

DOCKET NUMBER: 70-1257

LICENSE NUMBER: SNM-1227

LICENSEE: Framatome, Inc.  
2101 Horn Rapids Road  
Richland, WA 99354-0130

SUBJECT: SAFETY EVALUATION REPORT: TRIENNIAL UPDATE TO  
DECOMMISSIONING FUNDING PLAN (ENTERPRISE PROJECT  
IDENTIFIER L-2018-DFA-0010)

### 1.0 BACKGROUND

By letter dated November 8, 2018 (Agencywide Documents Access and Management System [ADAMS] Accession Number ML18317A057), Framatome, Inc. (Framatome or the licensee) submitted a revised decommissioning funding plan (DFP) for its Richland facility.

### 2.0 REGULATORY REQUIREMENTS

Nuclear facilities licensed under Title 10 of the *Code of Federal Regulations* (10 CFR), Part 70, are required to provide adequate financial assurance for decommissioning, decontamination and reclamation pursuant to 10 CFR Section 70.25, "Financial Assurance and Recordkeeping for Decommissioning." Framatome is the holder of Special Nuclear Material License Number SNM-1227. Pursuant to 10 CFR Paragraph 70.25(e)(2), Framatome is required to submit a DFP and financial assurance at least every 3 years for U.S. Nuclear Regulatory Commission's (NRC's) review and approval.

Framatome remains responsible for the current status and future decommissioning of the licensed site and facility; to abide by all commitments and representations previously made to NRC; and to abide by all constraints, conditions, requirements, representations, and commitments identified in the license. As required by 10 CFR 70.25(e)(2), Framatome must continue to submit an updated cost estimate for decommissioning for NRC's review at intervals not to exceed 3 years. After resolution of any NRC comments on the estimate, Framatome must submit a signed original of the financial instrument reflecting an amount sufficient to cover the approved cost estimate. Framatome remains liable for any decommissioning costs not covered by the financial instrument referenced above.

The NRC utilizes NUREG-1757, Vol. 3, Rev. 1, "Consolidated Decommissioning Guidance Financial Assurance, Recordkeeping, and Timeliness" as guidance to evaluate the DFP submitted by 10 CFR Part 70 licensees.

### 3.0 STAFF EVALUATION

The updated cost estimate in the DFP was reviewed and approved previously in a letter dated July 9, 2018 (ADAMS Accession Number ML18186A236). This letter requested that the licensee submit financial instruments that guarantee funds in the amount of the cost estimate.

An amendment to the existing letter of credit from Credit Industriel et Commercial was submitted previously for the signature of an NRC official. The amendment increased the dollar amount to match the cost estimate, and changed the name of the applicant to Framatome, Inc. All other terms and conditions remained unchanged. The NRC staff found the changes acceptable and returned signed copies of the amendment to Credit Industriel et Commercial on October 9, 2018 (ADAMS Accession Number ML18283A116). The DFP includes a copy of the amended letter of credit.

An amendment to the standby trust agreement between Framatome and State Street Bank and Trust Company was submitted previously for the signature of an NRC official. The amendment increased the dollar amount to match the cost estimate, and changed the name of the applicant to Framatome, Inc. All other terms and conditions remained unchanged. The NRC staff found the changes acceptable and returned signed copies of the amendment to the licensee on October 9, 2018 (ADAMS Accession Number ML18283A047). The DFP includes a copy of the amended standby trust agreement.

The DFP also includes an updated certification by the licensee that financial assurance for decommissioning has been provided in the amount of the cost estimate for decommissioning. The NRC staff finds the certification statement to be acceptable.

#### 4.0 ENVIRONMENTAL REVIEW

This action involves a change to surety requirements. Pursuant to 10 CFR 51.22(c)(10), this is a category of action that does not individually or cumulatively have a significant effect on the human environment. Therefore, neither an Environmental Assessment nor an Environmental Impact Statement is required for this action.

#### 5.0 CONCLUSION

Based on the evaluations discussed above, the staff finds that the updated DFP is acceptable and meets the regulatory requirements to provide financial assurance, as set forth in 10 CFR 70.25(e). The licensee remains liable for any costs not covered by the financial instrument(s).

#### 6.0 PRINCIPAL CONTRIBUTORS

K. Ramsey, NMSS