

**Craig M. Dean**  
**Statement of Professional Qualifications**

**CURRENT POSITION**

Senior Technical/Regulatory Specialist  
Regulatory Development and Analysis Group  
ICF International, Incorporated  
1725 I Street  
Washington, D.C. 20006

**EDUCATION**

Graduate Study, Economics and Statistics, American University  
Juris Doctor, Georgetown University Law Center  
M.A., (Ph.D. less dissertation), Russian Studies, Columbia University  
B.A., cum laude, Carleton College

**PROFESSIONAL**

Member of the Bar of the District of Columbia (Admitted to Practice, 1979)

**QUALIFICATIONS**

Mr. Dean is an attorney and Senior Regulatory Specialist, with over 30 years of experience in the development and implementation of financial assurance programs for federal agencies, including the Nuclear Regulatory Commission and the Environmental Protection Agency, as well as several states. Since 1986, Mr. Dean has provided support to the NRC for the development of financial assurance regulations, program implementation, case work, training, and special projects involving financial assurance. He served as an expert witness on financial assurance issues in hearings before the Atomic Safety and Licensing Board on the Louisiana Energy Services and USEC license applications.

Mr. Dean currently manages contractor support to NRC for the review of financial assurance submissions, including both decommissioning cost estimates and financial mechanisms. This work has included review of Decommissioning Cost Estimates for the Louisiana Energy Services (LES), USEC, Areva/Eagle Rock and General Electric/Hitachi proposed fuel enrichment facilities. Support has included preparation of reviews of decommissioning cost estimates; support for preparation of draft Requests for Additional Information; participation in telephone conferences to clarify issues; review of responses to the RAIs; and review of draft financial assurance instruments. Mr. Dean attended depositions of LES staff; developed draft written testimony for the Atomic Safety and Licensing Board contested hearing on the LES license application; and presented oral testimony at the ATSLB hearing. Mr. Dean also managed support provided to NRC's NMSS and OGC for expert witness services to evaluate and defend the purpose and need statement in the DEIS prepared by the NRC for the proposed LES facility. Mr. Dean also provided expert testimony at the ATSLB hearing in the USEC licensing proceeding. Mr. Dean currently is managing contractor support for the review of decommissioning cost estimates submitted by AREVA/Eagle Rock and GE/Hitachi (GLE) as well as additional materials submitted by USEC.

Since 1988, Mr. Dean has provided support to the NRC in analysis of financial assurance submissions, evaluation of financial assurance issues, licensing reviews, and enforcement. Mr. Dean has provided support to NRC in the review and evaluation of several hundred non-standard financial assurance submissions from licensees for costs of decommissioning licensed nuclear materials facilities, as well as providing training to NRC Headquarters and Regional staff and Agreement State personnel on conducting reviews.

Mr. Dean has also provided support for NRC financial assurance rulemakings, including the development of the draft technical basis for amendments to the NRC's regulations on financial assurance cost estimating and financial mechanisms (the "decommissioning planning rule") recently approved by the Commission. He participated in the development and implementation of NRC's financial assurance requirements, beginning in 1986-1987 with a detailed analysis of proposed financial assurance requirements, subsequently adopted in 1988, for low-level radioactive waste, mixed low-level and RCRA waste, uranium mill tailings, and source, special nuclear, and byproduct licensees, including financial mechanisms, decommissioning cost estimates, reporting and recordkeeping requirements, bankruptcy problems, financial test issues, overall regulatory structure, and guidance. Mr. Dean managed support to the NRC for the review of a petition for rulemaking by nuclear materials licensees requesting revisions to financial test for decommissioning financial assurance. The project involved quantification of the degree of assurance provided by all financial assurance mechanisms currently authorized by NRC and comparison to the degree of assurance provided by proposed financial test mechanism. Mr. Dean also managed a related project to address decommissioning by licensees that are not-for-profit entities, such as hospitals and universities, or that cannot qualify for the bond component of the financial test because they do not issue bonds. The report was published as NUREG/CR-6514, *Analysis of Potential Self-Guarantee Tests for Demonstrating Financial Assurance by Non-Profit Colleges, Universities, and Hospitals, and by Business Firms That Do Not Issue Bonds*, June 1997, and formed the basis for rulemaking action by NMSS.

Mr. Dean has provided support for the development of revisions to NUREG-1757, as well as several other guidance documents implementing NRC requirements for financial assurance for decommissioning of licensed facilities, including NUREG-1336, Rev. 1, *Standard Format and Content Guide for Financial Assurance Mechanisms Required for Decommissioning Under 10 CFR Parts 30, 40, 70, and 72*, July 1989 and NUREG-1337, Rev. 1, *Standard Review Plan for the Review of Financial Assurance Mechanisms for Decommissioning Under 10 CFR Parts 30, 40, 70, and 72*, August 1989, Regulatory Guide 3.66, *Standard Format and Content Guide for Financial Assurance Mechanisms Required for Decommissioning Under 10 CFR Parts 30, 40, 70, and 72*, September 1998, and NUREG-1727, NMSS Decommissioning Standard Review Plan, September 2000.

Between 1980 and the present Mr. Dean has also provided a wide range of financial assurance support to the EPA and several states, including development of financial assurance requirements for hazardous waste facilities, underground storage tanks, and other EPA-permitted facilities; development of trust fund language and procedures for incorporating trust funds into consent degrees, to ensure availability of funds under the Ocean Dumping Ban Act for New York City and several New York and New Jersey counties; and support to New Jersey, New York State, and Washington State in the design of taxes, bonds, and other financing systems to provide funds for State hazardous waste cleanup activities.

Mr. Dean has made numerous presentations on financial assurance topics to professional conferences and workshops.