

Mr. Brown,

This email serves to document our telephone conversation from this morning, regarding modifications to your license as a result of transferring your license from Region I jurisdiction to Region IV jurisdiction. In particular License Condition (LC) 15 will be modified to require that you submit a copy of the work agreement with each notification; and LC 18 will be updated to require that you submit a notification for completion of activities at your client's site within 30 days of disposition of the licensed material.

Additionally, we discussed the new regulations in 10 CFR 30.35(c)(5) which require waste processors to provide a decommissioning funding plan (DFP) to address all authorized materials in Parts 30, 40 or 70. Although your license was previously exempt from these regulations (Part 30, 40 and 70), we can not continue to exempt this part of the regulations and you must provide a DFP. Completion of a DFP should be fairly straightforward since you are only authorized for temporary job sites and a DFP addresses facilities in which the licensee is authorized to use radioactive materials. Therefore, your DFP should demonstrate that there is nothing to decommission because you are a contractor performing work at your client's facilities.

Attached is the applicable section (Appendix A) of NUREG-1757, Volume 3 which addresses DFP. The NUREG-1757, Volume 3, may be located on the NRC website at:
<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1757/v3/>

Please read through this section of the NUREG and provide the DFP so it may be docketed as part of your license. Additionally, in accordance with the regulations, your license will require you to update the DFP every 3 years. You may submit the DFP to the following address. Please include your license and docket numbers on your correspondence.

U.S. Nuclear Regulatory Commission
Nuclear Materials Licensing Branch
611 Ryan Plaza Dr, Ste 400
Arlington, TX 76011

Following is the regulation in 10 CFR 30.35 which addresses waste brokers. In particular section 10 CFR 30.35(c)(5) states:

(c)(5) Waste collectors and waste processors, as defined in 10 CFR part 20, Appendix G, must provide financial assurance in an amount based on a decommissioning funding plan as described in paragraph (e) of this section. The decommissioning funding plan must include the cost of disposal of the maximum amount (curies) of radioactive material permitted by license, and the cost of disposal of the maximum quantity, by volume, of radioactive material which could be present at the licensee's facility at any time, in addition to the cost to remediate the licensee's site to meet the license termination criteria of 10 CFR part 20. The decommissioning funding plan must be submitted by December 2, 2005.

If you have any questions, please do not hesitate to contact me by phone or email.

Sincerely,
Rachel S. Browder

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Recipients	Action	Date & Time
shawgrp.com steven.brown (steven.brown@shawgrp.com)		

Post Office	Delivered	Route
	Pending	shawgrp.com

Files	Size	Date & Time
MESSAGE	4221	06/13/2006 1:30:38 PM
SCAN0659.pdf	739612	06/13/2006 1:06:52 PM

Options

Auto Delete: No
Expiration Date: None
Notify Recipients: Yes
Priority: Standard
ReplyRequested: No
Return Notification: None

Concealed Subject: No
Security: Standard

To Be Delivered: Immediate
Status Tracking: Delivered & Opened