

**From:** [Ullrich, Betsy](#)  
**To:** [Sumlin, Jeffrey](#)  
**Subject:** Request to Additional Information - revised decommissioning cost estimate  
**Date:** Thursday, June 24, 2021 2:20:00 PM

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Jeff,

I will need a formal response letter for these questions. If you determine that the DFP and cost estimate need to be revised, please wait until I review your revisions before you revise the CFA and the Statement of Intent.

1. Table A.3.4 refers to the attached Certification of Financial Assurance (CFA) and states that "The last three materials listed are sealed sources used in" certain irradiators. However, the last 3 sources on the CFA are uranium-238, depleted uranium and americium-241, none of which are in the irradiators. The 2018 Table A.3.4 stated "the last two materials listed are sealed sources..." but the last two lines on the 2018 CFA were cesium-137 and cobalt-60.
  - a. Please specify which sources should be referenced on Table A.3.4 for use in the irradiators. Confirm that you understand that the sealed sources containing byproduct material authorized under your license fall under a different criterion for financial assurance, and determine if financial assurance is required for the sealed sources. If additional financial assurance is required, please revise your decommissioning funding plan and cost estimate.
  - b. Your license authorizes special nuclear material (SNM) (U-233 and U-235 in any form) which has a separate requirement for financial assurance in 10 CFR 70. This is in addition to the financial assurance provided for byproduct material. Determine if the quantities of SNM you possess also require provision of financial assurance. If additional financial assurance is required, please revise your decommissioning funding plan and cost estimate.
2. Table A.3.12 has same worker cost per day as was shown on the same table in 2018. However, Table A.3.13 has higher total cost for the same hours as in 2018. Explain how the total costs on Table A.3.13 were obtained in the 2021 cost estimate. If revisions to the costs are made, submit the revised cost estimate.
3. Tables A.3.14.a, A.3.14.c, A.3.15, A.3.16, and A.3.17 contain the exact same information as in the 2018 cost estimate tables. Explain your justification for assuming the costs are the same with no increase for inflation or other reasons. In general, costs related to waste disposal have continued to increase. If revisions to the costs are made, submit the revised cost estimate.

Let me know if you have any questions,  
Betsy

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