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**To:** [Yadav, Priya](#)  
**Cc:** [Valadez, Ernesto Jr CIV USARMY IMCOM HO \(USA\)](#)  
**Subject:** [External\_Sender] Statement of Intent, SML SUC-1593  
**Date:** Monday, August 31, 2020 12:40:59 PM  
**Attachments:** [CG budget authority.docx](#)

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Priya,

You may remember the difficulty I had staffing the statement of intent through our command group here at HQ IMCOM last Fall. Well, I think I am ready to try that staffing effort again in response to your RAI, , but I want to run three things by you.

First, is the attached explanation of our CG's authority to request funding adequate? I could not pry a statement from our financial wizards, so finally I wrote the attached myself based on my military experience, which they seem to agree is adequate.

Second, if I must obtain the CG's signature on any documents, I will have to staff the documents, which will greatly delay me in getting the RAI response to you. In particular, the statement of intent that MG McGuire signed last December actually is still valid under Army policy. See AR 600-20, paragraph 2-13, included in the attachment. This means that the current CG is bound by what the previous CG, MG McGuire, signed (unless he changes or rescinds it, which he has not done). So, will you accept the signed SOI from last December as still valid?

Third, in your RAI, you are asking for a "certification of financial assurance." This will also require the CG's signature. According to NUREG-1757, volume 3, appendix A, section A.16, "A statement of intent must include a site-specific decommissioning cost estimate OR [emphasis added] a certification of financial assurance." Since we provided a site-specific decommissioning cost estimate, I believe that we do not need a certification of financial assurance (which is the way we always proceeded in the past). Is that correct? Again, I am trying to avoid staffing documents with the command group, which is tedious and time-consuming.

With favorable answers to my three questions above, I have everything ready for our formal response to you RAI (and then I will prepare our response for your JPG RAI, which should quickly follow).

Thanks,  
Bob

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