



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
2100 RENAISSANCE BLVD.  
KING OF PRUSSIA, PA 19406-2713

June 11, 2018

Matthew Jewett, Executive Vice President  
Rolls-Royce Nuclear Field Services Inc.  
49 Bennett Drive  
Brattleboro, VT 05301

SUBJECT: ROLLS-ROYCE NUCLEAR FIELD SERVICES INC. REVIEW OF FINANCIAL  
ASSURANCE SUBMITTAL, MAIL CONTROL NO. 602331

Dear Mr. Jewett:

We have reviewed the Amendment Number One to Standby Trust Agreement entered into on January 19, 2018; Schedule A of the Standby Trust dated April 25, 2018; Certification of Financial Assurance dated April 25, 2018; Rider to Surety Bond dated April 18, 2018; and the Updated Decommissioning Cost Estimate dated March 29, 2018, to meet the financial assurance requirements for your license. We have no further questions at this time.

The following documents currently provide your financial assurance:

Certification of Financial Assurance dated April 25, 2018 [ML18120A307];  
Surety Bond effective April 17, 2015 [ML15124A868] with Surety Bond Rider dated  
April 18, 2018 [ML18115A235];  
Standby Trust Agreement dated August 11, 2015 [ML15246A095] and Amendment  
Number One to Standby Trust Agreement entered into on January 19, 2018  
[ML18150A297] with Schedule A of the Standby Trust Agreement dated  
April 25, 2018 [ML18120A307];  
Letter of Acknowledgement dated August 31, 2015 [ML15247A051];  
Certificate of Events and Certificate of Resolution received  
April 26, 2018 [ML18120A307]; and  
Decommissioning Funding Plan Cost Estimate dated March 29, 2018 [ML18100A221]

You had sent us two copies of the Amendment Number One to Standby Trust Agreement documents, but through an administrative error, one of the copies was marked non-negotiable and is not usable. We do have the other copy, but for your records and information, we only have one copy of the Amendment Number One to Standby Trust Agreement. We only need one copy so no further action is needed.

Your organization uses a Decommissioning Funding Plan (DFP) to determine the amount of financial assurance necessary to fund all decommissioning activities. 10 CFR 30.35(e)(2) and 70.25(e)(2) requires that, at the time of license renewal and at intervals not to exceed three years, the DFP must be resubmitted with adjustments as necessary to account for changes in costs and the extent of contamination. Your currently approved DFP was submitted on March 29, 2018; therefore, your DFP must be re-submitted on or before March 29, 2021. The DFP must update the information submitted with the original or prior approved DFP, and must specifically consider the effect of the following events on decommissioning costs: (1) spills of

radioactive material producing additional residual radioactivity in onsite subsurface material; (2) waste inventory increasing above the amount previously estimated; (3) waste disposal costs increasing above the amount previously estimated; (4) facility modifications; (5) changes in authorized possession limits; (6) actual remediation costs that exceed the previous cost estimate; (7) onsite disposal; and (8) use of a settling pond. If the amount of the financial assurance instrument will be adjusted to match the DFP, this cannot be done until the updated DFP is approved by the NRC. If the financial assurance instrument is revised (amended) to change the amount of financial assurance obligated, then you will need to also submit a revised Certificate of Financial Assurance (CFA) with the new amount.

We will return the original copies of the Amendment Number One to Standby Trust Agreement entered into January 19, 2018, under separate cover to Ms. Brooks.

Your cooperation is appreciated.

Sincerely,



Dennis R. Lawyer, Health Physicist  
Commercial, Industrial, R&D  
and Academic Branch  
Division of Nuclear Materials Safety  
Region I

License No. 44-30912-01  
Docket No. 03036563  
Mail Control No. 602331

cc: Thomas J. Dente, Radiation Safety Officer  
Sue Brooks, Legal Counsel

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Sincerely,

Dennis R. Lawyer, Health Physicist  
Commercial, Industrial, R&D  
and Academic Branch  
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[LAT to enter ADAMS Accession No.]

SUNSI Review Complete: DLawyer

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NAME	DLawyer						
DATE	6/11/2018						