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License No. R-98
July 12, 2011

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
11555 Rockville Pike
Rockville MD 20852
via courier

Aerotest Radiography and Research Reactor
Docket No. 50-228
Third Response to NRC Letters of February 26, 2011 and May 24, 2011

Ladies and Gentlemen:

This letter provides the third response to U.S. Nuclear Regulatory Commission ("NRC") letters dated February 26, 2011 and May 24, 2011 in the above docket.

On February 26, 2011, the NRC issued a Confirmatory Action Letter ("CAL") in this docket, describing the actions Aerotest Operations, Inc. ("Aerotest") agreed it had taken or will take regarding operations, amending the license, staffing, decommissioning planning, and managing and funding disposition of fuel associated with the Aerotest Radiography and Research Reactor ("ARRR"). As requested by the CAL, Aerotest's letter of March 23, 2011, provided the first response to the CAL and informed the NRC of any differences in understanding; provided prior notice to the NRC of any changes, deviations or incomplete commitments at the time; and confirmed completion of actions.

On May 24, 2011, the NRC issued a Request for Additional Information ("RAI"). Aerotest letter dated June 14, 2011 provided the first response to the RAI.

The RAI requested that Aerotest provide at 14 day intervals an update of the information request in the RAI. Aerotest letter dated June 28, 2011 provided the second update. This letter forwards an affidavit executed by Dario Brisighella on July 11, 2011,

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updating the previous responses. The attached primarily identifies that EnergySolutions has provided a draft of the Historic Site Assessment as expected and work on the next milestone in preparing the Decommissioning Plan (the Characterization Report) is continuing.

Aerotest will provide its next update under the CAL by October 4, 2011 and its next update in response to the RAI by July 26, 2011.

The undersigned affirms the accuracy of the contents of this letter to best of his knowledge and belief. If you have any questions regarding this submittal, please contact the undersigned at (202) 663-9086 (robert.haemer@pillsburylaw.com) or Michael S. Anderson, Secretary of Aerotest at (248) 475-0442 (mike.anderson@autoliv.com).

Sincerely,

Robert B Haemer

Robert. B. Haemer
Counsel for Aerotest Operations, Inc.

Attachments

Affidavit of Dario Brisighella dated July 12, 2011

cc: U.S. NRC Office of Nuclear Reactor Regulation/NRLPO
U.S. NRC Region IV, Regional Administrator
NRC, NRR (C. Montgomery)
NRC, OGC (S. Uttal)

AFFIDAVIT OF DARIO BRISIGHELLA

STATE OF UTAH)
) ss
)
)
COUNTY OF WEBER)

I, Dario Brisighella, President Aerotest Operations, Inc., do hereby affirm and state:

1. I am authorized to execute this affidavit on behalf of Aerotest Operations, Inc. (hereinafter referred to as "Aerotest").

2. I provide this affidavit pursuant to the actions described in the NRC letter to Aerotest of February 26, 2011, also known as a Confirmatory Action Letter. This affidavit also responds to the request for additional information in NRC letter of May 24, 2011.

3. Aerotest has signed a Non-Disclosure Agreement with an agent of a potential buyer and that entity has commenced due diligence reviews of the Aerotest Radiography and Research Reactor ("ARRR"). Those due diligence reviews are continuing. Most recently, additional financial information was provided at the other entity's request.

4. Aerotest plans to submit to the NRC a request for a possession only license within thirty days after negotiations with current potential buyers cease or in conjunction with submitting the decommissioning plan, whichever comes first. A letter stating that the ARRR has permanently ceased operations would be submitted at the time a request for a possession only license is submitted.

5. Current operations and status of the ARRR remain as described in paragraph 1 of Aerotest letter of January 7, 2011.

6. Current staffing of the ARRR remain as described in paragraph 2 of Aerotest letter of January 7, 2011.

7. After reviewing proposals from two decommissioning contractors, EnergySolutions, Inc. ("EnergySolutions") was selected as the decommissioning contractor in January 2011. A contract with EnergySolutions was signed in late February 2011.

8. EnergySolutions commenced site characterization, including a historical site assessment, on March 16, 2011. EnergySolutions has provided a draft historical site assessment report to Aerotest for review. EnergySolutions continues working on a site characterization report.

9. Aerotest is developing a decommissioning funding plan in parallel with the EnergySolutions preparation of the decommissioning plan.

10. Fuel management options continue to be studied.

11. Aerotest is preparing a fuel management funding plan in parallel with the EnergySolutions work.

12. Aerotest has no plans to commence research or N-ray work at the ARRR. Aerotest is not aware of any regulatory approvals required prior to resuming such work.

Dario Brisighella, being duly sworn, states that I am President of Aerotest, that I am authorized on the part of said Company to sign and file with the U. S. Nuclear Regulatory Commission this affidavit, and that all the matter and facts set forth herein are true and correct to the best of my knowledge.

Dario Brisighella
President, Aerotest Operations, Inc.

Subscribed and sworn to before me, a Notary Public, in and for the county and state above named, this 11 day of July, 2011.

Notary Public in and for the State of Utah

My Commission Expires: 10/20/2012

TERRI SCOVILL
Notary Public, State of Utah
Commission # 575822
My Commission Expires
October 20, 2012