

### **Telephone Conversation Record**

Persons Called: Clint Gregg, Aptuit KCM Radiation Safety Officer  
Michael Stewart, Shaw Environmental-Kansas City Project Manager  
Rick Greene, Shaw Environmental-Knoxville Project CHP  
Pam Barton, Aptuit KCM Facility Director

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Docket No.: 030-09415

Callers: Christine Lipa, Chief  
Materials Control, ISFSI, and Decommissioning Branch  
Division of Nuclear Materials Safety  
NRC Region III

Michael LaFranzo, Senior Health Physicist  
Materials Control, ISFSI, and Decommissioning Branch  
Division of Nuclear Materials Safety  
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Lionel Rodriguez, Reactor Engineer  
Materials Control, ISFSI, and Decommissioning Branch  
Division of Nuclear Materials Safety  
NRC Region III

Date of Call: December 15, 2011

Subject: CALL BETWEEN NRC RIII AND APTUIT, INC TO DISCUSS PLANNED  
DECOMMISSIONING OF THE SITE AND DECOMMISSIONING PLAN  
SUBMITTAL

During the conference call, the NRC RIII staff discussed with the licensee the next steps in the decommissioning process of the Aptuit facility. On October 26, 2011, Aptuit submitted a letter to the NRC RIII office notifying the NRC of their intention to cease all work with radioactivity at the site in accordance with 10 CFR 30.36(d) (ML113000552). The notification was made within 60 days of the licensee's decision to cease principal activities at the site.

The licensee informed the NRC that they were working on a Decommissioning Plan (DP) because they believed one was required according to 10 CFR 30.36(g)(1). The licensee also indicated that they felt they fit the description for a Group 3 decommissioning site per the guidance in NUREG 1757. The NRC decommissioning staff reminded the licensee that, in accordance with 10 CFR 30.36(d), they would have to submit a DP within 12 months of the

notification if a DP was required by 10 CFR 30.36(g)(1). The licensee acknowledged the requirement and indicated their plans to submit to the NRC a DP by the end of January of 2012.

The NRC staff discussed with the licensee instances where a DP is required and also discussed decommissioning activities that require approval of a DP before they can be performed. Specifically, the NRC staff reiterated the requirement in 10 CFR 30.36(g)(1) for requiring a DP when a licensee needs new procedures that have not been previously approved by the Commission for performing decommissioning activities that could have an increased health and safety impact on workers or the public. The licensee acknowledged an understanding of the requirement.

The NRC staff described to the licensee the typical process for an NRC review of a DP once it's submitted to the NRC. The NRC staff informed licensee that the length of the review period depends on the complexity of the decommissioning site and the quality of the submittal.

The licensee informed the NRC that they plan to use a decommissioning contractor to perform decommissioning activities. The licensee also informed the NRC that the decommissioning contractor would be working under the Aptuit license, and not under their own license. The NRC staff informed the licensee that if decommissioning activities were to be performed under the decommissioning contractor's license, there would have to be a formal agreement documented between Aptuit and the decommissioning contractor. The agreement would specify which activities would be performed under the Aptuit license and supervision, and which activities would be performed by the decommissioning contractor and their supervision.

End of conversation Record. No further discussion.