Louisiana Energy Services

License Application
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Revision 6, July 30, 1993

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BEFORE THE

UNITED STATES NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF

LOUISIANA ENERGY SERVICES

APPLICATION FOR LICENSES

UNDER THE ATOMIC ENERGY ACT OF 1954

AS AMENDED

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for the

CLAIBORNE ENRICHMENT CENTER

BEFORE THE

UNITED STATES NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF

LOUISIANA ENERGY SERVICES

APPLICATION FOR LICENSE

Louisiana Energy Services (LES) hereby makes application, pursuant to the provisions of the Atomic Energy Act of 1954, as amended, and the Nuclear Regulatory Commission's Rules and Regulations thereunder, for the necessary licenses to construct, own, use and operate the facilities hereinafter described as an integral part of a uranium enrichment facility, to be located in Claiborne Parish, Louisiana, and to be known as the "Claiborne Enrichment Center." This includes an application for any and all necessary licenses for source, special nuclear and byproduct material as more particularly described herein.

This application consists of the following parts:

(a) the general information required by 10 CFR 70.22(a)(1), (2), (3), (4) and 10 CFR 40.31, which is set forth herein;

(b) the technical information and safety analysis report required by 10 CFR 70.22(a)(6), (7) and (8), which is set forth in a separate document entitled, "Louisiana Energy Services, Claiborne Enrichment Center, Safety Analysis Report," forwarded herewith and made a part hereof;

(c) the environmental information required by 10 CFR 51, which is set forth in a separate document entitled, "Louisiana Energy Services, Claiborne Enrichment Center, Environmental Report," forwarded herewith and made a part hereof;

(d) the physical security information required by 10 CFR 70.22(k) and 10 CFR 73.67(a), (f) and (g), which is set forth in a separate document entitled, "Louisiana Energy Services, Claiborne Enrichment Center, Physical Security Plan," forwarded herewith

and made a part hereof to be withheld from public disclosure in accordance with 10 CFR 2.790(d)(1);

(e) the special nuclear material control and accounting information required by 10 CFR 70.22(b), which is set forth in a separate document entitled "Louisiana Energy Services, Claiborne Enrichment Center, Fundamental Nuclear Material Control Plan," forwarded herewith and made a part hereof to be withheld from public disclosure in accordance with 10 CFR 2.790(d)(1).

(f) the emergency planning information required by 10 CFR 70.22(i) and 10 CFR 40.31(j), which is set forth in a separate document entitled, "Louisiana Energy Services, Claiborne Enrichment Center, Emergency Plan," forwarded herewith and made a part hereof; and

(g) the physical security information required for the protection of classified matter and information required by 10 CFR 95, which is set forth in a separate document entitled "Louisiana Energy Services, Claiborne Enrichment Center, Security Plan for the Protection of Classified Matter and Information," forwarded herewith and made a part hereof to be withheld from public disclosure in accordance with 10 CFR 2.790(d)(1).

GENERAL INFORMATION

a. Name of Applicant

Louisiana Energy Services, L.P.

b. Address of Applicant

2600 Virginia Avenue NW, Suite 608
Washington, D.C. 20037

c. Description of Business or Occupation of Applicant

Applicant is engaged in the production and selling of uranium enrichment services to electric utilities for the purpose of generating electricity.

d. Organization and Management of Applicant

Louisiana Energy Services, L.P. ("LES") is a Delaware limited partnership. It has been formed to provide uranium enrichment services for commercial nuclear power plants. That is its only business. LES has no subsidiaries or divisions. The general partners are as follows:

- Urenco Investments, Inc. (a Delaware corporation and wholly-owned subsidiary of Urenco, Ltd., a corporation formed under the laws of the United Kingdom ("Urenco") and owned in equal shares by International Nuclear Fuels plc, a public limited company formed under English law ("INFL"), Ultra-Centrifuge Netherlands NV, a Netherlands corporation ("UCN"), and Uranit GmbH, a corporation formed under the laws of the Federal Republic of Germany ("Uranit"); INFL is wholly-owned by British Nuclear Fuels plc, which is wholly-owned by the Government of the United Kingdom; UCN is 99% owned by the Government of the Netherlands, with the remaining 1% owned collectively by the Royal Dutch Shell Group, the Dutch State Mines, Philips Gloeilampenfabrieken N.V. and VMF-STORK; Uranit is owned by PreussenElektra AG (37.5%), RWE AG (37.5%) and Hoechst AG (25%), all of which are corporations formed under laws of the Federal Republic of Germany);

- Claiborne Fuels L.P. (a Delaware limited partnership of which Claiborne Fuels, Inc., a California corporation and wholly-owned subsidiary of Fluor Daniel, Inc. ("FDI"), is the sole general partner; FDI is a California corporation and wholly-owned subsidiary of Fluor Corporation, a publicly-held Delaware corporation);

- Claiborne Energy Services, Inc. (a Louisiana corporation and wholly-owned subsidiary of Duke Power Company, a publicly-held North Carolina corporation); and

- Graystone Corporation (a Minnesota corporation ["Graystone"] a wholly-owned subsidiary of Northern States Power Company, a publicly-held Minnesota corporation).

The limited partners are presently as follows:

- Louisiana Power & Light Company (a Louisiana corporation and wholly-owned subsidiary of Entergy Corporation, a publicly-held Florida corporation and a public utility holding company);

- BNFL Enrichment (Investments US) Ltd. (a corporation formed under English law and a wholly-owned subsidiary of BNFL);

- GnV Gesellschaft fuer nukleare Verfahrenstechnik mbH (a corporation formed under the laws of the Federal Republic of Germany and a wholly-owned subsidiary of Uranit);

- UCN Deelnemingen B.V. (a Netherlands corporation and wholly-owned subsidiary of UCN);

- Claiborne Energy Services, Inc. (see above);

- Le Paz Incorporated (a Minnesota corporation and wholly-owned subsidiary of Graystone); and

- Micogen Limited III, Inc. (a California corporation and wholly-owned subsidiary of FDI).

Louisiana Energy Services is seeking an order under which the NRC would consent to the addition of additional limited partners or the assignment of limited partnership interest so long as such interests do not involve the present right to possession or the right to control licensed activities.

The LES Partnership Agreement currently provides that on all matters in which National Security Issues are involved Urenco Investments, Inc., shall have no more than 20 votes which is 20 percent of the possible votes. The remaining votes are allocated among the other general partners in accordance with the respective general partners' interests.

Listed below are the names of the responsible official(s) of each LES general partner:

General Partners

Gerald Glenn
President citizenship: United States
Claiborne Fuels L.P.
c/o Claiborne Fuels, Inc.
(General Partner)

Peter Jelinek
President citizenship: Austria
Urenco Investments, Inc.

Richard Priory
President citizenship: United States
Claiborne Energy Services, Inc.

Roland Jensen
President citizenship: United States
Graystone Corporation

Louisiana Energy Services

The President of LES is W. Howard Arnold, a citizen of the United States. LES' principal location for business is currently Washington, D.C. The facility will be located in Claiborne Parish, Louisiana.

e. Period of license applied for and use to which facilities will be put

The license is requested for a period of thirty years. Applicant further requests such additional source, byproduct and special nuclear material licenses as may be necessary or appropriate to the acquisition, construction, possession and operation of the licensed facility.

The facility will be used to produce uranium enriched in the U-235 isotope up to and including 5.000% by weight.

The facility, when at full capacity, will nominally produce 1,500,000 kilograms of separative work (SWU) per year. The maximum gross output of the facility is greater than 1,500,000 kilograms SWU in order to allow for centrifuge failures or adventitious production losses over the life of the facility.

f. Estimated Cost of the Facility

Applicant estimates the total cost of the Claiborne Enrichment Center to be approximately $800 million (in $1990), exclusive of financing costs.

LES intends to fund construction of the facility through a combination of debt and equity financing. LES expects to raise equity for construction from existing general or limited partners or both and possibly from additional limited partners. LES anticipates that approximately 70-80% of construction financing will come from debt.

g. Site Location and Completion Dates

The Claiborne Enrichment Center is located in Claiborne Parish, Louisiana, approximately 5 miles northeast of Homer, Louisiana, near the intersection of Louisiana State Route #9 and Claiborne Parish Road #39.

The projected startup date for the facility is September 1998, when one plant unit will be ready for operation. There are three plant units at the facility. Following installation and testing of feed, take-off, necessary support systems and at least one cascade in one plant unit, enrichment will commence. Within the operating plant unit additional cascades will be installed, tested and commence enrichment successively without any interruption of cascades already operating. The remaining plant units will be successively installed, tested and operated in the same manner, with the facility expected to reach full capacity in December 2000.

h. Restricted Data

Access to restricted data or national security information shall be controlled in accordance with 10 CFR Parts 10, 25 and 95. This application does contain classified information that has been submitted under separate correspondence.

i. Decommissioning

Information indicating how reasonable assurance will be provided that funds will be available to decommission the facility as required by 10 CFR 70.22(a)(9), 10 CFR 70.25, and 10 CFR 40.36 is attached hereto as Exhibit I.

j. Insurance

LES shall, prior to and throughout operation, have and maintain nuclear liability insurance in the amount of $200 million to cover liability claims arising out of any occurrence within the United States, causing, within or outside the United States, bodily injury, sickness, disease, or death, or loss of or damage to property, or loss of use of property, arising out of or resulting from the radioactive, toxic, explosive, or other hazardous properties of chemical compounds containing source or special nuclear material.

The amounts of nuclear energy liability insurance required may be furnished and maintained in the form of:

(1) An effective facility form (non-indemnified facility) policy of nuclear energy liability insurance from American Nuclear Insurers and/or Mutual Atomic Energy Liability underwriters; or

(2) Such other type of nuclear energy liability insurance as the Commission may approve; or

(3) A combination of the foregoing.

If the form of liability insurance will be other than an effective facility form (non-indemnified facility) policy of nuclear energy liability insurance from American Nuclear Insurers and/or Mutual Atomic Energy Liability Underwriters, such form will be provided to the Nuclear Regulatory Commission by LES. The effective date of this insurance will be no later than the date that LES takes possession of licensed nuclear material.

This amount of insurance is the maximum amount available from commercial nuclear energy liability insurers (reference section III.6, Notice of Receipt of Application for License Notice of Availability of Applicant's Environmental Report; Notice of Consideration of Issuance of License; and Notice of Hearing and Commission Order; Louisiana Energy Services, L.P.; Claiborne Enrichment Center, 56 FR 23312, May 21, 1991).

k. Communications

It is requested that all communications pertaining to this application be sent to:

W. Howard Arnold
President
Louisiana Energy Services
2600 Virginia Avenue NW, Suite 608
Washington, D.C. 20037

In addition, it is requested a copy of each communication be sent to:

Peter G. LeRoy
Licensing Manager
Louisiana Energy Services
c/o Duke Engineering & Services, Inc.
Post Office Box 1004
Charlotte, NC 28201-1004

J. Michael McGarry, III (Counsel for Applicant)
Winston & Strawn
1400 L Street, N.W.
Washington, D.C. 20005

EXHIBIT I

TO APPLICATION OF

LOUISIANA ENERGY SERVICES

Decommissioning Funding Plan

LOUISIANA ENERGY SERVICES
CLAIBORNE ENRICHMENT CENTER

DECOMMISSIONING FUNDING PLAN

Introduction:

Louisiana Energy Services ("Application") hereby submits, pursuant to the provisions of the Atomic Energy Act of 1954, as amended, and the Rules and Regulations of the Nuclear Regulatory Commission, its Decommissioning Funding Plan for the Claiborne Enrichment Center. This Decommissioning Funding Plan ("Plan") sets forth that information required by 10 CFR Parts 40 and 70 regarding the Applicant's plans for funding the ultimate decommissioning of the Claiborne Enrichment Center.

As indicated below, Louisiana Energy Services presently intends to provide for decommissioning funding through an external trust, coupled with a surety bond, in accordance with applicable requirements of 10 CFR Parts 40 and 70. Appropriate model documentation for this funding method is attached hereto. Upon execution of the funding instruments, Louisiana Energy Services will supplement this portion of its application.

General Information:

Facility Description: Louisiana Energy Services, a Delaware limited partnership, was formed to provide uranium enrichment services for commercial nuclear power plants for the purpose of generating electricity. These services are proposed to be provided at a facility to be known as the "Claiborne Enrichment Center," located in Claiborne Parish, Louisiana.[1]

Licensed Material: The Application for the Claiborne Enrichment Center seeks authorization to operate that facility to produce uranium enriched up to 5.000 wt% in the U^{235} isotope.. The facility, when at full capacity, will nominally produce 1,500,000 kilograms of separative work (SWU) per year. The unsealed uranium source material, and the unsealed special nuclear material, will contain uranium isotopes in amounts which exceed 10^5 times the applicable quantities set

[1] Details regarding the planned operations of the Claiborne Enrichment Center may be found in the Application for Licenses, and the accompanying Safety Analysis Report and Environmental Report.

forth in Appendix C to 10 CFR Part 20. Accordingly, pursuant to 10 CFR §§40.36(a) and 70.25(a), a Decommissioning Funding Plan is required.[2]

Schedule: The projected start-up date for the Claiborne Enrichment Center is September, 1998. The facility is expected to reach full capacity in December, 2000.

Period of Operation: The Application for Operation seeks authorization to operate for a period of thirty years.

Decommissioning Costs: Louisiana Energy Services has prepared a site-specific decommissioning cost estimate for the ultimate decommissioning of the Claiborne Enrichment Center. This cost estimate utilizes current information regarding the activities and associated costs of decommissioning. Louisiana Energy Services has utilized both existing engineering expertise and actual decommissioning experience, from similar facilities decommissioned by Urenco, Ltd., in Europe, to develop this cost estimate. The estimate and associated funding mechanisms will be adjusted over time, in accordance with the applicable provisions of 10 CFR Parts 40 and 70.

Decommissioning Funding: As set forth in this Plan, Louisiana Energy Services presently intends to utilize an external trust, coupled with a surety bond, to provide reasonable assurance of the availability of decommissioning funds when needed. This funding mechanism is intended to satisfy the provisions of 10 CFR Parts 40 and 70 with respect to decommissioning financial assurance for license applicants under those provisions.

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[2] The particular isotopes and quantities to be received and processed are described in Section 4.1 of the Safety Analysis Report.

Decommissioning Cost Estimate:

Pursuant to 10 CFR §§40.36(d) and 70.25(e), Louisiana Energy Services has evaluated the estimated costs of decommissioning the Claiborne Enrichment Center. The facility will be decommissioned such that the site and facilities may be released for unrestricted use. A summary of the estimated costs of decommissioning, arranged by principal activity, is set forth in the table below. The sources of the cost estimate data are also provided below.[3] As indicated, the total estimated cost of decommissioning the facility is $518.1 million ($1996).

Louisiana Energy Services' evaluation of decommissioning costs included an evaluation of current experience by one of the general partners in the project, Urenco, Ltd., at similar facilities in Europe. Appropriate adjustments have been made to account for cost differences associated with the performance of specific activities in the United States. The experience and adjustments are documented in the Urenco paper "Decommissioning and Decontamination of a USJVC Plant," USPDC(89)07, 27 April, 1989. Cost figures selected from this paper were escalated to 1996 dollars; otherwise, the selected figures were unchanged. The escalated figures include:

Decon Facility Capital Cost	$6.8 million
System Cleaning	$1.1 million
Dismantling	$6.8 million
Decontamination	$13.7 million
Sub-total (from Urenco figures)	$28.4 million

In addition to the figures supplied by Urenco, the following costs were estimated directly for LES:

Decon Facility Labor Cost	$ 1.4 million

This was taken to be 20% of capital cost above.

Decontamination of Decon Facility	$ 0.5 million

[3] A detailed description of the activities associated with decommissioning is also set forth in Section 11.8 of the Louisiana Energy Services Claiborne Enrichment Center Safety Analysis Report.

An independent estimate was provided by Naylor Industrial Services, Inc., transmitted by letter dated September 11, 1990.

Radioactive Waste Disposal $ 1.4 million

This assumes 100 m^3 @ $350 per ft^3, in 1992 dollars, escalated to 1996 dollars. This cost of disposal is estimated specifically for radioactive waste disposal in the Central States Compact. (References 5 and 6)

(The Urenco estimate of 200 m^3 of low-level waste in the cited reference was reduced by half due to a closer look at solid arisings from the decontamination process. A facsimile from Urenco's Almelo facility, 23 August, 1990, provides an estimate of 2 m^3 of "citric cake" arisings. This "citric cake" was considered in the Urenco cost estimate as a major portion of the low-level solid wastes from decommissioning; thus, it was concluded the estimate of 200 m^3 was high.)

Hazardous/Mixed Waste Disposal $ 0.1 million

Decontamination and decommissioning processes, as described in this section, do not result in the production of hazardous or mixed wastes for disposal. Normal accumulation of hazardous and mixed wastes will occur during the final months of CEC operation. The volume of these final wastes, not due to D&D activities, are estimated to be approximately equivalent to the annual amounts listed in the CEC Safety Analysis Report, Table 7.1-1.

Tails Disposal $485.3 million

The annual tails disposal cost is estimated to be $16.175 million. This is multiplied by 30 years to arrive at the $485.3 million figure. Costs are based on converting UF_6 to U_3O_8 with subsequent disposal in a facility under cognizance of the NRC. U_3O_8 conversion costs are based on estimates by a vendor which could make this service available to LES. Disposal costs are based on NRC recommendations and a study by Martin Marietta. The conversion and disposal costs are added and escalated to 1996 dollars.

The disposition of tails from the CEC, including potential disposition at the end of facility operation, is an element of authorized normal operating activities. It involves neither decommissioning waste nor is it a part of decommissioning activities. The disposal of these tails is analogous to the disposal of radioactive materials generated in the course of normal operations (even including spent fuel in the case of a power reactor), which is authorized by the operating license and subject to separate disposition requirements (i.e., requirements such as reflected in 10 CFR Part 20). Such costs are not appropriately included in decommissioning costs (this principle (in the Part 50 context) is discussed in

Regulatory Guide 1.159, Section 1.4.2, page 1.159-8). Further, the "tails" products from the CEC are not mill tailings, as regulated pursuant to the Uranium Mill Tailings Radiation Control Act, as amended (42 USC 7901, et seq) and 10 CFR Part 40, Appendix A, and are not subject to the financial requirements applicable to mill tailings.

Nevertheless, LES intends to provide during facility life for expected tails disposition costs (even assuming ultimate disposal as waste). Funds to cover these costs, estimated at $16.175 million ($1996) per equivalent years of tails production, will be set aside during the operating life of the CEC. Accordingly, tails disposition costs are now explicitly reflected in the funding table (also SAR Table 11.8-2, ER Table 4.4-2), which reflect both decommissioning funding and the separate matter of contingent end-of-life tails disposition funding.

Final Radiation Survey $ 1.0 million

This figure was estimated by two methods, as follows:

1) The first method is by extrapolation from "Technology and Cost of Termination Surveys Associated With Decommissioning of Nuclear Facilities," NUREG 2241, February 1982. The 1980 costs of decommissioning a fuel fabrication facility and a UF6 Production facility were escalated at 5% per year to 1990. The higher of the two costs, (calculated for a 1 mrem and a 5 mrem dose to the public), were selected and then averaged, for a total of $750,000. Further escalation brings the cost to $950,000.

2) The second estimate was roughly approximated at $725,000, in 1990 dollars, and is escalated to 1996 dollars. The estimate was based on experience, using the following assumptions:

12,000 hours for grid of property and gamma count
$23,000 for soil sampling
150 core holes for depth profile
Building size of 750' x 380'
Workhour rate, including per diem, $60/hour
Extensive use of swipes
Final analyses and report included

Subtotal (from non-Urenco sources) $ 489.7 million

Total Estimate $ 518.1 million

SUMMARY OF DECOMMISSIONING COSTS

Activity	Estimated Cost ($1996)
Planning and Preparation	600,000
Decontamination Facility Installation	8,200,000
System Cleaning, Decontamination and Dismantling of Radioactive Facilities	21,500,000
Sale, Salvage	(0)
Packaging, Shipping, and Disposal of Wastes	1,500,000
Final Radiation Survey	1,000,000
Tails Disposal	485,300,000
Site Stabilization, and Long-Term Surveillance	N/A
Total	$518,100,000

Finally, Louisiana Energy Services recognizes the need to adjust cost estimates and funding levels periodically, pursuant to 10 CFR §§40.36(d) and 70.25(e). These measures are described below. Louisiana Energy Services also recognizes that, pursuant to 10 CFR §§40.42(c) (2) (iii) (d) and 70.38 (c) (2) (iii) (d), it must update its detailed cost estimate at the time of license termination and provide, if necessary, additional assurance of the availability of adequate funds for completion of decommissioning.

Decommissioning Funding Mechanism:

Louisiana Energy Services presently intends to utilize an external trust, coupled with a surety bond, to provide reasonable assurance of decommissioning funding, pursuant to 10 CFR §§40.36(e) (3) and 70.25(f)(3). Accordingly, Louisiana Energy Services provides with this application model documentation related to the use of the external trust/surety method of providing decommissioning financial assurance.[4] Upon finalization of the specific funding instruments to be utilized, Louisiana Energy Services will supplement its application to include the executed documentation. Further, as indicated by the attached material, Louisiana Energy Services intends to provide continuous financial assurance from the time of initial licensing to the completion of decommissioning and termination of the license.

As noted, Louisiana Energy Services presently intends to utilize an external trust coupled with a surety bond to provide financial assurance for decommissioning. The trust will be used to collect decommissioning funds over the life of the plant. The surety bond will provide an ultimate guarantee that decommissioning costs will be paid in the event Louisiana Energy Services is unable to meet its decommissioning obligations at the time of decommissioning. The trust and surety bond instruments will become effective upon LES receipt of licensed material. A copy of a model trust agreement and a copy of a model surety bond are provided in Appendices A and B, respectively, to this Plan. Louisiana Energy Services describes below the particular attributes it presently anticipates including in the trust agreement and surety bond.

With respect to the trust, Louisiana Energy Services presently intends to provide for the following attributes. First, the trust fund will be external to Louisiana Energy Services, with fund assets derived from periodic contributions and administered by a trustee. Second, the trust will be governed by a trust agreement which will provide, among other restrictions, for the distribution of fund assets only upon commencement of decommissioning activities. Further, the trust may retain property with face value, and the trustee may make reasonable prudent investments, with investment income accruing to the trust.

With respect to the Surety Bond, Louisiana Energy Services presently anticipates providing for the following attributes. First, the bond will be issued by a Company which is listed as a qualified surety listed in the Department of Treasury, Circular 570. Second, the bond will be written for a specified term and will be renewable automatically unless the

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[4] The model documentation is derived from NRC guidance (see NRC Regulatory Guide 3.66, "Standard Format and Content of Financial Assurance Mechanisms Required for Decommissioning Under 10 CFR Parts 30, 40, 70 and 72" (June 1990).) Louisiana Energy Services will consider this model documentation as guidance in preparing and executing funding instruments for the Claiborne Enrichment Center. In the event Louisiana Energy Services ultimately selects another form of decommissioning funding, model documentation from Regulatory Guide 3.66 will also be used as guidance in the preparation of funding instruments.

issuer serves notice at least 90 days prior to expiration of an intent not to renew. Such notice must be served upon the NRC, the trustee of the Standby Trust, and Louisiana Energy Services. Further, in the event Louisiana Energy Services is unable to provide an acceptable replacement within 30 days of such notice, the full amount of the bond will be payable automatically, prior to expiration, without proof of forfeiture.

The Surety Bond will require that any funds paid under its terms will be deposited directly into the external trust or, if necessary or appropriate, a Standby Trust by the surety company. A copy of a model Standby Trust is provided as Appendix C to this plan.

Adjusting Decommissioning Costs and Funding:

Pursuant to 10 CFR §§40.36(d) and 70.25(e), Louisiana Energy Services will update the decommissioning cost estimate for the Claiborne Enrichment Center and the associated funding levels over the life of the facility. These updates will take into account changes resulting from inflation or site-specific factors, such as changes in facility conditions or expected decommissioning procedures.

Louisiana Energy Services presently anticipates such updating to occur approximately every five years. A record of the updating effort and results will be retained for review (see further discussion regarding recordkeeping, below). The NRC will be notified of any material changes to the decommissioning cost estimate and associated funding levels (e.g., significant increases in costs beyond anticipated inflation). To the extent the underlying instruments are revised to reflect changes in funding levels, the NRC will be notified as appropriate.

Recordkeeping Plans Related to Decommissioning Funding:

Pursuant to 10 CFR §§40.36 (f) and 70.25(g), Louisiana Energy Services will keep records until the termination of the license of information that could have a material effect on the ultimate costs of decommissioning. These records will include information regarding: (1) spills or other contamination that cause contaminants to remain following contemporaneous cleanup efforts, (2) as-built drawings of structures and modifications thereto where radioactive contamination exists (e.g., from the use or storage of such materials), (3) original and modified cost estimates of decommissioning, and (4) original and modified decommissioning funding instruments and supporting documentation.

Louisiana Energy Services will notify the NRC of material changes to the decommissioning cost estimates or associated funding mechanisms.