



Nuclear Fuel Services, Inc.

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CERTIFIED MAIL
RETURN RECEIPT REQUESTED

21G-21-0091
GOV-01-55-04
ACF-21-0152

November 30, 2021

Director
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

- References: 1) Docket No. 70-143; SNM License 124
 2) Letter from NFS to NRC, "Updated Decommissioning Funding Plan as Required by 10 CFR 70.25(e)(2)," dated November 30, 2018 (21G-18-0148)

Subject: Updated Decommissioning Funding Plan as Required by 10 CFR 70.25(e)(2)

Dear Sir:

Nuclear Fuel Services, Inc. (NFS), hereby submits an updated Decommissioning Funding Plan (DFP) per the requirements set forth in 10 CFR 70.25(e)(2). The DFP includes a detailed cost estimate for decommissioning that accounts for changes in costs and NFS facilities since December 2018. The updated cost estimate is based on over 26 years of experience conducting decommissioning projects at the NFS Erwin site, as well as commercial off-site decommissioning projects.

Two (2) Records of Revisions have been prepared to aid in your review. The first describes the changes to the text portion of the DFP, and the second describes the changes to the cost estimate portion of the DFP. NUREG-1757, Volume 3, Revision 1, "Financial Assurance, Recordkeeping, and Timeliness," Checklist 3 for Decommissioning Funding Plans was used as guidance to prepare this update.

The information contained in the Appendix of Enclosure 2 is considered proprietary in nature as set forth in the affidavit (Enclosure 1). Figure 1 is also marked as "Official Use Only" in accordance with 5 U.S.C. 552. Therefore, NFS requests that this information be withheld from public disclosure.

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Following the NRC's acceptance of the cost estimate amount, NFS will modify its financial assurance mechanisms as appropriate to ensure that the revised costs are fully covered by the mechanisms and will provide the revised documents to the NRC.

If you or your staff have any questions, require additional information, or wish to discuss this, please contact me, or Danielle Rogers, Nuclear Safety and Licensing Section Manager, at (423) 735-5475. Please reference our unique document identification number (21G-21-0091) in any correspondence concerning this letter.

Sincerely,

NUCLEAR FUEL SERVICES, INC.



Tim Knowles, Director
Safety and Safeguards

TCH/smd

Enclosure 1: Affidavit – Financial Information
Enclosure 2: Decommissioning Funding Plan

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Enclosure 1

Affidavit

Financial Information

(2 pages to follow)

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AFFIDAVIT
FINANCIAL INFORMATION

I, Tim Knowles, Director of Safety and Safeguards at Nuclear Fuel Services, Inc. (NFS), that to the best of my knowledge and beliefs, make the following representation contained herein:

- A. The following document(s) which Nuclear Fuel Services, Inc. (NFS) wishes to have withheld from public disclosure is:

Enclosure 2, Decommissioning Funding Plan

***Appendix to the Decommissioning Funding Plan
(Enclosure 2) to Letter (21G-21-0091)
dated November 30, 2021***

- B. The information contained in the document(s) cited in A above has been held in confidence by Nuclear Fuel Services, Inc. (NFS), in that it contains financial information as specified in Title 10, Code of Federal Regulations, Part 2.390(a). The basis for requesting that this document(s) be withheld from public disclosure is explicitly marked on the cover page to each of the aforementioned documents and/or the top of each affected page, as appropriate, in accordance with 10 CFR 2.390(b)(i)(B).
- C. The information contained in the document(s) cited in A above is the intellectual property of Nuclear Fuel Services, Inc. (NFS), and as such is customarily held in confidence by Nuclear Fuel Services, Inc. (NFS). As such, Nuclear Fuel Services, Inc. (NFS) has customarily submitted privileged and confidential information of this type to the Nuclear Regulatory Commission (NRC) and to its predecessor, the Atomic Energy Commission (AEC), in confidence.
- D. The information contained in the document(s) cited in A above has not been made available to public sources by Nuclear Fuel Services, Inc. (NFS), nor has Nuclear Fuel Services, Inc. (NFS) authorized that it be made available. In accordance with Nuclear Fuel Services, Inc. (NFS) policies governing the protection and control of information, proprietary information contained herein has been made available, on a limited basis, to others outside NFS only as required and under suitable agreement providing for nondisclosure and limited use of the information.
- E. The public disclosure of the information contained in the document(s) cited in A above is likely to cause substantial economic harm to the competitive advantage held by Nuclear Fuel Services, Inc. (NFS). The basis for withholding said

information is that it is vital to a competitive advantage held by Nuclear Fuel Services, Inc. (NFS), would be helpful to competitors of NFS, and would likely cause substantial harm to the competitive position of Nuclear Fuel Services, Inc. (NFS).

- F. The proprietary information that Nuclear Fuel Services, Inc. (NFS) requests to be withheld from public disclosure is contained in the entire document(s) as so marked.

Tim Knowles 11/30/2021
Date
Tim Knowles
Director, Safety and Safeguards
Nuclear Fuel Services, Inc.

I certify the above named person appeared before me and executed this document on this the 30 day of November, 2021.

Susan Marie Doman
State of Tennessee Notary Public
SUSAN M. DOMAN
STATE OF TENNESSEE
NOTARY PUBLIC
UNICOI COUNTY
My commission expires: 2/27/2024

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Enclosure 2

Decommissioning Funding Plan

(16 pages to follow)

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