

April 12, 1999

Dr. Carl J. Paperiello, Director
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U.S. Nuclear Regulatory Commission
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Washington, D.C. 20555-0001

REFERENCE: Recommended Changes to Draft NUREG-1520 Standard Review Plan (SRP) Chapter 10 ('Decommissioning')

Dear Dr. Paperiello:

In support of your efforts to revise draft NUREG-1520 ('*Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility*'), the Nuclear Energy Institute (NEI)¹ has reviewed the *revision-in-total* of Chapter 10 which was posted on the Nuclear Regulatory Commission's (NRC) Webpage on February 5, 1999.

Our principal concern with draft Standard Review Plan (SRP) Chapter 10 continues to be the confusing manner in which the requirements for *Decommissioning Plans* (DPs), which are submitted at the time of license termination or removal of inactive areas from the license, are unnecessarily mixed with those for *Decommissioning Funding Plans* (DFPs), which are submitted as part of a license application or license renewal. This SRP is intended to provide guidance to the Staff in reviewing applications for licenses and renewals. It is not guidance for reviewing DPs and should not be used for that purpose. By mixing these two functions, unnecessary confusion is created within the document.

Draft SRP Chapter 10 continues to reference various guidance documents that either focus exclusively on DPs, rather than DFPS, or whose scope goes well

¹ NEI is the organization responsible for establishing unified nuclear industry policy on matters affecting the nuclear energy industry, including the regulatory aspects of generic operational and technical issues. NEI's members include all utilities licensed to operate commercial nuclear power plants in the United States, nuclear plant designers, major architect/engineering firms, fuel fabrication facilities, materials licensees, and other organizations and individuals involved in the nuclear energy industry.

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beyond the criteria applicable to DFPs. References to Reg. Guide 3.65, FC 91-02 and the NMSS Handbook (NUREG/BR-0241) should be deleted from this SRP chapter. The applicable guidance documents that should be referenced are NUREG-1337, Reg Guide 3.66 and, if desired, FC-90-02.

The NRC has developed, and continues to develop extensive guidance on the review of DPs. Inclusion of such guidance in draft SRP Chapter 10 will create unnecessary confusion. SRP chapter 10 should be limited to a discussion of the requirements for submittal of *Decommissioning Funding Plans*, record retention requirements for new license applications and waste/contamination plans. The SRP should also reference pre-existing guidance on DFPs to the maximum extent possible and not create new regulatory criteria.

The NRC announced at the March 23, 1999 *Public Meeting on Revision to 10 CFR Part 70* that the requirement to provide for a separate decommissioning ISA (§70.62(b) in the SECY-98-185 proposed Rule revisions and §10.4.3.2 in draft SRP Chapter 10) would be deleted. We commend the NRC for this action.

The Enclosure to this letter presents a red-lined version of the NCR's *revision-in-total* that incorporates our recommended improvements.

We appreciate being able to participate in the NUREG-1520 revision process. We should be pleased to address any questions which you or your staff may have on NEI's recommended revisions to SRP Chapter 10.

Sincerely,

Marvin S. Fertel
Enclosures

c: The Honorable Shirley A. Jackson, Chairman, NRC
The Honorable Greta J. Dicus, Commissioner, NRC

The Honorable Nils J. Diaz, Commissioner, NRC
The Honorable Edward McGaffigan, Jr., Commissioner, NRC
The Honorable Jeffrey S. Merrifield, Commissioner, NRC
Dr. William D. Travers, Executive Director for Operations, NRC

U.S. NUCLEAR REGULATORY COMMISSION
STANDARD REVIEW PLAN
OFFICE OF NUCLEAR MATERIAL SAFETY AND SAFEGUARDS

10.0 DECOMMISSIONING

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10.0 DECOMMISSIONING

10.1 PURPOSE OF REVIEW

The purpose of the review of the applicant's plans for decommissioning is to ensure that these plans provide reasonable assurance that the applicant will be able to decommission the facility safely and in accordance with NRC requirements.

At the time of the initial license application, and upon license renewal, the applicant/licensee may be required to submit a decommissioning funding plan (DFP). The purpose of NRC review of the DFP is to determine that the applicant/licensee has considered decommissioning actions which may be needed in the future, has performed a credible site-specific cost estimate for those actions, and has presented NRC with financial assurance to cover the cost of these actions in the future. The DFP, therefore, should contain an overview of the proposed decommissioning actions, the methods used to determine the cost estimate and the financial assurance mechanism. These must be in sufficient detail to allow the reviewer to determine that the decommissioning cost used in the DFP is reasonably accurate.

~~Prior to the initiation of decommissioning activities, for the entire site or some portion of the site, the applicant must submit a decommissioning plan (DP). The review for a DP is more rigorous than the review of the DFP. A DP must contain a detailed description of the specific decommissioning activities to be performed and must be sufficient to allow the reviewer to assess the appropriateness of the decommissioning activities, the potential impacts on health and safety of the public, workers, and the environment and the adequacy of the actions to protect health and safety and the environment. The reviewer must ascertain that the applicant understands decommissioning requirements and procedures, and commits to health and safety during decommissioning.~~

~~[Comment: The foregoing sentence should not be included in this SRP as DPs need not be included as part of the application for a Part 70 license. Detailed requirements for DPs can be included in separate guidance documents.]~~

10.2 RESPONSIBILITY FOR REVIEW

~~[Comment: The need for decommissioning technical specialists at the time of license application is minimal. Their contribution will be important when a facility's DP is submitted to the NRC for review and approval.]~~

Primary: Licensing Project Manager

Secondary: Environmental Reviewer
~~ISA Lead Reviewer~~

~~Technical and f~~ Financial specialists in the Division of Waste Management

Supporting: Fuel facility inspection staff

10.3 AREAS OF REVIEW

The reviewer will evaluate the applicant's decommissioning funding plan in accordance with NUREG-1337 and Reg. Guide 3.66.~~description of plans for decommissioning plans, and financial assurance for decommissioning, as described in Regulatory Guide 3.65, Standard Format and Content of Decommissioning Plans for Licensees under 10 CFR Parts 30, 40, and 70, and Regulatory Guide 3.66, Standard Format and Content of Financial Assurance Mechanisms Required for Decommissioning under 10 CFR Parts 30, 40, 70, and 72.~~ In addition, the reviewer will verify that the applicant has agreed to maintain records until license termination and that the applicant has identified the location where such records will be kept (see FC 90-02).~~evaluate the applicant's plans for preparing and retaining records important to decommissioning and,~~ For new applicants (not including renewal applications submitted after August 20, 1997) the reviewer will evaluate the applicant's description of how the facility design and procedures for operation will minimize, to the extent practicable, contamination of the facility and the environment and facilitate eventual decommissioning. New applicant's applicants' descriptions of waste minimization plans are evaluated under SRP 9.0 on Environmental Protection. Existing licensees are already required to minimize contamination and reduce exposures and effluents as part of radiation protection established under 10 CFR Part 20 [see 62 FR 39082]. Consequently, review of these aspects for existing facilities will be conducted under SRP 9.0.~~Review of the applicant's decommissioning portions of the (Integrated Safety Analysis) ISA and ISA summary will be conducted under SRP 3.0 on ISA. [Comment: there is no ISA for decommissioning.]~~

[Comment: NEI recommends that specific items for review be specified in this §10.3 be identified.]

The reviewer will evaluate the applicant's DFP to determine that the applicant:

- (1) has prepared a preliminary cost estimate for decommissioning
- (2) commits to periodically review this cost estimate over the life of the facility and update it when required
- (3) has certified that financial assurance for decommissioning is funded to the amount of the cost estimate
- (4) commits to promptly adjust the amount of financial assurance as the cost estimate is periodically reviewed

- (5) commits to retain records of cost estimates performed for the DFP including descriptions of the funding mechanism used

The reviewer will also evaluate the applicant's commitments to:

- (1) maintain records of information important to decommissioning (such as records of spills, abnormal events, facility drawings, waste burial sites, maps of restricted areas, etc.)
- (2) maintain records of decommissioning cost estimates, amounts certified for decommissioning and records of funding methods used for assuring funds (for either a DFP or certificate)
- (3) prepare and submit for NRC approval a DP upon license expiration, revocation or within 24 months of cessation of operations, and
- (4) implement the NRC-approved DP in an expeditious and comprehensive manner"

[Comments:

- (1) the repetitious inclusion of Reg Guide references in the following section is unnecessary. Such references should be consolidated into §10.4.2
- (2) reference to Reg. Guide 3.65 is inappropriate and should be deleted
- (3) a description of the proposed waste minimization plan may not be needed in SRP 10. Compliance with 10 CFR 20.1406 ('Minimization of Contamination') could be addressed in SRP Chapter 1, 3 or 9, but should be emphasized at the time of DP preparation
- (4) reference to the decommissioning ISA should be deleted.]

10.4 ACCEPTANCE CRITERIA

10.4.1 Regulatory Requirements

[Comment: References to highly technical and specific decommissioning requirements in Chapter 10 is not necessary (e.g. NUREG/BR-0241). Technical guidance will be valuable when the applicant's DP is submitted for approval, but not at the time of license application submittal. The license application will only contain **commitments** to prepare the DP and to decommission the facility in accordance with the NRC-approved DP. Reference to proposed revision of 10 CFR 70.62(b) is deleted in accordance with NEI's recommendation that a separate Decommissioning ISA is not required.]

Decommissioning planning~~Planning for decommissioning,~~ Financial assurance for decommissioning, recordkeeping for decommissioning, ~~recordkeeping,~~ and waste and contamination minimization are required by the following NRC regulations:

10 CFR 70.22(a)(9)

Decommissioning Funding Plan

10 CFR 70.25	Financial Assurance and Recordkeeping for Decommissioning
10 CFR 70.38	Expiration and Termination of Licenses and Decommissioning of Sites and Separate Buildings or Outdoor Areas
10 CFR 70.62(b)	ISAs during Decommissioning
10 CFR 20.1401-1406 (Subpart E)	Radiological Criteria for License Termination

10.4.2 Regulatory Guidance

“Relevant regulatory guidance for decommissioning in license applications includes:

Standard Review Plan for the Review of Financial Assurance Mechanisms Required for Decommissioning Under 10 CFR Parts 30, 40, 70 and 72, NUREG-1337 (Rev. 1)

Standard Review Plan for Evaluating Compliance with Decommissioning Requirements for Source, Byproduct, and Special Nuclear Material License Applications [Policy and Guidance Directive FC 90-2, April 30, 1991 This document provides guidance on decommissioning financial assurance reviews, planning and recordkeeping.]

Standard Format and Content of Financial Assurance Mechanisms Required for Decommissioning under 10 CFR Parts 30, 40, 70 and 72, Reg. Guide 3.66

The principal document that provides NRC regulatory guidance for the review of ~~plans for decommissioning plans, financial assurance for decommissioning, recordkeeping for decommissioning, and waste and contamination minimization~~ is the ~~NMSS Handbook for Decommissioning Fuel Cycle and Materials Licensees, NUREG/BR-0241 (March 1997) and documents referenced therein. This includes~~ *Standard Review Plan for the Review of Financial Assurance Mechanisms Required for Decommissioning Under 10 CFR Parts 30, 40, 70 and 72, NUREG-1337 (Rev. 1)*, ~~the~~ *Standard Review Plan for Evaluating Compliance with Decommissioning Requirements for Source, Byproduct, and Special Nuclear Material License Applications [Policy and Guidance Directive FC 90-2, April 30, 1991; provides guidance on decommissioning financial assurance reviews, planning, and recordkeeping]*, and ~~Standard Review Plan for Evaluating Decommissioning Plans for Licensees under 10 CFR Parts 30, 40, and 70 [Policy and Guidance Directive FC 91-02, August 5, 1991; provides guidance on reviewing decommissioning plans].~~ ~~Because NRC requirements for decommissioning have changed since issuance of these two SRPs, the reviewer should first consult NUREG/BR-0241 for specific guidance on the application of the SRPs.~~

~~Additional relevant guidance is *Demonstrating Compliance with the Radiological Criteria for License Termination*, Draft Regulatory Guide DG-4006, February 17, 1998 [to be updated].~~

10.4.3 Regulatory Acceptance Criteria

10.4.3.1 ~~Decommissioning Planning, Recordkeeping, and Financial Assurance Funding Plans~~

[Comments: Judging the acceptability of a financial assurance plan against only a single standard (NUREG/BR-0241) is too prescriptive. A financial assurance plan will, in actuality, be 'acceptable' if it satisfies the requirements of 10 CFR 70.25(e),(f) and(g).]

An applicant/licensee's ~~decommissioning funding plan is plans for decommissioning planning, recordkeeping and financial assurance in a DFP are acceptable if it they fulfill~~s the criteria described in ~~Reg. Guide 3.66 and NUREG-1337, the NMSS Handbook for Decommissioning Fuel Cycle and Materials Licensees, NUREG/BR-0241 (March 1997) and documents referenced therein including the Standard Review Plan for Evaluating Compliance with Decommissioning Requirements for Source, Byproduct, and Special Nuclear Material Applications [Policy Guidance Directive FC 90-2, April 30, 1991].~~

At the time of licensing or license renewal, a DFP may be required. A DFP does not need to meet all of the criteria of a formal DP, but will be considered a subset of the information required in a DP. The DFP must provide an estimate of the decommissioning cost for unrestricted or restricted release of the site. It also must include a means for adjusting cost estimates and associated levels periodically over the life of the facility. If submitted during license renewal, the DFP must also compare the estimated cost with the present level of financial assurance funds set aside for decommissioning, and should note how decommissioning financial assurance instruments required under 10 CFR 70.22 will be increased, if necessary. The financial assurance instrument required under 10 CFR 70.22(a)(9) must be funded to the amount of the cost estimate. If there is a deficit in current funding, the DFP must indicate the means for assuring adequate funds to complete decommissioning.

The DFP decommissioning cost estimates are acceptable if they include an evaluation of the following cost estimates identified below. In addition, Regulatory Guide 3.66 ~~“Standard Format and Content of Financial Assurance Mechanisms Required for Decommissioning Under 10 CFR Parts 30, 450, 70 and 72”~~, provides a detailed explanation of methods for estimating decommissioning costs, as well as accepted financial assurance mechanisms.

Cost Estimates:

- cost assumptions used, including a contingency factor
- major decommissioning activities and costs
- unit cost factors
- estimated costs of decontamination and removal of equipment and structures
- estimated costs of waste disposal, including applicable disposal site surcharges and transportation costs
- estimated final survey costs
- estimated total costs

The DFP cost estimate is acceptable if it includes the costs of the remediation action being evaluated, the cost of transportation and disposal of the waste generated by the action, and other costs that are appropriate for the specific case. The current version of NUREG-1307, "Report on Waste Burial Charges", provides guidance on estimating waste disposal costs. Additional guidance can be found in NUREG/CR-1754 *Technology, Safety and Costs of Decommissioning Reference Non-Fuel-Cycle Nuclear Facilities*, NUREG/CR-0129 *Technology, Safety and Costs of Decommissioning a Reference Small Mixed Oxide Fuel Fabrication Plant*, and NUREG/CR-1266 *Technology, Safety and Costs of Decommissioning a Uranium Fuel Fabrication Plant*.

~~10.4.3.2~~ — ~~Decommissioning Plan~~

[Comment: The NRC announced at the March 23, 1999 Public Meeting that the DP requirement has been deleted from the Rule and SRP.]

~~An applicant's~~~~When the applicant/licensee is required to submit a formal DP, the plan is acceptable if it satisfies the review criteria described in the NMSS Handbook for Decommissioning Fuel Cycle and Materials Licensees, NUREG/BR-0241 (March 1997) and documents referenced therein, including the Standard Review Plan for Evaluating Decommissioning Plans for Licensees under 10 CFR Parts 30, 40, and 70 [Policy and Guidance Directive FC 91-02, August 5, 1991]. In addition, an acceptable DP will demonstrate compliance with the radiological criteria for license termination in Subpart E of 10 CFR Part 20.~~

10.4.3.23 *Minimization of Contamination*

[For New Applicants excluding applicants for license renewal after August 20, 1997] An applicant's plans for minimization of contamination are acceptable if they satisfy the following criteria:

1. The applicant's facility has been designed, to the extent practicable, to minimize radioactive and hazardous chemical contamination of the facility (buildings, structures, and equipment) and the environment, to minimize the generation of

radioactive waste, and to facilitate eventual decommissioning. The design incorporates features, such as strippable coatings, low porosity and permeability barriers, filters, ventilation systems, glove boxes, closed containers, double containment and leak detection, overhead piping, monitoring devices and instrumentation, and catch basins, intended to contain contamination, detect contaminant migration through barriers, minimize the extent of contamination, and limit volumes and hazards associated with wastes from operations and decommissioning.

2. The facility design reflects consideration of the accident sequences and essential controls identified in the ISA reviewed under SRP 3.0.
3. The application reflects consideration of radiological survey needs in support of decommissioning and demonstrates that the facility has been designed to facilitate routine area surveys to detect contamination, operational surveys to plan for and conduct decommissioning, and final termination surveys to demonstrate compliance with license termination criteria.
4. The facility has been designed to minimize, to the extent practicable, the potential the facility and site will require land use restrictions and institutional controls following decommissioning and license termination.
5. The application identifies the volumes and types of radioactive waste that will be stored onsite, describes the controls that will ensure containment of the waste while in storage, and ensures that the duration and effects of waste storage will be minimized. The application demonstrates a firm commitment to storing waste inside buildings with appropriate environmental controls, as described in NRC Information Notice 90-09, rather than relying on outside storage of wastes in lagoons, scrap yards, or paved areas. If wastes are stored in outdoor areas, the application includes adequate environmental monitoring provisions to promptly detect and assess environmental migration of contaminants in soil, surface water, and groundwater [see SRP 9.0]
6. The applicant's procedures for operation will minimize radioactive and hazardous chemical contamination of the facility (buildings, structures, and equipment) and the environment, to minimize the generation of radioactive waste, and to facilitate eventual decommissioning. Operating procedures minimize the potential for release of contaminants outside of process vessels. Spills, drips, and other unplanned releases are promptly detected and corrected to stop the release, prevent the spread of contamination, and remove contamination. Procedures for monitoring and surveillance include steps to identify and report any unplanned releases and take prompt corrective action.

10.5 REVIEW PROCEDURES

10.5.1 Acceptance Review

The primary reviewer evaluates the applicant's description of the decommissioning funding plan DP and financial assurance for decommissioning as described in Reg. Guide 3.66 and NUREG-1337. ~~as described in Regulatory Guide 3.65, Standard Format and Content of Decommissioning Plans for Licensees under 10 CFR Parts 30, 40, and 70, Standard Review Plan for the Review of Financial Assurance Mechanisms Required for Decommissioning Under 10 CFR Parts 30, 40, 70 and 72, NUREG-1337 (Rev. 1) and Regulatory Guide 3.66, Standard Format and Content of Financial Assurance Mechanisms Required for Decommissioning under 10 CFR Parts 30, 40, 70, and 72.~~ In addition, the reviewer evaluates the applicant's plans for preparing and retaining records important to decommissioning. For new applicants after August 20, 1997 (other than applicants for license renewal) the reviewer also evaluates the applicant's description of how the facility design and procedures for operation will minimize, to the extent practicable, contamination of the facility and the environment and facilitate eventual decommissioning. The purpose of these reviews is to ensure completeness against NRC requirements and the acceptance criteria of SRP 10.4. If the application is incomplete in any areadeficiencies are identified, the applicant will be is requested to submit additional information to correct these deficiencies before NRC acceptance of the application, and the start of the safety and environmental evaluation.

10.5.2 Safety Evaluation

Comment: A separate 'safety review' is really not required since only the financial assurances of the DFP are being evaluated. DP is not the subject of review at the time of license submittal. Involvement of the Division of Waste Management might better be postponed until the applicant submits a DP for approval. Review of waste minimization plans has been relocated to SRP Chapter 9 ('Environmental Protection'). Reference to the decommissioning ISA should again be deleted.

Upon acceptance of the application for review, the primary reviewer will review the application against NRC requirements and acceptance criteria identified in SRP 10.4 using the procedures described in NUREG-1337 and Reg. Guide 3.66. ~~NUREG/BR-0241 and in the Standard Review Plan for Evaluating Compliance with Decommissioning Requirements for Source, Byproduct, and Special Nuclear Material License Applications [Policy and Guidance Directive FC 90-2, April 30, 1991; provides guidance on decommissioning financial assurance reviews, planning, and recordkeeping], and Standard Review Plan for Evaluating Decommissioning Plans for Licensees under 10 CFR Parts 30, 40, and 70 [Policy and Guidance Directive FC 91-02, August 5, 1991; provides guidance on reviewing decommissioning plans]; and Standard Review Plan for the Review of Financial Assurance Mechanisms Required for Decommissioning Under 10 CFR Parts 30, 40, 70 and 72, NUREG-1337 (Rev. 1).~~ This review will be supplemented as appropriate by detailed review of any contamination and waste minimization plans submitted by

~~the applicant in response to 10 CFR 20.1406. The reviewer will also coordinate with the principal reviewers for environmental protection under SRP 9.0 to confirm review of a new applicant's descriptions of plans for waste minimization, as well as plans for existing licensees to minimize contamination and reduce exposures and effluents as part of radiation protection established under 10 CFR Part 20. The reviewer will also coordinate with the lead reviewer for the ISA to confirm the evaluation of the applicant's ISA for decommissioning under the ISA SRP 3.0. The purpose of this coordination is to ensure that any issues that are relevant to the environmental review or the ISA are properly conveyed to the lead reviewers for these sections for consideration and resolution. Similarly, any decommissioning issues that arise in the environmental or ISA reviews and that are most suited for review under SRP 10.0 are conveyed to the primary reviewer for consideration and resolution.~~

~~If the applicant submits a DP for all or a portion of the site (individual buildings or separate outdoor areas), the reviewer will conduct the review in accordance with the procedures described in NUREG/BR-0241. Such reviews would not normally be conducted as part of the review for a new application, unless the applicant submits detailed information as part of the cost estimate for decommissioning.~~

~~If the safety evaluation identifies the need for the applicant to submit information that has not already been included in the application, the reviewer will document these additional information needs in a Request for Additional Information (RAI). The RAI will be transmitted to the applicant with a request for the information in a reasonable amount of time (e.g., 30 to 60 days). Failure of the applicant to provide the information by the requested date, or on an alternative schedule that is mutually agreeable, could be grounds to terminating or suspending the application review.~~

In accordance with the FCLB licensing manual, the lead reviewer will coordinate with the Division of Waste Management for appropriate technical assistance reviewing proposed ~~decommissioning~~ plans for financial assurance, ~~and other environmental site-related issues~~ [Comment: "...*other environmental site related issues...*" is beyond the scope of SRP 10.] The lead reviewer will coordinate the evaluation of the application with reviewers assigned by the Division of Waste Management and will incorporate, as appropriate, RIAs and review findings in licensing correspondence and safety evaluation reports related to decommissioning.

10.6 EVALUATION FINDINGS

If the staff's review verifies that sufficient information has been provided in the application to satisfy the acceptance criteria and requirements identified in SRP 10.4, the staff will document its review as follows:

The NRC staff has reviewed the applicant/licensee's plans for financial assurance, for decommissioning in accordance with SRP 10.0. Based upon this review, the NRC staff has determined that the applicant's plans for

~~decommissioning [and decommissioning financial assurance, provide reasonable assurance]~~ of protection for members of the public and the environment and comply with NCR's regulations.

10.7 REFERENCES

Code of Federal Regulations, Title 10, Part 70, Domestic Licensing of Special Nuclear Material, U.S. Government Printing Office, Washington, DC.

~~Orlando, D. A., et al. 1997. *NMSS Handbook for Decommissioning Fuel Cycle and Materials Licensees*, U.S. Nuclear Regulatory Commission, NUREG/BR-0241.~~

U.S. Nuclear Regulatory Commission, 1991, *Standard Review Plan for Evaluating Compliance with Decommissioning Requirements for Source, Byproduct, and Special Nuclear Material License Applications*, Office of Nuclear Material Safety and Safeguards, Policy and Guidance Directive FC 90-2.

~~U.S. Nuclear Regulatory Commission, 1993, *Standard Review Plan for the Review of Financial Assurance Mechanisms Required for Decommissioning Under 10 CFR Parts 30, 40, 70 and 72*, NUREG-1337 (Rev. 1),~~

~~Standard Format and Content of Financial Assurance Mechanisms Required for Decommissioning under 10 CFR Parts 30, 40, 70 and 72, (June 1990) Reg. Guide 3.66~~

~~U.S. Nuclear Regulatory Commission, 1991, *Standard Review Plan for Evaluating Decommissioning Plans for Licensees under 10 CFR Parts 30, 40, and 70*, Office of Nuclear Material Safety and Safeguards, Policy and Guidance Directive FC 91-02.~~