Kodak

10 May 2007

Division of Fuel Cycle Safety and Safeguards
Office of Nuclear Material Safety and Safeguards
US Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852
Attention: Mary T. Adams

Subject: Environmental Report for Decommissioning of Kodak CFX Research Reactor, SNM-1513, Docket 7001703.

Dear Ms. Adams,

Enclosed is Technical Memorandum 06-05 prepared by Nextep Consulting Group, which is to serve as the Environmental Report for the Eastman Kodak CFX decommissioning project under license SNM-1513, docket 7001703. This Environmental Report was prepared to assess the potential environmental impacts of the CFX decommissioning and was prepared in accordance with NRC guidance document NUREG-1748, Environmental Guidance for Licensing Actions with NMSS Programs, Final Report. Portions of this report have been labeled as Proprietary Information. An affidavit requesting withholding of the Proprietary Information from public disclosure has been included with submission of the report. Also, a public version of the Environmental Report has been included, with the sections of the report that contain Proprietary Information intentionally left blank.

Upon completion of the CFX decommissioning and a final status survey, we will be requesting termination of the license and release of the area previously occupied by the CFX operation for unrestricted use.

We respectively request review of this report.

Please contact either Mr. John Heyer or myself if you need any additional information.

Best regards,

Mark A. Morse

Foundation Science and Technology Center

Kodak Research Laboratories

Eastman Kodak Company

Rochester, NY 14650-2106

Phone: 585-722-3353

John H. Heyer, CIH Radiation Safety Officer Eastman Kodak Company Rochester, NY 14652-6255

Phone: 585-588-6567

AFFIDAVIT

I, Brian P. O'Connor, Chief Security and Privacy Officer, and Vice President, Legal Division of Eastman Kodak Company ("Kodak"), do hereby affirm and state:

- 1. I am authorized to execute this affidavit on behalf of Kodak, and
- 2. Kodak is providing information to the Nuclear Regulatory Commission in the form of Nextep Technical Memorandum 06-05, Subject: Kodak CFX Decommissioning Environmental Report (Revision 1, January 2007). This Technical Memorandum concerns the decommissioning of a CFX research reactor. Pages 1-7 of the Memorandum contain proprietary commercial information that should be held in confidence by the NRC pursuant to the policy reflected in 10 CFR 2.390(a)(4) and 9.17(a)(4), because:
 - i. This information is and has been held in confidence by Eastman Kodak Company.
 - ii. This information is of a nature that describes the type, quantity, location, enrichment levels, and physical security characteristics of special nuclear material of moderate strategic significance, which is owned by Kodak.
 - iii. This information is not available in public sources and could not be gathered readily from other publicly available information.
 - iv. This information is being submitted to the NRC voluntarily and in confidence.
 - v. Public disclosure of this information could pose a threat to the employees of Kodak and a threat to national security by making available the details of this highly enriched nuclear material to the general public.
- 3. Accordingly, Eastman Kodak Company requests that the sections of the above referenced Environmental Report identified as "Proprietary Information", be withheld from public disclosure pursuant to the policy reflected in 10 CFR 2.390(a)(4) and 9.17(a)(4).

Brian P. O'Connor

STATE OF NEW YORK COUNTY OF MONROE

Subscribed and sworn to me, a Notary Public, in and for the State of New York, this <u>///</u> day of May, 2007.

Notary Public in and for the State of New York

CYNTHIA M. SCHMIDT
Notary Public, State of New York
Monroe County
Commission Expires October 27.