



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

October 31, 2018

John F. Hedderich, III, Director, ARDEC
Department of the Army
Armament Research, Development and Engineering Center (ARDEC)
Attn: RDAR-D
Building 93
Picatinny, NJ 07806-5000

SUBJECT: DEPARTMENT OF THE ARMY, REVIEW OF FINANCIAL ASSURANCE
SUBMITTAL, CONTROL NOS. 609280 AND 609281

Dear Mr. Hedderich:

We have reviewed the letters dated June 2018, August 2018, and October 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 October 2018 (ML18289A356)
Decommissioning Funding Plan dated June 12, 2018 (ML18276A144)
Statement of Intent dated August 1, 2018 (ML18276A144)

We will return the original copies of superseded documents under separate cover. We will return the original copies of superseded documents under separate cover

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), 40.36(d)(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 August 2018; therefore, your DFP must be re-submitted on or before August 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.

J. Hedderich

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Your cooperation is appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis R. Lawyer". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

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

License Nos. 29-00047-02 and SUB-348
Docket Nos. 03005215 and 04006377
Mail Control Nos. 609280 and 609281

cc: Malgorzata Kouretas, Radiation Safety Officer

DEPARTMENT OF THE ARMY, REVIEW OF FINANCIAL ASSURANCE SUBMITTAL,
CONTROL NOS. 609280 AND 609281 DATED October 31, 2018

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SUNSI Review Complete: DLawyer

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NAME	DLawyer							
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