

March 25, 2014

Mr. Bill Halliburton  
Administrator, Cimarron Environmental  
Response Trust  
c/o Environmental Properties Management, LLC  
9400 Ward Parkway  
Kansas City, MO 64114

SUBJECT: U.S. NUCLEAR REGULATORY COMMISSION STAFF REVIEW OF FINAL DRAFT  
OF THE STANDBY TRUST AGREEMENT BETWEEN CIMARRON  
ENVIRONMENTAL RESPONSE TRUST AND U.S. BANK NATIONAL  
ASSOCIATION FOR THE CIMARRON FACILITY IN CRESCENT, OKLAHOMA

Dear Mr. Halliburton:

By e-mail dated January 30, 2014, you submitted a Final Draft of the Standby Trust Agreement and supporting documents establishing U.S. Bank National Association as the financial trustee for the Cimarron site in Crescent, Oklahoma for U.S. Nuclear Regulatory Commission (NRC) review.

In accordance with NUREG-1757, Vol. 3, Rev. 1, A.12 and 10 CFR 70.25(f)(2)(ii), a standby trust must be established for decommissioning costs. The trustee and trust must be acceptable to the Commission. An acceptable trustee is regulated by a State or Federal Government agency, or an entity having the authority to act as a trustee, and whose trust operations are regulated and examined by a Federal or State agency.

Pursuant to your request, the NRC staff has reviewed the Final Draft of the Standby Trust Agreement against the guidance provided in NUREG-1757. The NRC staff determined that the trustee is federally regulated and has the authority to act as a trustee, and that the language used in the Final Draft of the Standby Trust meets the NRC's guidance and regulatory requirements, and therefore is acceptable.

Please execute the Final Standby Trust Agreement with U.S. Bank National Association and provide a signed original of the Agreement to Ken Kalman, Project Manager.

B. Halliburton

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If you have any questions concerning the above, please contact Mr. Kalman, at (301) 415-6664 or via email at [kenneth.kalman@nrc.gov](mailto:kenneth.kalman@nrc.gov).

Sincerely,

**/RA/**

Michael Norato, Ph.D., Chief  
Materials Decommissioning Branch  
Decommissioning and Uranium Recovery  
Licensing Directorate  
Division of Waste Management  
and Environmental Protection Program  
Office of Federal and State Materials  
and Environmental Management Programs

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Sincerely,

**/RA/**

Michael Norato, Ph.D., Chief  
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<b>NAME</b>	KKalman	RAugustus	CHolston	MNorato
<b>DATE</b>	3/20/14	3/24/14	3/24/14	3/25//14.

**OFFICIAL RECORD COPY**

Cimarron Site Service List - Ken Kalman, Project Manager

cc:

Mike Broderick  
Radiation Management Section  
Waste Management Division  
Department of Environmental Quality  
707 North Robinson  
Oklahoma City, OK 73102-6087

Jeff Lux  
Environmental Properties Management LLC  
1908 Willow Way Circle  
Edmond, OK 73013