

10.0 DECOMMISSIONING

In accordance with Reference 1, this chapter provides an overview of proposed decommissioning activities for the American Centrifuge Plant (ACP). The ACP is located in a leased area of the U.S. Department of Energy's (DOE) reservation in Piketon, Ohio. USEC Inc. (USEC) requests a 30-year license to accommodate plans to operate the ACP through 2036. At the end of useful plant life, the ACP will be decommissioned such that the facilities will be either returned to the DOE in accordance with the requirements of the Lease Agreement with the DOE or will be released for unrestricted use. The criteria for final disposition of facilities will be established in the Decommissioning Plan (DP) which, as noted below, will be submitted prior to license termination. Nevertheless, for the purposes of the License Application for the American Centrifuge Plant, the decommissioning discussions in this Application and the decommissioning estimated costs are based on decontaminating the plant to the radiological criteria for unrestricted use in 10 *Code of Federal Regulations* (CFR) 20.1402. Information about USEC, the location of the site, and the types and authorized uses of licensed material are provided in Section 1.2 of the license application and a description of the site and immediate environs is provided in Section 1.3 of the license application.

A detailed DP for the ACP will be submitted by USEC in accordance with 10 CFR 70.38(g) and applicable risk-informed U.S. Nuclear Regulatory Commission (NRC) guidance (References 2, 3, and 4) prior to the time of license termination. Prior to decommissioning, an assessment of the radiological status of the ACP will be made. Enrichment equipment will be removed, leaving only the building shells and the plant infrastructure, including equipment that existed at the time of lease with the DOE (e.g., rigid mast crane, utilities, etc.). Classified material, components, and documents will be destroyed or disposed of in accordance with the Security Program for the American Centrifuge Plant (Reference 5). Requirements for nuclear material control and accountability will be maintained during decommissioning in a manner similar to the programs in force during ACP operation (Reference 6). Depleted uranium hexafluoride (UF₆) material (tails), if not sold or disposed of prior to decommissioning, will be sold, or converted to a stable, non-volatile uranium compound and disposed of in accordance with regulatory requirements utilizing facilities constructed by DOE, as authorized by the USEC Privatization Act, and/or other licensed facilities. Radioactive wastes will be disposed of at licensed low-level waste disposal sites. Hazardous wastes will be treated or disposed of in licensed hazardous waste facilities.

The DP submitted at the time of license termination consists of several interrelated components, including (1) site characterization information, (2) remediation plan, and (3) a final status survey plan. The costs for activities required for these components have been identified in this chapter and estimated in the Decommissioning Funding Plan (DFP). Costs projected were developed based on the experience at the Portsmouth Gaseous Diffusion Plant during the transition to Cold Standby operation and decommissioning cost estimates developed for the American Centrifuge Demonstration Facility. Additionally, USEC has performed dismantling and decontamination work at the gaseous diffusion plants. Data and experience from these activities allowed a realistic estimation of expected decommissioning financial expenditures.

Using the cost data as a basis, financial arrangements are made to cover costs required to release the ACP for unrestricted use and to dispose of the tails. Updates on cost and funding will be provided periodically as describe in Section 10.10.3. In accordance with 10 CFR 70.22(a)(9) and 70.25(a)(1), a DFP is submitted as part of the license application for the ACP (Reference 7).

The following assumptions are utilized in the plan for decommissioning:

- No credit is taken for salvage value of equipment or materials.
- Decontamination liability is anticipated in the X-3001 and X-3002 Process Buildings, X-3012 Process Support Building, X-3346 Feed and Customer Services Building, X-3346A Feed and Product Shipping and Receiving Building, X-7725 Recycle/Assembly Facility, X-7726 Centrifuge Training and Test Facility, X-7727H Interplant Transfer Corridor, X-3356 Product and Tails Withdrawal Building, X-2232C Interconnecting Process Piping, and miscellaneous cylinder storage yards.
- No decontamination is anticipated for the other ACP leased facilities.
- Decommissioning estimated costs are based on decontaminating the plant to the radiological criteria for unrestricted use in 10 CFR 20.1402.

The centrifuge assembly area in the X-7725 facility is identified as the Decontamination Service Area (DSA). The centrifuge machine transport system is used to transport the centrifuge machines from the cascade area to the DSA.

The remaining sections of this chapter describe decommissioning plans and funding arrangements, and provide a detailed examination of the decontamination aspects of the program. The information herein was developed in connection with the decommissioning cost estimate and is provided for information. Specific elements of the planning may change with the submittal of the detailed DP required near the time of license termination.

10.1 Decommissioning Program

The plan for decommissioning is to decontaminate or remove materials from the facilities promptly after cessation of ACP operations. Decommissioning planning begins by incorporating special design features into the plant. These features simplify dismantling and decontamination. The plans are implemented through proper management of Radiation Protection and Industrial Health and Safety programs for the ACP. Decommissioning policies address radioactive waste management, physical security, and nuclear material control and accountability.

10.1.1 Decommissioning Design Features

Specific features are incorporated into the plant design to accommodate decontamination and decommissioning activities. The major features are described below.

10.1.1.1 Radioactive Contamination Control

The following features primarily serve to minimize the spread of radioactive contamination during operation, and simplify the eventual plant decommissioning. As a result, worker exposure to radiation and radioactive waste volumes are maintained as low as reasonably achievable (ALARA).

- Areas of the plant are sectioned off into clean areas and potentially contaminated areas, called Contamination Control Zones (CCZs) that have access control requirements. CCZs are buffer zones established where discrete areas of contamination might be occasionally encountered. Areas that are contaminated are called Contamination Areas (CAs). Figure 10.1-1 (located in Appendix A of this license application) provides a diagram showing the CCZ boundary. Procedures for these areas are encompassed by the Radiation Protection Program, and serve to minimize the spread of contamination and simplify eventual decommissioning.
- Non-radioactive process equipment and systems are minimized in locations subject to likely contamination. This limits the size of the CCZs, and limits the activities occurring inside these areas.

10.1.1.2 Worker Exposure and Waste Volume Control

The following features primarily serve to minimize worker exposure to radiation and minimize radioactive waste volumes during decontamination activities. As a result, the spread of contamination is minimized as well.

- Ample access is provided for efficient equipment dismantling and removal of equipment that may be contaminated. This minimizes the time of worker exposure.
- Connections in the process systems are provided for thorough purging. This removes a significant portion of radioactive contamination prior to disassembly.
- Design drawings prepared for the plant, simplify the planning and implementing of decontamination procedures.
- Worker access to contaminated areas is controlled to assure that workers wear proper protective equipment and limit their time in the areas.

This figure is withheld pursuant to 10 CFR 2.390 and is located in Appendix A of this license application

Figure 10.1-1 Contamination Control Zone

10.2 Decommissioning Steps

Decommissioning may begin immediately following termination of operation, since only low radiation levels exist at this plant. Overall, the decommissioning is estimated to require approximately six years from plant shutdown to completion of the final status survey of radiological conditions. The order of activities to support decommissioning will generally be: planning and preparation; process system purging; equipment dismantling and removal; decontamination; disposition of equipment and material (including classified items); disposal of wastes; completion of a final status survey. The following sections provide an overview and explanation of each of these steps.

10.2.1 Overview

The intent of decommissioning is to return the ACP to an unrestricted use state. Removed equipment includes the centrifuges, the feed and withdrawal equipment, piping and components from systems providing UF₆ containment, systems in direct support of the centrifuges (e.g., cooling water), radioactive and hazardous waste handling systems, contaminated air filtration systems, etc. The remaining plant infrastructure includes utility services such as electrical power supply, sanitary water, fire suppression, ventilation, communications, and sewage treatment.

Decontamination of the plant will not require the installation of a new facility dedicated for that purpose since the X-7725 facility will serve as the DSA and will accommodate repetitive equipment decontamination of centrifuges and other components. The DSA is described in Section 10.8.1 of this license application and will be the location for decontamination activities.

Although certain unclassified components may be reused or sold as scrap, for conservatism this plan assumes only that components will be decontaminated in accordance with radiation protection requirements. Classified parts will be dispositioned in accordance with the Security Program. Table 10.2-1 of this license application lists components for potential decontamination at decommissioning.

USEC intends to evaluate possible commercial uses of UF₆ tails. UF₆ tails which are not commercially reused will be converted to a stable form and disposed of in accordance with the USEC Privatization Act and other applicable statutory authorizations and requirements at DOE's UF₆ conversion facilities and/or other licensed facilities. UF₆ tails are stored in steel cylinders until the tails material can be processed in accordance with the disposal strategy established by USEC. USEC provides financial assurance to fund the estimated cost of conversion and disposal of the depleted uranium inventory as it is generated during operation. This funding is described in the DFP and is in addition to the funding requirements for decommissioning the ACP. At full capacity, the ACP will generate approximately 11,920 Metric Ton (MT) of UF₆ tails annually. Over the 30-year license, that is a total of approximately 326,530 MT of UF₆ tails, as noted in Table C3.19 of the DFP. Depending on technological developments and the existence of facilities available prior to ACP shutdown, the tails may have commercial value and may be

marketable for further enrichment or other processes. However, funding provisions are made to dispose of the tails should that become necessary.

Contaminated portions of the buildings will be decontaminated. Structural contamination is expected to be limited to the areas indicated on Figure 10.1-1 (located in Appendix A) inside the CCZ of the plant. The remainder of the ACP is not expected to require decontamination. Good housekeeping practices during normal operation and cleanup activities following spills or contamination events will maintain these other areas contamination free. Decontamination activities will continue until facilities satisfy the specified radiological criteria.

10.2.2 Purging

At the end of useful operation, the ACP is shut down and UF₆ material is removed to the fullest extent possible by normal process operation. This is followed by evacuation and purging of process systems. This shutdown and purging portion of the decommissioning process is estimated to take approximately three months.

10.2.3 Dismantling and Removal

Dismantling is the process of unbolting, disconnecting, cutting, etc., of components requiring removal. The dismantling and removal activities are simple but labor intensive. They generally require the use of protective equipment. The work process will be optimized, considering the following:

- Minimize spread of contamination and the need for protective equipment;
- Balance the number of cutting and removal operations with the resultant decontamination and disposal requirements;
- Optimize the rate of dismantling with the rate of decontamination plant throughput;
- Provide storage and laydown space required, as impacted by retrievability, criticality safety, security, etc.; and
- Balance the cost of decontamination with the cost of disposal.

Details of the complex optimization process will be decided near the end of plant useful life, taking into account specific contamination levels, market conditions, and available waste disposal sites. To avoid laydown space and contamination problems, dismantling will proceed generally no faster than the downstream decontamination process. The time frame to accomplish both dismantling and decontamination is estimated to be five years.

10.2.4 Decontamination

The decontamination process is addressed separately in Section 10.8 of this chapter. The decommissioning estimated costs are based on decontaminating the plant to the radiological criteria for unrestricted use in 10 CFR 20.1402.

10.2.5 Salvage and Sale

Items to be removed from the facilities can be categorized as potentially re-usable equipment (whether contaminated or decontaminated), recoverable decontaminated scrap, and wastes. Based on a 30-year plant operating life, operating equipment is not assumed to have a significant reuse value. Equipment-bearing aluminum that remains in the plant will be treated and disposed of appropriately. Smaller amounts of steel, copper, and other metals can be recovered and sold at market price. However, for conservatism, no credit is taken for salvage value in the DFP.

Other items are considered waste. Wastes have no salvage value.

10.2.6 Disposal

Wastes produced during decommissioning will be collected, handled, and disposed of in a manner similar to that described for those wastes produced during normal operation. Wastes will consist of normal industrial trash, non-hazardous chemicals and fluids, small amounts of hazardous materials, and low-level mixed (LLMW) and radioactive (LLRW) wastes. The radioactive waste will primarily be crushed centrifuge rotors, trash, and citric cake. Citric cake consists of uranium and metallic compounds precipitated from citric acid decontamination solutions. It is estimated that approximately 55,000 cubic feet of compacted radioactive waste will be generated during the decommissioning operation. This waste may be subject to further volume reduction prior to disposal.

Radioactive wastes (both LLRW and LLMW) will ultimately be disposed of in licensed low-level radioactive waste disposal facilities. Hazardous wastes will be disposed of in hazardous waste disposal facilities. Non-hazardous and non-radioactive wastes will be disposed of in a manner consistent with good industrial practice and in accordance with applicable regulations. A more complete estimate of the wastes and effluent to be produced during decommissioning will be provided in the DP to be submitted at or about the time of license termination.

The ultimate disposal of UF₆ tails remains to be determined between potential commercial uses or processing at the DOE UF₆ conversion facility in Piketon, Ohio. However, for conservatism, USEC provides financial assurance to fund the estimated cost of conversion and disposal of the depleted uranium inventory. This funding is described in the DFP and is in addition to the funding requirements for decommissioning the ACP. Classified components and documents will be disposed of in accordance with the requirements of the Security Program for

the American Centrifuge Plant.

10.2.7 Final Status Survey

A final status survey of the radiological conditions of the plant is performed to verify proper decontamination. The evaluation of the final radiation survey is based, in part, on an initial radiation survey performed prior to operation. The initial survey determines the background radiation of the area; providing a datum for measurements that determine any increase in levels of radioactivity.

The final status survey will systematically take measurements and perform sampling to describe radioactivity over the ACP. The intensity of the survey will vary depending on the location (i.e., the buildings, the immediate area around the buildings, the controlled fenced area, and the remainder of the site). The survey procedures and results will be documented in a report. The results of the report will become part of the application to terminate the license. The format and content of the report will follow current NRC guidance (Section 4.5 of Reference 3).

Table 10.2-1 Components for Potential Decontamination at Decommissioning

Components	Description [units]	Estimated Quantity
Centrifuges	Internals: Rotor Assemblies, Motors, Suspensions and Mounts (Classified)	12,000 ¹
Piping	1 to 10 inch process piping length (Lft)	168,100
Pumps	Vacuum Pumps (Evacuation/Purge)	246
Ventilation	Ductwork; Miscellaneous Gulper Ducting (ft ³);	118
Surface Areas ²	Building Floors, Yards, Equipment (ft ²)	1,736,492
Valves	Process valves (excluding Sheetmetal)	7,250
	Miscellaneous valves	652
Process Equipment	[This information has been withheld pursuant to 10 CFR 2.390]	
Scales	Process Weighing Equipment	6
Compressors	Process Gas Compressors	12
Heat Exchangers	Machine Cooling Water HX, Freezer/Sublimers Compressor Train Coolers	16
Traps	Chemical traps (8 banks of 4), Cold Traps, Roughing Filters, Miscellaneous Traps	111
Tanks	Mixing, Holdup, Surge, and Dump Tanks	15
Cylinders	Tails (14, 10 Ton)	26,178
Cylinders	Tails, Parent (2.5 Ton)	1,000
Other Equipment	UF ₆ Portable Carts, Buffer Storage Stands, and Gas Test Stand Equipment (Valve boxes)	66
Decontamination Equipment	Centrifuge Transporter ³	3
	Cranes (RMC) ³	8
	Cranes, Bridge X-7725 ³	2
	Centrifuge Mobile Equipment ³	4
	Centrifuge Dismantling Equipment (X-7725 Assembly Stands)	6

¹ Includes 11,520 operational units plus contaminated spare centrifuges.² Wall surface areas excluded since these areas are not anticipated to require decontamination.³ Equipment re-utilized from operational phase.

Components	Description [units]	Estimated Quantity
Decontamination Equipment (Continued)	Cutting Machines	2
	Degreasers	2
	Decontamination Tanks	4
	Wet Blast Cabinets	2
	Crusher	1

10.3 Management/Organization

Management of the decommissioning program will assure proper training and procedures are provided to assure worker health and safety. The programs will focus on minimizing waste volumes and worker exposure to hazardous or radioactive materials. Qualified contractors assisting with decommissioning will be subject to ACP security and training requirements, and procedural controls.

10.4 Health and Safety

Consistent with the policy during ACP operation, the policy during decommissioning is to keep individual and collective occupational radiation exposure with the ALARA principle. A Radiation Protection Program will identify and control sources of radiation, establish worker protection requirements and direct the use of survey and monitoring instruments.

10.5 Waste Management

Radioactive and hazardous wastes produced during decommissioning will be collected, handled, and disposed of in accordance with regulations applicable to the ACP at the time of decommissioning. Generally, procedures will be similar to those described for wastes produced during operation. These wastes will ultimately be disposed of in licensed radioactive or hazardous waste disposal facilities. Non-hazardous and non-radioactive wastes will be disposed of consistent with good industrial practice, and in accordance with applicable regulations.

10.6 Security and Nuclear Material Control

Requirements for physical security and for nuclear material control and accountability will be maintained during decommissioning in a manner similar to the programs in force during ACP operation. This includes requirements for control of classified information and classified

equipment described in the Security Program for the American Centrifuge Plant and the requirements for control of nuclear materials in the Fundamental Nuclear Materials Control Plan for the American Centrifuge Plant. The DP is submitted near the end of plant life and will provide a description of revisions to these programs.

10.7 Record Keeping

Records important for safe and effective decommissioning of the ACP are maintained in accordance with established Records Management and Document Control procedural requirements. Information maintained in these records include:

- Records of spills or other unusual occurrences involving the spread of contamination in and around the plant, equipment, or site. Records of spills or other unusual occurrences may be limited only to instances when contamination remains after any cleanup procedures or when there is reasonable likelihood that contaminants may have spread to inaccessible areas as in the case of possible seepage into porous materials such as concrete. These records will include any known information on identification of involved radionuclides, quantities, forms, and concentrations;
- As-built drawings and modifications of structures and equipment in areas where radioactive materials are used and/or stored, including locations that possibly could be inaccessible (e.g., buried pipes which may be subject to contamination); and
- A list contained in a single document that is updated every two years of the following:
 - Areas designated and formerly designated as restricted areas as defined under 10 CFR 20.1003.
 - Areas outside of restricted areas that require documentation under 10 CFR 70.25(g)(1).
 - Areas outside of restricted areas where current and previous wastes have been buried as documented under 10 CFR 20.2108.
 - Areas outside of restricted areas that contain material such that, if the license expired, USEC would be required to either decontaminate the area to meet the criteria for decommissioning in 10 CFR Part 20, Subpart E or would apply for NRC approval for disposal under 10 CFR 20.2002.
- Records of the cost estimate performed for the DFP, and records of the funding method used for assuring funds, including a copy of the financial assurance mechanism and any supporting documentation.

10.8 Decontamination

The DSA, the general procedures used to decontaminate, and the expected results of decontamination are described in the paragraphs below. Table 10.2-1 lists the major components and structures that may need to be decontaminated to some extent at the plant. Other components and structure will generally not require any decontamination.

10.8.1 Decontamination Service Area

The centrifuge assembly area within X-7725 facility is identified as the DSA. The centrifuge machine transport system would be used to transport the centrifuge machines from the process buildings to the DSA. The DSA handles centrifuges, feed, withdrawal, sampling and transfer equipment to be disassembled and dispositioned along with the UF₆ vacuum pumps, valves, piping, and other miscellaneous equipment. Unusable material will be destroyed. The DSA will have four functional areas: disassembly area, buffer stock area, decontamination area, and scrap storage area. Equipment in the decontamination area may include:

- Transport and manipulation equipment
- Dismantling area
- Cutting machines
- Dismantling boxes and tanks (e.g., B-25 boxes)
- Degreasers
- Citric acid and demineralized water baths
- Contamination monitors
- Wet blast cabinets
- Crushers or size reduction equipment
- Shredding equipment
- Scrubbing facility

There is no normal operational need for the ACP to have a decontamination facility readily available.

10.8.2 Procedures

Procedures for decontamination will be developed and approved by plant management to minimize worker exposure and waste volumes, and to assure work is carried out in a safe manner. At the end of useful plant life, some of the equipment, most of the buildings, and the outdoor areas should already be acceptable for release for unrestricted use in accordance with 10 CFR 20.1402. If these areas were inadvertently contaminated during ACP operation, they would likely be cleaned up when the contamination is discovered. This limits the scope of necessary decontamination at the time of decommissioning.

The centrifuges will be processed and the following operations will be performed:

- Removal of external fittings;
- Removal of bottom flange, motor and bearings, and collection of contaminated oil;
- Removal of top flange, and withdrawal and disassembly of internals;
- Degreasing of items, as required; and
- Destruction of classified parts by shredding, crushing, burial, etc.

10.8.3 Results

Recoverable items will be externally decontaminated and suitable for reuse except for a very small amount of internally contaminated items where recovery and reuse is not feasible. There is potentially a small amount of salvageable scrap material. Material requiring disposal will be process piping, trash, and residue from the effluent treatment systems. No problems are anticipated which will prevent the facilities from being released for unrestricted use.

10.9 Agreements with Outside Organizations

The decommissioning activities described herein and in the DFP provide for decontamination of the ACP for unrestricted use. As such, no agreements with outside organizations are required for control of access to the plant following shutdown and decommissioning.

10.10 Arrangements for Funding

This section provides a general estimate of decommissioning costs and explains the arrangements made to assure funding is available to cover these costs. A more detailed description of these costs and the financial assurance mechanism is provided in the DFP.

10.10.1 Plant Decommissioning Costs

Table 10.10-1, provides a summary of the cost estimates of the major decommissioning activities described in Section 10.2. Costs are provided in 2004 dollars with a 25 percent contingency factor added based on the NRC guidance (Reference 4). The total estimated cost to decommission the 3.5 million SWU ACP is \$130.4 million. Since costs will likely change between the time of license issuance and actual decommissioning, USEC will adjust the cost estimate prior to operation of each additional increment of capacity on process gas, and after full capacity is reached, no less frequently than every three years consistent with the requirements of 10 CFR 70.25(e) and recent NRC changes to financial assurance requirements for materials licensees (Reference 8). The method for adjusting the cost estimate will consider the following:

- Changes in general inflation (e.g., labor rates, consumer price index);
- Changes in price of goods (e.g., packing materials);
- Changes in price of services (e.g., shipping and disposal costs);
- Changes in plant condition or operations; and
- Changes in decommissioning procedures or regulations.

These costs are estimated as explained below:

Planning and Preparation: \$2.8 million

Scope to be completed in 24 months and includes developing and submitting a detailed DP as a license amendment for NRC review and approval.

Decontamination and/or Dismantling of Radioactive Facilities: \$32.4 million

This is based upon utilizing salary and hourly workers at their respective average cost over a five-year duration. For conservatism, decommissioning estimated costs are based on decontaminating the plant to the radiological criteria for unrestricted use in 10 CFR 20.1402.

Restoration of Contaminated Areas On Plant Grounds: \$1.1 million

This is based upon utilizing salary and hourly workers at their respective current average cost distribution over a two-year duration. This assumes the contamination of the plant grounds from the ACP operations will be minimal.

Final Status Survey: \$2.2 million

This is based upon utilizing salary technicians at their current average cost distribution. Costs do not include any NRC confirmatory surveys to verify the results of the Final Status Survey.

Site Stabilization and Long-Term Surveillance: \$1.0 million

As previously stated, the intent of decommissioning is to return the plant to the radiological criteria for unrestricted use. To accomplish this activity, stabilization and surveillance is required due to the number of components involved and the duration of the decommissioning effort. This scope is estimated to be completed in approximately 30 months.

Packing Materials, Shipping, and Waste Disposal: \$56.2 million

This is based upon shipping and disposal of the internals for 12,000 centrifuge machines (which includes operating machines as well as contaminated spares), feed and withdrawal equipment, and other components totaling approximately 55,000 cubic feet of waste and 12 million pounds of classified waste in non-reusable packaging.

Equipment and Supply: \$2.7 million

This includes the purchase or lease of dismantling, cutting, degreasing, and crushing equipment; decontamination tanks, wet blast cabinets, and over 3,000 shipping containers.

Laboratory: \$3.3 million

This includes labor costs for sampling, transport, testing, and analysis of samples.

Miscellaneous: \$2.6 million

This includes NRC review fees for the submitted DP, confirmatory surveys performed by the NRC staff or its contractor to verify the results of Final Status Survey, and miscellaneous materials.

Subtotal	\$104.3 million
Contingency (25 percent)	\$26.1 million
Total Decommissioning Cost Estimate	\$130.4 million

10.10.2 Tails Disposition Costs

Cost estimates to dispose of UF₆ tails generated during ACP operation are separate from the cost estimates to decommission the plant. As noted previously, the ultimate disposal of UF₆ tails remains to be determined. USEC intends to evaluate possible commercial uses of UF₆ tails before having the tails processed by the DOE UF₆ conversion facility in Piketon, Ohio. UF₆ tails are stored in steel cylinders until they can be processed in accordance with the disposal strategy established by USEC. Depending on technological developments and the existence of facilities available prior to ACP shutdown, the tails may have commercial value and may be marketable for further enrichment or other processes.

For conservatism, USEC provides financial assurance to fund the estimated cost of conversion and disposal of the depleted uranium inventory as it is generated during ACP operation. This funding is described in the DFP and is in addition to the funding requirements for decommissioning the ACP. As with plant decommissioning, the cost estimate will likely change between the time of license issuance and actual decommissioning. USEC commits to adjust the cost estimate for tails disposal prior to operation of each additional increment of capacity on process gas and no less frequent than annually, once full capacity is achieved. The method for adjusting the cost estimate will consider the same factors as previously described in Section 10.10.1 of this chapter.

At full capacity, the ACP will generate approximately 11,920 MT of UF₆ tails annually. As with other decommissioning costs, the disposal cost estimate for UF₆ tails disposal is provided in 2004 dollars. In view of the commitment to annually adjust tails disposal cost estimates, the ability to know with certainty the tails inventory from prior years of ACP operation, and USEC's demonstrated ability to accurately and conservatively predict anticipated tails generation one year ahead of time, a 10 percent contingency factor is applied to the tails disposal cost estimate. This contingency factor is consistent with that used for tails generated from the United States Enrichment Corporation's GDP operations. The total estimated cost to dispose of UF₆ tails over the 30-year license, including a four year ramp up to full capacity and the 10 percent contingency factor, is \$728.55 million. The basis for this estimate is provided in the DFP.

10.10.3 Funding Arrangements

Per the exemption request in Section 1.2.5 of this license application, the financial assurance for decommissioning the plant and disposal of UF₆ tails will be provided incrementally as centrifuges are installed, operated on process gas, and UF₆ tails generated. The modular aspect of the American Centrifuge technology allows enrichment operations to begin well before the full capacity of the plant is reached. Thus, the decommissioning liability is incurred incrementally as more centrifuge machines, and associated equipment, are added to the process, until such time as full capacity of the facility (i.e., 3.5 million SWU) is achieved. Once full capacity of the facility is achieved, the UF₆ tails are generated at a relatively constant rate throughout the life of the plant.

To ensure adequate financial assurance is in place as centrifuge machines, and associated equipment, are added to the process and placed into operation, USEC will update the cost estimates for decommissioning and UF₆ tails disposal and provide a revised funding instrument to NRC prior to operation of additional incremental capacity on process gas. Once full capacity of the facility is achieved, USEC will annually adjust the cost estimate for UF₆ tails disposal and all other decommissioning costs will be adjusted periodically, and no less frequently than every three years. In this way, financial assurance will be made available as the decommissioning liability is incurred. This exemption is justified based on the unique modularity aspects of centrifuge technology that allow enrichment operations to begin well before the full capacity of the plant is reached. In addition, the NRC has accepted an incremental approach to funding disposal cost of tails for the GDPs. Financial assurance will be provided in the form of a surety method or other guarantee method as required by 10 CFR 70.25(f). The selected guarantee method is described in the DFP, included as part of this license application. In the DFP, methods are described for periodic adjustments in the cost estimate and resulting necessary adjustments to the funding method.

10.11 References

1. NUREG-1520, *Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility*, March 2002
2. NUREG-1757, Consolidated NMSS Decommissioning Guidance, Volume 1, Revision 1, *Decommissioning Process for Materials Licensees*, Final Report, September 2003.
3. NUREG-1757, Consolidated NMSS Decommissioning Guidance, Volume 2, *Characterization, Survey, and Determination of Regulation Criteria*, Final Report, September 2003
4. NUREG-1757, Consolidated NMSS Decommissioning Guidance, Volume 3, *Financial Assurance, Recordkeeping, and Timeliness*, Final Report, September 2003
5. NR-3605-0004, Security Program for the American Centrifuge Plant, Revision 0
6. NR-3605-0005, Fundamental Nuclear Materials Control Plan for the American Centrifuge Plant, Revision 0
7. NR-3605-0006, Decommissioning Funding Plan for the American Centrifuge Plant, Revision 0
8. Federal Register, Volume 68 Number 192, *Financial Assurance for Materials Licensees*, Final Rule, October 3, 2003

Table 10.10-1 Plant Decommissioning Cost Estimates and Expected Duration

<u>Task/Item</u>	Cost Estimate (Millions, 2004 dollars)	Approx Percentage
Planning and Preparation (see Note)	\$2.8	3%
Decontamination and/or Dismantling of Radioactive Facilities	\$32.4	31%
Restoration of Contaminated Areas On Plant Grounds	\$1.1	1%
Final Status Survey	\$2.2	2%
Site Stabilization and Long-Term Surveillance	\$1.0	1%
Packing Materials, Shipping, and Waste Disposal	\$56.2	54%
Equipment and Supply	\$2.7	3%
Laboratory	\$3.3	3%
Miscellaneous	\$2.6	2%
Subtotal	\$104.3	100%
Contingency	\$26.1	25%
TOTAL	\$130.4	125%

Note: It is anticipated that upon cessation of operations, decommissioning activities would start immediately. Any necessary decommissioning plan development, review, and approval times would occur during ACP operations.