



Nuclear Underwater Equipment  
SALES AND SERVICE

Developed by Nuclear Professionals

July 7, 2005

Mr. David Collins  
US Nuclear Regulatory Commission  
Nuclear Materials Safety and Safeguards  
Materials Licensing Section  
61 Forsyth Street, Suite 23T85  
Atlanta, GA 30303

J-8  
44-30912-01  
07036563

RECEIVED  
REGION 1  
2005 JUL 12 AM 11:35

RE: R.O.V. Technologies, Inc., License Amendment, Control No. 137008

Dear Mr. Collins:

Pursuant to your conversation with Mr. Tim McCarthy on June 17, 2005, ROV is pleased to provide the following information.

Enclosed is the revised Letter of Credit (LOC) in the amount of \$469,462. The source document that was the basis for the LOC and Decommissioning Cost Estimate (DCE) is NUREG 1757. Specifically, the DCE tables are modeled after the tables presented in NUREG-1757, Volume 3, Appendix A, pages A-32 through A-42. For your convenience, the updated tables are attached and include a reference to the source document. While the revision date has been changed consistent with the date of this letter, the information presented is identical to prior information date 2 May 2005.

If you have any further questions, please contact us at your earliest convenience.

Sincerely,

John J. Judge, Jr.  
President/CEO

cc: Tim McCarthy, RSO

Attachments:

1. DCE Tables #3.5 through #3.17

JJJ/clb

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CORPORATE OFFICES: 49 Bennett Drive, Brattleboro, VT 05301 • •  
SATELLITE MANUFACTURING OFFICE: 616 Franklin Road, Vernon, VT 05354  
MAILING ADDRESS: P.O. Box 10, Vernon, VT 05354 • • Telephone: 802-254-9353, Facsimile: 802-254-9354  
ENTERGY VT YANKEE OFFICE: Telephone: 802-258-5711 • Facsimile: 802-258-5854  
24-hr Technical Support: 413-292-4772, 4773, or 815-979-0712  
E-Mail: mail@rovtech.com • URL: http://www.rovtech.com/

137008  
NMSS/RGNI MATERIALS-002



**Banknorth**

Vermont

215 Main Street  
P.O. Box 812  
Brattleboro, VT 05302-0812  
T: 802 254-8711  
Toll Free: 800 922-8288  
TDBanknorth.com

**AMENDMENT TO IRREVOCABLE STANDBY LETTER OF CREDIT**

Date of Amendment No.1: July 7, 2005

Letter of Credit Number [REDACTED]

Issuer: TD-Banknorth, N.A

Issuance Date: September 20, 2004.

**BENEFICIARY**

U.S. Nuclear Regulatory Commission  
Washington, DC 20555

**CUSTOMER:**

ROV Tech, Inc.  
616 Franklin Road  
P.O. Box 10  
Vernon, VT 05354

Dear Beneficiary,

At the request and on the instruction of our customer, **ROV Tech, Inc.** we hereby amend our Irrevocable Standby Letter of Credit Number: [REDACTED] in your favor as follows:

- This Letter of Credit has been increased by **USD335,872.00** to a new outstanding balance of **US\$469,423.00**
- All demands for payment and all other communications to the Bank relative to this Letter of Credit shall be in writing and addressed and presented to TD Banknorth, N.A, International Banking, 7 New England Executive Park, Tenth Floor, Burlington, MA 01803

All other terms and conditions remain unchanged. This amendment is considered an integral part of the Letter of Credit and must be attached thereto.

This amendment is subject to the Uniform Customs and Practice for Documentary Credits, 1993 Revision, International Chamber of Commerce Publication No. 500

Sincerely,

TD Banknorth, N.A.

By: 

Peter Blackmore

Its: Vice President

**NONNEGOTIABLE**

A division of TD Banknorth, N.A.

Table 3.5 Number and Dimension of Facility Components			
Name of room, laboratory or area:	ROV Storage area		
Level of Contamination:	< 20/200 dpm alpha and beta-gamma, respectively		
Component	Number of Components	Dimensions of Components	Total Dimensions
Glove Boxes	0		
Fume Hoods	0		
Lab benches	0		
Sinks	0		
Drains	0		
Floors	1	6400 ft <sup>2</sup>	6400 ft <sup>2</sup>
Walls	3	640 ft <sup>2</sup>	1920 ft <sup>2</sup>
Ceilings	1	400 ft <sup>2</sup>	400 ft <sup>2</sup>
Ventilation/Ductwork	0		
Hot Cells	0		
Equipment/Materials	0		
Soil Plots	0		
Storage Tanks	0		
Storage Areas	0		
Radwaste Areas	0		
Scrap Recovery Areas	0		
Maintenance Shop	1		
Equipment Decontamination Areas	0		
LLRW Containers	2	100 ft <sup>3</sup>	200 ft <sup>3</sup>
Fencing	2	640 ft <sup>2</sup>	1280 ft <sup>3</sup>

Source Document: NUREG-1757

Revision 3, Date: 5 July 2005

Table 3.5 Number and Dimension of Facility Components			
Name of room, laboratory or area:	Maintenance area		
Level of Contamination:	< 200/2000 dpm alpha and beta-gamma, respectively		
Component	Number of Components	Dimensions of Components	Total Dimensions
Glove Boxes	0		
Fume Hoods	0		
Lab benches	0		
Sinks	0		
Drains	0		
Floors	1	400 ft <sup>2</sup>	400 ft <sup>2</sup>
Walls	4	320 ft <sup>2</sup>	1280 ft <sup>2</sup>
Ceilings	1	400 ft <sup>2</sup>	400 ft <sup>2</sup>
Ventilation/Ductwork	1	2 x 2 x 30 ft	2 x 2 x 30 ft
Hot Cells	0		
Equipment/Materials	0		
Soil Plots	0		
Storage Tanks	0		
Storage Areas	0		
Radwaste Areas	0		
Scrap Recovery Areas	0		
Maintenance Shop	0		
Equipment Decontamination Areas	0		
HEPA Unit (including motor)	1	64 ft <sup>3</sup>	64 ft <sup>3</sup>
HEPA Plenum	1	64 ft <sup>3</sup>	64 ft <sup>3</sup>
Vacuum Pump	1	2 ft <sup>3</sup>	2 ft <sup>3</sup>
Associated Piping - <100 ft @ 2" diam.	1	6 ft <sup>3</sup>	6ft <sup>3</sup>

Source Document: NUREG-1757

Revision 3, Date: 5 July 2005

Table 3.5 Number and Dimension of Facility Components			
Name of room, laboratory or area:	Lease Storage area		
Level of Contamination:	< 20/200 dpm alpha and beta-gamma, respectively		
Component	Number of Components	Dimensions of Components	Total Dimensions
Glove Boxes	0		
Fume Hoods	0		
Lab benches	0		
Sinks	0		
Drains	0		
Floors	1	80 ft x 250 ft	20,000 ft <sup>2</sup>
Walls	2	(250 + 80)ft * 8 ft	2640 ft <sup>2</sup>
Ceilings	0		
Ventilation/Ductwork	0		
Hot Cells	0		
Equipment/Materials	0		
Soil Plots	0		
Storage Tanks	0		
Storage Areas	0		
Radwaste Areas	0		
Scrap Recovery Areas	0		
Maintenance Shop	0		
Equipment Decontamination Areas	0		
LLRW Containers	0		
Fencing	1	250 ft x 8 ft	2000

Source Document: NUREG-1757

Revision 3, Date: 5 July 2005

Table 3.7 Decontamination or Dismantling of Radioactive Facility Components (Work Days)							
Name of room, laboratory or area:	Storage and maintenance areas						
Level of Contamination:	As specified						
Component	Decon. Method	Labor Category					
		Supervisor/ Foreman	Craftsman	Technician	Health Physicist	Laborer	Clerical
Glove Boxes							
Fume Hoods							
Lab benches							
Sinks							
Drains							
Floors	Shot Blast	2.00		2.00		12.00	
Walls	Pressure Wash	1.00		0.50		4.00	
Ceilings	Pressure Wash	0.50				2.00	
Ventilation/Ductwork (includes removal and disassembly)	Pressure Wash/Grit Blast	2.00		1.00		4.00	
Hot Cells							
Equipment/Materials							
Soil Plots	NA						
Storage Tanks							
Storage Areas (Lease Containers)	Spot decon	0.50		4.00			
Radwaste Areas							
Scrap Recovery Areas							
Maintenance Shop							
Equipment Decontamination Areas							
NOTE: All HEPA Compenets included above.							
Disassemble Maintenance Area	Dissassemble	1.00		1.00		4.00	
Additional Contingency Remediation	Spot decon	1.00		1.00		2.00	
Initial Equipment removal	NA	1.00		1.00		2.00	
General Oversight					2.00		
Isolate Electrical/Gas/Water Supplies			3.00				
<b>TOTALS</b>		<b>9.00</b>	<b>3.00</b>	<b>10.50</b>	<b>2.00</b>	<b>30.00</b>	

Table 3.6 Planning and Preparation (Work Days)						
Activity	Labor Category					
	Supervisor/ Foreman	Craftsman	Technician	Health Physicist	Laborer	Clerical
Preparation of Documentation for Regulatory Agencies (Final Submission)	1.00		2.00	3.00		2.00
Submittal of Decommissioning Plan				1.00		
Development of Work Plans	1.00		1.00	2.00		1.00
Procurement of Special Equipment	2.00				2.00	
Staff Training	1.00		1.00	1.00	3.00	1.00
Characterization of Radiological Conditions of the Facility			2.00			
<b>TOTALS</b>	5.00		6.00	7.00	5.00	4.00

Table 3.8 Restoration of Contaminated Areas on Facility Grounds (Work Days)						
Activity	Labor Category					
	Supervisor/ Foreman	Craftsman	Technician	Health Physicist	Laborer	Clerical
Backfill and Restore Site						
Verification Soil Sampling (including uR walk over)	0.50		1.00			
<b>TOTALS</b>	0.50		1.00			

Source Document: NUREG-1757

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Table 3.9 Final Radiation Survey (Work Days)						
Activity	Labor Category					
	Supervisor/ Foreman	Craftsman	Technician	Health Physicist	Laborer	Clerical
Removal of non-rad equip.	4.00		8.00		8.00	
Floors	2.00		15.00			
Walls	1.00		9.00			
Ceiling	1.00		1.00			
Fence Survey			5.00			2.00
Lease Storage Containers	1.00		5.00			
Review/Organize Paperwork				2.00		
<b>TOTALS</b>	9.00		43.00	2.00	8.00	2.00

Source Document: NUREG-1757

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Table 3.10 Site Stabilization and Long-Term Surveillance (Work Days)						
Activity	Labor Category					
	Supervisor/ Foreman	Craftsman	Technician	Health Physicist	Laborer	Clerical
None						
<b>TOTALS</b>						

Source Document: NUREG-1757

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Table 3.11 Total Work Days by Labor Category						
Activity	Labor Category					
	Supervisor/ Foreman	Craftsman	Technician	Health Physicist	Laborer	Clerical
Planning and Preparation (Totals for Table 3.6)	5.00		6.00	7.00	5.00	4.00
Decontamination and Dismantling (Totals from Table 3.7)	9.00	3.00	10.50	2.00	30.00	
Restoration of Facility Grounds (Totals from Table 3.8)	0.50		1.00			
Final Radiation Survey (Totals from Table 3.9)	9.00		43.00	2.00	8.00	2.00
Site Stabilization and Surveillance (Totals from Table 3.10)						

Source Document: NUREG-1757

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Table 3.12 Worker Unit Cost Schedule						
Labor Cost Component	Labor Category					
	Supervisor/ Foreman	Craftsman	Technician	Health Physicist	Laborer	Clerical
Annual Salary	\$60,000	\$50,000	\$40,000	\$90,000	\$35,000	\$30,000
Fixed Cost Benefits in \$ (Medical, Payroll, etc.)	\$15,000	\$15,000	\$15,000	\$15,000	\$15,000	\$15,000
Salary Dependant Benefits (%)	30%	30%	30%	30%	30%	30%
Salary and Fringe Benefits (\$/year)	\$93,000	\$80,000	\$67,000	\$132,000	\$60,500	\$54,000
Overhead Rate (%)	30%	30%	30%	30%	30%	30%
Total Cost Per Year	\$120,900	\$104,000	\$87,100	\$171,600	\$78,650	\$70,200
Total Cost Per Work Day (Based on 260 work days per year.)	\$465.00	\$400.00	\$335.00	\$660.00	\$302.50	\$270.00

Source Document: NUREG-1757

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Table 3.13 Total labor Costs by major Decommissioning Task							
Task	Labor Category						Total Labor Cost by Task
	Supervisor/ Foreman	Craftsman	Technician	Health Physicist	Laborer	Clerical	
Planning and Preparation	\$2,325		\$2,010	\$4,620	\$1,513	\$1,080	\$11,548
Decontamination and Dismantling	\$4,185	\$1,200	\$3,518	\$1,320	\$9,075		\$19,298
Restoration of Facility Grounds	\$233		\$335				\$568
Final Radiation Survey	\$4,185		\$14,405	\$1,320	\$2,420	\$540	\$22,870
Site Stabilization and Surveillance							
Total Labor Cost by Labor Category	\$10,928	\$1,200	\$20,268	\$7,260	\$13,008	\$1,620	\$54,283

Source Document: NUREG-1757

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Table 3.14 Packaging, Shipping, and Disposal of Radioactive Wastes					
(a) Packing Material Costs					
Waste Type	Volume (ft3)	No. of Containers	Type of Container	Unit Cost of Container	Total Packaging Costs
Stored LLRW	200	2	B-25	\$600	\$1,200
Metal	400	4	B-25	\$600	\$2,400
Maint. Shop	400	4	B-25	\$600	\$2,400
Misc. DAW	200	2	B-25	\$600	\$1,200
Lease Material	7500	3	40' Sealand	\$7,200	\$21,600
					\$0
					\$0
<b>TOTAL</b>	<b>0</b>	<b>15</b>	<b>NA</b>	<b>NA</b>	<b>\$28,800</b>

Source Document: NUREG-1757

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Table 3.14 Packaging, Shipping, and Disposal of Radioactive Wastes					
(b) Shipping Costs					
Waste Type	No. of Truckloads	Unit Cost (\$/mile/truckload)	Surcharges* (\$/mile)	Distance Shipped (miles)	Total Shipment Costs
All LLRW	3	\$2.35		562	\$3,962
					\$0
					\$0
					\$0
					\$0
					\$0
					\$0
<b>TOTAL</b>	<b>0</b>	<b>NA</b>	<b>NA</b>	<b>562</b>	<b>\$3,962</b>

\*Includes overweight surcharges, if any.

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Table 3.14 Packaging, Shipping, and Disposal of Radioactive Wastes					
(c) Waste Disposal Costs					
Waste Type	Disposal Volume/Weight		Unit Cost	Surcharges (\$/ft3)	Total Disposal Costs
DAW	1200	lbs.	\$3.75	0	\$4,500
Metal	3500	lbs.	\$2.75	0	\$9,625
Lease Material	60000	lbs.	\$3.75		\$225,000
					\$0
					\$0
					\$0
					\$0
<b>TOTAL</b>		<b>0</b>	<b>NA</b>	<b>NA</b>	<b>\$239,125</b>

Processing Cost include disposal

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Source Document: NUREG-1757



Table 3.15 Equipment/Supply Costs*			
Equipment or Supply	Quantity	Unit Cost	Total Cost
Expendables (smears, PPE, maslin, etc.)	1	\$5,000.00	\$5,000.00
Shot blast rental (days)	5	\$1,250.00	\$6,250.00
Pressure wash rental (days)	5	\$85.00	\$425.00
Boom lift rental (days)	2	\$175.00	\$350.00
Fork lift rental (days)	2	\$125.00	\$250.00
Floor Scan Equipment	8	\$250.00	\$2,000.00
HP instruments 3 handheld for 4 weeks	12	\$150.00	\$1,800.00
Smear counter	4	\$175.00	\$700.00
			\$0.00
			\$0.00
			\$0.00
			\$0.00
<b>TOTAL</b>	<b>NA</b>	<b>NA</b>	<b>\$16,775.00</b>

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Table 3.16 Miscellaneous Costs		
Item	Cost	Comment
Regulatory Fees	\$12,000.00	
Analytical lab	\$20,625.00	
<b>TOTAL</b>	<b>\$32,625.00</b>	<b>NA</b>

Source Document: NUREG-1757

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Table 3.17 Total Decommissioning Costs		
Task/Component	Total Cost	Percentage of Total Cost
Planning and Preparation (From Table 3.13)	\$11,548	3.07%
Decontamination and/or Dismantling (From Table 3.13)	<b>\$19,298</b>	5.14%
Restoration of Grounds (From Table 3.13)	\$568	0.15%
Final Radiation Survey (From Table 3.13)	<b>\$22,870</b>	6.09%
Site Stabilization and Surveillance (From Table 3.13)	\$0	0.00%
Packing Materials Costs (From Table 3.14(a))	<b>\$28,800</b>	7.67%
Shipping Costs (From Table 3.14(b))	<b>\$3,962</b>	1.05%
Waste Disposal Costs (From Table 3.14(c))	<b>\$239,125</b>	63.67%
Equipment/Supply Costs (From Table 3.15)	<b>\$16,775</b>	4.47%
Miscellaneous Costs (From Table (3.16)	\$32,625	8.69%
SUBTOTAL	<b>\$375,570</b>	100%
25% Contingency	<b>\$93,892</b>	NA
TOTAL DECOMMISSIONING COST ESTIMATE	<b>\$469,462</b>	NA