



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

May 16, 2018

Mr. T. J. Tate, Manager
Environmental, Safety, Health
and Licensing
Framatome Inc.
2101 Horn Rapids Road
Richland, WA 99354

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING TRIENNIAL UPDATE
TO DECOMMISSIONING FUNDING PLAN (ENTERPRISE PROJECT IDENTIFIER
L-2018-DFA-0001)

Dear Mr. Tate:

We have reviewed your updated decommissioning funding plan (DFP) transmitted by your letter dated January 17, 2018. Our review has identified additional information that is needed before a final action can be taken. The information listed below is required to verify compliance with the requirements in Title 10 of the *Code of Federal Regulations* (10 CFR) Paragraph 70.25(e)(2). The information should be provided to us within 30 days of the date of this letter. Please reference Enterprise Project Identifier L-2018-DFA-0001 in your response.

1. Your 2016 DFP submittal included a revision of Key Assumption 10. Your updated DFP fails to include the revised language. You need to retain this information (either verbatim or by reference) or explain why it no longer applies.
2. Your 2016 DFP contains the following line item in Table 12. The inventory disposition cost does not appear in the 2018 DFP. What is the basis for removing that cost?
Table 12 Miscellaneous Costs - Production and Production Support Facilities
No longer contains line item:
USEC UF6 Inventory Disposition
3. Comparing Table 26 in the 2016 DFP to Table 26 in the 2018 DFP, the low-level radiological disposal rate went from to \$275.71 in 2016 to \$268.53 in 2018. What is the basis for the reduction? Additionally, line item MW- No Disposal Option \$300/ft³ in the 2016 DFP is removed from the 2018 DFP. What is the basis for removing that cost?
4. Regarding the January 24 e-mail from Calvin Manning which covered the 8 regulatory factors, the following factors need more basis than what has been provided:
 - a. "Spills—no spills that will impact decommissioning costs occurred since the last update." Additional information would help us make a finding. Have you reported any unplanned contamination events since the last update?
 - b. Waste inventory increases - A statement is needed regarding changes in the waste inventory since the last update and the reason for the changes (if any).

- c. "Increasing waste disposal costs—the estimated cost increases listed in this update of the DFP are primarily due to increased disposal and labor costs." Additional information would help us make a finding. What factors have changed since the last update? Has the waste volume changed (if so, how much)? Have the disposal charges changed (if so, how much)? Have the labor rates changed (if so, how much)?
- d. "Facility Modifications—no facility modifications were made since the last update that will impact decommissioning costs." Additional information would help us make a finding. Has the footprint of contaminated buildings changed? Has the volume of contaminated piping, duct work, or other equipment changed significantly?

In accordance with 10 CFR Section 2.390, a copy of this letter will be available electronically for public inspection in the U.S. Nuclear Regulatory Commission (NRC) Public Document Room and from the Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions concerning this request for additional information, please contact me by telephone at (301) 415-7506, or via e-mail to Kevin.Ramsey@nrc.gov.

Sincerely,

/RA/

Kevin M. Ramsey, Senior Project Manager
Fuel Manufacturing Branch
Division of Fuel Cycle Safety, Safeguards,
and Environmental Review
Office of Nuclear Material Safety
and Safeguards

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