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October 20, 2021

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington D. C. 20555-001

**Subject:** GEH Request to Withdraw Commitment Letter to NRC Order EA-06-155

- References:**
- 1) NRC Order EA-06-155, Issuance of Order Imposing Fingerprinting and Criminal History Check Requirements for Access to Safeguards Information, Issued 8/21/2006 (ML061370106)
  - 2) California Agreement State Byproduct Material License CA 0017-01, Docket 030-36792
  - 3) NRC License SNM-960, Docket 070-00754
  - 4) NRC License SNM-1270, Docket 070-01220
  - 5) NRC License R-33, GEH Nuclear Test Reactor, Docket 050-00073
  - 6) GEH Letter David W. Turner to Ernesto Quinones, EA-06-155 for License CA 0017-01, Docket 030-36792, 9/8/2006
  - 7) NRC Letter, Rescission of USNRC's Issued Security Orders for Compensatory Measures, Additional Security Measures, and Increased Controls, 4/10/2014 (ML14073A493)
  - 8) NRC Letter, Rescission of USNRC's Issued Security Orders for Compensatory Measures, Additional Security Measures, 4/21/2016 (ML16053A395)

GEH wishes to withdraw a 2006 letter (Ref 6) to clear up ambiguous licensing commitments made to rescinded NRC Order EA-06-155.

On August 21, 2006, the NRC issued Order EA-06-155 (Ref 1) against the GEH Vallecitos Nuclear Center (VNC) California Agreement State byproduct material license, CA 0017-01 (Ref 2). On September 8, 2006, GEH responded in a letter (Ref 6), and in that letter made voluntary commitments that applied requirements contained in Order EA-06-155 to site licenses R-33, SNM-960, and SNM-1270 (Refs 3, 4, & 5).

M210138  
U.S. NRC  
October 20, 2021  
Page 2 of 2

Order EA-06-155 was subsequently rescinded on 4/21/2016 (Ref 7 & 8), superseded by and coinciding with the full implementation of 10 CFR 37. As a result, VNC licenses R-33, SNM-960, and SNM-1270 are now ambiguously committed to requirements of rescinded Order EA-06-155.

If you have any questions concerning this letter, please contact David Heckman, GEH VNC Licensing Lead, at (925) 918 6116.

Sincerely,



David Heckman, VNC Licensing Lead  
Vallecitos Nuclear Center

cc: NRC Region IV Administrator  
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