

November 17, 2017

Mr. Dennis Lawyer, Senior Health Physicist
U.S. Nuclear Regulatory Commission, Region I
Division of Nuclear Safety, Decommissioning & Technical Support Branch
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713

Re: TerranearPMC, LLC (TPMC) Request for Relief from U.S. Nuclear Regulatory Commission (NRC) Decommissioning Timeliness Rule (DTR) Requirements – RML No. 37-31379-02- Additional Information

Dear Mr. Lawyer:

This letter is in response to your telephone conversation with our Corporate Radiation Safety Officer, Mr. Ted Adams on November 14, 2017. In that conversation, you requested that additional information be provided by TerranearPMC, LLC (TPMC) to complete your review of our request for relief from the U.S. Nuclear Regulatory Commission Timeliness Rule (DTR) requirements which we submitted to the NRC on September 29, 2017.

NRC Request for Additional Information

The requested additional information included three (3) items.

1. Authorization of Mr. Adams's submittal of the subject request.
2. Justification/basis of TPMC's statement "is otherwise in the public interest" presented in Item 5 of the request.
3. Length of time requested by TPMC for the relief.

TPMC Response to NRC Request for Additional Information

1. Mr. Adams is the TPMC Corporate Radiation Safety Officer and hence, was/is authorized to submit licensing related information to the NRC including the request for relief from the timeliness rule in his letter dated September 29, 2017.

2. The justification/basis for the statement “is otherwise in the public interest” is that the termination of the TPMC license (and similar licensees) would in effect reduce the number of competent NRC service provider licensees that would be qualified/licensed to provide bids or proposals to commercial and governmental Clients. This reduction would result in fewer competitors providing bids/proposals. Hence, the result would be an increase in the cost of the work to be performed due to the lack of additional competition that would be provided by TPMC (and similar licensees). Reduced costs for work to be performed by NRC service provider licensees such as TPMC is clearly in the public interest and is directly beneficial to the public.
3. TPMC requests that a two (2) year extension be granted by the NRC. The requested extension would start on October 1, 2017 and end September 30, 2019.

Please don't hesitate to give Ted Adams a call (716-592-3431) if you have any questions regarding this request.

Sincerely,

A handwritten signature in black ink, appearing to read 'AR', written in a cursive style.

Amar Raval
Chairman
TerranearPMC, LLC