



BWX Technologies, Inc.

December 7, 2021
21-064

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

Reference: SNM-42, Docket 70-27

Subject: Request to Amend License SNM-42, Chapter 10, *Decommissioning* -
Update of Decommissioning Cost Estimate

Dear Sir or Madam:

BWXT Nuclear Operations Group, Inc. - Lynchburg (BWXT NOG-L) is submitting the revised Chapter 10 of the SNM-42 License Application in accordance with 10 CFR 70.25(e). This proposed amendment updates the cost estimate required for financial assurance for decommissioning as required by SNM-42, Chapter 10, Section 10.4. The original decommissioning plan, accompanying cost estimate and assurances were prepared in accordance with NUREG 1727 and approved by the NRC. This amendment updates those cost estimates for the approved decommissioning plan as required by the license. NUREG 1757, which incorporates and updates NUREG 1727, has been regarded as appropriate while updating this cost estimate. Amendments to the current Surety Bond, Standby Trust Agreement and Certificate of Financial Assurance will be revised and provided to NRC following NRC approval of this update to the Decommissioning Cost Estimate.

The following changes to Chapter 10 are being submitted for approval:

Changes	Justification
Table 10.3 (pg. 10-5): Revised cost estimates for Downblend and LTC.	These changes reflect the updated cost estimates required to be submitted by the licensee every three years.
Section 10.3.6 (Page 10-6): clarified Standby Trust item	Minor editorial change
Appendix 10-3, 1 st & 2 nd bullet (pg. 10-17): updated labor rates used in estimate	These changes reflect the updated cost estimates required to be submitted by the licensee every three years.
Appendix 10-3, final paragraph (pg. 10-17): updated cost estimate	These changes reflect the updated cost estimates required to be submitted by the licensee every three years.
Appendix 10-3, Tables 1 and 2 (pgs. 10-18 through 10-21): Updated costs throughout.	These changes reflect the updated cost estimates required to be submitted by the licensee every three years.
Appendix 10-4, 1 st bullet (pg. 10-23): revised "Controlled contamination areas" to "Controlled and Intermediate Areas"	Minor editorial change
Appendix 10-4, 8 th paragraph (pg. 10-26): clarified wording	Minor editorial change
Appendix 10-4, 2 nd paragraph (pg. 10-28): clarified wording	Minor editorial change
Appendix 10-4, 3 rd paragraph (pg. 10-29): replaced "minus" with "-"	Minor editorial change
Appendix 10-4, 4 th paragraph (pg. 10-29): replaced "ten, fifteen or more years" with "many years"	Minor editorial change
Appendix 10-4: Updated labor rates (pg.10-30)	These changes reflect the updated cost estimates required to be submitted by the licensee every three years.
Appendix 10-4: Replaced cost estimates with updated costs (pgs. 10-32 and 10-33)	These changes reflect the updated cost estimates required to be submitted by the licensee every three years.

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As required, the enclosure to this letter includes the adjusted Decommissioning Funding Plan, as documented in Chapter 10 of the SNM-42 License Application, accounting for changes in costs and extent of contamination. The enclosure also contains the revised SNM-42, License Application Chapter 10, *Decommissioning*. It consists of commercial and financial proprietary information, as well as proprietary contractual information, which is of a type described in 10 CFR 2.390(a)(4) and 10 CFR 9.17(a)(4). The enclosure has been designated as Official Use Only.

If you have questions or require additional information, please contact Chris Terry, Manager of Licensing and Safety Analysis, at cterry@bwxt.com or 434-522-5202.

Sincerely,



Richard J. Freudenberger
Manager, Environment, Safety, Health & Safeguards
BWXT Nuclear Operations Group, Inc., Lynchburg

Enclosure

cc: NRC, Resident Inspector (Cover Letter Only)
NRC, James Downs, Senior Project Manager (Cover Letter Only)
NRC, Noel Pitoniak, Region II