



March 6, 2007

Director, Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555-0001

**Subject: Mt. Athos Road Decommissioning Funding Plan, SNM-1168, Docket 07-1201 (TAC L32600)**

Reference 1: Letter from M. Breeda Reilly to Charlie Holman, January 4, 2007, "Acknowledgement of Receipt of Decommissioning Funding Cost Estimate and Funding Adjustment for SNM-1168 (TAC L32600)"

Enclosure (1) Affidavit for request for information to be withheld from public disclosure  
Attachment (1) MAR Decommissioning Funding Plan  
Attachment (2) Letter of Credit

Dear Ms. Reilly:

Per your request (Reference 1) and our telephone conference on February 5, 2007, AREVA NP Inc. Lynchburg Mt. Athos Road Facility (MAR) hereby submits a reformatted submittal of our Decommissioning Funding Plan (DFP). The DFP is aligned with guidance provided by NUREG-1757. This submittal supersedes previous DFP revisions. Attachment (1) presents the details of the current estimated costs. Per 10 CFR 70.25(e) and our License Application, the DFP will be reviewed and updated periodically not to exceed three years. Updated data will include items such as disposal costs, labor rates, and facility changes. Also, Attachment (2) is an originally signed Letter of Credit for the amount of the DFP.

In accordance with 10 CFR 2.390, the information contained within the DFP should be withheld from public disclosure as it considered proprietary to AREVA NP Inc. An affidavit is provided in Enclosure (1).

Should you have any questions regarding this submittal, please feel free to contact me at 434-832-5276.

Sincerely,

A handwritten signature in black ink, appearing to read 'Charlie F. Holman'.

Mr. Charlie F. Holman, Manager  
Environmental, Health, Safety and Licensing

**AREVA NP INC.**

An AREVA and Siemens company

ENCLOSURE 1

TRADE SECRETS OR COMMERCIAL INFORMATION

I, Charlie Holman, Environmental, Health, Safety and Licensing Manager at AREVA NP Inc., Lynchburg, Mt. Athos Road (MAR) Fuel Fabrication Facility, that to the best of my knowledge and beliefs, make the following representation contained herein:

- A. The following document(s) which AREVA NP Inc., requests to have withheld from public disclosure is:
- Attachment (1 and 2) "Mt. Athos Road Decommissioning Funding Plan, SNM-1168, Docket 07-1201 (TAC L32600)" Letter dated March 6, 2007, Charlie F. Holman to M. Breeda Reilly, NMSS,**
- B. The information contained in the document(s) cited in A above has been held in confidence by AREVA NP, Inc., in that it contains commercial information as specified in Title 10, Code of Federal Regulations, Part 2.390(d). The basis for requesting that this document(s) be withheld from public disclosure is explicitly marked on the cover page to each of the aforementioned documents and/or the top of each affected page, as appropriate, in accordance with 10 CFR 2.390(b)(i)(B).
- C. The information contained in the document(s) cited in A above is the intellectual property of AREVA NP, Inc., and as such is customarily held in confidence by AREVA NP Inc. As such, AREVA NP Inc., has customarily submitted privileged and confidential information of this type to the Nuclear Regulatory Commission (NRC) and to its predecessor, the Atomic Energy Commission (AEC), in confidence.
- The information contained in the document(s) cited in A above has not been made available to public sources by AREVA NP Inc., nor has AREVA NP Inc., authorized that it be made available. In accordance with AREVA NP Inc., policies governing the protection and control of information, proprietary information contained herein has been made available, on a limited basis, to others outside AREVA only as required and under suitable agreement providing for nondisclosure and limited use of the information.
- The public disclosure of the information contained in the document(s) cited in A above is likely to cause substantial economic harm to the competitive advantage held by AREVA NP Inc. The basis for withholding said information is that it contains distinguishing aspects of a process, methodology, or component(s), the exclusive use of which provides a competitive advantage for AREVA in product optimization or marketability.
- D. The proprietary information that AREVA NP Inc., requests to be withheld from public disclosure is contained in the entire document(s) as so marked.

  
C.F. Holman  
Manager, EHS&L

3-6-07  
Date

I certify the above named person appeared before me and executed this document on this the day of March 6, 2007.

  
Notary Public

My commission expires: 09/30/2009

