

From: [Lawyer, Dennis](#)
To: [Brian Livingston \(brian.livingston@usuhs.edu\)](mailto:brian.livingston@usuhs.edu)
Subject: Department of the Army, Request for Additional Information Concerning Financial Assurance, Control 582847
Date: Monday, November 24, 2014 11:26:00 AM

Mr. Livingston,

This is in reference to Col. Huff's letter dated October 13, 2014, submitting financial assurance information for Nuclear Regulatory Commission License No. 19-08330-02, Docket 03004545. In order to continue our review, we need the following additional information:

1. The Statement of Intent stated to decommission licensed facilities located at 8901 Wisconsin Avenue, Building 42. The decommissioning funding plan describes more areas than just Building 42. Please modify the Statement of Intent to include all facilities under the decommissioning funding plan.
2. The cost estimate contains funds to dispose of three drums of waste. It is not clear if the three drums of waste is an estimate of waste on hand prior to decommissioning activities, is inclusive of the waste generated from decommissioning, or is both. Please describe your average amount of waste, the estimated amount of waste generated, and how it is factored into your cost estimate.
3. The laboratory and material costs was calculated as very low cost with a justification that it would be performed with in-house instrumentation and equipment. 10 CFR 30.35(e)(1)(i)(A) requires a detailed cost estimate for decommissioning, in an amount reflecting the cost of an independent contractor to perform all decommissioning activities. Thus please submit an estimated laboratory costs and material costs for decontamination and instrumentation that would support the cost of an independent contractor to perform the activity.
4. Your descriptions of facilities included the panoramic irradiator. As this facility is not part of this license and is covered by other financial assurance, please revise this section to include only the facilities that would be a part of this decommissioning funding plan. Your facility location also included grounds of the Walter Reed National Military Medical Center. This facility does not appear to be authorized under the license and thus does not need to be included in the decommissioning funding plan. Please revise the facility descriptions to include only those facilities as authorized under this NRC License.
5. Your cost estimate did not include a description of the means that will be used to adjust the site-specific cost estimate and associated funding level. As required by Checklist 3 in NUREG-1757, Volume 3, Revision 1, "Consolidated Decommissioning Guidance Financial Assurance, Recordkeeping, and Timeliness, please include a description of the means that will be used to adjust the site-specific cost estimate and associated funding level.
6. As required in 10 CFR 30.35(e)(1)(i)(c) please provide the volume of subsurface material containing residual radioactivity that will require remediation to meet the

criteria for license termination.

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office (Address below) and refer to Mail Control No. 582847. If you have technical questions regarding this letter, please call me at (610) 337-5366.

Please note that you may not reply to this letter by return e-mail. Your reply must be in writing. Please respond within 30 calendar days from the date of this e-mail..

Region 1 Office Mailing Address: Licensing Assistance Team, US Nuclear Regulatory Commission Region I, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406-2713.

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