

Interim Staff Guidance

**Decommissioning Funding Plans
Materials Licensees**

Interim Staff Guidance

Overview

- Decommissioning Funding Plans (DFPs) covering current facility conditions including onsite inventory onsite
- Efficiencies preparing DFPs
- Three items pertaining to Financial Instruments

Interim Staff Guidance

DFPs Covering Current Facilities Conditions

- Part 70 licensees covering inventory
- (ML16307A014) NRC response to NEI which outlines a number of acceptable ways to meet the regulation
 - Licensee owned - contract in place where another party pays for packing, loading and shipping to an end destination
 - Customer owned - customer retains legal title to the material and is contractually responsible for packing, loading and shipping to an end destination
 - In-process inventory - justify a brief timeframe to process the material through into finished product, and then it will fall into licensee-owned or customer-owned inventory

Interim Staff Guidance

Efficiencies Preparing Decom Funding Plans

- Make sure to include the 8 factors required by 30.35(e)(2), 40.36(d)(2) and CFR 70.25(e)(2):
 - Spills of radioactive material producing additional residual radioactivity in onsite subsurface material
 - Waste inventory increasing above the amount previously estimated
 - Waste disposal costs increasing above the amount previously estimated
 - Facility modifications

Interim Staff Guidance

Efficiencies Preparing Decom Funding Plans (Continued)

- Changes in authorized possession limits
- Actual remediation costs that exceed the previous cost estimate
- Onsite disposal
- Use of a settling pond

Based on these requirements, providing a narrative in the DFP describing these factors will assist to reduce the number of RAIs and in completing the approval process, the Safety Evaluation Report.

Interim Staff Guidance

Financial Instruments

- Send original hard copy financial instruments directly to site PM not NRC Document Control as DC does not maintain original hard-copy documents
- For approval, NRC staff needs to review all agreements including any side letters to the financial instruments
- A template sight draft is being provided a sight draft as typically banks require a sight draft to draw on the financial instrument

Interim Staff Guidance

Other Areas

- Working to identify other areas in guidance which may need updating to include in the ISG

Interim Staff Guidance

Schedule

- Draft ISG is scheduled to be completed end of June 2018
- 45-day public comment on draft ISG
- Final ISG is scheduled to be completed end of October 2018