

**From:** Bartlett, Matthew  
**Sent:** Thursday, September 08, 2011 10:01 AM  
**To:** Simon  
**Cc:** George Adams; Asadul Chowdhury; John Stamatakos; Sircar, Madhumita  
**Subject:** RE: Structural and Digital I&C

INIS has provided the following commitments in response to our request.

Sincerely,

Matt Bartlett  
Project Manager  
U.S. Nuclear Regulatory Commission  
NMSS/FCSS/AFCB  
(301)-492-3119

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**From:** John Miller [<mailto:jjmiller@intisoid.com>]  
**Sent:** Wednesday, September 07, 2011 5:37 PM  
**To:** Bartlett, Matthew  
**Cc:** Jim Thomas; 'Steve Laflin'  
**Subject:**

Matt,

We will revise the LA to include the following commitments:

**1. Structural Request:**

*In the LA (possibly section 1.5.4) provide a commitment substantially similar to the following: IIFP commits to develop a geotechnical and geophysical investigation and analysis plan which includes a commitment to acquire the necessary information on the site soil class, seismic site response, liquefaction potential, soil settlement potential, and allowable bearing capacity for the IIFP site. The field activities are to include dilatometer soundings, seismic cone penetration tests, cross-hole seismic tests, standard penetration tests, auger borings, and soil sampling. IIFP commits to conduct the geotechnical and geophysical investigations in accordance with the ASTM standards listed in ISA Summary Section 2.3.3 [list the appropriate standards].*

**Revise Section 1.5.4 to include:**

IIFP commits to develop a geotechnical and geophysical investigation and analysis plan which includes a commitment to acquire the necessary information on the site soil class, seismic site response, liquefaction potential, soil settlement potential, and allowable bearing capacity for the IIFP site. The field activities are to include dilatometer soundings, seismic cone penetration tests, cross-hole seismic tests, standard penetration tests, auger borings, and soil sampling. IIFP commits to conduct the geotechnical and geophysical investigations in accordance with the ASTM standards listed in ISA Summary Section 2.3.3.

**2. Digital I&C Request:**

*In the LA (possibly in section 11.4.1.1) provide a commitment substantially similar to the following: For administrative control preventive IROFS in the same accident sequence, IIFP commits to ensure the procedures will be written to ensure strict independence of the preventive IROFS.*

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**Revise Section 11.4.1 to include:**

For administrative control preventive IROFS in the same accident sequence, IIFP commits to ensure the procedures will be written to ensure strict independence of the preventive IROFS.

**3. Financial Assurance**

In regard to the Financial Assurance License conditions; IIFP concurs with the following:

- 1. The licensee shall not obtain radioactive material until the NRC reviews and approves the executed financial assurance instrument and certification of financial assurance.*
- 2. The licensee shall provide an updated DFP, and updated facility decommissioning cost estimate to NRC for review at least six months prior to the planned date for obtaining licensed material.*

*On an annual basis, starting on the anniversary date of obtaining licensed material, the licensee shall provide an updated DFP, and updated facility decommissioning cost estimate to the NRC for review. With each annual update, if the cost estimate exceeds the amount of financial assurance provided, the licensee shall provide financial assurance in the amount of the updated cost estimate and an updated certification of financial assurance to NRC for review and approval.*

*All updates to the DFP, and cost estimate for facility decommissioning and financial assurance instruments, shall be updated to current year United States dollars and shall encompass all current cost data, taking into account changes in inflation, possession limits, licensed material, labor rates, disposal and shipping rates, and site and facility factors. All updates to the DFP, and cost estimate for facility decommissioning and financial assurance instruments shall also include updated costs for the disposal of DUF<sub>6</sub>, DUF<sub>4</sub>, DUO<sub>2</sub>, and UO<sub>2</sub>. The licensee shall include the costs of shipping and disposal of any DUF<sub>6</sub> that the licensee has financial responsibility for its disposal, including DUF<sub>6</sub> that the licensee holds legal title. All costs shall be supported by a detailed basis, be based on the costs of a third party contractor or the Department of Energy, and shall not take credit for any salvage value that might be realized from the sale of potential assets during or after decommissioning. The total cost estimate shall include a contingency factor of at least 25 percent.*

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