



Lance M. Hauer, P.E.
Legacy Site Team Leader

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March 31, 2022

ATTN: Document Control Desk
Jane Marshall, Director
Division of Decommissioning, Uranium Recovery, and Waste Programs
Office of Nuclear Materials Safety and Safeguards
U.S. Nuclear Regulatory Commission
11555 Rockville Pike, #2 White Flint
Mailstop T5A10
Rockville, MD 20852-2738

Subject: Church Rock Financial Surety Requirement- Source Material License No. SUA-1475

Dear Ms. Marshall:

Source Materials License No. SUA-1475, License Condition 25, requires that United Nuclear Corporation (UNC) provide an annual update of the surety amount and maintain a Nuclear Regulatory Commission (NRC) approved surety arrangement, consistent with 10 CFR 40, Appendix A, Criteria 9 and 10. This letter provides the annual surety update.

UNC completed a comprehensive re-baseline of the surety requirement in July 2020. This re-baseline surety estimate included the ongoing efforts at the UNC Mill and implementing the license amendment request to consolidate Northeast Church Rock Mine materials at the UNC Mill. The conditions used in the current updated annual surety calculation have not changed from those used for the 2020 re-baseline adjustment.

The attached table presents the change to the annual surety amount based on the 8.92% increase in the unadjusted consumer price index for all urban consumers from the end of December 2020 (260.474) through the end of February 2022 (283.716). As a result of continued steady-state conditions at the site it is recommended that the surety amount be increased from \$23,649,776 to \$25,511,264 and the license be amended to reflect the change.

Following NRC's approval of this annual surety update, UNC will issue a bond rider for the updated surety amount.

As of September 1997, UNC became a wholly owned, indirect subsidiary of the General Electric (GE) Company. GE Corporate Environmental Programs have been retained through a separate administrative services agreement to assist UNC both technically and administratively with environmental issues at the Church Rock site.

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Please contact me at (484) 213-0300 if you have any questions or would like additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Lance M. Hauer". The signature is fluid and cursive, with the first name being the most prominent.

Lance M. Hauer P.E.

Legacy Site Team Leader – Remediation

GE Global Operations – EHS

cc: Jim Smith, NRC Region IV (via E-mail)

Summary of Surety Costs		
Item	Reclamation or Decommissioning Task	Baselined Field Cost*
1	Procurement	\$22,500
2	Site Preparation Work	\$374,363
3	Jetty Borrow Haul Road Construction	\$10,108
4	Repository Construction/Preparation for Mine Waste	\$605,046
5	Mine Waste Transportation within Site and Disposal in Repository	\$1,313,503
6	Repository ET Cover Construction (Material Placement and Grading)	\$3,493,751
7	Mill Site Final Grading and Seeding	\$72,009
8	Permanent Stormwater Features construction	\$4,949,010
9	Final Revegetation	\$179,965
10	Monitoring, Testing, and Verification Controls	\$3,026,190
11	Mill Site Debris Excavation and Disposal	\$420,235
12	Cover Evaporation Ponds	\$319,396
13	Mill Site Well Decommissioning	\$539,180
14	Short-Term Surveillance	\$1,186,024
15	Groundwater Monitoring - Maintenance and Sampling	\$2,819,195
16	Land Surveying	\$673,755
17	Engineering and Fees	\$2,101,321
18	Contingency	\$3,315,833
Existing USEPA Financial Assurance Bond		-\$2,000,000
Total 2020 Surety Amount		\$23,421,383
2020 December unadjusted CPI-U value		260.474
2022 February unadjusted CPI-U value		283.716
Total 2022 Surety Amount		\$25,511,264

* Baselined on Dec. 2020 unadjusted CPI-U value