

**From:** [Lawyer, Dennis](#)  
**To:** [Kouretas, Malgorzata E CIV USARMY RDECOM ARDEC \(US\)](#)  
**Subject:** Department of the Army, Request for Additional Information Concerning Financial Assurance for a License Amendment, Controls 609280 and 6009281  
**Date:** Wednesday, July 25, 2018 10:42:00 AM

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Dear Ms. Kouretas

This is in reference to your letter dated June 2018, received July 3, 2018, submitting financial assurance documents for Nuclear Regulatory Commission License Nos. 29-00047-02, and SUB-348, Docket Nos. 03005215 and 04006377. In order to continue our review, we need the following additional information:

1. The Certification of Financial Assurance does not certify for Part 70 materials which would need to be included due to the licensed amount of plutonium. Please include the statements for Part 70 materials for unsealed special nuclear materials in the Certification of Financial Assurance and certification statement.
2. The Certification of Financial Assurance appears to have the incorrect amount of Californium 252 listed when compared to License No. 29-00047-02, Amendment 55, Item 8.J. Please correct the maximum amount.
3. When adding the costs provided in the Decommissioning Funding Plan, it appears to add to \$979,982 and not \$972,543. Please provide the specific addition sheet from a program or adding machine for comparison, or correct the amount.
4. In the Decommissioning Funding Plan section on Building 320 item g., Cold Lab Ceiling, and older factor was used for calculating cost of \$182 per square meter instead of the current use of \$206 per square meter. Please correct this error.
5. The current Statement of Intent dated April 24, 2015, lists the terminated license No. 29-00047-06. Also the amount on the Statement of Intent is almost twice the amount required for financial assurance. It is recommended that this be resubmitted to correct the License Nos.

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office (Address below) and refer to Mail Control Nos. 609280 and 6009281. If you have technical questions regarding this letter, please call me at (610) 337-5366.

Your reply must be an originally signed and dated letter. The letter may be scanned and submitted as a pdf document attached to an email; or it may be transmitted by facsimile to (610) 337-5269; or it may be sent by regular mail. If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application OR amendment request.

Please respond by e-mail to acknowledge that you have received the e-mail request for additional information.

Region 1 Office Mailing Address: Licensing Assistance Team, US Nuclear Regulatory Commission Region I, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406-2713.

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