



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

July 28, 2006

Docket No. 03030941
Control No. 138391

License No. 37-28329-01

Andrew J. Armbrust
Senior Vice President
Philotechnics, Ltd.
DBA Afftrex, Ltd.
600 State Street
Clairton, PA 15025-1800

SUBJECT: PHILOTECHNICS, LTD., REQUEST FOR ADDITIONAL INFORMATION
CONCERNING FINANCIAL ASSURANCE DOCUMENTS, CONTROL NO.
138391

Dear Mr. Armbrust:

This is in reference to your letters dated May 31 and June 22, 2006, providing an updated decommissioning funding plan (DFP) for the Clairton, Pennsylvania, nuclear laundry facility operating under Nuclear Regulatory Commission License No. 37-28329-01. In order to continue our review, we need the following additional information:

1. Your DCE relies heavily on equipment disassembly, survey, decontamination, resurvey and release (as appropriate) as a means to reduce the volume of material which will require LLRW disposal. For example, Table 3.5 of the DFP indicates that of a total estimated volume of nearly 1900 ft³, the volume of material to be disposed of a LLRW (other than DAW) is only 95 ft³. The total estimated manpower to accomplish these activities as listed in Table 3.7 is less than 10 man-days. Based upon our knowledge of these activities, this manpower estimate is not considered reasonable.

Please revise the DCE to more realistically reflect the estimated manpower resources needed to accomplish decommissioning activities, or provide a detailed justification that supports the existing estimates. Information contained in NUREG/CR-6477, "Revised Analysis of Decommissioning Reference Non-Fuel-Cycle Facilities" provides information that may be useful in establishing revised estimates.

2. Your facility presently disposes of liquid waste by release into sanitary sewerage in accordance with 10 CFR 20.2003. Your DFP does not address activities associated with the decommissioning of underground piping that exists for this release pathway.

Please revise your DFP to address the estimated costs associated with decommissioning of the sewerage release pathway.

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Nuclear Materials; Medical, Academic, and Industrial Uses of Nuclear Material**;

A. Armbrust
Philotechnics, Ltd.

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then **Toolkit Index Page**. Or you may obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-888-293-6498. The GPO is open from 7:00 a.m. to 8:00 p.m. EST, Monday through Friday (except Federal holidays).

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 138391. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5276.

Sincerely,

Original signed by James Schmidt

James Schmidt
Health Physicist
Materials Security and Industrial Branch
Division of Nuclear Materials Safety

cc:
Glenn R. Marshall, C.H.P., Radiation Safety Officer

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SUNSI Review Complete: JSchmidt

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NAME	JSchmidt/JWS						
DATE	7/28/2006						

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