

April 16, 2014

Mr. Steven A. Toelle, Director
Nuclear Regulatory Affairs
United States Enrichment Corporation
Two Democracy Center
6903 Rockledge Drive
Bethesda, MD 20817

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING CHANGES TO THE
DECOMMISSIONING FUNDING PROGRAM DESCRIPTION FOR CALENDAR
YEAR 2014 - TECHNICAL ASSIGNMENT CONTROL NUMBER L36029

Dear Mr. Miner:

I am responding to the United States Enrichment Corporation's letter dated December 19, 2013 (GDP 13-0021), requesting U.S. Nuclear Regulatory Commission's (NRC's) review and approval of revisions to the Paducah Gaseous Diffusion Plant Decommissioning Funding Program Description for calendar year 2014.

Our review of your submittal has identified additional information that is needed before final action can be taken. The additional information specified in the enclosure should be provided to us within 30 days from the date of this letter. Please reference Technical Assignment Control Number L36029 for this action in your response.

In accordance with Title 10 of the *Code of Federal Regulations* 2.390(d) of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records System component of NRC's Agencywide Documents Access and Management Systems (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

If you have any questions, please contact me at 301-287-9070, or by e-mail at

osiris.siurano-perez@nrc.gov.

Sincerely,

/RA/

Osiris Siurano-Perez, Project Manager
Uranium Enrichment Branch
Division of Fuel Cycle Safety
and Safeguards
Office of Nuclear Material Safety
and Safeguards

Docket No.: 70-7001
Certificate No.: GDP-1

Enclosure:
Request for Additional Information

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Sincerely,

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Enclosure:
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**REQUEST FOR ADDITIONAL INFORMATION
REGARDING CHANGES TO THE
DECOMMISSIONING PROGRAM DESCRIPTION FOR CALENDAR YEAR 2014
FOR THE PADUCAH GASEOUS DIFFUSION PLANT
Docket: 70-7001**

- (1) Confirm the estimated volume of low level radioactive waste (LLRW) and mixed waste requiring disposition (Title 10 of the *Code of Federal Regulations* [10 CFR] 76.35(n) and NUREG-1757, Volume 3, Rev. 1, Section 4.1).**

10 CFR 76.35(n) states that “[t]he funding program must contain a basis for cost estimates used to establish funding levels.” NUREG-1757, Volume 3, Rev. 1, Section 4.1 states that cost estimates should be “based on documented and reasonable assumptions” and that the key assumptions should be “identified and justified.”

Section 3.1 of the Decommissioning Funding Program (DFP) states that the Paducah Gaseous Diffusion Plant’s (PGDP’s) LLRW and mixed waste “...decommissioning liability is calculated as the sum of the liability associated with the cost of disposal of the amount of waste estimated to be generated during the calendar year plus the liability associated with the estimated amount of waste that is in storage from the previous calendar year.” However, the volumes of waste on which the decommissioning liability is calculated in Section 3.1.1, Low Level Radioactive Waste Disposal, and 3.1.2, Mixed Waste Disposal, include only the amounts of waste estimated to be generated during the calendar year (CY) and do not include liability associated with the estimated amount of waste that is in storage from the previous CY. The DFP uses the waste volumes from Enclosures 3 and 4, which estimate only volumes generated during the CY.

Furthermore, Section 3.1.4, Low-level Radioactive Waste in Storage, of the CY 2013 DFP stated that “...there is an amount of LLRW that will remain in storage at the end of CY 2013. At PGDP, this LLRW volume is estimated to be 14,000 ft³.” The 2014 DFP does not discuss this 14,000 ft³ of LLRW (or any other waste) that presumably remains in storage at PGDP.

In order to ensure the reasonableness of the cost estimate, please confirm the amount of waste that remains in storage at PGDP which will require disposal and ensure that the DFP reflects the costs associated with disposing of that amount of waste.

- (2) Justify the estimated unit cost of LLRW disposal (10 CFR 76.35(n) and NUREG-1757, Volume 3, Rev. 1, Section 4.1).**

10 CFR 76.35(n) states that “[t]he funding program must contain a basis for cost estimates used to establish funding levels.” NUREG-1757, Volume 3, Rev. 1, Section 4.1 states that cost estimates should be “...based on documented and reasonable assumptions. The key assumptions are identified and justified.”

Enclosure 4, Waste Disposal Estimate Spreadsheet, estimates the unit cost of LLRW disposal based on historical costs and waste volumes. The updated spreadsheet included in the CY 2014 DFP does not include costs associated with “Estimated Special Nuclear Material (SNM) Charges.” Past submittals included “Estimated SNM Charges” to estimate the unit cost of LLRW disposal. For example, United States Enrichment Corporation’s March 21, 2013, LLW Disposal Estimate Spreadsheet includes a line item of \$360,000 for

the annual cost of SNM charges associated with LLRW disposal and the PGDP's April 17, 2012, LLW Disposal Estimate Spreadsheet includes a line item of \$628,000 for the annual cost of SNM charges associated with LLRW disposal. This line item has been deleted in the December 19, 2013, version.

In order to ensure that the full cost of LLRW disposal is included in the cost estimate, please provide an explanation justifying why SNM Charges are no longer included in the calculation of the unit cost of LLRW disposal.