

April 10, 2007 REL:07:012

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

Gentlemen:

Subject: Annual Financial Test Update for Decommissioning Financial Assurance for the AREVA NP Inc. (AREVA NP) Richland Fuel Fabrication Facility (License No. SNM-1227, Docket No. 70-1257)

Decommissioning financial assurance for AREVA NP's Richland, Washington fuel fabrication facility is provided by a parent company guarantee as provided for in 10 CFR 70.25 (f)(2). The financial test underlying that guarantee is as specified in 10 CFR 30, Appendix A, which also includes a requirement that passage of the test be reaffirmed on an annual basis (within 90 days after the close of each succeeding fiscal year). Attached in support of this annual demonstration are the following updated financial assurance instruments:

- AREVA NP Inc. Chief Executive Officer (CEO) Letter; [Exhibit 2 from AREVA NP's Decommissioning Funding Plan (DFP)];
- AREVA Chief Financial Officer (CFO) Letter, Including Parent Company Guarantee Financial Test; (Exhibit 3 from AREVA NP's DFP). This financial instrument, signed on March 30, 2007, is responsive to the 10 CFR 30 Appendix A, Section II C.1 requirement for annual passage of the financial test. Please note that the letter indicates that a copy of the firm's 2006 financial statements will be provided as soon as available.
- Auditor's Special Report Confirmation of the Chief Financial Officer's Letter (Exhibit 4 in AREVA NP's DFP).

An updated Exhibit 5 of AREVA NP's DFP, Report of the Auditors on the Consolidated Financial Statements, will be provided in conjunction with copies of the 2006 financial statements, as discussed above.

The attached financial assurance instruments are copies of the originals. Consistent with prior instruction from the NRC, original copies of the instruments will be submitted under separate cover directly to the Deputy Director, Fuel Facility Licensing Directorate, FCSS.

AREVA NP INC. An AREVA and Siemens company NMSSOI

US NRC Ápril 10, 2007 REL:07:012 Page 2

If you have questions, please contact me on 509-375-8409 or Loren Mass on 509-375-8537.

Very truly yours,

R. E. Link, Manager Environmental, Health, Safety & Licensing

/mah

Enclosures

cc: U. S. Nuclear Regulatory Commission Mr. Merritt N. Baker, Project Manager Mail Stop T8 F42 Fuel Manufacturing Licensing Branch Division of Fuel Cycle Safety and Safeguards Rockville, MD 20852



Thomas A. Christopher President and CEO

CHIEF EXECUTIVE OFFICER (CEO) LETTER

March 26, 2007

U. S. Nuclear Regulatory Commission Washington, D.C. 20055

Dear Sir or Madam:

I am the President and Chief Executive Officer of AREVA NP Inc., 2101 Horn Rapids Road, Richland, Washington, 99352, a corporation. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in 10 CFR Part 70.

I hereby certify that AREVA NP Inc. is currently a going concern, and that it possesses positive tangible net worth in the amount of \$195M as of December 31, 2006.

This firm is not required to file a Form 10-K with the U.S. Securities and Exchange Commission for the latest fiscal year. This fiscal year of this firm ends on December 31.

I hereby certify that the content of this letter is true and correct to the best of my knowledge.

Sincerely, Jon anist

Thomas A. Christopher

TAC/kc

AREVA NP Inc.

An AREVA and Siemens company

3315 Old Forest Road, P. O. Box 10935, - Lynchburg, VA 24506-0935 Tel: 434 832 2519 - Fax: 434 832 3003 www.areva.com



Direction Financière Direction des Opérations Financières et de la Trésorerie

Paris, March 30th 2007

NUCLEAR REGULATORY COMMISSION

WASHINGTON, DC 20055

CHIEF FINANCIAL OFFICER (CFO) LETTER

Lam the chief financial officer of the "Société des Participations du Commissariat à l'Energie Atomique", whose trade name is AREVA and registered office is 27-29 rue Le Peletier, 75009 Paris, a French Société Anonyme. This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in 10 CFR Part 70.

This firm guarantees, through the parent company guarantee submitted to demonstrate compliance under 10 CFR Part 70, the decommissioning of the following facility owned or operated by subsidiaries of this firm. The current cost estimate or certified amount for decommissioning so guaranteed, is as follow:

Name of Facility	and the second		Certified Amounts or Current Cost Estimates
Areva NP; Inc	SNM - 1227	Richland, WA 99352	37.4 M\$

This firm is not required to file a Form 10-K with the U.S. Securities and Exchange Commission for the latest fiscal year.

This fiscal year of this firm ends on December 31st. The figures for the following items marked with an asterisk are derived from this firm's independently audited year-end financial statements and footnotes for the latest completed fiscal year, ended December 31st, 2006. A copy of this firm's 2006 financial statements will be enclosed as soon as available.

The completed Financial Test I is enclosed.

I hereby certify that the content of this letter is true and correct to the best of my knowledge.

Alain Pierre Raynaud Chief Financial Officer

27 - 29. rue Le Peletier - 75433 Paris cedex 09 - France T4L - 33 (0)1 44 83 71 00 - Fax - 33 (0)1 44 83 25 00

SOCIETÉ DES PARTICIPATIONS DU COMMISSARIAL À L'ÉNERGIE ATOMICUE S'À A DIRECTORE ET CONCEIL DE SUMPERILANCE AU CÀPITAL DE LI 246 822 63416 - ROS PARIS 71 2 654 923 -



Parent company guarantee financial test 1 (USD) - FY2006

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1	Current decommissioning cost estimates or certified am	юцп	ts ·	
a	(all amounts in \$m) Decommissioning amounts covered by this parent company guarantee	M\$	37.4	
ь	All decommissioning amounts covered by other NRC or Agreement State parent company	M\$	0	
ċ	All amounts covered by parent company guarantees, self guarantees, or financial tests of other Federal or State	M\$	0	
	agencies (eg EPA) TOTAL	M\$	37;4	
*2	Total liabilities (if any portion of the cost estimates for decommissioning is included in total liabilities on your firm's financial statements; you may deduct the amount of that portion from this line and add this amount to lines 3 and 4).	MS	19 208	Total of liabilities minus 3,285 billion \$ of provision for Group share dismantling costs and minus 2,75 billion \$ of provisions for thid party share dismantling costs!
•3 [:]	tangible net worth (net worth minus goodwill, patents, trademarks and copyrights) plus provisions for Group share dismantling costs	MS	8 5 39	Net worth (including decomissioning costs - Group share) minus 3,445 Billion & as goodwill and minu 0,153 billion & as copyright, trademarks and pater
-4	Net worth plus decomissioning cost plus provisions for Group share dismantling costs	ŴŜ	12 137	shareholder's equity+additional capital (including decomissioning costs - Group share).
15)	Current assets (less than 1 year)	M\$	10,756	
*8	Current liabilities (less than 1 year)	MS	9 021	
•7	Net working capital (line 5 minus line 6)	.M\$	1 734	
*8	The sum of the net income plus depreciation, depletion and amortization.	M\$	1 927	
*9	Total assets in the US	M\$	1 774	
<u>1</u>	TEST			YES/NO
10	is line 3 at least \$10 million?		854	YES
11	is line 3 et léast 6 times line 1?	×.	228	YES
12	is line 7 at least 6 times line 1?		46	YES
13	Are at least 90% of firm's assets located in the US? If not complete 14			
14	is line 9 at least 6 times line 1?		47,43	YES
	Guarantor must meet two of the following three ratios:			
16	total liabilities (*2) / net worth $\langle *4 \rangle < 2$		1,58	YES
17	net income plus amortization; depletion, depreciation (*8) 7 net worth (plus uncovered AREVA share decommissioning costs) > 0,1		0,22	YES



Schedule reconciling amounts contained in Chief Financial Officer's Letter with the amounts in financial statements (USD)

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finăricial test l	PER FINANCIAL STATEMENT M\$	Reconciling Items	PER CFO's Letter M\$
6 Total current liabilities (less than 1year) Long term debt Déferred income taxes	9 021 14 745 1480 25 247		
Accrued decommissioning costs included in long term debts		6 038	
Total liabilities (less accrued decommissioning costs - Group share)			19 208
4 Net worth Less: patents, trademarks and copywright	8 853 +153		
Less: Cost in excess of value of tangible assets acquired	-3 445 5 255		
Accrued decommissioning costs included in long term debts Less : Third party part in long term decommissioning/		6 038	
assets		-2 754	
AREVA share of the accrued decommissioning costs included in long term debts		3 285	
Net worth (plus AREVA share of decommissioning costs) Tangible net worth (plus AREVA share of			12 137
decommissioning costs)			8 539
Less: Long term portfolio dedicated to decommissioning assets Net AREVA share of the accrued decommissioning costs		-3 933	
included in long term debts		-648	
Net worth (plus uncovered AREVA share decommissioning costs)	•		8 853
CONTROL			27 748
 + good will + patents + copywrights +trademarks. + Third party part in long term decommissioning essets 			3 598 2 754
TOTAL BALANCE SHEET			34 100



Parent company guarantee financial test 1 (EUR) - FY2006

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1	Current decommissioning cost estimates or certifie	d am	ounta	
	(all amounts in Em)			
8	Decommissioning amounts covered by this parent company guarantee	Me	28,4	
b	All decommissioning amounts covered by other NRC or Agreement State parent company	Me	0.1	
C	All amounts covered by parent company guarantees, sell guarantees, or financial tests of other Federal or State agencies (eg EPA)	M€	0 '	
	TOTAL	. M€	28,4	· · · · · · · · · · · · · · · · · · ·
•2	Total liabilities (if any portion of the cost estimates for decommissioning is included in total liabilities on your firm's financial statements, you may deduct the amount of that portion from this line and add this amount to lines 3 and 4).	ME	14 585	Total of liabilities minus 2,494 billion Euros of provision: for Group share dismentling costs and minus 2,091 bill Euros of provisions for thid party share dismantling cost
3	tangible net worth (net worth minus goodwill, patents, trademarks and copyrights) plus provisions for Group share clismantling costs	ME	6 484 .	Net worth (including decomissioning costs - Group shar minus 2,016 Billion Euros as goodwill and minus 0,118 billion Euros as copyright, trademarks and patents.
•4	Net worth plus decomissioning cost plus provisions for Group share dismantling costs	Mę	9 216,	shareholder's equity+additional capital (including decomissioning costs - Group share)
· ' 5	Current assets (less than 1:year)	ME	8 167	
-6	Current liabilities (less than 1 year)	MÉ;	6 850;	
° 7	Nel working capital (line 6 minus line 6)	ME	1,317	
*8	The sum of the net income plus depreciation, depletion and amontzation	ME	1 463	
-9	Total assets in the US	Me	1 347	
		_		
10	TEST is line 3 at least \$10 million? (line 10 is in \$).		864	YES/
11	is line 3 at least 6 times line 1? X		228	YES
12	is line 7 at least 6 times line 17 X		46	YES
13	Are at loast 90% of firm's assets located in the US? If not complete 14			
14	is line 9 at least 6 times line 17 X		47.43	YES
	Guarantor must meet two of the following three ratios;			
16	total llabilities (*2) / net worth (*4) < 2		1,58	YES
17	net income plus amortization, depletion, depreciation (*8) / net worth (plus uncovered AREVA share decommissioning.costs) > 0,1		0,22	YËS
	•			



Schedule reconciling amounts contained in Chief Financial Officer's Letter with the amounts in financial statements (EUR)

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financial test I	PER FINANCIAL STATEMENT (MM)	Réconciling Items	PER CFO's Letter
6 Total current liabilities (less than 1 year) Long term dubl, Deferred income taxes	6 850 11 198 1124 19 170	,	(202)
Accued decommissioning costs included in lo term debts	ng	4 585	
Total liabilities (less accued decommissioning costs - Group stiare)	Í	·	14 585
4 Not worth Less: patents, tredemarks and copywright Less: Cost in excess of value of tangible asset acquired	6 722 -116 -2 616 -3 690	-	
Accrued decommissioning costs included in lo term debts Less : Third party part in long term decommissioning assets	ńg	4 585	
AREVA share of the accrued decommissioning costs included in long term debts	Ĵ	2 494	
Net worth (plus AREVA share of decommissio costs) tangible net worth (plus AREVA share of decommissioning costs)	ning		9 216 6 484
Leas: Long lerm portfollo declocitod to decommissioning assets		-2 986	
Net AREVA share of the accrued decominissi costs included in long term dobts	ming	-492	
Net worth (plus uncovered AREVA share decommissioning costs)			6 722
CONTROL + good will + patents + copywrights +brademarks + Third perty part in long term decommissioning assots TOTAL BALANCE SHEET			21 069 2 732 2 091 25 892

Mazars & Guérard

Salustro Revdel Membre de KPMG International

Deloitte & Associés

61, rue Henri Régnault 92075 La Défense cedex

1, cours Valmy 92923 La Défense cedex

185, avenue Charles de Gaulle 92524 Neuilly-sur-Seine cedex

Auditors' Report

In accordance with our appointment as statutory auditors of the "Société des Participations du Commissariat à l'Energie Atomique", whose trade name is AREVA, the "Letter", prepared by the Chief Financial Officer of AREVA and enclosed with the present report has been communicated to us in order to perform certain agreed procedures.

Our work has been performed in accordance with professional standards applicable in France. The procedures we performed are summarized as follows:

- 1. We compared the amounts in the attached schedules with amounts included in the company's consolidated financial statements prepared in accordance with IFRS as adopted by the European Union for the year ended December 31, 2006 and which were approved by the Executive Board on March 5, 2007 and reviewed by the Supervisory Board on March 22, 2007; or with amounts included in the corresponding general ledger;
- 2. We checked the totals and percentages included in the schedules.

Based on the procedures referred above, we have no matters to report regarding the consistency of the information given by AREVA in the attached "Letter" with the consolidated financial statements of AREVA as at December 31, 2006 or the corresponding general ledger.

Because the above procedures do not constitute either an audit or a review made in accordance with professional standards applicable in France, we do not express any assurance on the individual accounts available in the attached schedule. Had we performed additional procedures, others matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the Nuclear Regulatory Commission and yourselves, and should not be assigned to unspecified use or to be communicated to other person without our prior written authorization.

This report shall be governed by, and construed in accordance with the French Laws. The Courts of France (represented by the Cour d'Appel de Paris) shall have exclusive jurisdiction in relation to any claim, dispute or difference concerning this report and any matter arising from them. Each party irrevocably waives any right it may have to object an action being brought in those Courts, to claim that the action has been brought in an inconvenient forum, or to claim that those Courts do not have jurisdiction.

Paris-La-Défense and Neuilly-sur-Seine, March 30, 2007

Mazars & Guérard	Salustro Reydel	Deloitte & Associés
M.M.	Membre de KPMG International	
Thierry Blanchetier	Denis Marangé	Pascal Colin

Thierry Blanchetier

Denis Marangé

Direction Financière Direction des Opérations Financières et de la Trésorerie



Paris, March 30th 2007

NUCLEAR REGULATORY COMMISSION

WASHINGTON, DC 20055 USA

CHIEF FINANCIAL OFFICER (CFO) LETTER

I am the chief financial officer of the "Société des Participations du Commissariat à l'Energie Atomique", whose trade name is AREVA and registered office is 27-29 rue Le Peletier, 75009 Paris, a French: Société Anonyme, This letter is in support of this firm's use of the financial test to demonstrate financial assurance, as specified in 10 CFR Part 70.

This firm guarantees, through the parent company guarantee submitted to demonstrate compliance under 10 CFR Part 70, the decommissioning of the following facility owned or operated by subsidiaries of this firm. The current cost estimate or certified amount for decommissioning so guaranteed, is as follow:

Name of Facility	License Number	Location of Facility	Certified Amounts or Current Cost Estimates
Areva NP, Inc	SNM - 1227	Richland, WA 99352	37.4 M\$

This firm is not required to file a Form 10-K with the U.S. Securities and Exchange Commission for the latest fiscal year.

This fiscal year of this firm ends on December 31st. The figures for the following items marked with an asterisk are derived from this firm's independently audited year-end financial statements and footnotes for the latest completed fiscal year, ended December 31st, 2006. A copy of this firm's 2006 financial statements will be enclosed as soon as available.

The completed Financial Test I is enclosed.

I hereby certify that the content of this letter is true and correct to the best of my knowledge.

Alain Pierre Raynaud Chief Financial Officer

27 - 29. rue Le Peletier 75433 Paris cedex 09. France Tél. : 33 (0)1 44 83 71 00 - Tax : 33 (0)1 44 83 25 00

SOCIÉTÉ DES PARTICIPATIONS DU COMMISSARIAT À L'EMERGIE AJOMIQUE S'A A DIVECTOIRE ET CONSEIL DE SURVEILÉÀNCE AU CAPITAL DE 1-346 B22 636 Y - RES PARIS 7 (2.064-023)



Parent company guarantee financial test 1 (USD) - FY2006

317	31/12/06			
1	Current decommissioning cost estimates or certified am	юшп	ts	
	(all amounts in \$m)			
a	guarantee	M\$	37,4	
Ь	All decommissioning amounts covered by other NRC or Agreement State parent company	М\$	Ċ	· · ·
ċ	All amounts covered by parent company guarantees, self guarantees, or financial tests of other Federal or State	M\$	0	
	agencles (eg EPA) TOTAL	MS	37,4	
*2	Total liabilities (if any portion of the cost estimates for decommissioning is included in total liabilities on your firm's financial statements, you may deduct the amount of that portion from this line and add this amount to lines 3 and 4)	M\$	19 208.	Total of liabilities minus 3,285 billion \$ of provisions, for Group share dismantling costs and minus 2,754 billion \$ of provisions for third party share dismantling costs.
*3	tängible net worth (net worth minus goodwill, patents, trademarks and copyrights) plus provisions for Group share dismantling costs	MŠ	8 539	Net worth (including decomissioning costs - Group share) minus 3,445 Billion 5 as goodwill and minus 0,153 billion 5 as copyright, trademarks and patents.
₹4	Net worth plus decomissioning cost plus provisions for Group share dismantling costs	MŚ	12 137	shareholder's equity+additional capital (including decomissioning costs - Group share):
*5 -	Current assets (less than 1 year)	M\$	10 756	
*8	Current liabilities (less than 1 year)	MS	9 021	
7י	Net working capital (line 5 minus line 6)	M\$	1 734	
*8 '	The sum of the net income plus depreciation, depletion and amortization	M\$	1 927	
*9	Total assets in the US	M\$	1 774	
	TEST			YESINO
10	is line 3 at least \$10 million?		854	YES
11	is line 3 at least 6 times line 1?	x	228	YES
12	is line 7 at least 6 times line 1?		46	YES
13	Are at least 80% of firm's assets located in the US? If not complete 14			
14	Is line 9 at least 6 times line 17		47,43	YES
	Guarantor must meet two of the following three ratios:			
16	total liabilities (*2) / net worth (*4) < 2		1,58	YES
17	net income plus amortization, depletion, depreciation (*8)/ net worth (plus uncovered AREVA share decommissioning costs) > 0,1		0,22	YES

1,19

NO

18 current assets / current liabilities > 1,5



Schedule reconciling amounts contained in Chief Financial Officer's Letter with the amounts in financial statements (USD)

finàncial test l	PER FINANCIAL STATEMENT M\$	Reconciling litems M\$	PER CFO's Letter M\$
6 Total current liabilities (less than 1year) Long term debt Deferred income taxes.	9 021 14 745 <u>1480</u> 25 247		
Accrued decommissioning costs included in long term debts		6 038	
Total liabilities (less accrued decommissioning costs - Group share)			19 208
4 Net worth Less: patents, trademarks and copywright	8 853 -153		
Less: Cost in excess of value of tangible assets acquired	<u>-3 445</u> 5 255		
Accrued decommissioning costs included in long term debts Less : Third party part in long term decommissioning		6 038	
assets AREVA share of the accrued decommissioning costs included in long term debts		-2 754 3 285	
Net worth (plus AREVA share of decommissioning costs) Tangible net worth (plus AREVA share of decommissioning costs)			12 137 8 539
Less : Long term portfolio dedicated to decommissioning assets Net AREVA share of the accrued decommissioning costs included in long term debts		<u>-3 933</u> -848	
Net worth (plus uncovered AREVA share decommissioning costs)			8 853
CONTROL + góod will + pálants + copywrights +trádemarks + Third perty part in long ferm decommissioning assals TOTAL BALANCE SHEET			27 748 3 598 2 754 34 100



Parent company guarantee financial test 1 (EUR) - FY2006

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	31/12/08			·
1	Current decommissioning cost estimates or certifie	d am	ounts	
	(ell amounts in Em)			
á	Decommissioning amounts covered by this parent	ME	28,4	
a	company guarantee		20,4	
6	All decommissioning amounts covered by other NRC	ME	٥	
U	or Agreement State parent company	1414	v	
	All amounts covered by parent company guarantees,	•		
C	sell guarantees, or financial tests of other Federal or	ME	0	
	State agencies (eg EPA)	-		·
	TOTAL	. M€	28,4	·
	Total liabilities (if any portion of the cost estimates for			
	decommissioning is included in total liabilities on your			Total of liabilities minus 2,494 billion Euros of provisions
•2	firm's financial statements, you may deduct the amount	MÉ	14 585	
₩.	of that portion from this line and add this amount to			Euros of provisions for thid party share dismantling cost
	lines 3 and 4)			
				المراجع والمراجع والم
	tangible net worth (net worth minus goodwill, patents,	ند		Net worth (including decomissioning costs - Group shar
-3	trademarks and copyrights) plus provisions for Group	ME	6 484	
	share, dismantling costs			billion Euros as copyright, trademarks and patents.
	and the state of the state of the feature of the state of			shareholder's equity+additional capital (including
-4	Net worth plus decomissioning cost plus provisions for	MĘ	9 216	
	Group share dismantling costs			decomissioning costs - Group share)
-15	Current agoits Rong three 1 whow	M6.	8 167	
	Current assets (less than 1 year)	IV PS	0 IVI	
*6	Current liabilities (less than 1 year)	M€	6 850	
•7	in the second state of the second state of	ME	1317	· _
-7	Net working capital (line 5 minus line 6)	WR.	1311	
	The sum of the net income plus depreciation, depletion	المديد ا		
*8	and amortization	MA	1 463	
.8	Total assets in the US	M€	1 347	
				ning and a little state of the
	TEST		، بذير	YES/NO
10	is line 3 at least \$10 million? (line 10 is in \$)		864	YES YES
11	is line 3 at least 6 times line 1? X		228	· •
12	Is line 7 at least 6 times line 17 X		46	YES
13.	Are at least 90% of firm's assets located in the US? If			
· ·	not complete 14			VID
14	Is line 9 at least 6 times line 17 X		47,43	YES
	Guarantor must meet two of the following three			
	ratios:			
16	total llabilities (*2) / net worth (*4) < 2		1,58	YES
	net income plus amortization, depletion, depreciation			
17	(*8) / net worth (plus uncovered AREVA share		0,22	YES
	decommissioning costs) > 0,1			
				NO



Schedule reconciling amounts contained in Chief Financial Officer's Letter with the amounts in financial statements (EUR)

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finañaiel tèst l		PER FINANCIAL STATEMENT (ME)	Reconciling Items (M4)	PER CFQ's Letter (M5)
	Total current flabilitide (less than 1 year) Long term debi Deferred income taxes	6 850 11 196 <u>1124</u> 19,170		
	Accrued decommissioning costs included in long term debts		4 585	
	Total libbilities (less accrued decommissioning costs - Group share)			14-686
	Networth	6 722		
4	Less: patents, trademarks and copywright	-116		
	Less: Cost in excess of value of tangible assets	-110		
	acquired	-2 616		
	28 - 19 - 2 - 14	3 990		
	Accrued decommissioning costs included in long term debts		4 585	
	Less : Third party part in long term decommissioning assets		-2 091	
	AREVA share of the accrued decommissioning costs included in long term debts		2 494	
	Net worth (plus AREVA share of decommissioning costs)			9 216
	tangible net worth (plus AREVA share of			
,	decommissioning costs)			6 484
	Less: Long term partialia dedicated to			
	decommissioning assets		-2 986	
	Net AREVA share of the accrued decommissioning			
	costs included in long term debts		-492	
	Net worth (plus uncovered AREVA share			
	decommissioning costs)			6 722
	CONTROL			21 069
	+ good will + palants + copywrights +lrademarks			2 732
	+ Third perty part in long form decommissioning assets			2 091
	TOTAL BALANCE SHEET			25 892