

January 4, 1991

MEMORANDUM FOR: Seymour H. Weiss, Director
Non-Power Reactors, Decommissioning
and Environmental Project Directorate
Division of Reactor Projects - III, IV, V,
and Special Projects
Office of Nuclear Reactor Regulation

THRU: Darrel A. Nash, Section Chief
Policy Development and Financial Evaluation Section
Program Management Policy Development
and Analysis Staff
Office of Nuclear Reactor Regulation

FROM: Robert S. Wood, Financial Policy Analyst
Policy Development and Financial Evaluation Section
Program Management Policy Development
Office of Nuclear Reactor Regulation

SUBJECT: PTSB REVIEW OF NON-POWER REACTOR DECOMMISSIONING
FUNDING SUBMITTALS

I have reviewed the decommissioning financial assurance plan submissions from the non-power reactor licensees under your directorate. Except for the licensees described in Enclosure 1, all submissions appear to be in full compliance with our regulations in Sections 50.33(k) and 50.75.

ORIGINAL SIGNED BY

Robert S. Wood, Financial Policy Analyst
Policy Development and Financial Evaluation Section
Program Management, Policy Development
and Analysis Staff
Office of Nuclear Reactor Regulation

Enclosure:
As stated

cc: Marvin M. Mendonca
Theodore S. Michaels

DISTRIBUTION: [MEMO FOR SEYMOUR WEISS]
Central File
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* See previous concurrence

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Enclosure 1

Deficiencies In Non-Power Reactor
Submissions of
Decommissioning Funding Plans

1. Catholic University (Docket 50-77) - CU's submission indicated that their funding plan will be submitted later. They also indicated via telephone that they believed their contamination levels would be sufficiently small that formal assurance would not be required.
2. General Electric (Dockets 50-70, 50-73, and 50-183) - GE has requested an exemption to allow them to self-guarantee decommissioning costs. After the Commission disapproved their initial request, GE submitted a request for reconsideration. To date, GE has not submitted an alternative to a self guarantee.
3. Manhattan College (Docket 50-199) - Manhattan College indicated that because decontamination will not be necessary, they do not need to submit formal financial assurance.
4. Massachusetts Institute of Technology (Docket 50-20) - MIT has requested an exemption from the NRC's financial assurance regulations because of their sound financial health. Their rationale is essentially the same as that used by Cornell and Rensselaer in their exemption requests. Our analysis and recommendation of denial of these requests was contained in a memorandum from me to Ted Michaels dated November 20, 1990.
5. North Carolina State University (Docket 50-297)- NC State did not indicate what method of financial assurance they plan to use. As a state University, they presumably would use a statement of intent, but this should be formally stated in their submission.
6. Pennsylvania State University (Docket 50-5)-Penn State did not specify which method of financial assurance they plan to use. As a state university, they presumably would use a statement of intent, but they have not yet decided which approach to use.
7. Waltz Mill (Docket 50-22)- Westinghouse has submitted an exemption request that is being considered with GE's exemption request.
8. Wooster Polytechnic Institute (Docket 50-134) - We have not yet received a copy of the letter of credit that WPI indicated in its submission that it would be using.