



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

January 19, 2006

Docket No. 03036563
Control No. 137808

License No. 44-30912-01

John J. Judge, Jr.
President/CEO
R.O.V. Technologies, Inc.
P.O. Box 10
616 Franklin Road
Vernon, VT 05354

SUBJECT: R.O.V. TECHNOLOGIES, INC., REQUEST FOR ADDITIONAL INFORMATION
CONCERNING FINANCIAL ASSURANCE DOCUMENTS, CONTROL NO.
137808

Dear Mr. Judge:

This is in reference to your letter dated October 3, 2005, revising your decommissioning cost estimate (DCE) for Nuclear Regulatory Commission License No. 44-30912-01. In order to continue our review, we need the following additional information:

1. Your DCE states that it will be reviewed at least every five years. 10 CFR 30.35(e) requires that decommissioning cost estimates be adjusted at intervals not to exceed three years.

Please revise your DCE to state that it will be reviewed and adjusted at least every three years.

2. Your revised DCE uses a less conservative estimate of leased-storage material requiring disposal at the time of decommissioning (20% of 275,000 lbs or 55,000 lbs verses 50% of 120,000 lbs. or 60,000 lbs). Although use of this less conservative estimate is the judged acceptable since the material involved is owned by other licensees, use of this less conservative estimate requires that costs associated with disposal of ROV-owned equipment be more appropriately estimated. As a result, your current assumption that ROV-owned equipment is valuable and will simply be transferred to another licensed facility is no longer acceptable. As stated in NUREG-1757, "Consolidated NMSS Decommissioning Guidance", Volume 3, Appendix A, Section A.3.1.3, decommissioning cost estimates cannot take credit for salvage values which might exist at the time of decommissioning. The willingness of another licensee to take ownership of contaminated equipment implies a salvage value.

Please revise your DCE to address disposal and/or decontamination and subsequent free release of radioactively contaminated equipment likely to be owned by ROV at the time of decommissioning. The amount of equipment estimated should not be less than that presently owned by ROV.

J. Judge
R.O.V. Technologies, Inc.

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Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Nuclear Materials; Medical, Industrial, and Academic Uses of Nuclear Material**; then **Toolkit Index Page**. Or you may obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-888-293-6498. The GPO is open from 7:00 a.m. to 9:00 p.m. EST, Monday through Friday (except Federal holidays).

We will continue our review upon receipt of your revised decommissioning cost estimate. Please reply to my attention at the Region I Office and refer to Mail Control No. 137808. If you have any technical questions regarding this deficiency letter, please call Jim Schmidt at (610) 337-5276.

Sincerely,

Original signed by John D. Kinneman

John D. Kinneman, Chief
Materials Security and Industrial Branch
Division of Nuclear Materials Safety

cc:
John T. McCarthy, Radiation Safety Officer

J. Judge
R.O.V. Technologies, Inc.

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DATE	01/09/2006		01/19/2006					

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