

**From:** [Lawyer, Dennis](#)  
**To:** [Ramsey, Amy J CIV USARMY RDECOM \(US\)](#)  
**Subject:** Department of the Army, Request for Additional Information Concerning Financial Assurance for a License, Control 608962  
**Date:** Tuesday, February 12, 2019 6:06:00 AM

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Dear Amy Ramsey,

This is in reference to your letter received January 30, 2019, submitting financial assurance for Nuclear Regulatory Commission License No. 19-10306-01, Docket No. 03004552. In order to continue our review, we need the following additional information:

1. In the key assumptions section, the estimated cost listed is based on 2017 dollars spent on a MARSSIM survey performed by a contractor. The most significant cost for the self-shielded irradiators was also based on 2017 cost. The submitted cost estimate needs to be submitted in what decommissioning your facilities costs in today's dollars. Please state that the cost estimate is accurate for 2019 costs or provide adjustments to estimate the cost of decommissioning today.
2. In the key assumptions, you state that no travel or equipment rental costs were used in the estimate since it is assumed that work will be done by ECBC personnel. In NUREG-1757, Volume 3, Rev. 1, "Consolidated Decommissioning Guidance Financial Assurance, Recordkeeping, and Timeliness," section A.3.1, it states, "The site-specific cost estimate required for a DFP must assume that the work will be performed by an independent third party and should represent the licensee's best approximation of all direct and indirect costs of decommissioning its facilities under routine facility conditions." Please perform the calculation as if an independent third party was performing the decommissioning.
3. For all future submittals, please include the date of the calculation. It is difficult referencing the calculation without a date.
4. The following buildings were included in the previous decommissioning cost estimate performed in May 2015 that was not included in this cost estimate: E-2371, E-3334, E3831, E-5325, E-3607, E-3942, E-5604, and E-5951. Please state why these buildings are no longer included in the cost estimate.
5. The radiological square footage of the buildings has changed since the May 2015 submittal. Please provide a statement why these amounts have changed.
6. The totals on the Unsealed and Sealed Radioactive Materials Decommissioning Surveys, appear to be incorrect. The total Rad Square Feet should be 106104, the total number of wipes should be 1680. The scan cost per building total would be \$37, 646, Cost of Wipe Tests would be \$13154, and cost of Direct Measurements \$4620. For the Sealed Only Source Decommissioning Surveys, Table Scan cost per Building total should be \$5720, 520 wipes, and \$4082. Please review your tables and calculations, make corrections and resubmit.
7. Section A.3.2 of NUREG-1757, Vol. 3, Rev. 1, states, "Licensees who use DFPs must specify the means (i.e., the method and frequency) by which they will periodically adjust their cost estimates and associated funding levels over the life of

their facilities.” Please provide this statement.

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 No. 608962. 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.

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.

Dennis Lawyer  
U.S. NRC Region 1  
Health Physicist  
610-337-5366