



BWX Technologies, Inc.

June 08, 2017  
17-035

Attn: Document Control Desk  
Director, Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington D.C. 20555-0001

- References:
- (1) License No. SNM-42, Docket 70-27
  - (2) Letter dated November 8, 2016, Baker (NRC) to C. Terry (BWXT NOG-L), Amendment 23: Approval of Revision to Chapter 10 Decommissioning (Cost Activity Code L33397)
  - (3) Letter dated January 6, 2017, Burch (BWXT NOG-L) to Document Control Desk (NRC), Change of Trustee for BWXT NOG-L Standby Trust Agreement and Revised Letter of Credit
  - (4) Email dated April 11, 2017, R. Johnson (BWXT NOG-L) to Baker (NRC), BWXT Draft Surety Bond Providing SNM-42 Financial Assurance for Decommissioning
  - (5) Email dated April 25, 2017, Baker (NRC) to R. Johnson (BWXT NOG-L), Reply to BWXT Draft Surety Bond Providing SNM-42 Financial Assurance for Decommissioning
  - (6) Email dated May 11, 2017, Baker (NRC) to R. Johnson (BWXT NOG-L), Reply to BWXT Draft Surety Bond Providing SNM-42 Financial Assurance for Decommissioning

Subject: Amendment to BWXT NOG-L Standby Trust Agreement, Amendment to Chapter 10 of License Application SNM-42, and Replacement of Letter of Credit with Surety Bond

BWXT Nuclear Operations Group, Inc. - Lynchburg (BWXT NOG-L) is providing originally signed documents that establish a surety bond with Argonaut Insurance Company for Lynchburg site (Enclosure 1). Also provided are originally signed documents to amend the Standby Trust Agreement which replace the term "letter of credit" with "surety bond" throughout the document (Enclosure 2). All other provisions of the Trust Agreement remain unchanged. The surety bond valued at \$32,903,313.00 is identical with respect to the existing Letter of Credit and recently approved decommissioning cost estimate found in Chapter 10 of the SNM-42 License Application (Reference 2). We are not submitting a revised Decommissioning Cost Estimate (DCE) at this time; however, BWXT NOG-L is requesting approval to revise Chapter 10 by replacing "letter of credit" with "surety bond" (Enclosure 3).

NM5520  
MDDI



BWX Technologies, Inc.

With regard to the Standby Trust Agreement (STA), BWXT NOG-L submitted a request on January 6, 2017, to change the Trustee from Union Bank to Regions Bank (Reference 3). Assuming the imminent acceptance of that request, the attached STA amendment is associated with the agreement with Regions Bank, and not Union Bank.

### Standby Trust Agreement Request

If not already accomplished, in your response to this letter, please address the following request from the letter identified in Reference 3: "BWXT NOG-L, at the behest of Union Bank, requests that the NRC specifically express acceptance of Regions Bank as the new trustee and relinquishes Union Bank from any further obligation."

In addition, NRC is requested, upon acceptance and agreement, to execute Amendment No. 1 to the STA with Regions Bank and return a copy to BWXT NOG-L in care of Chris Terry at the following address:

Chris Terry  
Manager, Licensing and Safety Analysis  
MC- 81  
PO Box 785  
Lynchburg, VA 24501

### Letter of Credit Request

Given that the surety bond with Argonaut Insurance Company is intended to replace the letter of credit through Credit Agricole, BWXT NOG-L is providing a 'Cancellation Notice' affecting the contract with Credit Agricole (Enclosure 4). NRC is requested, upon acceptance and agreement, complete the following with respect to the return for cancellation of Credit Agricole SBLC No. 835737019:

- 1) Complete and sign the attached 'Cancellation Notice' on NRC letterhead;
- 2) Return the original SBLC, together with all amendments, and the executed 'Cancellation Notice' to Credit Agricole at the address noted in the notice;  
and
- 3) Provide BWXT NOG-L with a PDF copy of the executed "Cancellation Notice" and the courier tracking number for the documents returned to Credit Agricole.

## Chapter 10 of SNM-42 License Application

The following changes to Chapter 10 are being submitted for approval. Only page 10-5 and 10-6 are affected; however, the entire Chapter 10 is attached for completeness.

Changes	Justification
<b>Table 10.3:</b>  Replace "Letter of Credit" with " Surety Bond" for Downblend and LTC Assurance	The Credit Agricole Letter of Credit (LOC) is being replaced with a Surety Bond via Argonaut Insurance Company.
<b>10.3.3- Financial Assurance for LTC:</b>  Replaced "...the Letter of Credit (LOC). LOCs exist that cover the total decommissioning liability" with "... a surety bond. A surety bond exists that covers the total decommissioning liability."	The Credit Agricole Letter of Credit (LOC) is being replaced with a Surety Bond via Argonaut Insurance Company.
<b>10.3.4- Financial Assurance for Downblending Area:</b>  Replaced "... the LOC. LOCs exist that cover the total decommissioning liability." with "... a surety bond. A surety bond exists that covers the total decommissioning liability."	The Credit Agricole Letter of Credit (LOC) is being replaced with a Surety Bond via Argonaut Insurance Company.

To prevent any gap in coverage, all replacement financial instruments are fully executed and incurring significant fees until the NRC formally communicates their agreement and acceptance to the involved institutions. Therefore, we respectfully request an expedited review and return of the STA, release of Union Bank as Trustee, and release of the Credit Agricole letter of credit.

Enclosure 5 includes a copy of the emails identified in references 4, 5, & 6.

If you have questions or require additional information, please contact Chris Terry, Manager of Licensing and Safety Analysis, at [cterry@bwxt.com](mailto:cterry@bwxt.com), or 434-522-5202.

Sincerely,



B. Joel Burch  
Vice President and General Manager  
BWXT Nuclear Operations Group, Inc. - Lynchburg

Enclosures

cc: NRC, Region II  
NRC, Resident Inspector  
NRC, M. Baker, Senior Project Manager

# ENCLOSURE 1

Surety Bond Documentation  
Argonaut Insurance Company

## DECOMMISSIONING SURETY BOND

Date Bond Executed: May 23, 2017

Effective Date: May 23, 2017

Principal: BWXT Nuclear Operations Group, Inc.  
2016 Mount Athos Road  
Lynchburg, VA 24504

Type of Organization: Corporation

State of Incorporation: Delaware

License Number: SNM-42

Docket Number: 70-27

Surety: Argonaut Insurance Company  
P.O. Box 469011  
San Antonio, TX 78246

Trustee: Regions Bank

Total Penal Sum of Bond: \$32,903,313.00

Bond Number: SUR0032602

KNOW ALL PERSONS BY THESE PRESENTS, That we, the Principal and Surety hereto are firmly bound to the United States Nuclear Regulatory Commission (hereinafter called "the Commission"), in the above penal sum for the payment of which we bind ourselves, our heirs, executors, administrators, successors, and assigns jointly and severally.

WHEREAS the Commission, an agency of the United States Government, under its authority pursuant to the Atomic Energy Act of 1954, as amended, and the Energy Reorganization Act of 1974, has promulgated regulations in Title 10, Chapter I of the Code of Federal Regulations (CFR), Parts (30, 40, 70 or 72), which require that a holder of or an applicant for a license issued under 10 CFR Parts (30, 40, 70, or 72) provide assurance that funds will be available when needed for decommissioning, and

WHEREAS said Principal is required to provide financial assurance for decommissioning as a condition of License No. SNM-42, Docket No. 70-27, and

WHEREAS said Principal shall establish a standby trust fund for decommissioning costs as is required when a surety bond is used to provide such financial assurance;

NOW, THEREFORE, the conditions of this obligation are such that if the Principal shall faithfully perform decommissioning, whenever required to do so, in accordance with the decommissioning plan and other requirements of the license as such plan and license may be amended, pursuant to all applicable laws, statutes, rules, and regulations, as such laws, statutes, rules, and regulations may be amended,

OR, if the Principal shall provide alternate financial assurance as specified in 10 CFR Part 70.25 and obtain from the Commission the written approval of such alternate financial assurance, within 30 days after the date notice of cancellation is received by both the Principal and the Commission from the Surety, then this obligation shall be null and void, otherwise it is to remain in full force and effect.

The Surety shall become liable on this bond obligation only when the Principal has failed to fulfill the conditions described above.

Upon notification by the Commission that the Principal has been found in violation of the decommissioning requirements of 10 CFR Parts (30, 40, 70, or 72) for which this bond guarantees performance of decommissioning, the Surety shall place the amount guaranteed for decommissioning into the standby trust fund for decommissioning costs as directed by the Commission.

Upon notification by the Commission that the Principal has failed to provide alternate financial assurance as specified in 10 CFR Part 70.25, and obtain written approval from the Commission of such alternate financial assurance during the 30 days following receipt by both the Principal and the NRC of a notice of cancellation of this bond, the Surety shall place the amount guaranteed for decommissioning into the standby trust fund for decommissioning costs as directed by the Commission.

The Surety hereby waives notification of amendments to decommissioning plans, licenses, applicable laws, statutes, rules, and regulations and agrees that no such amendment shall in any way alleviate its obligation on this bond.

The liability of the Surety shall not be discharged by any payment or succession of payments hereunder, unless and until such payment or payments shall amount in the aggregate to the penal sum of this bond, but in no event shall the obligation of the Surety hereunder exceed the amount of said penal sum.

The Surety may cancel the bond by sending notice of cancellation by certified mail to the Principal and to the Commission, provided, however, that cancellation shall not occur during the 90 days beginning on the date of receipt of the notice of cancellation by both the Principal and the Commission, as evidenced by the return receipts.

The Principal may terminate this bond by sending written notice to the Surety, provided, however, that no such notice shall become effective until the Surety receives written authorization for termination of this bond by the Commission.

Principal and Surety hereby agree to adjust the penal sum of the bond as necessary so that it guarantees a new decommissioning amount, provided that the penal sum does not increase by more than twenty percent (20%) in any one year, and no decrease in the penal sum takes place without the written permission of the Commission.

IN WITNESS WHEREOF, the Principal and Surety have executed this DECOMMISSIONING SURETY BOND and have affixed their seals on the date set forth below.

The persons whose signatures appear below hereby certify that they are authorized to execute this surety bond on behalf of the Principal and Surety.

PRINCIPAL

BWXT Nuclear Operations Group, Inc.



Kirt J. Kubbs  
Treasurer

(Corporate Seal)

CORPORATE SURETY

Argonaut Insurance Company  
P.O. Box 469011  
San Antonio, TX 78246

State of Incorporation: Illinois

Surety's qualification in jurisdiction where licensed facility is located: [ As listed in Circular 570 as qualified in the Commonwealth of Virginia; see attached Certificate of Authority ]

Liability Limit: \$75,285,000.00



David T. Miclette  
Attorney-in-Fact

(Corporate Seal)

Bond Premium: \$ 329,033.13

**Argonaut Insurance Company**  
**Deliveries Only: 225 W. Washington, 24th Floor**  
**Chicago, IL 60606**  
**United States Postal Service: P.O. Box 469011, San Antonio, TX 78246**

**POWER OF ATTORNEY**

KNOW ALL MEN BY THESE PRESENTS: That the Argonaut Insurance Company, a Corporation duly organized and existing under the laws of the State of Illinois and having its principal office in the County of Cook, Illinois does hereby nominate, constitute and appoint:

David G. Miclette, Edward G. Britt, Jr., David T. Miclette, Barry K. McCord, Kristi Lovett, Ashley Britt, Joni Bowen, Rita G. Gulizo, Tabitha Starkey, Jennie Goonie

Their true and lawful agent(s) and attorney(s)-in-fact, each in their separate capacity if more than one is named above, to make, execute, seal and deliver for and on its behalf as surety, and as its act and deed any and all bonds, contracts, agreements of indemnity and other undertakings in suretyship provided, however, that the penal sum of any one such instrument executed hereunder shall not exceed the sum of:


\$50,000,000.00

This Power of Attorney is granted and is signed and sealed under and by the authority of the following Resolution adopted by the Board of Directors of Argonaut Insurance Company:

"RESOLVED, That the President, Senior Vice President, Vice President, Assistant Vice President, Secretary, Treasurer and each of them hereby is authorized to execute powers of attorney, and such authority can be executed by use of facsimile signature, which may be attested or acknowledged by any officer or attorney, of the Company, qualifying the attorney or attorneys named in the given power of attorney, to execute in behalf of, and acknowledge as the act and deed of the Argonaut Insurance Company, all bond undertakings and contracts of suretyship, and to affix the corporate seal thereto."

IN WITNESS WHEREOF, Argonaut Insurance Company has caused its official seal to be hereunto affixed and these presents to be signed by its duly authorized officer on the 18th day of July, 2013.



Argonaut Insurance Company  
by: 

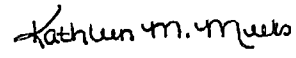
Joshua C. Betz, Senior Vice President

STATE OF TEXAS  
COUNTY OF HARRIS SS:

On this 18th day of July, 2013 A.D., before me, a Notary Public of the State of Texas, in and for the County of Harris, duly commissioned and qualified, came THE ABOVE OFFICER OF THE COMPANY, to me personally known to be the individual and officer described in, and who executed the preceding instrument, and he acknowledged the execution of same, and being by me duly sworn, deposed and said that he is the officer of the said Company aforesaid, and that the seal affixed to the preceding instrument is the Corporate Seal of said Company, and the said Corporate Seal and his signature as officer were duly affixed and subscribed to the said instrument by the authority and direction of the said corporation, and that Resolution adopted by the Board of Directors of said Company, referred to in the preceding instrument is now in force.

IN TESTIMONY WHEREOF, I have hereunto set my hand, and affixed my Official Seal at the County of Harris, the day and year first above written.

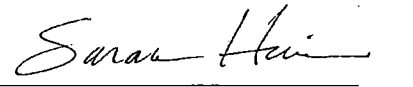


  
\_\_\_\_\_  
(Notary Public)

I, the undersigned Officer of the Argonaut Insurance Company, Illinois Corporation, do hereby certify that the original POWER OF ATTORNEY of which the foregoing is a full, true and correct copy is still in full force and effect and has not been revoked.

IN WITNESS WHEREOF, I have hereunto set my hand, and affixed the Seal of said Company, on the 23rd day of May, 2017.



  
\_\_\_\_\_  
Sarah Heineman, VP-Underwriting Surety



# Commonwealth of Virginia

## STATE CORPORATION COMMISSION

July 1, 2016

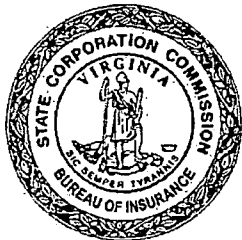
ARGONAUT INSURANCE COMPANY  
225 W WASHINGTON ST FL 24  
CHICAGO IL 60606

is hereby licensed to transact the business of

Aircraft Liability	Fire
Aircraft Physical Damage	Glass
Animal	Inland Marine
Auto Liability	Liability Other than Auto
Auto Physical Damage	Misc Property & Casualty
Boiler & Machinery	Ocean Marine
Burglary & Theft	Surety
Commercial Multi-Peril	Water Damage
Farmowners Multi-Peril	Workers Compensation & Employers'
Fidelity	Liability

in the Commonwealth of Virginia through the thirtieth day of June next succeeding the date hereof unless this license shall be sooner revoked or otherwise cancelled.

ID: 19801



State Corporation Commission  
Bureau of Insurance

By: Jacqueline K. Conlan  
Commissioner

# ENCLOSURE 2

Standby Trust Agreement Amendment  
Regions Bank

**AMENDMENT No. 1**  
**To**  
**Trust Agreement Dated December 6, 2016**  
**By And Between**  
**BWXT Nuclear Operations Group, Inc. (as "Grantor")**  
**And**  
**Regions Bank (as "Trustee")**  
**(the "Trust Agreement")**

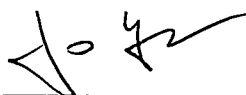
NOW THEREFORE, the parties to the Trust Agreement hereby agree that, effective as of the date of this Amendment No. 1, the form of financial assurance provided by the Grantor to NRC and referenced in the Trust Agreement shall be amended from "letter of credit" to "surety bond".

All other provisions of the Trust Agreement remain unchanged.

This Amendment No. 1 shall be administered, construed and enforced according to the laws of the State of New York.

IN WITNESS WHEREOF, the parties hereto have caused this Amendment No. 1 to be executed by the respective officers duly authorized effective as of this 23<sup>rd</sup> day of May, 2017.

**BWXT Nuclear Operations Group, Inc.**  
**As Grantor**



\_\_\_\_\_  
By: Joseph G. Henry  
Its: President

**Regions Bank**  
**As Trustee**



\_\_\_\_\_  
By: VAN K. BROWN  
Its: VICE PRESIDENT

**ACCEPTED AND AGREED BY:**

**United States Nuclear Regulatory Commission**

\_\_\_\_\_  
By:  
Its:  
Date:

# ENCLOSURE 4

'Cancellation Notice' Affecting the Contract with Credit  
Agricole

[ NRC LETTERHEAD ]

Date: \_\_\_\_\_

To: Crédit Agricole Corporate and Investment Bank  
Crédit Agricole CIB Building  
1301 Avenue of the Americas  
New York, New York 10019-6022  
Attn: Standby Letter of Credit Department

From: U.S. Nuclear Regulatory Commission  
11545 Rockville Pike  
Rockville, Maryland 20852

**RE: Crédit Agricole Corporate and Investment Bank Standby Letter of Credit No. 835737019  
issued for the account of BWXT Nuclear Operations Group, Inc. for the benefit of the U.S.  
Nuclear Regulatory Commission**

Dear Sir/Madam:

We hereby provide notice to Crédit Agricole Corporate and Investment Bank that the above referenced standby letter of credit is no longer required by the beneficiary, and we return the enclosed original standby letter of credit, together with all amendments thereto, for immediate and irrevocable cancellation by Crédit Agricole Corporate and Investment Bank.

Sincerely,

**U.S. NUCLEAR REGULATORY COMMISSION**

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By: [Name]  
Its: [Title]

# ENCLOSURE 5

Emails Regarding BWXT Draft Surety Bond  
Providing SNM-42 Financial Assurance for  
Decommissioning

## Johnson, Robert L

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**From:** Johnson, Robert L  
**Sent:** Tuesday, April 11, 2017 1:06 PM  
**To:** 'Merritt.Baker@nrc.gov'  
**Cc:** Ward, David C; Spangler, David L; Terry, Chris T; Subosits, Stephen G; Genzale, Anthony A.; Kubbs, Kirt J  
**Subject:** BWXT Draft Surety Bond Providing NOG-L SNM-42 Financial Assurance for Decommissioning  
**Attachments:** NRC NOG License SNM-42 Surety Bond Form v170406.docx

Hi Nick,

Please see the attached draft Surety Bond created by Argonaut Insurance Company intended to be used as the financial instrument to cover decommissioning costs as required by 10 CFR 70.25. As discussed before per teleconference, the surety bond will replace the current Letter of Credit(LOC) with Credit Agricole. Also, the Standby Trust Agreement (STA) will be updated to reflect the replacement of the LOC with the surety bond once implemented. Please note, the total amount of the surety bond is equal to the current LOC, which in turn is identical to the full amount of the decommissioning costs identified in Chapter 10 of our license, SNM-42.

The surety bond attached meets the requirements of 10 CFR 70.25 (f).

Please forward this information to Ken Kline or other relevant party. BWXT is requesting that the NRC review the attached draft document, provided feedback as necessary, and indicate that BWXT can move forward with the alternate financial method given pertinent NRC conditions. Per the 10 CFR 70.25, BWXT concludes that the surety bond is equivalent in adequacy to provide for decommissioning funds to the trustee, Regions Bank, and the amount of financial assurance will not be adjusted downward as a result of this change.

BWXT requests NRC concurrence with our estimation that prior NRC approval is not required for this transaction given that the surety bond is effectively equivalent to the LOC and the amount of financial assurance has not been adjusted downward; however, per §70.25(f), BWXT is required to submit within 30 days the financial instruments reflecting the aforementioned changes.

Thank you for your time and consideration.

Warm Regards,

*Robert Johnson*

Rob Johnson CSP, PMP, MBA, MS  
Sr. Licensing and Safety Analyst  
BWXT Nuclear Operations Group- Lynchburg  
ofc 434.522.5969

## Johnson, Robert L

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**From:** Baker, Merritt <Merritt.Baker@nrc.gov>  
**Sent:** Tuesday, April 25, 2017 12:06 PM  
**To:** Johnson, Robert L; Terry, Chris T  
**Subject:** EXTERNAL: FW: RE: FW: BWXT Draft Surety Bond Providing SNM-42 Financial Assurance for Decommissioning

Hi Rob

See Ken's changes described below. He recognizes that we're in a draft stage, so you might as well make the changes and send it in formally.

Regards

Nick

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**From:** Kline, Kenneth  
**Sent:** Tuesday, April 25, 2017 11:39 AM  
**To:** Baker, Merritt <Merritt.Baker@nrc.gov>  
**Cc:** McKenney, Christopher <Christopher.McKenney@nrc.gov>  
**Subject:** RE: RE: FW: BWXT Draft Surety Bond Providing SNM-42 Financial Assurance for Decommissioning

Nick, a couple of small things as they don't follow the template in guidance. The checklists in guidance (pages A-57 through A-59 of NUREG-1757, Vol. 3, Rev. 1) indicate the bond should state the "Surety's qualification in jurisdiction where licensed facility is located" and should list the bond premium. Neither of these are in the draft submitted by BWXT. We also didn't get a copy of the broker/agent's power of attorney authorizing the broker/agent to issue bonds (that is okay at this draft stage, but we will need it in the final submittal). Finally, I don't recall the last cost estimate amount. I just want to confirm the bond amount of \$32,903,313 covers it?

Ken

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**From:** Baker, Merritt  
**Sent:** Friday, April 21, 2017 8:42 AM  
**To:** Kline, Kenneth <Kenneth.Kline@nrc.gov>  
**Subject:** FW: RE: FW: BWXT Draft Surety Bond Providing SNM-42 Financial Assurance for Decommissioning

Hi Ken

BWXT has reviewed your feedback and appreciate the difference between a *payment* bond as opposed to a *performance* bond. BWXT has subsequently updated the language to eliminate the performance aspect of the bond. In addition, they reviewed NUREG-1757 Vol 3 Rev 1, section A.5 *Surety Bonds*.

The attached pdf "NRC NOG License SNM-42 Surety Bond Form v170420(redline).pdf" demonstrates our adjustments to the original bond form submitted on 4/11/17 in light of the feedback

The attached word document "NRC NOG License SNM-42 Surety Bond Form v170420.docx" represents their finalized bond form after accepting the adjustments noted in the red-lined pdf document.

Please review the attached and provide any feedback once again. BWXT intends to make an official submittal once they have confidence that the draft is acceptable. Also, after the draft is deemed acceptable, BWXT will



request concurrence from the NRC that prior NRC approval is not required for this transaction given that the surety bond is effectively equivalent to the LOC and the amount of financial assurance has not been adjusted downward; however, per §70.25(f), BWXT acknowledges that it is required to submit within 30 days the financial instruments reflecting the changes.

Thanks again

Nick

## Johnson, Robert L

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**From:** Baker, Merritt <Merritt.Baker@nrc.gov>  
**Sent:** Thursday, May 11, 2017 10:37 AM  
**To:** Johnson, Robert L  
**Subject:** EXTERNAL: FW: BWXT financials L33435

Hi Rob

See the below from ken Kline

This looks like a 'go'

Regards

Nick

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**From:** Kline, Kenneth  
**Sent:** Thursday, May 11, 2017 10:28 AM  
**To:** Baker, Merritt <Merritt.Baker@nrc.gov>  
**Subject:** RE: BWXT financials L33435

Yes, that is reasonable. Their submittal should clearly state that they request the use of the recently approved cost estimate (Nov. 2016) rather than submit another cost estimate at this time.

Ken

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**From:** Baker, Merritt  
**Sent:** Thursday, May 11, 2017 9:48 AM  
**To:** Kline, Kenneth <Kenneth.Kline@nrc.gov>  
**Subject:** BWXT financials L33435

Hi Ken

Sorry to keep asking different versions of the same question

As I understand it, we

- (1) Recently approved the decommissioning cost estimate (Chapter 10) via amendment 23 on 11/8/2016 with a final price of \$32, 903,313.00
  - a. This action is closed
- (2) Still have in house the request to change banks for the Letter of Credit and Standby Trust Agreement – see CAC L33435
  - a. I believe that you said this looks OK because and it has the correct dollar amount
- (3) You agreed that the **draft** insurance bond looks OK if the final 3 changes are made
  - a. Since this was a draft for comment, there's no CAC number
  - b. you said it ought to be submitted for approval per 10 CFR 70.25(e)

I looked at 10 CFR 70.25( e) and it says that

- (1) the Decommissioning Funding Plan (BWXT's Chapter 10) must contain a detailed estimate, contingency, etc. [see 70.25( e)(i)(1)(A-D)]

- (2) description of the method for assuring funds . [see 70.25( e)(iii) and section 10.3 of the license application
- (3) signed original or copy (if permitted) of the financial instrument . [see 70.25( e)(v)]

It looks to me as if the thing to do is

- (1) make the changes to the affected sections of chapter 10 of the license application where they describe the LOC and replace with text about the insurance
- (2) make the last 3 changes to the insurance instrument
- (3) submit a request to amend chapter 10, but not re-examine the details of the cost estimate, and include the insurance instrument

what do you think?

Nick