



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

April 28, 2008

Docket No. 03004523  
Control No. 141269

License No. 19-00294-19

COL John P. Rooney  
Commander  
Department of the Army  
Commander U.S. Army Aberdeen Test Center  
400 Colleran Road  
Aberdeen Proving Ground, MD 21005-5059

**SUBJECT: DEPARTMENT OF THE ARMY, REQUEST FOR ADDITIONAL INFORMATION CONCERNING FINANCIAL ASSURANCE DOCUMENTS, CONTROL NO. 141269**

Dear COL Rooney:

This is in reference to your letter dated April 4, 2008 providing financial assurance for decommissioning for Nuclear Regulatory Commission License No. 19-00294-19. In order to continue our review, we need the following additional information:

1. The Certification of Financial Assurance stated that you are licensed to only possess sealed sources and plated foils. However, the material listed on your license in 6.A., 7.A., and 8.A. are listed as "any form" and therefore unsealed for purposes of financial assurance. Additionally, the licensed amount of sealed material does not require financial assurance and thus does not need to be listed on the Certification of Financial Assurance. Please resubmit the Certification of Financial Assurance for your unsealed materials. Please follow closely the model on page A-23 of NUREG-1757, Volume 3.
2. The calculated cost estimate for "Building Decommissioning Surveys" was not clear. It appeared to include time to decontaminate the associated buildings. It appeared that only the same area as performing a Marssim grid survey would be decontaminated. No justification or basis was included to substantiate the estimate of area that would require decontamination. Please re-perform this calculation giving more detailed calculation and description for the basis of the numbers.
3. A contingency allowance of 25% was not included in the final decommissioning cost estimate. Please see page A-42 of NUREG-1757, Volume 3 which gives guidance associated with a contingency allowance. Please include a minimum of 25% contingency allowance for your decommissioning funding plan cost estimate.
4. Documentation was not included verifying that COL John Rooney, is authorized to represent the licensee in providing the Statement of Intent. A review of previously submitted documentation did not reveal this documentation on file. Please submit documentation verifying that COL John Rooney is authorized to represent the licensee in providing the Statement of Intent.

J. Rooney  
Department of the Army

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Current NRC regulations and guidance are included on the NRC's website at [www.nrc.gov](http://www.nrc.gov); select **Nuclear Materials; Medical, Academic, and Industrial Uses of Nuclear Material**; then **Regulations, Guidance, and Communications**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. 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. 141269. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5366.

Sincerely,

***Original signed by Dennis R. Lawyer***

Dennis R. Lawyer  
Health Physicist  
Commercial and R&D Branch  
Division of Nuclear Materials Safety

cc:  
Tanya Oxenberg, Acting Radiation Safety Officer  
J. Scott Wright, ATC Safety Officer

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**SUNSI Review Complete: DLawyer**

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NAME	DLawyer/DRL							
DATE	4/28/2008							

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