

From: Ramsey, Kevin
Sent: Tuesday, March 22, 2011 3:31 PM
To: Przygodzki, Roman; Wheeler, Jennifer K.
Subject: Final Summary of 3/9/11 Call w/NFS re: Decommissioning Cost Estimate (L32974)

On March 9, 2011, a call was conducted to discuss open issues associated with the Nuclear Fuel Services (NFS) update to its decommissioning cost estimate. The following individuals participated:

Kevin Ramsey, NMSS
Roman Przygodzki, FSME
Jennifer Wheeler, NFS

On September 23, 2010, NFS responded to a request for additional information (RAI). The participants discussed open issues associated with specific RAI questions.

RAI 1: NFS confirmed its intent to submit a new color-coded map to address differences in the maps submitted previously.

With regard to the volume of soil to be excavated, NFS referred to a footnote on page 56 of 104 on its RAI response. NFS used a 20 percent swell factor to estimate the difference between compacted soil excavated and loose soil loaded into waste containers. NFS stated that it assumed that soils would be excavated to a depth of 4 feet. NFS stated that this depth is based on historical experience, as described on page 5 of 104 RAI response. This factor explains why NRC failed to obtain the same answer when it tried to calculate the total disposal volume.

In addition, NRC noted differences in the liability for soil excavation in building specific tables and the liability for soil excavation in summary tables. NFS explained that on the main site, the government (i.e., DOE) is responsible for soil excavation under older buildings even though some of those buildings are now used by NFS for non-government processes. With regard to the Blended Low-Enriched Uranium (BLEU) Complex next door, NFS confirmed that there was no contaminated soil beneath those buildings before they were built. That is why NFS estimates no liability for contaminated soil under those buildings.

RAI 3: With regard to financial instruments that guarantee funds for the BLEU Complex, NFS submitted 2 letters of credit to guarantee the funds when it requested license amendments to authorize operation of the BLEU Complex. Those instruments will have to be updated when the amount of the new cost estimate is approved.

RAI 4: With regard to the difference between the disposal volume in the updated cost estimate and disposal volume in the previous cost estimate, NFS explained that the previous estimate assumed the site was returned to green field status which included demolishing all structures. The updated estimate assumes that only contaminated structures are demolished. Uncontaminated structures are left standing. That is why the estimated disposal volume is lower in the updated estimate.

RAI 5: With regard to difficulty factors, NRC stated that it would like to know how the factors were applied. Are difficulty factors applied to operators only, or are they applied to all labor categories? NFS agreed to address the question.

With regard to disposal costs, NFS stated that it is working on clarifying its response.

With regard to salvage value, NFS stated that AREVA owns the transport casks used for liquid uranyl nitrate. There is no disposal cost listed for the casks because they will be returned to AREVA. Page 5 of 104 of the RAI response includes a statement that “no credit for any salvage value that might be realized from the sale of potential assets (e.g., recovered materials or decontaminated equipment) during or after decommissioning is included in the estimate.”

RAI 6: NFS recognizes that it needs to update funding instruments after NRC approves the amounts in the cost estimate. NRC stated that upon resolution of RAIs, it would issue a letter documenting its approval of the cost estimate so NFS could proceed with changes to bank documents.

NRC agreed that the information discussed in the conference call appears to resolve the open issues. NFS estimated that the additional information needed for NRC to approve the cost estimate amount can be submitted by the end of March.

Kevin M. Ramsey
Senior Project Manager
Fuel Manufacturing Branch
U.S. NRC
301-492-3123