be available during decommissioning activities.

3.4 *Cost Estimation Methodology*

The proposed decommissioning option does not require the removal of soils and debris contained within the slurry walls and having residual thorium radioactivity. Waste volumes are those associated with small amounts of existing sample derived wastes as well as a small amount of debris associated with the removal of the LCTS building or termination of the LCTS piping system below grade that might have surface radioactivity in excess of the release limits (See Table 1).

To account for uncertainty, provisions have been made to include reasonable contingency funds in the cost estimates.

Estimates provided in this Plan are shown in 2003 dollars. A summary of the costs associated with activities described in the DP and through license termination are presented in Section 7. A summary of the cost estimates associated with the balance of the decommissioning activities is shown in Table 11; the details of these cost estimates are shown in the Table 4 through Table 10.

4.0 DECONTAMINATION METHODOLOGY

This section outlines the major procedural aspects involved in the decontamination and decommissioning of the leachate collection system and treatment building.

4.1 *Leachate Collection and Treatment System*

The LCTS consists of six leachate extraction wells, associated piping, and a building, which was designed to house equipment for the treatment of leachate. The building is considered part of the LCTS.

LCTS components (piping, valves, extraction wells, etc.) will be terminated below the ground surface and rendered inaccessible. The removed piping and components will be surveyed to identify the presence and extent of residual surface radioactivity levels.

LCTS equipment identified as containing residual surface radioactivity in excess of the release limits specified in Table 1 will either be decontaminated on site or (if decontamination is ineffective or impracticable) will be sized and packaged for disposal at an approved radioactive waste disposal facility. No extraordinary or reagent facilitated decontamination is anticipated as the volume of waste having residual radioactivity in excess of approved limits is expected to be minimal. Planned decontamination activities are limited to those using water and detergent.

4.2 *LCTS Building and Decontamination Pad*

It is assumed that only minor, if any, residual surface radioactivity will be encountered on floors, walls, ceilings, and other surfaces of the LCTS building and the decontamination pad. LCTS building and decontamination pad surfaces identified as having residual surface radioactivity in excess of the release limits specified in Table 1 will either be decontaminated on site or (if decontamination is ineffective or impracticable) will be sized and packaged for disposal at an approved radioactive waste disposal facility. No extraordinary or reagent facilitated decontamination is anticipated as the volume of waste having residual radioactivity in excess of approved limits is expected to be minimal. Planned decontamination activities are limited to those using water and detergent.

5.0 LOW LEVEL WASTE

This plan assumes that a LLW burial site will be available to bury debris and equipment that does not meet the unrestricted use release criteria. Transport of the waste off-site will be conducted in accordance with applicable DOT regulations.

Cost estimates associated with disposal of LLW are shown in Table 5.

6.0 RESTORATION

Following completion of task involving the removal of the LCTS building and decontamination pad and the termination of the LCTS system piping below grade, it will be necessary to restore the disturbed sections of the clay cover over the disposal cell in accordance with design specifications developed for that task. After the clay cover has been restored, a post-closure gamma radiation survey will be performed on a systematic grid over the entire cover to demonstrate that the cover is attenuating

radiation as expected. Upon determination that cover is performing as expected, the disturbed areas of the cover will be provided with appropriate surface covering to minimize erosion.

Cost estimates associated with restoration of the restoration activities are shown in Table 6 and Table 9.

7.0 DECOMMISSIONING COST ESTIMATE

The estimated remaining cost to complete the decommissioning of the Tobico Marsh SGA site is approximately \$250,000.00, including contingency. The previous estimate of the anticipated costs through site characterization and completion of the DP was \$2.5 Million. MDNR estimates that it has spent approximately \$3.5 Million to date. Considering that the cost for the remaining work is estimated to be less than \$1.0 Million, the revised cost estimate is well within the original estimate of \$12.5 Million.

The remaining decommissioning tasks to be completed are itemized in Table 2. Table 3 provides unit labor rates from which the cost estimates are derived. Table 11 provides a cumulative summary of the estimated costs for the remaining decontamination and decommissioning activities at the Tobico Marsh SGA site. Table 4 through Table 10 provide estimates of the costs broken down by task.

Table 2 Major Activities Associated with Decommissioning and License Termination

Description	Cost Estimated in Table
Planning and Preparation	Table 4
Radioactive Waste Characterization and Disposal	Table 5
Specifications and Procurement Assistance	Table 6
MDNR/NRC Correspondence and Meetings	Table 7
Site Radiological Training & Surveys	Table 8
Post Closure Radiological Survey	Table 9
Final Radiological Status Report	Table 10

Table 3 Unit Labor Rates

Classification	Unit Labor Rates (per Hour)
Project Manager	\$115
Senior Engineer	\$125
Engineer	\$95
Project Geologist	\$75
Senior Health Physicist	\$125
Health Physicist	\$90
Technician	\$55
Graphics	\$55
Contracts Administration	\$60
Project Assistant	\$50
Clerical	\$40

Table 4 Planning and Preparation

Staff	Hours	Rate	Cost
Project Manager	24	\$115	\$2,760
Project Geologist	60	\$75	\$4,500
Health Physicist	60	\$90	\$5,400
Project Assistant	11	\$50	\$550
Clerical	2	\$40	\$80
Other Direct Costs (ODCs)	NA	NA	\$500
		Total	\$13,790

Table 5 Radioactive Waste Characterization & Disposal

Table 5-A Procurement of Laboratory Services

Staff	Hours	Rate	Cost
Project Manager	1	\$115	\$115
Project Geologist	8	\$75	\$600
Health Physicist	2	\$90	\$180
Contracts Administration	4	\$60	\$240
ODCs	NA	NA	\$100
Total			\$1,235

Table 5-B Sample and Analysis of Radioactive Waste

Staff	Hours	Rate	Cost
Project Manager	2	\$115	\$230
Project Geologist	24	\$75	\$1,800
Health Physicist	8	\$90	\$720
Technician	8	\$55	\$440
Project Assistant	2	\$50	\$100
ODCs	NA	NA	\$1,500
Total			\$4,790

Table 5-C Procurement and Oversight of Radioactive Waste Removal

Staff	Hours	Rate	Cost
Project Manager	2	\$115	\$230
Project Geologist	16	\$75	\$1,200
Health Physicist	8	\$90	\$720
Technician	16	\$55	\$880
Contracts Administration	4	\$60	\$240
ODCs	NA	NA	\$1,000
Waste Broker	NA	NA	\$10,000
Total			\$14,270

Table 6 Specifications and Procurement Assistance

Table 6-A Specifications for Removal/Termination of the LCTS Building and Piping

Staff	Hours	Rate	Cost
Project Manager	16	\$115	\$1,840
Senior Engineer	8	\$125	\$1,000
Engineer	60	\$95	\$5,700
Project Geologist	8	\$75	\$600
Graphics	24	\$55	\$1,320
Project Assistant	11	\$50	\$550
Clerical	2	\$40	\$80
Health Physicist	30	\$90	\$2,700
ODCs	NA	NA	\$1,000
Total			\$14,790

Table 6-B Procurement Assistance

Staff	Hours	Rate	Cost
Project Manager	40	\$115	\$4,600
Engineer	12	\$95	\$1,140
Project Geologist	80	\$75	\$6,000
Project Assistant	7	\$50	\$350
Clerical	2	\$40	\$80
Health Physicist	8	\$90	\$720
ODCs	NA	NA	\$1,500
Total			\$14,390

Table 6-C Removal/Termination of LCTS Building and Piping

Staff	Hours	Rate	Cost
Project Manager	32	\$115	\$3,680
Engineer	24	\$95	\$2,280
Project Geologist	50	\$75	\$3,750
Technician	80	\$55	\$4,400
Project Assistant	5	\$50	\$250
Clerical	2	\$40	\$80
Health Physicist	50	\$90	\$4,500
Demolition Activities	NA	NA	\$40,000
ODCs	NA	NA	\$3,000
Total			\$61,940

Table 7 MDNR/NRC Correspondence and Meetings

Staff	Hours	Rate	Cost
Project Manager	120	\$115	\$13,800
Project Geologist	40	\$75	\$3,000
Project Assistant	15	\$50	\$750
Clerical	3	\$40	\$120
Health Physicist	120	\$90	\$10,800
ODCs	NA	NA	\$5,000
		Total	\$33,470

Table 8 Site Radiological Training & Surveys

Table 8-A Radiological Training

Staff	Hours	Rate	Cost
Project Manager	16	\$115	\$1,840
Project Geologist	16	\$75	\$1,200
Technician	32	\$55	\$1,760
Health Physicist	40	\$90	\$3,600
ODCs	NA	NA	\$1,500
Total			\$9,900

Table 8-B Site Radiological Surveys

Staff	Hours	Rate	Cost
Project Manager	28	\$115	\$3,220
Project Geologist	36	\$75	\$2,700
Technician	144	\$55	\$7,920
Project Assistant	11	\$50	\$550
Clerical	3	\$40	\$120
Health Physicist	24	\$90	\$2,160
ODCs	NA	NA	\$2,000
Total			\$18,670

Table 8-C Quarterly Smears

Staff	Hours	Rate	Cost
Project Manager	4	\$115	\$460
Project Geologist	4	\$75	\$300
Technician	40	\$55	\$2,200
Health Physicist	6	\$90	\$540
ODCs	NA	NA	\$500
Total			\$4,000

Table 9 Post Closure Radiological Survey

Staff	Hours	Rate	Cost
Project Manager	16	\$115	\$1,840
Project Geologist	40	\$75	\$3,000
Technician	16	\$55	\$880
Health Physicist	40	\$90	\$3,600
ODCs	NA	NA	\$2,000
Total			\$11,320

Staff	Hours	Rate	Cost
Project Manager	40	\$115	\$4,600
Project Geologist	120	\$75	\$9,000
Graphics	24	\$55	\$1,320
Project Assistant	11	\$50	\$550
Clerical	2	\$40	\$80
Health Physicist	60	\$90	\$5,400
ODCs	NA	NA	\$1,000
Total			\$21,950

Table 10 Final Radiological Status Report

Staff	Hours	Rate	Cost
Project Manager	60	\$115	\$6,900
Project Geologist	200	\$75	\$15,000
Graphics	40	\$55	\$2,200
Project Assistant	19	\$50	\$950
Clerical	4	\$40	\$160
Health Physicist	120	\$90	\$10,800
ODCs	NA	NA	\$2,000
Total			\$38,010

Table 11 Summary of DFP Cost Estimates

Description	Table	Cost Estimate Summary
Unit Cost for Workers	2	NA
Planning and Preparation	3	\$13,790
Radioactive Waste Characterization and Disposal	4	\$20,295
Specifications and Procurement Assistance	5	\$91,120
MDNR/NRC Correspondence and Meetings	6	\$33,470
Site Radiological Training & Surveys	7	\$32,570
Post Closure Radiological Survey	8	\$33,270
Final Radiological Status Report	9	\$38,010
	Subtotal	\$262,525
Contingency	25%	\$65,631
	Grand Total	\$328,156

8.0 FINANCIAL ASSURANCE METHOD

As a state government agency, the MDNR has provided a "Statement of Intent" as the financial assurance vehicle in accordance with the requirements of 10 CFR 40.36. A copy of the MDNR's Statement of Intent is provided in Appendix A.

9.0 REFERENCES

- MDNR 1997 Michigan Department of Natural Resources, 1997. *Decommissioning Funding Plan*, Revision 0, February 25, 1997, prepared for MDNR by ABB-Environmental Services, Inc.
- MDNR 2003 Michigan Department of Natural Resources, 2003. *Decommissioning Plan, Tobico Marsh State Game Area Site*, Revision 0, February, 2003, prepared for MDNR by MACTEC E&C of Michigan, Inc.
- NRC 2002 U.S. Nuclear Regulatory Commission, 2000. *Consolidated NMSS Decommissioning Guidance, Financial Assurance, Recordkeeping, and Timeliness*, NUREG-1575, Vol. 3, Draft Report, Division of Waste Management, Office of Nuclear Material Safety and Safeguards, Washington, DC, December 2002.
- NRC 2000 U.S. Nuclear Regulatory Commission, 2000a. *NMSS Decommissioning Standard Review Plan*, NUREG-1727, Rev. 0, Office of Nuclear Material Safety and Safeguards, Washington, DC, September 2000.
- NRC 1999 U.S. Nuclear Regulatory Commission, 1999. *Domestic License for the Possession of Source Materials, SUC-1581*, Washington, DC, August 26, 1999.
- NRC 1995 U.S. Nuclear Regulatory Commission, 1995. *Site Decommissioning Management Plan*, NUREG-1444, Supplement 1, USNRC, October 1995.
- NRC 1993 U.S. Nuclear Regulatory Commission, 1993. *Site Decommissioning Management Plan*, NUREG-1444, USNRC, August 1993.
- NRC 1990 U.S. Nuclear Regulatory Commission, 1999. *Standard Format and Content of Financial Assurance Mechanisms Required for Decommissioning Under 10 CFR 40*, Regulatory Guide 3.66, USNRC, June 1990.
- NRC 1989 U.S. Nuclear Regulatory Commission, 1989. *Standard Format and Content Guide for Financial Assurance Mechanisms Required for Decommissioning Under 10 CFR Part 40*, NUREG-1336, Rev. 1, USNRC, August 1989.
- NRC 1974 U.S. Atomic Energy Commission, 1974. *Termination of Operating Licenses for Nuclear Reactors*, RegGuide 1.86, Directorate of Regulatory Standards, Washington, DC, June, 1974.

APPENDIX A

MDNR "Statement of Intent"



JOHN ENGLER, Governor

DEPARTMENT OF NATURAL RESOURCES

STEVENS T MASON BUILDING, PO BOX 30028, LANSING MI 48909-7528

K. L. COOL, Director

NATURAL RESOURCES
COMMISSION

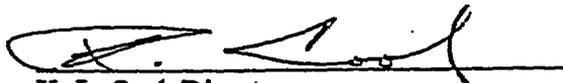
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**Statement of Intent to Accompany Amended
License Application for the MDNR owned portion
of the Hartley and Hartley Landfill**

I, K. L. Cool, was appointed Director of the Michigan Department of Natural Resources in March of 1996. In my capacity as Director I am the public licensee applicant for a license with respect to the MDNR Owned Portion of the Hartley and Hartley Landfill, located in Kawkawlin Township, Bay County, Michigan which was acquired by the agency in 1973 (Docket Number 40-9015.) In my current capacity as the Director of the Department of Natural Resources, I possess the authority of the State of Michigan to sign this Statement of Intent.

This Statement of Intent is submitted to the Nuclear Regulatory Commission together with an amended license application, and estimates of the costs for both the pre-decommissioning site characterization and decommissioning. The Michigan Department of Natural Resources' cost estimate to conduct the site characterization activities leading to the development and preparation of the Decontamination and Decommissioning (D&D) plan is in the amount of \$2.5 million. The cost of the implementation of the final D&D plan is estimated at this time to be 10 million dollars.

Under the Constitution of the State of Michigan, the operation of the Michigan Department of Natural Resources is supported by the General Fund of the State of Michigan, which can only be constitutionally appropriated by the Michigan Legislature. The current Legislature has been informed of the potential decommissioning requirements, costs and the eventual need for this funding. The Michigan Legislature understands that this Statement of Intent is not a binding promise on future Legislatures for funding. The funds for decommissioning costs will be requested by the Michigan Department of Natural Resources from the Michigan Legislature, in an amount up to 10 million dollars, sufficiently in advance of decommissioning for the purpose of preventing delay of the required activities.


K. L. Cool, Director


Date