

**From:** [John Miller](#)  
**To:** "[Bartlett, Matthew](#)"  
**Subject:** RE: Decommissioning  
**Date:** Thursday, January 24, 2013 6:57:00 PM

---

I would say we wouldn't meet any of the criteria in (i)-(iv). I still plan on developing a decommissioning plan but I guess it wouldn't need to be approved by NRC before we start decommissioning.

Then I suppose I would submit the plan and results of final surveys with the request to amend the license to remove 1359 as a location listed on SUB-1587.

---

**From:** Bartlett, Matthew [mailto:[Matthew.Bartlett@nrc.gov](mailto:Matthew.Bartlett@nrc.gov)]  
**Sent:** Thursday, January 24, 2013 1:54 PM  
**To:** John Miller  
**Subject:** Decommissioning

John,

Have you determined if decommissioning of the 1359 building will trip one of the criteria in 40.42(g)?

40.42(g)(1) A decommissioning plan must be submitted if required by license condition or if the procedures and activities necessary to carry out decommissioning of the site or separate building or outdoor area have not been previously approved by the Commission and these procedures could increase potential health and safety impacts to workers or to the public, such as in any of the following cases:

- (i) Procedures would involve techniques not applied routinely during cleanup or maintenance operations;
- (ii) Workers would be entering areas not normally occupied where surface contamination and radiation levels are significantly higher than routinely encountered during operation;
- (iii) Procedures could result in significantly greater airborne concentrations of radioactive materials than are present during operation; or
- (iv) Procedures could result in significantly greater releases of radioactive material to the environment than those associated with operation.

If so, looks like you will need to submit a decommissioning plan for NRC review before proceeding.

Sincerely,

Matt Bartlett  
Project Manager  
NMSS/FCSS  
(301) 492-3119