



September 26, 2017

Via e-mail: christopher.grossman@nrc.gov

Mr. Christopher Grossman, Project Manager
Division of Decommissioning, Uranium Recovery and Waste Programs
Office of Nuclear Materials Safety and Safeguards
U.S. Nuclear Regulatory Commission
11545 Rockville Pike
Two White Flint North
Rockville MD 20852-2738

Re: **Renewal of License SUC-1591, Docket 40-9059** –
Delay in NRC Staff Review of WRT's Responses to RAIs dtd. 7/18/2017

Dear Mr. Grossman:

In your e-mail to me on September 20, 2017, you explained that both you and the NRC Staff reviewers that are working on WRT's license renewal have yet to receive WRT's responses and the digital support documents, both responding to NRC's Request for Additional Information (RAI) referenced above. In addition to being concerned about how this nearly one-month delay will affect the overall schedule for the license renewal, WRT management is also concerned about how this delay may increase or extend NRC's billing for the license renewal. This concern comes along with the fact that WRT has already not only disputed the past two quarterly invoices for the license renewal, but also requested from NRC/OCFO either an exemption from or a reclassification of its Part 170 Program Code and the associated classification for the annual license-support fee.

Regarding the delay receiving the responses from the Document Control Desk (DCD), I briefly want to say that WRT now understands that the pdf documents submitted must be in a searchable-pdf format, so that the digital documents can be entered into ADAMS, and we are working on resolving that issue. While the digital documents may not have been compatible for ADAMS, they were still readable and useable pdf document, and we do not understand why the responses to the RAIs and the digital support documents were not forwarded to the Staff, so that the license renewal review could continue.

WRT's concern for the possible billing for the third quarter 2017: WRT expects that there should be minimal hours, if not no hours, charged by Staff for this quarter, based in part on the following timeline.

- NRC sent the final RAIs to WRT on July 18, 2017, near the start of the quarter;
- The DCD received WRT's responses to the RAIs, including the digital support documents on August 24, 2017;

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- Based on your e-mail on September 20, 2017, you and the Staff had not yet received WRT's response package from the DCD, and even a draft version of the renewal license conditions was not ready for WRT's review. Accordingly, we assume that little work, if any, was done on the license conditions, likely pending review of WRT's responses, which didn't happen yet.

So, in summary, WRT feels that nearly the whole third quarter has gone by with the Staff likely doing very little work on the WRT renewal. This is the reason why WRT is expecting minimal charges to the license renewal project for the quarter. Also, since WRT has not yet received any response from NRC/OCFO to its request for an exemption or relief from the Part 170 fees, we do not know what they are thinking, and so I appreciate NRC's consideration here of WRT's concern for additional charges to the project. Chris, I also welcome your comments and thoughts.

Best regards,



Duane W. Bollig
Director – Environmental & Regulatory Affairs

