

November 24, 2009

**To:** Kenneth Kline, U.S. Nuclear Regulatory Commission

**From:** Craig Dean, and Paul Bailey  
ICF International

**Subject:** Review of USEC American Centrifuge Lead Cascade Responses to RAI on Decommissioning Funding Plan Cost Estimate

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USEC American Centrifuge Lead Cascade (USEC) submitted responses dated November 4, 2009, to Requests for Additional Information (RAI) on its decommissioning cost estimate (DCE) and financial assurance instruments submitted as part of its revised Decommissioning Funding Plan for the Lead Cascade Facility in Piketown, Ohio (Docket No. 70-7003, License No. SNM-7003).

### **Comments and Recommendations**

ICF reviewed both the proprietary and the non-proprietary responses to the NRC RAI dated October 6, 2009. In general, the responses appear to address each RAI satisfactorily. ICF found the USEC Response on page 3 of 7 to be somewhat imprecise, when it states that “unit quantities were developed from GCEP clean-out data, and . . . unit costs were developed from CY 2009 cost data or industry standard labor rates escalated to CY 2009 dollars” (emphasis added). The sentence would be clearer if the “or” were changed to “and.” The tables now specify the sources of information on which they are based, although the note to Table 3-7 could specify 2009 scrap metal disposal costs instead of “current” scrap metal disposal costs.

ICF notes that in footnote 2 to Section 4.0 of the DFP, USEC continues to cite NUREG-1727 as the source of model documentation for the financial assurance instruments. (See comment #1 in ICF’s review of the USEC DFP, dated September 3, 2009.) USEC states: “In the event the Licensee ultimately selects another form of decommissioning funding, model documentation from NUREG-1727 will also be used as guidance in the preparation of funding instruments.” Because NUREG-1727 has been superseded by NUREG-1757, Volume 3, USEC’s commitment should be to use NUREG-1757.