

*The information requested on Form 314 is appropriate for the vast majority of licensees. However, Form 314 is not just a "Certification of Disposition"; it is a checklist of criteria, identifying the information needed to justify license termination.*

*For those licensees who have decommissioned a "complex site" in accordance with a Decommissioning Plan or License Termination Plan, there should be no need to provide the information listed on Form 314. The decommissioning of a complex site often extends over several decades; disposition of licensed material likely consisted of multiple shipments overseen by multiple "vendors" (e.g., the licensee, a licensee contractor, or a waste broker) to numerous licensed disposal sites.*

*NRC should have over the years received records of the disposition of licensed material; to recover and report the history of past disposition of licensed material should be unnecessary, and would likely involve significant cost and time going through archived records to capture all the relevant information. Final status survey plans submitted to demonstrate compliance with 10 CFR 20, Subpart E contain the information required to justify license termination.*

*For the thousands of radioactive material licensees, for whom decommissioning consists primarily of the disposition of their licensed material and perhaps limited release surveys, Form 314 is simple and effective not only for identifying the disposition of the licensed material, but for demonstrating that the conditions for license termination have been met.*

*Form 314 should NOT be required for those licensees who have decommissioned their facilities in accordance with an NRC-approved Decommissioning Plan or License Termination Plan submitted in accordance with 10 CFR 30.36(d), 40.42(d), 50.82 (a) and (b), 70.38(d), or 72.54.*