

From: ROYER David (AREVA) [mailto:DM.Royer@areva.com]
Sent: Monday, September 26, 2016 11:08 AM
To: Siurano-Perez, Osiris <Osiris.Siurano-Perez@nrc.gov>; PETERS Gary (AREVA) <Gary.Peters@areva.com>; ELLIOTT Gayle (AREVA) <Gayle.Elliott@areva.com>
Cc: Kline, Kenneth <Kenneth.Kline@nrc.gov>; Grice, Thomas <Thomas.Grice@nrc.gov>
Subject: [External_Sender] RE: RE: Re: AREVA LTA

Osiris,

In addition to the below information, I am providing a letter from our bank verifying Financial Assurance for LuckyMc.

David

From: ROYER David (CORP-NP)
Sent: Thursday, September 22, 2016 6:49 PM
To: 'Siurano-Perez, Osiris'; PETERS Gary (DTI); ELLIOTT Gayle (DTI)
Cc: 'Erlanger, Craig'; 'Kline, Kenneth'
Subject: RE: RE: Re: AREVA LTA

Osiris,

Further to the OCG question regarding decontamination and decommissioning of the Lucky Mc facilities, AREVA respectfully responds as follows:

- 1) The facility has already been decommissioned and the site reclaimed (see attached NRC Completion Report - REVIEW OF PATHFINDER LUCKY MC MILL TAILINGS SITE RECLAMATION COMPLETION REPORT, AMENDMENT NO. 69 TO SOURCE MATERIALS LICENSE SUA-672 (TAC LU0099).
- 2) The land for the former site is owned by DOE and AREVA is awaiting agreement and approval of the long term surveillance fee so the license can be terminated (see NRC web-page and second attached document on current status <http://www.nrc.gov/info-finder/decommissioning/uranium/pathfinder-lucky-mc.html>)
- 3) In the third attached NRC submission (Docket No. 40-2259, Source Material License No. SUA-672 Surety estimate for the Lucky Mc mill tailings site), AREVA's licensing agent states that: "This surety estimate reflects the completion of the site closure, including the decommissioning of the ground water corrective action system and all other site wells not required by the license for monitoring purposes."

Once more, please let us know if you think a conference call with concerned stakeholders or OGC would be helpful.

Best regards,
David Royer
434-841-3218

From: ROYER David (CORP-NP)
Sent: Thursday, September 22, 2016 3:16 PM
To: 'Siurano-Perez, Osiris'; PETERS Gary (DTI); ELLIOTT Gayle (DTI)
Cc: Erlanger, Craig; Kline, Kenneth
Subject: RE: RE: Re: AREVA LTA

Osiris,

I am in the process of pulling together the information related to financial assurance for the LuckyMc license and will be responding to that question in a separate email to follow this email.

Concerning the EREF license and the financial stability of AREVA Nuclear Materials LLC, AREVA respectfully responds as follows:

- 1) We remind OGC that financial assurance is **not** currently a requirement of the EREF license conditions since there is no constructed enrichment facility for which SNM would have been received. Please see earlier RAI response submitted on this point.
- 2) Notwithstanding that there is no current financial requirement, the reorganization plan described in AREVA's earlier License Transfer Application will result in AREVA Nuclear Materials LLC (f/k/a AREVA Enrichment Services LLC) being a stronger company financially with no debt. The proprietary financial evaluation AREVA provided to NRC shows AREVA Enrichment Services with a negative value due to the losses associated with the EREF project which currently is suspended. However, this does not mean that the businesses that will comprise ANM LLC going forward will not be financially sound.

Again, please let us know if you think a conference call with concerned stakeholders would be helpful.

David Royer
434-841-3218