

**From:** [Downs, James](#)  
**To:** [Terry, Chris T](#)  
**Cc:** [Subosits, Stephen G](#); [McCarthy, Steve](#); [Kline, Kenneth](#); [Siurano-Perez, Osiris](#)  
**Subject:** Request for additional information - decommissioning cost updates (EPID L-2021-DFA-0010)  
**Date:** Wednesday, June 8, 2022 11:07:00 PM

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Chris,

This is regarding your decommissioning funding submittal dated December 7, 2021 (Agencywide Documents Access and Management System [ADAMS] Accession Number ML21344A061). Our review of your application has identified that additional information is needed before final action can be taken. The additional information, specified below, should be provided within 30 days from the date of this email.

1. The proposed Chapter 10, Decommissioning, of the SNM-42 License Application does not document how the eight factors from Title 10 of the *Code of Federal Regulations* (10 CFR), Section 70.25(e)(2) were specifically considered. Please revise Chapter 10 to explicitly address those eight factors.
2. It is unclear how the proposed Chapter 10 of the SNM-42 License Application addresses the decommissioning cost associated with onsite inventory. Additional guidance is available in the U.S. Nuclear Regulatory (NRC) Interim Staff Guidance on Decommissioning Funding Plans for Material Licensees (<https://www.nrc.gov/docs/ML1907/ML19079A314.pdf>). Please revise Chapter 10 to clarify how the decommissioning cost associated with onsite inventory (e.g., licensee-owned, customer-owned, and inventory in-process) is addressed. For example, title of material subject to a processing contract with an entity may remain with that entity however, in some circumstances, the cost to load, survey, and ship the material back to that entity may need to be accounted for.

Pending your response, we anticipate completing our review approximately 2 weeks after receiving the revised pages. This timeframe could change depending on the findings of our technical review, urgent assignments, or other factors. We will promptly communicate any significant changes to this schedule.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this email will be available electronically for public inspection in the NRC's Public Document Room, or from the Publicly Available Records component of the NRC's ADAMS.

Thanks,

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