

- 1205 banner hill road □ erwin, tn 37650 □ phone 423.743.9141
- www.nuclearfuelservices.com

21G-10-0244 GOV-01-55-04 ACF-10-0343 December 17, 2010

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

- References: 1) Docket No. 70-143; SNM License 124
  - 2) Letter from NFS to NRC, dated July 14, 2010, "Request to Release Performance Bond for BAST/KAST Equipment" (21G-10-0139)
  - 3) Letter from NRC to NFS, dated October 29, 2010, "Request for Additional Information Concerning Release of a Performance Bond" (TAC NO. L33007)

Subject:

Response to Request for Additional Information Concerning Release of Performance Bond for BAST/KAST Equipment

Nuclear Fuel Services, Inc. (NFS) hereby submits the attached response to the October 29, 2010, request for additional information (Reference 3) regarding the request that NRC inform and direct ACSTAR Insurance Company (ACSTAR) to release Bond Number 00000463793 in the amount of \$525,000.00. The decommissioning work for which the bond had been established as financial assurance pursuant to the NRC regulations has been accomplished.

If you or your staff have any questions, require additional information, or wish to discuss this, please contact me, or Mr. Rik Droke, Senior Regulatory Advisor, at (423) 743-1741. Please reference our unique document identification number (21G-10-0244) in any correspondence concerning this letter.

Sincerely,

NUCLEAR FUEL SERVICES

Mark P. Elliott, Director

Quality, Safety, and Safeguards

JKW/pdi **Attachments** 

Copy:
Regional Administrator
U.S. Nuclear Regulatory Commission
Region II
245 Peachtree Center Ave., NE, Suite 1200
Atlanta, GA 30303-1257

Mr. John Pelchat Project Inspector U.S. Nuclear Regulatory Commission Region II 245 Peachtree Center Ave., NE, Suite 1200 Atlanta, GA 30303

Mr. Kevin Ramsey
Project Manager
Fuel Manufacturing Branch
Fuel Facility Licensing Directorate
Division of Fuel Cycle Safety and Safeguards
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Galen Smith Senior Resident Inspector U.S. Nuclear Regulatory Commission Attachment 1 Response to RAI

2 pages to follow

### **RESPONSE TO RAI**

### **RAI Question 1**

Provide survey reports, shipping papers, or other documents which confirm that the KAST/BAST equipment was removed from the site and that radiation/contamination levels in Building 301 were acceptable after the work was complete.

The Status Report requests the U.S. Nuclear Regulatory Commission (NRC) to certify that the decommissioning work was completed and it was satisfactory. Despite the certification provided by Nuclear Fuel Services (NFS), we are unaware of any documentation which confirms the shipment of the equipment from the site and which confirms radiation/contamination levels in Building 301 after the equipment was removed.

This information is needed to provide a basis for finding that decommissioning financial assurance is no longer required for this equipment under Title 10 of the *Code of Federal Regulations* (10 CFR) Part 70.25.

### **NFS Response**

NFS uses an internal shipment tracking log to record the container number (intermodal or trailer), the shipment number, a short description of the contents of the container, when the shipment left NFS, and scheduled delivery date of the shipment to the disposal site. The log entries for the waste generated from the removal of the KAST/BAST equipment from Building 301 can be found in Attachment 2. All shipments related to the KAST/BAST equipment have left the NFS site and have been received at the disposal site. Several examples of related waste manifest shipping papers that demonstrate receipt of the shipment can also be found in Attachment 2. The remaining waste manifest shipping papers are available for review at the NFS site.

Transferable alpha and beta surveys were performed throughout the equipment removal and the follow-on construction phases of the project. At the point equipment was removed from Building 301 and new equipment was being installed, the accessible surfaces were essentially clean, with no contamination above clean area limits. Survey records are available for review at the NFS site.

#### **RAI Question 2**

Confirm that ACSTAR Insurance Company will accept a statement that NRC finds the decommissioning of the KAST/BAST equipment to be acceptable and has no objection to releasing the performance bond.

The two documents that NRC is requested to sign contain inaccurate and misleading information. The Status Report implies that NFS was working under contract to NRC. The NRC conducted regulatory oversight, but was not involved in the management of contracts associated with this work. In addition, the Bond Release contains a notary

attestation which refers to NRC as a "corporation." The NRC is a Federal regulatory agency, not a corporation.

Any statement signed by an NRC official must be complete and accurate. We would prefer to provide a letter instead of signing the documents provided in the request.

## NFS Response

A representative of ACSTAR Insurance Company has confirmed that a letter from NRC to ACSTAR Insurance Company will be acceptable. The letter must be an original, and should contain the justification for not completing the form. The justification as provided in the NRC's RAI question would be sufficient.

### **RAI Question 3**

Confirm that no other financial instruments are payable to the standby trust established by Standby Trust Agreement, dated August 7, 1996.

The NFS's cover letter, dated July 14, 2010, states that "...the release of the referenced bond will terminate the need for the associated Standby Trust Agreement." Schedule B to the Standby Trust referenced in Attachment C lists only the ACSTAR Bond as payable to this particular Standby Trust. The staff infers that NFS intends to cancel the Standby Trust Agreement date August 7, 1996. Confirm that the only instrument payable to the standby trust is the ACSTAR performance bond.

This information is needed to verify compliance with 10 CFR, Part 70.25(f) which requires, in part, that certain financial instruments be payable to a standby trust.

### NFS Response

NFS has reviewed the active financial assurance instruments, and no other instruments refer to the Standby Trust Agreement dated August 7, 1996. Therefore, NFS intends to cancel this standby trust at the conclusion of this action.

## Attachment 2 Internal Shipment Tracking Log And Waste Manifest Examples

10 pages to follow

**Shipment** Issued Status **EOU** Batch No/ Container/ Ship Scheduled Clerk Descript. Number To Trailer# Date Delivery Manifest Manifest 0318-01-2131 12/12/06 301 Debris AKR Shipped 2377 01/03/07 306 Trash D 0318-01-2132 AKR Shipped 1356 12/12/06 01/03/07 0318-01-2133 1291 01/04/07 WW/MISC IM **AKR** Shipped 12/14/06 0318-01-2134 1375 12/19/06 01/05/07 301 Debris AKR Shipped WW/MISC IM 0318-01-2135 AKR Shipped 1791 12/21/06 01/09/07 0318-05-0107 111257 01/22/07 02/05/07 **WWTF** AKR Shipped **WWTF** 0318-05-0108 **AKR** Shipped 111399 12/20/06 01/08/07 301 Debris 0318-01-2136 AKR Shipped 1668 12/20/06 01/08/07 0318-01-2137 BB062/CD019 **AKR** 635067 01/17/07 01/22/07 Shipped WW/MISC IM 0318-01-2138 **AKR** 1384 01/22/07 02/05/07 Shipped WW/MISC IM 0318-01-2139 AKR Shipped 1940 01/22/07 02/05/07 WW/MISC IM 0318-01-2140 1974 01/22/07 02/05/07 AKR Shipped \* 0318-01-2141 AKR 2080 01/24/07 02/14/07 301 Debris Shipped 0318-01-2142 1885 306 Trash Z **AKR** Shipped 01/25/07 02/15/07 \* 306 Trash X 0318-01-2143 AKR 1842 02/09/07 02/16/07 Shipped 301 Chemicals 0318-01-2144 AKR \* 105 IM 0318-01-2145 1954 02/09/07 02/16/07 **AKR** Shipped 301/105 IM 0318-01-2146 AKR Shipped 1973 02/22/07 03/16/07 **WWTF** 0318-05-0109 AKR Shipped 635215 03/07/07 03/12/07 LabFuel036 0318-01-2147 AKR Shipped 1831 03/09/07 03/23/07 WW/MISC IM 0318-01-2148 AKR Shipped 2042 03/14/07 03/28/07 **WWTF** 0318-05-0110 **AKR** Shipped 636543 03/21/07 03/26/07 636543 FMFCD-021 0318-01-2149 AKR Shipped 03/21/07 03/26/07 WWTF IM 0318-05-0111 AKR Shipped 111239 04/03/07 04/24/07 \* 0318-01-2150 **AKR** 636523 04/02/07 FMFCD-022 Shipped 03/28/07 FMFCD-023 0318-01-2151 AKR Shipped 637112 04/13/07 04/18/07 \* WWTF 0318-05-0112 AKR Shipped 637112 04/13/07 04/18/07 0318-05-0113 54336 WWTF AKR Shipped 04/20/07 04/25/07 BB063/CD024 0318-01-2152 **AKR** Shipped 54336 04/20/07 04/25/07 0318-01-2153 1737 05/25/07 LabFuel038 AKR Shipped 05/04/07 301/Mix 0318-01-2154 AKR 1981 05/04/07 05/25/07 Shipped BB064/CD025 0318-01-2155 AKR 54463 05/16/07 05/21/07 Shipped 0318-05-0114 **WWTF AKR** Shipped 54463 05/16/07 05/21/07 \* **WWTF** 0318-05-0115 AKR Shipped 53817 05/31/07 06/04/07 FMFBB-065 0318-01-2156 **AKR** 53817 05/31/07 06/04/07 Shipped

Cost center

Batch No/	Shipment	Issued	Status	Container/	Ship	Scheduled	Clerk	EOU
Descript.	Number	То		Trailer#	Date	Delivery	Manifest	Manifest
WWTF	0318-05-0116	AKR	Shipped	L5442	06/08/07	06/12/07	*	
BB066/CD026	0318-01-2157	AKR	Shipped	L5442	06/08/07	06/12/07	*	
306 Trash	0318-01-2158	AKR	Shipped	1596	06/06/07	06/26/07	*	
311 Trash	0318-01-2159	AKR	Shipped	2409	06/06/07	06/26/07	*	
WWTF	0318-05-0117	AKR	Shipped	54540	06/20/07	06/25/07	*	
BB067/CD027	0318-01-2160	AKR	Shipped	54540	06/20/07	06/25/07	*	
306 Trash	0318-01-2161	AKR	Shipped	2384	06/20/07	07/11/07	*	
301 NFS	0318-01-2162	AKR	Shipped	2325	06/27/07	0717/07	* .	*
LabFeul037	0318-01-2163	AKR	Shipped	2076	06/20/07	07/11/07	*	
306 Trash	0318-01-2164	AKR	Shipped	1679	06/21/07	07/11/07	*	
301 NFS	0318-01-2165	AKR	Shipped	1838	07/18/07	08/01/07	*	*
301 NFS	0318-01-2166	AKR	Shipped	2211	07/18/07	08/01/07	*	*
301 NFS	0318-01-2167	AKR	Shipped	1452	07/17/07	08/01/07	*	*
306 Trash	0318-01-2168	AKR	Shipped	2162	07/23/07	08/15/07	*	*
301 NFS	0318-01-2169	AKR	Shipped	1384	09/13/07	09/27/07	*	*
FMFBB 068	0318-01-2170	AKR	Shipped	54569	09/21/07	09/26/07	*	*
WWTF	0318-05-0118	AKR	Shipped	54569	09/21/07	09/26/07	*	*
FMFCD-028	0318-01-2171	AKR	Shipped	54192	09/27/07	10/01/07	*	*
WWTF	0318-05-0119	AKR	Shipped	54192	09/27/07	10/01/07	*	*
301 NFS	0318-01-2173	AKR	Shipped	1808	10/05/07	10/26/07	*	*
WWTF	0318-05-0120	AKR	Shipped	53725	10/19/07	10/23/07	*	*
FMFCD-029	0318-01-2174	AKR	Shipped	53725	10/19/07	10/23/07	*	*
Mix IM	0318-01-2175	AKR	Shipped	1561	10/10/07	10/31/07	*	*
Lauren IM	0318-01-2176	AKR	Shipped	1387	10/10/07 -	10/31/07	*	*
306 Trash	0318-01-2177	AKR	Shipped	2406	11/09/07	11/30/07	*	*
Lauren Trash	0318-01-2178	AKR	Shipped	1848	11/19/07	12/10/07	*	*
WWTF	0318-05-0121	AKR	Shipped	635266	12/04/07	12/10/07	*	*
FMFBB 069	0318-01-2179	AKR	Shipped	635266	12/04/07	12/10/07	*	*
WWTF	0318-05-0122	AKR	Shipped	53732	12/06/07	12/13/07	*	*
FMFBB 070	0318-01-2180	AKR	Shipped	53732	12/06/07	12/13/07	*	*
WWTF	0318-05-0123	AKR	Shipped	636545	12/21/07	01/03/08	*	*
FMFBB071	0318-01-2181	AKR	Shipped	636545	12/21/07	01/03/08	*	*
FMFBB072	0318-01-2182	AKR	Shipped	7413	01/16/08	01/21/08	*	*
WWTF	0318-05-0124	AKR ·	Shipped	7413	01/16/08	01/21/08	*	*
306Trash	0318-01-2183	AKR	Shipped	1369	01/16/08	02/06/08	*	*

Cost center

Batch No/	Shipment	Issued	Status	Container/	Ship	Scheduled	Clerk	EOU	Cost center
Descript.	Number	То		Trailer#	Date	Delivery	Manifest	Manifest	
WWTF	0318-05-0125	AKR	Shipped	7229	01/23/08	01/28/08	*	*	,
BB073/CD030	0318-01-2184	AKR	Shipped	7229	01/23/08	01/28/08	*	*	
301 NFS	0318-01-2185	AKR	Shipped	1880	01/22/08	02/19/08	*	* /	Sheet
WWTF	0318-05-0126	AKR	Shipped	7282	02/06/08	02/11/08	*	*	4890
FMFBB-074	0318-01-2186	AKR	Shipped	7282	02/06/08	02/11/08	*	*	Sheet
306 Trash/mix	0318-01-2187	AKR	Shipped	1206	02/08/08	03/07/08	*	*	Sheet
301 Roof	0318-01-2188	AKR	Shipped	1862	02/13/08	03/13/08	*	*	4227-1972-3100
301 Roof	0318-01-2189	AKR	Shipped	2129	02/08/08	03/07/08	*	* /	4227-1972-3100
Lauren/mix	0318-01-2190	AKR	Shipped	2210	02/08/08	03/07/08	*	*	Sheet
105Roof Mix	0318-01-2191	AKR	Shipped	1357	02/08/08	03/07/08	*	*	Sheet
WWTF	0318-05-0127	AKR	Shipped	7002	02/14/08	02/19/08	*	*	4890
FMFBB-075	0318-01-2192	AKR	Shipped	7002	02/14/08	02/19/08	*	*	Sheet
301 Roof	0318-01-2193	AKR	Shipped	1805	02/27/08	03/11/08	*	*	4227-1972-3100
301 CDL	0318-01-2194	AKR	Shipped	2162	02/29/08	03/13/08	*	*	4227-1972-6100
301 Roof	0318-01-2195	AKR	Shipped	1846	02/28/08	03/12/08	*	*	4227-1972-3100
WW Mix	0318-01-2196	AKR	Shipped	1990	02/27/08	03/11/08	*	*	Sheet
301 CDL	0318-01-2197	AKR	Shipped	2042	02/27/08	03/11/08	*	*	4227-1972-6100
301 Roof	0318-01-2198	AKR	Shipped	2271	02/27/08	03/11/08	*	*	4227-1972-3100
301 Roof	0318-01-2199	MAC	Shipped	1604	03/07/08	03/28/08	*	*	4227-1972-3100
306 CDL Mix	0318-01-2200	MAC	Shipped	1234	03/26/08	04/16/08	*	*	
WWTF	0318-05-0128	AKR	Shipped	7084	03/25/08	03/31/08	*	*	4890
FMFBB-076	0318-01-2201	AKR	Shipped	7084	03/25/08	03/31/08	*	*	4129-2035
306 CDL Mix	0318-01-2202	MAC	Shipped	1854	03/19/08	04/09/08	*	*	Sheet
301 Roof	0318-01-2203	AKR	Shipped	1973	03/28/08	04/18/08	*	*	4227-1972-3100
105 Roof	0318-01-2204	AKR	Shipped	2149	03/26/08	04/16/08	*	*	4600
306 Trash	0318-01-2172	AKR	Shipped	1737	03/28/08	04/28/08	*	*	Sheet
301 Roof	0318-01-2205	AKR	Shipped	1569	03/28/08	04/28/08	*	*	4227-1972-3100
306/Mix	0318-01-2206	AKR	Shipped	1441	04/07/08	04/28/08	*	*	Sheet
105 Lab	0318-01-2207	AKR	Shipped	1831	04/04/08	04/25/08	*	*	4600
Jay's Sacks	0318-01-2208	AKR	Shipped	1838	04/04/08	04/25/08	*	*	4870 EQ08
105/CDL	0318-01-2209	AKR	Shipped	1993	04/07/08	04/28/08	*	*	Sheet
WWTF	0318-05-0129	AKR	Shipped	7035	04/21/08	04/25/08	*	*	4890
306 Trash/CDL	0318-01-2210	AKR	Shipped	1903	04/11/08	05/02/08	*	*	Sheet
BB077/CD031	0318-01-2212	AKR	Shipped	7035	04/21/08	04/25/08	*	*	Sheet
Lab Fuel 040	0318-01-2211	AKR	Shipped	2392	04/21/08	05/12/08	*	*	4128-1959

Batch No/	Shipment	Issued	Status	Container/	Ship	Scheduled	Clerk	EOU	Cost center
Descript.	Number	То		Trailer#	Date	Delivery	Manifest	Manifest	
301 Roof	0318-01-2213	AKR	Shipped	1840	04/23/08	05/14/08	*	*	4227-1972-3100
301 CDL	0318-01-2214	AKR	Shipped	2390	04/30/08	05/21/08	*	*	4227-1972-3100
FMFBB-078	0318-01-2215	AKR	Shipped	7197	05/14/08	05/19/08	*	*	Sheet
WWTF	0318-05-0130	AKR	Shipped	7197	05/14/08	05/19/08	*	*	4890
301 CDL	0318-01-2216	AKR	Shipped	2296	05/15/08	06/05/08	*	*	4227-1972-3100
306 Trash	0318-01-2217	AKR	Shipped	1679	05/22/08	06/12/08	*	*	Sheet
301 CDL	0318-01-2218	AKR	Shipped	2179	05/22/08	06/12/08	*	*	4227-1972-3100
FMFBB-079	0318-01-2219	AKR	Shipped	7320	06/10/08	06/16/08	*	*	Sheet
WWTF	0318-05-0131	AKR	Shipped	7320	06/10/08	06/16/08	*	*	4890
301 CDL	0318-01-2220	AKR	Shipped	2162	06/06/08	06/27/08	*	*	4227-1972-3100
WWTF	0318-05-0132	AKR	Shipped	7280	06/18/08	06/23/08	*	*	4890
BB080/CD032	0318-01-2222	AKR	Shipped	7280	06/18/08	06/23/08	*	*	Sheet
306Mix	0318-01-2221	AKR	Shipped	1970	06/18/08	07/05/08	*	*	Sheet
105Mix	0318-01-2223	AKR	Shipped	1831	06/18/08	07/05/08	*	*	Sheet
105Mix	0318-01-2224	AKR	Shipped	1452	06/18/08	07/05/08	*	*	Sheet
301CDL	0318-01-2225	AKR	Shipped	2269	06/18/08	07/05/08	*	*	4227-1972-3100
WWTF	0318-05-0133	AKR	Shipped	7248	07/02/08	07/09/08	*	*	4890
BB081/CD033	0318-01-2226	AKR	Shipped	7248	07/02/08	07/09/08	*	*	Sheet
301CDL	0318-01-2227	AKR	Shipped	1356	07/02/08	07/24/08	*	*	4227-1972-3100
301CDL	0318-01-2228	AKR	Shipped	1818	07/07/08	07/30/08	*	* /	4227-1972-3100
BB082	0318-01-2229	AKR	Shipped	7308	07/23/08	07/28/08	*	*	Sheet
WWTF	0318-05-0134	AKR	Shipped	7308	07/23/08	07/28/08	*	*	4890
Labfuel 039	0318-01-2230	AKR	Shipped	1880	08/06/08	08/23/08	*	*	SO# 1903J
105 Roof	0318-01-2231	AKR	Shipped	1889	08/11/08	08/28/08	*	*	4600
WWTF	0318-05-0135	AKR	Shipped	7373	08/15/08	08/22/08	*	*	4890
FMFCD-034	0318-01-2232	AKR	Shipped	7373	08/15/08	08/22/08	*	*	Sheet
FMF IM	0318-01-2233	AKR	Shipped	1842	08/19/08	09/05/08	*	*	4120-2068
WWTF	0318-05-0136	AKR	Shipped	7261	08/27/08	09/02/08	*	*	4890
BB/CD	0318-01-2234	AKR	Shipped	7261	08/27/08	09/02/08	*	*	Sheet
105 Roof	0318-01-2235	AKR	Shipped	1800	08/19/08	09/05/08	*	*	4600
Lauren	0318-01-2236	AKR	Shipped	1750	08/19/08	09/05/08	*	*	4813
301CDL	0318-01-2237	AKR	Shipped	2162	08/19/08	09/05/08	*	*	4227-1972-3100
FMF/MIX	0318-01-2238	AKR	Shipped	2232	08/19/08	09/05/08	*	*	Sheet
LabFuel041	0318-01-2239	AKR	Shipped	1603	08/27/08	09/16/08	*	*	Sheet
105 Roof	0318-01-2240	AKR	Shipped	1450	09/02/08	09/19/08	*	*	4600

Batch No/	Shipment	Issued	Status	Container/	Ship	Scheduled	Clerk	EOU	Cost center
Descript.	Number	То		Trailer#	Date	Delivery	Manifest	Manifest	
Lauren Mix	0318-01-2241	AKR	Shipped	2174	09/02/08	09/19/08	*	*	Sheet
301 CDL	0318-01-2242	AKR	Shipped	2237	09/02/08	09/19/08	*	*	4227-1972-3100
301 Mix	0318-01-2243	AKR	Shipped	2260	09/09/08	09/26/08	*	* /	Sheet
WWTF	0318-05-0137	AKR	Shipped	7321	09/12/08	09/18/08	*	*	4890
FMF-BB084	0318-01-2244	AKR	Shipped	7321	09/12/08	09/18/08	*	*	Sheet
BB085/CD036	0318-01-2245	AKR	Shipped	7218	09/22/08	09/27/08	*	*	Sheet
WWTF	0318-05-0138	AKR	Shipped	7218	09/22/08	09/27/08	*	*	4890
301 CDL	0318-01-2246	AKR	Shipped	2220	10/01/08	10/17/08	***************************************	*	4227-1972-3100
Lauren	0318-01-2247	AKR	Shipped	2353	10/07/08	10/23/08	*	*	4813
FMFCD-037	0318-01-2248	AKR	Shipped	7103	10/13/08	10/17/08	*	*	Sheet
WWTF	0318-05-0139	AKR	Shipped	7103	10/13/08	10/17/08	*	*	4890
Jay's Sacks	0318-01-2249	AKR	Shipped	1973	10/16/08	11/01/08	*		4870 EQ08
301 Dirt	0318-01-2250	AKR	Shipped	2055	10/16/08	11/01/08	*	*	4227-1972-3100
FMF Debris	0318-01-2251	AKR	Shipped	2284	10/22/08	11/07/08	*	*	4120-2069
301/105	0318-01-2252	AKR	Shipped	2251	10/22/08	11/07/08	*	* /	Sheet
BB086/CD038	0318-01-2253	AKR	Shipped	7441	10/31/08	11/04/08	*	*	Sheet
WWTF	0318-05-0140	AKR	Shipped	7441	10/31/08	11/04/08	*	*	4890
301/105	0318-01-2254	AKR	Shipped	2295	10/22/08	11/07/08	*	* /	Sheet
301 CDL	0318-01-2255	MAC	Shipped	1896	10/22/08	11/07/08	*	g of the y	4227-1972-3100
Jay's Sacks	0318-01-2256	MAC	Shipped	2271	10/22/08	11/07/08	*	*	4870 EQ08
301 CDL	0318-01-2257	MAC	Shipped	2355	10/22/08	11/07/08	*	*	4227-1972-3100
WWTF	0318-05-0141	AKR	Shipped	7240	11/04/08	11/12/08	*	*	4890
BB087/CD039	0318-01-2258	AKR	Shipped	7240	11/04/08	11/12/08	*	*	Sheet
NaHS WW	0318-09-0001	DWS	Shipped	Pan Van	11/10/08	11/13/08	*	*	4299
WWTF	0318-05-0142	AKR	Shipped	7394	12/05/08	12/15/08	*	*	4890
BB088/CD040	0318-01-2259	AKR	Shipped	7394	12/05/08	12/15/08	*		Sheet
Mix IM	0318-01-2260	AKR	Shipped	1800	12/04/08	12/19/08	*		Sheet
301 CDL	0318-01-2261	AKR	Shipped	2135	12/04/08	12/19/08	*	*	4227-1972-3100
301 CDL	0318-01-2262	AKR	Shipped	2316	12/04/08	12/19/08	*	*	4227-1972-3100
Mix IM	0318-01-2263	AKR	Shipped	1373	12/04/08	12/19/08	*	*	Sheet
105 Roof	0318-01-2264	AKR	Shipped	2363	12/04/08	12/19/08	*	*	4600
105 Roof	0318-01-2265	AKR	Shipped	1933	12/04/08	12/19/08	*	*	4600
301 CDL	0318-01-2266	AKR	Shipped	1978	12/04/08	12/19/08	*	* *	4227-1972-3100
105 Roof	0318-01-2267	AKR	Shipped	2381	12/04/08	12/19/08		*	4600
FMFCD-041	0318-01-2268	AKR	Shipped	7185	12/11/08	12/22/08	*	*	Sheet

Batch No/	Shipment	Issued	Status	Container/	Ship	Scheduled	Clerk	EOU	Cost center
Descript.	Number	To		Trailer#	Date	Delivery	Manifest	Manifest	
WWTF	0318-05-0143	AKR	Shipped	7254	01/08/09	01/12/09	*	*	4890
FMFCD-042	0318-01-2269	AKR	Shipped	7254	01/08/09	01/12/09	*	*	Sheet
301/105	0318-01-2270	AKR	Shipped	1369	01/19/09	02/05/09	*	*	Sheet
105 Roof	0318-01-2271	AKR	Shipped	1452	01/19/09	02/05/09	*	*	4600
105 Roof	0318-01-2272	AKR	Shipped	1829	01/19/09	02/05/09	*	*	4600
BB089	0318-01-2273	AKR	Shipped	7025	01/22/09	01/28/09	*	*	Sheet
WWTF	0318-05-0144	AKR	Shipped	7025	01/22/09	01/28/09	*	*	4890
BB090/CD043	0318-01-2274	AKR	Shipped	7340	02/05/09	02/09/09	*	*	Sheet
WWTF	0318-05-0145	AKR	Shipped	7340	02/05/09	02/09/09	*	*	4890
301CDL IM	0318-01-2275	AKR	Shipped	1245	02/02/09	02/26/09	*	*	4227-1972-3100
FMF IM	0318-01-2276	AKR	Shipped	2395	02/02/09	02/26/09	*	*	4120-2069
WWTF	0318-05-0146	AKR	Shipped	7303	03/05/09	03/11/09	*		4890
BB091/CD044	0318-01-2277	AKR	Shipped	7303	03/05/09	03/11/09	*		Sheet
FMF Debris	0318-01-2278	AKR	Shipped	1415	03/12/09	03/29/09	*	*	Sheet
Mix IM	0318-01-2279	AKR	Shipped	2400	03/12/09	03/29/09	*	*	Sheet
Mix IM	0318-01-2280	AKR	Shipped	1384	03/13/09	03/30/09	*	*	Sheet
BB092/CD045	0318-01-2281	AKR	Shipped	7125	03/19/09	03/24/09	*	*	Sheet
WWTF	0318-05-0147	AKR	Shipped	7125	03/19/09	03/24/09	*	*	4890
FMF IM	0318-01-2282	AKR	Shipped	2384	03/24/09	04/10/09	*	*	4170-2110
Mix IM	0318-01-2283	AKR	Shipped	2410	03/24/09	04/10/09	*	*	Sheet
BB093	0318-01-2284	AKR	Shipped	7108	04/08/09	04/16/09	*	*	Sheet
WWTF	0318-05-0148	AKR	Shipped	7108	04/08/09	04/16/09	*	*	4890
Mix IM	0318-01-2285	AKR	Shipped	1393	04/02/09	04/19/09	*	*	Sheet
Mix IM	0318-01-2286	AKR	Shipped	1565	04/02/09	04/19/09	*	*	Sheet
CDL IM	0318-01-2287	AKR	Shipped	1866	04/02/09	04/19/09	*	*	4227-1972-3100
Mix IM	0318-01-2288	AKR	Shipped	2063	04/02/09	04/19/09	*	*	Sheet
Mix IM	0318-01-2289	AKR	Shipped	2325	04/02/09	04/19/09	*	*	Sheet
BB094	0318-01-2290	AKR	Shipped	7382	04/22/09	04/27/09	*	*	Sheet
WWTF	0318-05-0149	AKR	Shipped	7382	04/22/09	04/27/09	*	*	4890
FMF IM	0318-01-2291	AKR	Shipped	2295	04/09/09	04/26/09	*	*	4170-2110
Mix IM	0318-01-2292	MAC	Shipped	1700	04/28/09	06/01/09	*	*	Sheet
FMFCD-046	0318-01-2293	AKR	Shipped	7099	05/13/09	05/18/09	*	*	4170-2110
WWTF	0318-05-0150	AKR	Shipped	7099	05/13/09	05/18/09	*	*	4890
BB095/CD047	0318-01-2294	AKR	Shipped	7224	05/28/09	06/01/09	*	*	Sheet
CDL IM	0318-01-2295	AKR	Shipped	2232	05/21/09	06/07/09	*	*	4227-1972-3100

Batch No/	Shipment	Issued	Status	Container/	Ship	Scheduled	Clerk	EOU	Cost center
Descript.	Number	То		Trailer#	Date	Delivery	Manifest	Manifest	
CDL IM	0318-01-2296	AKR	Shipped	2335	05/21/09	06/07/09	*	*	4227-1972-3100
CDL IM	0318-01-2297	MAC	Shipped	2050	06/19/09	07/06/09	*	*	4227-1972-3100
Mix IM	0318-01-2298	MAC	Shipped	1433	06/23/09	07/10/09	*	*	Sheet
WWTF IM	0318-01-2299	AKR	Shipped	1727	07/01/09	08/01/09	*	*	4890
WWTF	0318-05-0151	AKR	Shipped	7340	06/25/09	06/30/09	*	*	4890
FMFBB-096	0318-01-2300	AKR	Shipped	7340	06/25/09	06/30/09	*	*	4600
Mix IM	0318-01-2301	AKR	Shipped	1954	07/01/09	08/01/09	*	*	Sheet
FMFBB-097	0318-01-2302	AKR	Shipped	7429	07/31/09	08/04/09	*	*	Sheet
WWTF	0318-05-0152	AKR	Shipped	7429	07/31/09	08/04/09	*	*	4890
WWTF	0318-05-0153	AKR	Shipped	7297	10/09/09	10/13/09	*		4890
Pb Mixed	0318-07-0002	AKR	Shipped	7297	10/09/09	10/13/09	*		4813-0000-3000
FMFBB-098	0318-01-2304	AKR	Shipped	7297	10/09/09	10/13/09	*		Sheet
Mix IM	0318-01-2303	MAC	Shipped	1630	10/28/09	12/09/09	*	*	Sheet
Mix IM	0318-01-2305	MAC	Shipped	1439	10/28/09	12/09/09	*	*	Sheet
Mix IM	0318-01-2306	MAC	Shipped	1375	10/28/09	12/09/09	*	*	Sheet
Mix IM	0318-01-2307	MAC	Shipped	1813	10/29/09	12/10/09	*	*	Sheet
Mix IM	0318-01-2308	MAC	Shipped	2179	10/29/09	12/10/09	*	*	Sheet
WWTF	0318-05-0154	AKR	Loaded	7297			*	*	4890
Mix IM	0318-01-2309	MAC	Shipped	2336	12/10/09	12/23/09	*	*	Sheet
Mix IM	0318-01-2310	MAC	Shipped	2257	12/10/09	12/23/09	*	*	Sheet
Sodium Nitrate	0318-10-01	DWS	Shipped	7371	12/30/09		*	*	4296-1877-3000
Mix IM	0318-01-2311	MAC	Shipped	1949	01/20/10	02/06/10	*	*	Sheet
Mix IM	0318-01-2312	MAC	Shipped	1848	01/20/10	02/06/10	*	*	Sheet
WWTF	0318-05-0155	MAC	Shipped	7402	04/05/10	04/08/10	*	*	7945
Mix	0318-01-2313	MAC	Shipped	7190	05/17/10		*	*	Sheet
WWTF	0318-05-0156	MAC	Shipped	7190	05/17/10		*	*	7945
MIX	0318-01-2314	MAC	Shipped	1439	05/21/10	06/07/10	*	*	Sheet
WWTF	0318-05-0157	AKR	Shipped	7293	08/26/10		*	*	7945
Sack mix	0318-01-2315	AKR	Shipped	7293	08/26/10		*	*	Sheet
Mix IM	0318-01-2316	MAC	Shipped	2033	08/18/10	09/01/10	*	*	Sheet
Mix IM	0318-01-2317	MAC	Shipped	1957	08/18/10	09/01/10	*	*	Sheet
Mix IM	0318-01-2318	MAC	Shipped	1791	08/18/10	09/01/10	*	*	Sheet
Mix IM	0318-01-2319	MAC	Shipped	1940	08/18/10	09/01/10	*	*	Sheet
WWTF	0318-05-0158	AKR	Shipped	7171	10/11/10	10/15/10	*	*	7945
Mix IM	0318-01-2320	MAC	Loaded	1706	09/28/10	10/13/10	*	*	

FORM 540	EnergySolutions, LLC	5. SHIPPER - NAME AND FACILITY  Nuclear Fuel Services, Inc.			T I.D. NUMBER	7::540 / 540A Page 1	· · · · · · · · · · · · · · · · · · ·	8. Manifest Number:
UNIFORM LOW-LEVE	L-RADIOACTIVE	1205 Banner Hill Road		. 03184	COLLECTOR	9 CONSIGNEE - Name and Facility Address	- The tables of the control of the c	(Use this number on all continuation pages.)
The state of the s	NIFEST	Erwin, TN 37650	<ol> <li>A registration of a service field</li> </ol>		PROCESSOR	9 CONSIGNEE - Name and Facility Address EnergySolutions, LLC		0318-01-2162 CONTACT
SHIPPING I	PAPER  e Area Code)	DISPOSAL PERMIT NUMBER	SHIPMENT NUMBER	<del></del>	GENERATOR TYPE	Clive Disposal Site - Bulk Waste I	Shipping and Receiving	
800-424-9300	e Area Code)	0109000006	0318-01-2162	X	(Specify) I	Interestate 80, Exit 49		TELEPHONE NUMBER (Include Area Code)
ORGANIZATION	CONTACT			NE NUMBER Area Code)	Clive, UT 84029		435-884-0155	
ChemTrec		Brad A. McKeehan Transpor	tation & Waste Manager	4	23-743-9141	SIGNATURE - Authorized consignee acknowled	dging waste receipt	DATE
2. (S THIS AN EXCLUSIVE USE SHIPMENT?	3: Total Number of Packages	6. CARRIER EPES Transport		EPA I.D.	NA.	*10 18° .	10. CERTIFICATION	
X YES	Identified on this Manifest	2415 Davy Crockett Parkway PO Box 3067		SHIPPING		This is to certify that the herein-named materials	are properly classified, described,	packaged, marked, and labeled and are in proper
□ио		Morristown, TN 37814		l	6/27/2007	condition for transportation according to the app This also certifies that the materials are classified		nent of Transportation. and are in proper condition for transportation and
4. DOES EPA REGULATED WASTE REQUIRING A YES	EPA MANIFEST NUMBER	CONTACT			NE NUMBER ide Area Code)	disposal as described in accordance with the requ	airements of 10 CFR Parts 20 and	61, or equivalent state regulations.
MANIFEST ACCOMPANY X NO		Richard Price SIGNATURE - Authorized carrier acknowledge		8	00-272-4416	AUTHORIZED SIGNATURE	TITLE	DATE
THIS SHIPMENT?  If "Yes", provide Manifest Number>	NA	SIGNATURE - Authoritied carrier accessive edg	( ) + Ria	DATE	72-02	16-Michelle Ledford	I librate for	2 Adm. 6-25-07
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						P.O. # 01	05024812	
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	S	ee Attached	540 A			LINE ITEM	DESCRIPTI	ION
	D	oc municu	5 1011			234, 143 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	<u></u>	
·						0003	INTERMODA	L SOIL
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1						0004	CONTAINER	SOIL
1						TT 0005	DEDDIC	
						X 0005	DEBRIS	
FOR CONSIGNEE USE ONLY			20. TERMS AND CONDITION					
	Record Waste Des	cription Inadequate				and warrants that Waste Material is (or) _X_ is a is also accompanied by a separate and completed I		in 40 CFR 261. with the appropriate land-disposal restriction notice
[	Contamination or	Leakage Detected	and/or certification	as required	by 40 CFR 268.1.	. , , ,		
and the same of the parties.	Unexpected Expos	sure Rates Detected				onsignee, and all appropriate regulatory authorities		1
Original Signed Copy of Manifest Resides Nuclear Fuel Services, Inc.	Labels, Markings,	etc. Inadequate	conforms to Gener	ator's repres	entations herein shall the	ereupon transfer from Generator and be vested in t	ne Consignee.	
	Container Integrity	/ Inadequate				ants that all data set forth in this (UNIFORM LOW with all applicable governmental laws, rules, regulat		
	Other	·	1	-		· · ·		actise.
	· leasurer	ected on this Shipment				the Consignee, its officers, employees and agents : ilure of the Waste Material to conform in all materi		a the
		ooled on and ompinion	(UNIFORM LOW	whatsoever if such losses or liability results from the failure of the Waste Material to conform in all material respects to the data sur (UNIFORM LOW-LEVEL RADIOACTIVE WASTE MANUFEST,) or if this shipment fails to meet the standards prescribed by the governmental agency having jurisdiction over such matters.				tment of Transportation or any
L			SUT-GENERAL ARCH	_,				Version 2.0, Rev. 0
		425			•	and you are an amount of the state of the st		71
			•					

800-424-9300  ORGANIZATION ChemTrec  2. IS THIS AN EXCLUSIVE USE SHIPMENT?  X YES NO 4. DOES EPA REGULATED	ANIFEST	Nuclear Fuel Services, Inc.  1205 Banner Hill Road  Erwin, TN 37650  DISPOSAL PERMIT NUMBER SHIPMENT NUMBER 0109000006 0318-01-2173  CONTACT TE  Brad A. McKeehan Transportation & Waste Manager  6. CARRIER EPES Transport 2415 Davy Crockett Parkway PO Box 3067 Morristown, TN 37814  CONTACT TI			OLLECTOR PROCESSOR GENERATOR TYPE (Specify) I NNE NUMBER NA BATES OLOMOTOR NO NUMBER NA BATES OLOMOTOR NE NUMBER	7. 540/540A — Page 1  9: CONSIGNEE Name and Facility Address Energy Solutions, LLC Clive Disposal Site - Bulk Waste Facility Interestate 80, Exit 49 Clive, UT 84029 SIGNATURE: Authorized consignce acknowledging waste receipt  10. CERTIFICATION This is to certify that the herein-named materials are properly classified, describe condition for transportation according to the applicable regulations of the Depart This side ocrifies that the materials are classified, packaged, marked, and labeled disposal as described in accordance with the requirements of 10 CFR Parts 20 at	tment of Transportation.  I and are in proper condition for transportation and
WASTE REQUIRING A MANIFEST ACCOMPANY THIS SHIPMENT? If "Yes", provide Manifest Number	NA	Richard Price SIGNATURE - Authorized carrier scknowleds	ging whate receipt		ade Area Code) 00-272-4416	AUTHORIZED SIGNATURE TITLE POUR	Adm. 10-4-07
	S	ee Attached		***************************************		P.O. # 0105024812  LINE ITEM DESCRIPT  0003 INTERMODA  0004 CONTAINER  X 0005 DEBRIS	AL SOIL
Original Signed Copy of Manifest Resid Nuclear Fuel Services, Inc.	contamination of Unexpected Expo Labels, Markings Container Integri	ty Inadequate	Where the material and/or certification  B. TITLE: Upon acc conforms to Gener  C. WASTE MATERI are true and corret  D. INDEMNIFICATI whatsoever if such (UNIFORM LOW	ATERIALS: is a hazardo as required eptance at th ator's represe AL: Genera it in all respo ON: Genera losses or lial LEVEL RA	us waste, this shipment by 40 CFR 268.1.  e disposal site by the Co- entations herein shall the tor represents and warra- ects and in accordance wattor agrees to indemnify bility results from the fai	and warrants that Waste Material _ is (or) _X is not a hazardous waste as define is also accompanied by a separate and completed hazardous waste manifest, along consignee, and all appropriate regulatory authorities, title to the Waste Material while creupon transfer from Generator and be vested in the Consignee.  Anist that all data set forth in this (UNIFORM LOW-LEVEL RADIOACTIVE WA with all applicable governmental laws, rules, regulations and the Consignee's facility the Consignee, its officers, employees and agents against all losses and liability the Consignee, its officers, employees and agents against all losses and liability the of the Waste Material to conform in all material respects to the data supplied MANIFEST.) or if this shipment fails to meet the standards prescribed by the Deparent.	with the appropriate land-disposal restriction notice  th  STE MANIFEST) ticense.  on the artment of Transportation or any  Version 2.0, Rev. 0

					T				
	FORM 540	EnergySolutions, LLC	5. 7% n.s.			NT I.D. NUMBER	7. 540 / 540A Page 1	8. Manifest Number:	
: :	UNIFORM LOW-EEVE					01-2185	EGN C CONTROL CONTROL CONTROL	(Use this number on all continuation pages.)	
	WASTE MA	NIFEST				COLLECTOR	9. CONSIGNEE - Name and Facility Address	0318-01-2185	
	SHIPPING I	PAPER	Erwin, TN 37650	Erwin, TN 37650			EnergySolutions, LLC	CONTACT	
		e Area Code)	3510 01 2100		*7	GENERATOR TYPE	Clive Disposal Site - Bulk Waste Facility	Shipping and Receiving	
	800-424-9300				(Specify)		Interestate 80, Exit 49	TELEPHONE NUMBER (Include Area Code)	
	ORGANIZATION	S.F.S. Marketon				ONE NUMBER Area Code)	Clive, UT 84029	435-884-0155	
120	ChemTrec	The state of the s	brad A. McKeenan Transportation & waste manager			23-743-9141	SIGNATURE - Authorized consignee acknowledging waste receipt	DATE	
		C. Taral Nicoland Challenge				NUMBER		·   :-	
	2. IS THIS AN EXCLUSIVE USE SHIPMENT?	Total Number of Packages     Identified on this Manifest				NA	IO. CERTIFICATION		
	X YES NO	======================================	2550 Mittellen St.		SHIPPING	DATE	This is to certify that the herein-named materials are properly classified, describe		
	NO		Knoxville, TN 37917			1/22/2008	condition for transportation according to the applicable regulations of the Depar This also certifies that the materials are classified, packaged, marked, and labeled		
1	4. DOES EPA REGULATED	EPA MANIFEST NUMBER	CONTACT			ONE NUMBER	disposal as described in accordance with the requirements of 10 CFR Parts 20 ar		
1	WASTE REQUIRING A YES MANIFEST ACCOMPANY X NO		Dayid Pemberton			ude Area Code) 65-524-5592	AUTHORIZED SIGNATURE TITLE	DATE	
	THIS SHIPMENT?		SIGNATURE - Authorized Carrier acknowledge	ging waste receipt	DATE A				
	If "Yes", provide Manifest Number	NA	Kwil _ co			(-03	Kennix lagismes Woste From Adm. 1-21-1		
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			ng san.				P.O. # 0105024812		
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		C	ee Attached	510 A			TIME TOOM DECORING	HON	
		S	ee Allacheu	<b>340A</b>			<u>LINE ITEM</u> <u>DESCRIPT</u>	ION	
							0003 INTERMODA	AL SOIL	
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aria.	FOR CONSIGNEE USE ONLY		<del></del>	, 20. TERMS AND CONDITIO	ON				
		Record Waste Des	scription Inadequate				nd warrants that Waste Material is (or) _X_ is not a hazardous waste as define		
			•	Where the material and/or certification	l is a hazardo as required	ous waste, this shipment i	is also accompanied by a separate and completed hazardous waste manifest, along	with the appropriate land-disposal restriction notice	
		Contamination or	Leakage Detected	1	-	-		·	
	Grining Signed Copy of Manifest Resides	Unexpected Expos	sure Rates Detected				nsignee, and all appropriate regulatory authorities, title to the Waste Material whi	ch '	
	Nuclear Fuel Services, Inc.	Labels, Markings,	etc. Inadequate	contorms to Gener	ators repres	entations herein shall the	reupon transfer from Generator and be vested in the Consignee.		
5.2		Container Integrity	•				ints that all data set forth in this (UNIFORM LOW-LEVEL RADIOACTIVE WA		
			, manoquate	are true and correc	ct in all respo	ects and in accordance w	ith all applicable governmental laws, rules, regulations and the Consignee's facility	license.	
200		Other		D. INDEMNIFICATI	ON: Genera	ator agrees to indemnify	the Consignee, its officers, employees and agents against all losses and liability		
		No Violations Det	ected on this Shipment	whatsoever if such	losses or lia	bility results from the fail	lure of the Waste Material to conform in all material respects to the data supplied		
							MANIFEST,) or if this shipment fails to meet the standards prescribed by the Depers.	eartment of Transportation or any Version 3.0, Rev. 0	
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