



U.S. Department
of Transportation
**Maritime
Administration**

Office of Ship Disposal

1200 New Jersey Ave., SE
Washington, DC 20590

Ref: 50.82(a)(7)

May 16, 2019

ATTN: Document Control Desk

U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Docket No. 50-238; License No. NS-1; N.S. SAVANNAH
Change of Planned Decommissioning Activities

- Reference**
- (a) Letter from Mr. Erhard W. Koehler (MARAD) to U.S. Nuclear Regulatory Commission (NRC), dated December 11, 2008, Submittal of Post Shutdown Decommissioning Activities Report, Revision 1
 - (b) Transcript of Proceedings of Nuclear Regulatory Commission Nuclear Ship Savannah Public Meeting, Accession Number ML090770957, dated March 11, 2009.

In accordance with 10 CFR 50.82(a)(7), the Maritime Administration (MARAD) hereby provides notice that MARAD may be performing decommissioning activities inconsistent with actions described in the PSDAR, Reference (a).

The actions described in Reference (a) were focused on using limited resources to ensure the protective storage period was conducted in accordance with current SAFSTOR criteria and not the circa 1974 Mothballing criteria implemented for the Possession-only license amendment request. In sections 3.1 SAFSTOR Preparations and 3.3.1 DECON Preparations, the PSDAR lists activities MARAD will complete to bring the NSS into contemporary SAFSTOR compliance and prepare for Active Decommissioning. However, the PSDAR does not describe the location where these SAFSTOR activities will be performed. The Decommissioning Project Schedule in Appendix B includes a line item for a "SAFSTOR Drydock" but does not indicate where the drydocking will occur.

In Reference (b), page 33, MARAD describes removing three buffer seal charge pumps as part of SAFSTOR preparations. On pages 34 and 35, MARAD states all SAFSTOR preparations will be performed in Baltimore, MD. Subsequent to the meeting, funding for NSS was reduced to a level that no SAFSTOR preparations could be completed. The funding history is fully described in Decommissioning Funds Status Reports for Calendar Years (CYs) 2009 through 2018. As noted in the reports for CY 2017 and 2018, MARAD received funding sufficient to implement SAFSTOR preparations as precursor to starting active decommissioning.

The purpose of this letter is to notify the NRC that certain SAFSTOR and DECON preparation activities will be performed during an upcoming drydock period. The location for performing these activities will be determined as part of a competitive bid process. Based on responses to pre-bid information requests, the drydocking may occur in Philadelphia, PA

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Current planning indicates that the SAFSTOR activities that will be performed during drydock include, but are not limited to, removal of three buffer seal charge pumps. Other decommissioning preparation activities that require heavy lifts may also be performed while in the drydock.

This letter contains no commitments.

If you have any questions or concerns, please feel free to contact me at (202) 366-2631, or by email erhard.koehler@dot.gov.

Respectfully,

A handwritten signature in black ink, appearing to read 'Erhard', followed by a long horizontal line.

Erhard W. Koehler
Senior Technical Advisor, N.S. SAVANNAH
Office of Ship Disposal

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cc:

Electronic copy

NSS ESC

NSS SRC

MAR 610, 612, 615

Hardcopy, cover letter only

MAR-600, 640, 640.2

Hardcopy w/ all enclosures

MAR-100, 640.2 (rf)

USNRC (Ted Smith, Katherine Warner)

USNRC Regional Administrator - NRC Region I

MD Department of the Environment (Eva S. Nair)

EWK/jmo