

**From:** [Lawyer, Dennis](mailto:nrazmianfar@hsc.wvu.edu)  
**To:** "nrazmianfar@hsc.wvu.edu"  
**Subject:** West Virginia University, Request for Additional Information Concerning Financial Assurance, Control 592976, Lic. No. 47-23035-03, Docket 03038182  
**Date:** Tuesday, February 28, 2017 7:47:00 AM

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Dear Dr. Nasser Razmianfar,

This is in reference to your letter dated January 5, 2017, submitting financial assurance documents for Nuclear Regulatory Commission License No. 47-23035-03, Docket No. 03038182. In order to continue our review, we need the following additional information:

1. The Certification of Financial Assurance document was missing a certification statement. The guidance for completing the Certification of Financial Assurance is provided in NUREG-1757, Volume 3, Revision 1, "Consolidated Decommissioning Guidance Financial Assurance, Recordkeeping, and Timeliness," Appendix A.2 (<https://www.nrc.gov/docs/ML1204/ML12048A683.pdf>). The provided certification did not provide state the appropriate amount of financial assurance amount, and that a certification that the funds were available. Please add the following paragraph as appropriate from the model certification in Appendix A.2.4:

I also certify that financial assurance in the amount of [insert the total of all prescribed amounts calculated from Checklist 2 or the amount of the site-specific cost estimate, in U.S. dollars] has been obtained for the purpose of decommissioning as prescribed by 10 CFR Part [insert 30, 40,70, or 72].

Additionally, it is requested that in the future the Certification of Financial Assurance and the Statement of Intent be placed on separate documents as the documents require separate document handling requirements at the NRC. All Statement of Intents will be returned when superseded by new financial assurance documents.

2. Section 3.14 (c) Waste Disposal Costs in your decommissioning cost estimate gives a large disposal volume for DAW, Metal, Concrete Rubble waste which is inconsistent with the volumes in 3.14 (a) and (b). Please review these tables and make corrections. Any lowering of cost estimate may be reflected in Statement of Intent and the Certification of Financial Assurance.
3. The Decommissioning Funding Plan did not include a statement that means for adjusting cost estimates and associated funding levels periodically over the life of the facility, as required by 10 CFR 30.35(e)(1)(iii). This was previously provided in your letter dated February 13, 2014. Please provide a statement that about how you will adjusting cost estimates and associated funding levels periodically over the life of the facility.

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. 592976. If you have technical questions regarding this letter, please call me at (610) 337-5366..

Your reply must be an originally signed and dated letter. The letter may be scanned and submitted as a pdf document attached to an email; or it may be transmitted by facsimile to (610) 337-5269; or it may be sent by regular mail. If we do not receive a reply from you

within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application OR amendment request.

Please respond by e-mail to acknowledge that you have received the e-mail request for additional information.

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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