



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

REGION III  
2443 WARRENVILLE RD. SUITE 210  
LISLE, IL 60532-4352

**MAY 24 2018**

James Seufert  
Radiation Safety Officer  
Grand Valley State University  
1 Campus Drive  
Allendale, MI 49401

Dear Mr. Seufert:

On October 17, 2017, Grand Valley State University submitted to the U.S. Nuclear Regulatory Commission (NRC) a decommissioning funding plan (DFP) including a Statement of Intent to fulfill its requirements under 10 CFR Part 30. The DFP will require additional information to be acceptable.

A review of the DFP, Statement of Intent, and related documents was conducted using the guidance included in NUREG-1757, Volume 3, Revision 1, Appendix A, which applies to licenses granted under 10 CFR Part 30. Grand Valley State University will need to provide the following information to support the cost estimate:

**(1) Submit additional detail on the description of the facility (10 CFR 30.35(e); NUREG-1757, Volume 3, Appendix A)**

In accordance with 10 CFR 30.35(e), licensees are required to identify and justify key assumptions contained in the decommissioning cost estimate. Further guidance is provided in section A.3.1.3 of NUREG-1757, Volume 3, Revision 1, Appendix A. Additional detail is needed to justify the assumptions upon which your decommissioning cost estimate is based.

For example, additional detail is necessary for the basis for the number of facilities and facility components included in the cost estimate for the decontamination of your facilities. The DFP provides a description of the licensee's facilities, however, the facility description does not include a discussion of the areas that will need to be decommissioned or disposed.

In addition, NUREG-1757, Volume 3, Appendix A, Section A.3.1.1 recommends that a detailed facility description be included in the DFP which contains the following:

- specific quantities and types of materials authorized by the license (e.g., by specific isotope);
- general discussion of how licensed materials are used in the licensee's operations;
- description of facility buildings, rooms, and grounds, including the number and dimensions of areas (e.g., laboratories) that require decontamination;
- number and dimensions of facility components (e.g., fume hoods, glove boxes, laboratory benches, ductwork) that require decontamination;

- an estimate of the volume of contaminated material, including that in the subsurface, containing residual radioactivity that will require remediation to meet the criteria for license termination

The decommissioning cost estimate that you submitted does not include any facility dimensions, facility components, or an estimate of the volume of contaminated material which would require remediation.

Please revise the cost estimate to include the additional details necessary to justify the cost of decontamination and dismantling of the necessary facilities and components, as well as addressing all of the isotopes on your license with a half-life greater than 120 days.

**(2) Revise the cost estimate in the DFP to ensure the estimate reflects the assumption that decommissioning activities will be performed by an independent third party contractor (10 CFR 30.35(e); NUREG-1757, Volume 3, Section A.3.1)**

In accordance with 10 CFR 30.35(e) the decommissioning cost estimate is required to reflect the cost of an independent contractor to perform all decommissioning activities. Further guidance is provided in NUREG-1757, Volume 3, Appendix A, Section A.3.1.2

In the cost estimate that you have submitted, you state "I have estimated the costs of this biased on similar work in 2009 and 2010 that we have completed that involved similar components." Because the primary purpose of demonstrating financial assurance is to assure funding is available in circumstances where the licensee is unable or unwilling to pay for the costs of decommissioning, this justification is not sufficient.

In addition, the cost estimate must assume that the decommissioning will take place immediately upon cessation of licensed activities, without additional time to allow for decay of materials.

Please revise the cost estimate to reflect the assumption that decommissioning activities will be completed by an independent third-party contractor and will take place immediately upon cessation of licensed activities.

**(3) Account for labor costs associated with decommissioning activities**

In NUREG-1757, Volume 3, Appendix A, Section A.3.1.2.1, discusses the information needed in a DFP describing the labor costs for each major task or activity. In your cost estimate, you include a table describing the some costs associated with the staffing required to decommission your facility, however, no clear justification for the salaries and the amount of time needed to complete each task is provided. In addition, units are not provided, so it is not clear if the values provided are on per hour or per day basis.

Please revise the cost estimate to more clearly explain the labor costs anticipated to decommission your facility. Please be sure to include a justification for the salary information provided, the total amount of time you anticipate each person will need to work, and the tasks they will be completing.

**(4) Account for decommissioning equipment/supply costs, laboratory costs, and miscellaneous costs (NUREG-1757, Volume 3, Appendix A)**

NUREG -1757, Volume 3, Appendix A recommends that equipment/supply costs, laboratory costs, and miscellaneous costs should be included in the decommissioning cost estimate.

The cost estimate that you submitted includes quotes from contractors on waste disposal costs, however it is not clear what these quotes incorporate. In addition, the costs estimate does not provide an estimate on the additional costs to decommission your facility, such as surveys or analysis of samples.

Please also clarify what the energy surcharge in the cost estimate includes and why the estimated cost is \$0.

Please revise the cost estimate to include the additional equipment and supply costs, laboratory costs, and miscellaneous costs associated with decommissioning.

**(5) Clarify the means to be used for adjusting the cost estimate and associated funding levels over the life of the facility (10 CFR 30.35(e); NUREG-1757, Volume 3, Appendix A)**

In accordance with 10 CFR 30.35(e)(2), licensees are required to update the DFP "at the time of license renewal and at intervals not to exceed 3 years." Furthermore, 10 CFR 30.35(e) requires licensees to describe the means they will use to adjust decommissioning cost estimates and associated funding levels over the lives of their facilities. The revised cost estimate should address the list of considerations found in 10 CFR30.35 (e)(2)(i-viii).

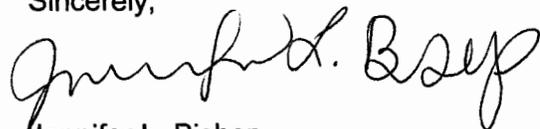
In the DFP that you provided, you do not state the planned frequency or scope of updating the cost estimate. Please revise the DFP to include the frequency and scope of updating the cost estimate.

Please note that if your revisions to the decommissioning cost estimate increases the anticipated costs, a revised Statement of Intent and Certification of Financial Assurance will need to be provided.

A copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Please provide a response within 30 days of receipt of this letter. When responding to the above, please reference as additional information to Control Number 601469. If you have any questions, please feel free to contact me at (630) 829-9607.

Sincerely,



Jennifer L. Bishop  
Materials Licensing Branch