

P.O. Box 1088
Gallup, New Mexico 87305-1088

Telephone: (505) 905-6651
Fax: (505) 905-6654

UNITED NUCLEAR CORPORATION



March 27, 2018

ATTN: Document Control Desk
Ms. Andrea Kock, Deputy Director
Division of Decommissioning, Uranium Recovery, and Waste Programs
Office of Nuclear Materials Safety and Safeguards
U.S. Nuclear Regulatory Commission
11545 Rockville Pike
Mailstop T8-F05
Rockville, MD 20852-2738

Subject: Church Rock Financial Surety Requirement- Source Material License No. SUA-1475

Dear Ms. Kock:

Source Materials License No. SUA-1475, License Condition 25, requires that United Nuclear Corporation (UNC) provide an annual update of the surety amount and maintain a Nuclear Regulatory Commission (NRC) approved surety arrangement, consistent with 10 CFR 40, Appendix A, Criteria 9 and 10. This letter transmits the annual surety update.

In 2004 UNC completed a comprehensive re-baseline of the surety requirement that was submitted in September of that year. The conditions used in the re-baselined surety calculation have not changed from the re-baselined adjustment. A Site-Wide Supplemental Feasibility Study (SWSFS), directed by U.S. Environmental Protection Agency (EPA) in 2005, is in progress at the site. Completion of the SWSFS is expected to occur in 2018. Additionally, a License Amendment Request (LAR) is being prepared for submittal to the Nuclear Regulatory Commission (NRC) for review. Once the SWSFS and LAR are complete, a review of the study results will be conducted and where applicable, compared against the conditions used in the initial re-baseline calculation.

This correspondence calculates the change to the annual surety amount based on the 30.43% increase in the consumer price index for all urban consumers from the end of October 2004 (190.9) through the end of February 2018 (248.991). As a result of continued steady-state conditions at the site and the ongoing SWSFS and LAR, it is recommended that the surety amount be increased from \$3,270,959 to \$3,422,485 and the license be amended to reflect the change. The following table is included to show how this amount was calculated.

2004 Dollars from Rebaseline Surety Requirement					
Section		Amount			
3.4.1	Monitoring of the Alluvium and Zone 3 S-I Groundwater	433,154			
3.4.2	De-water Zone 3 S-I Groundwater	1,692,966			
3.4.3	Well Decommissioning	23,128			
3.5.2	Decommissioning Surveys	9,025			
3.5.3	Personnel Monitoring	6,000			
3.6	Project Management, Labor, and Miscellaneous	663,509			
3.7	Equipment	534,625			
3.8	Long-Term Surveillance Fee	719,325			
TOTAL		4,081,732			
Calculated in Section 3.10 of 2004 Surety Rebaseline Estimate - Adjustment -		2004 CPI Value	2018 CPI Value	2018 Dollars	
149,248		190.9	248.991	194,664	
9,025		190.9	248.991	11,771	
TOTAL SITE RESTORATION COST MINUS 2,000,000 EPA ASSURANCE BOND		6,000	190.9	248.991	7,826
663,509		190.9	248.991	865,415	
534,625		190.9	248.991	697,312	
719,325		190.9	248.991	938,216	
2004 TOTAL		2,081,732	2018 TOTAL	2,715,204	
15% CONTINGENCY				707,281	
GRAND TOTAL		3,422,485			

I will forward a copy of the bond to you as soon as I receive the reissued certificate rider. As of September 1997, UNC became a wholly-owned, indirect subsidiary of the General Electric (GE) Company. GE Corporate Environmental Programs have been retained through a separate administrative services agreement to assist UNC both technically and administratively with environmental issues at the Church Rock site. Please contact me if you have any questions.

Sincerely,



Roy Blickwedel
Senior Project Manager – Remediation
GE Global Operations - EHS

cc: Jim Smith, NRC (via E-mail)
NRC Region IV
Rick Spitz, Wood (via E-mail)