

From: [Lawyer, Dennis](mailto:Lawyer.Dennis)
To: charles.woodruff@usuhs.edu
Subject: Department of the Army, Request for Additional Information Concerning Financial Assurance, Control 582847
Date: Tuesday, August 12, 2014 2:22:47 PM

This is in reference to Col. Huff's letter dated December 26, 2011, submitting financial assurance information for Nuclear Regulatory Commission License No. 19-08330-02, Docket 03004545. In order to continue our review, we need the following additional information:

1. Your cost estimate allows for the cost of a Health Physics Technician to be \$25 per hour. The cost for labor should be the amount that you would pay an independent contractor to perform the duties as required by 10 CFR 35(e)(1)(i)(a). In your Decommissioning Funding Plan (DFP) performed in 2006, a value of \$30.25 per hour was used for a Health Physics Technician, thus your current value seems low. Please revise the value or show evidence that you can obtain qualified personnel at \$25 per hour.
2. Your cost estimate gives very little detail or description of the areas to be decommissioned. NUREG-1757, Volume 3, Revision 2, Checklist 3 gives the information required for a DFP. The detailed cost estimate must include a detail description of the facilities. In particular, you have previously only performed a DFP for your special nuclear material, but seem to have included your unsealed byproduct material. Please clarify by describing the facilities and the types of materials that are used in these facilities.
3. Your cost estimate did not include a description of the means that will be used to adjust the site-specific cost estimate and associated funding level. As required by Checklist 3, please include a description of the means that will be used to adjust the site-specific cost estimate and associated funding level.
4. It is not clear in your cost estimate if the current quantity of radioactive waste in addition to the waste generated from decommissioning was included in your waste costs. Please describe your average amount of waste on hand and how it was factored into your cost estimate.
5. As part of your DFP, you need to identify and justify the key assumptions used in performing this calculations, including the volume of subsurface material containing residual radioactivity that will require remediation to meet the criteria for license termination.
6. The Certificate of Financial Assurance (CFA) dated December 26, 2013, does not support your current estimate. The CFA certifies a higher amount than what is being supported by your financial instrument. Additionally, the CFA needs to list 10 CFR Part 70 as a basis for the financial assurance as well as 10 CFR 30. Please resubmit a CFA that supports the required funding level.
7. Currently, License Condition 13 restricts the possession limits of unsealed byproduct material to that amount that requires a DFP. Since you have included

byproduct material into your DFP, this License Condition may be removed. Do you request that your license be amended to remove this license condition, upon acceptance of your financial assurance?

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office (Address below) and refer to Mail Control No. 582847. If you have technical questions regarding this letter, please call me at (610) 337-5366.

Please note that you may not reply to this letter by return e-mail. Your reply must be in writing. Please respond within 30 calendar days from the date of this e-mail..

Region 1 Office Mailing Address: Licensing Assistance Team, US Nuclear Regulatory Commission Region I, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406-2713.

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