

From: [Kline, Kenneth](#)
To: [Naquin, Ty](#)
Subject: RE: Reference
Date: Wednesday, November 06, 2019 9:03:46 AM

Okay Ty, if based on your sight knowledge, you can fill-in the gaps in their submittal we can go ahead and accept. I was a little reluctant to accept as the submittal is more of a preliminary decommissioning plan rather than a cost estimate. I am no longer in decom (they moved Reggie and I into a new division). As there is mention of subsurface contamination below the accelerator facility below the water table without any sampling or supporting data and restricted release and to evaluate the half-life of the material/contamination, it would seem this is more for the decom staff to evaluate. But again, if you feel you can fill-in the gaps and know what the half-life is of the contamination/material in order that we can reasonably evaluate their long-term care proposal and help map out the delta between the 2016 and 2019 submittal, then sure, we can go ahead and accept.

Ken

From: Naquin, Ty
Sent: Wednesday, November 06, 2019 5:17 AM
To: Kline, Kenneth <Kenneth.Kline@nrc.gov>
Subject: RE: Reference
Importance: High

Should we handle this as an RAI? It sounds like we have a basis for the work they have considered for Decommissioning, but no explicit explanation. I'm pretty sure I understand why the estimate went down. They disposed of a great deal of material in the last few years, including a pool irradiator. What we don't have is a statement explaining the decrease. We also don't have a statement that the considerations of the 2016 estimate are still in place.

I am up against the wall for acceptance. I had asked for an acceptance by 10/29 in the RWR. I left a little padding there, but that expires this week. **Can you give me your acceptance?** I can then prepare a letter of acceptance and we can set up a call to discuss RAIs, preferably before Thanksgiving week.

Ty

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From: Kline, Kenneth
Sent: Tuesday, November 05, 2019 6:21 PM
To: Naquin, Ty <Tyrone.Naquin@nrc.gov>
Subject: RE: Reference

Ty, yes the 2016 submittal is very large as compared to the 2019 submittal. The 2016 is what we would expect to see. The 2019 really doesn't provide the required detail. So I am assuming NIST is simply relying on the 2016 previously approved estimate. If so, the 2019 should be explicit in stating that it is simply providing updates to the previously approved 2016 submittal and clearly identify what is it changing from the 2016 submittal (map out the changes). The 2019 estimate is lower than the 2016 submittal?? I will dig further into the 2016 submittal to see if it answers some of the questions I have pertaining to the 2019 submittal, but at minimum, NIST needs to provide a narrative to describe what has changed since 2016 and why the costs are now lower?

Ken

From: Naquin, Ty
Sent: Monday, November 04, 2019 11:38 AM
To: Kline, Kenneth <Kenneth.Kline@nrc.gov>
Subject: Reference

I think the last submittal, in 2016 will answer the questions you are looking for. The accession number is ML16279A280. I had supplied this with the RWR, but you probably had not looked at it.

The first 40 pages are copies of legal code that NIST abides by. Starting on page 44 of the .pdf the DFP begins description. Beginning on page 63, the entire section of the accelerator issue is addressed with a scoping report and cost estimates.

Let me know if this is directing you to what you're looking for. If not, let me know, but this seems pretty comprehensive. Let me know what you want to do going forward.

Ty

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