



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

March 28, 2019

Mr. Richard J. Freudenberger, Director  
Safety and Safeguards  
Nuclear Fuel Services, Inc.  
P.O. Box 337, MS 123  
Erwin, TN 37650

SUBJECT: NUCLEAR FUEL SERVICES, INCORPORATED, REQUEST FOR ADDITIONAL INFORMATION CONCERNING UPDATED DECOMMISSIONING FUNDING PLAN (ENTERPRISE PROJECT IDENTIFICATION CODE L-2018-DFA-0011)

Dear Mr. Freudenberger:

We have reviewed your letter dated November 30, 2018 (Agencywide Documents Access and Management System [ADAMS] Accession Number ML18341A249), transmitting the updated decommissioning funding plan. Our review has identified that the following additional information is needed to complete our review:

1. Clarify the "miscellaneous costs" section in Decommissioning Cost Estimate (DCE).

We acknowledge that, during the last update, we approved the key assumption that the U.S. Department of Energy (DOE) would remove high-enriched uranium (HEU) from the site if operations cease. This is based on the fact that HEU is a strategic resource requiring extensive security measures and that HEU can be transported only by the DOE Office of Secure Transport. However, we are concerned that reviewers of future updates may not understand the statement in the miscellaneous costs section that "...all special nuclear material requiring such security has been removed." Please add the statement, "Planning has established that DOE will retrieve strategic special nuclear material requiring extensive security measures if operations cease," and add a reference to the HEU Materials section.

This information is required to verify compliance with Title 10 of the *Code of Federal Regulations* (10 CFR) Paragraph 70.25(e)(1)(ii) which requires the identification and justification of key assumptions.

2. Provide the basis for statements in the "LEU Materials" section.

In the letter dated August 30, 2016 (ADAMS ML16252A325), Nuclear Fuel Services, Inc. provided a detailed estimate of the cost to load, survey, and ship 10 LR230 Transport containers to Columbia, SC. This cost was compared to the total NFS liability to demonstrate that it was less than 0.25 percent. The DCE needs to retain this level of detail. Provide an updated estimate of this cost in the DCE to demonstrate that it continues to be less than 0.25 percent of the total NFS liability.

This information is required to verify compliance with 10 CFR 70.25(e)(1)(ii) which requires the identification and justification of key assumptions.

The information should be provided to us within 30 days from the date of this letter.

In accordance with 10 CFR Section 2.390 of the U.S. Nuclear Regulatory Commission's (NRC's) "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from ADAMS. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions concerning this letter, please contact me at (301) 415-7506, or via e-mail to [Kevin.Ramsey@nrc.gov](mailto:Kevin.Ramsey@nrc.gov).

Sincerely,

*/RA/*

Kevin M. Ramsey, Senior Project Manager  
Fuel Facility Licensing Branch  
Division of Fuel Cycle Safety, Safeguards,  
and Environmental Review  
Office of Nuclear Material Safety  
and Safeguards

Docket No. 70-143  
License No. SNM-124

cc: T. Knowles, NFS

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**ADAMS Accession No.: ML19079A226**

**\*via email**

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