



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

May 2, 1991

Docket No. 50-139

Dr. Maurice A. Robkin, Director
Nuclear Engineering Laboratories
University of Washington
Seattle, Washington 98195

Dear Dr. Robkin:

SUBJECT: DECOMMISSIONING PLAN FOR THE UNIVERSITY OF WASHINGTON REACTOR

In the course of our review of your decommissioning plan for the University of Washington (UW) Argonaut reactor, we have become aware that you apparently do not have the funds for decommissioning the reactor nor a statement of intent or a letter of credit or surety bond. The regulation in Section 50.82(b)(4) requires that funds be set aside for decommissioning, and a plan for assuring the availability of adequate funds for completion of decommissioning be submitted. Therefore, before the NRC can issue to UW an order to dismantle the facility and dispose of the component parts, we need to have a letter of intent from the State of Washington as to when funds will be made available for decommissioning or alternatively a letter of credit or surety bond from an organization that is not affiliated with the UW. The letter of intent from the State or the letter of credit or surety bond should state when the funds will be made available. For the content of these financial assurance mechanisms, please refer to Regulatory Guide 1.159, "Assuring the Availability of Funds for Decommissioning Nuclear Reactors."

Also, in the course of our discussion, it was brought out that you are planning a partial dismantlement now and full dismantlement when the State appropriates the full decommissioning costs, which are expected in the State fiscal year 1993. You also state that the first stage of dismantlement would consist of removing the control room equipment so that the control room in conjunction with the reactor bay area could be used for a robotics laboratory. When the State funds become available, then you plan to completely dismantle the reactor. Your present decommissioning plan does not reflect this sequence of events and, therefore, should be amended accordingly. As previously discussed with you, no dismantling or decommissioning in any manner may occur prior to approval of the decommissioning plan by the NRC.

The NRC requests the following information to complete its review of the UW decommissioning plan:

- a. A letter of intent from the State of Washington, or a letter of credit, or a surety bond from an organization not affiliated with the State specifying how and when decommissioning funds will be made available.
- b. A schedule indicating the sequence of events in the decommissioning plan.

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- c. A description of controls and limits on procedures and equipment to protect occupational health and safety for interim (control room and reactor bay area) and for final dismantlement.
- d. A description of the planned interim and final radiation survey.
- e. A description of the disposal plan and a cost estimate.
- f. A revised cost estimate for the decommissioning, if applicable.
- g. A list of the technical and environmental specifications applicable to decommissioning. Refer to the Branch Position provided to you, entitled "Guidance and Discussion of Requirements for an Application to Terminate a Non-Power Reactor Facility Operating License," Revision 1, September 15, 1984, for further guidance in the development of this information.

Following receipt and review of the requested information, the Commission may issue a decommissioning order authorizing partial dismantlement of the UW facility. After completion of the interim radiation survey, the UW would be allowed, under the decommissioning order, to use the facility as described in the revised decommissioning plan, i.e. a robotic laboratory or classroom space etc., until the remaining decommissioning funds are available for complete dismantlement of the facility.

In the alternative, if a letter of intent from the State of Washington is not feasible, the UW can request a possession-only license. The decommissioning plan, submitted on August 31, 1989, prior to the expiration of the operating license, anticipated that the decommissioning would be completed by 2009. If you request a possession-only license, select a license extension date which anticipates the complete decommissioning of your facility.

The proposed possession-only license application should contain the following information:

- a. The expiration date of the possession-only license.
- b. Describe the equipment that will be removed from the facility and the radiation controls to be used to monitor activities.
- c. Describe any radiation measurements to be made while in possession-only status.
- d. Describe the scope of your interim activities and where they will be conducted.
- e. Provide a revised set of Technical Specifications and License Conditions effective pending complete decommissioning.
- f. If there are any radioactive wastes, your plan for disposal of these wastes.
- g. An inventory of activated materials and their location in the facility.

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g. Date the funding plan will be submitted and date the final decommissioning/dismantling will begin.

If you have any questions, please call me on (301) 492-1102. This requirement affects (9 or fewer) respondent(s) and, therefore, is not subject to Office of Management and Budget review under P.L. 96-511.

Sincerely,

Theodore S. Michaels, Senior Project Manager
Non-Power Reactors, Decommissioning and
Environmental Project Directorate
Division of Advanced Reactors
and Special Projects
Office of Nuclear Reactor Regulation

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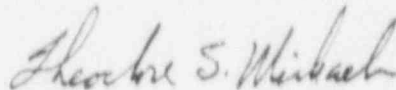
Dr. Maurice Robkin

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University of Washington

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cc:

Mayor of City of Seattle
Seattle, Washington 98104