

SAFETY EVALUATION REPORT

Triennial Update of the Decommissioning Funding Plan Dated June 8, 2015
Westinghouse Electric Company LLC

DOCKET: 70-1151

LICENSE: SNM-1107

LICENSEE: Westinghouse Electric Company, LLC

SUBJECT: Westinghouse Decommissioning Funding Plan

1. BACKGROUND

By letter dated June 5, 2015, the Westinghouse Electric Company LLC (Westinghouse) submitted a decommissioning funding plan (DFP) (Ref. 1). The staff at the U.S. Nuclear Regulatory Commission (NRC) accepted the DFP for a detailed technical review (Ref. 2). The NRC staff requested additional information (Ref. 3). The NRC staff and Westinghouse staffs had conference calls on November 30, 2015 (Ref. 4), December 15, 2015 (Ref. 5), and March 22, 2016 (Ref. 6). Westinghouse responded to the request for additional information (Refs. 7 and 8) and resubmitted the DFP (Ref. 8).

2. REVIEW PROCESS

The NRC staff reviewed the subject submittal using the Standard Review Plan for financial assurance (Ref. 9) to determine compliance with applicable paragraphs of Title 10 of the *Code of Federal Regulations* (10 CFR) 70.25.

3. DISCUSSION

3.1. Timing and Scope of the DFP

3.1.1. Regulatory Requirement

10 CFR 70.25(e)(2) states, in part, that at the time of license renewal and at intervals not to exceed 3 years, the DFP must be resubmitted with adjustments as necessary to account for changes in costs and the extent of contamination. If the amount of financial assurance will be adjusted downward, this cannot be done until the updated DFP is approved. The DFP must update the information submitted with the original or prior approved plan, and must consider the effect of events on decommissioning costs.

3.1.2. Licensee Submittal

The DFP submitted by letter dated June 5, 2015, documents the total cost of decommissioning as \$[REDACTED] (Ref. 1). A 25 percent contingency factor of \$[REDACTED] was not in the June 5, 2015, submittal; the contingency factor was included in the revised DFP dated May 12, 2016 (Ref. 8). With the contingency factor, the total cost is \$[REDACTED].

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The DFP submitted by letter dated June 8, 2012, documents the total cost of decommissioning as \$ [REDACTED] (Ref. 10) with a 25 percent contingency factor amounting to \$ [REDACTED]; the total cost is \$ [REDACTED].

In following NRC staff guidance (Ref. 9), Westinghouse accounted for the following:

1. Spills of radioactive material.

Since the 2012 DFP update, the Columbia Fuel Fabrication Facility (CFFF) has not had any spills or releases of radioactive material that could contribute to any structure or subsurface residual radioactivity.

2. Waste inventory increases.

Waste inventories at the time of decommissioning will be consistent with typical inventories present during normal operations.

3. Waste disposal costs increases.

The 2015 waste processing and disposal costs increased in some aspects and decreased in others as follows: the bulk survey for release (BSFR) of concrete decreased by \$ [REDACTED]/lb to \$ [REDACTED]/lb; the BSFR for metals and dry active waste increased by \$ [REDACTED]/lb to \$ [REDACTED]/lb; direct burial for concrete, sponge jet blasting media, and rubble decreased by \$ [REDACTED]/lb to \$ [REDACTED]/lb; direct burial for soils remained the same; and direct burial for metals increased by \$ [REDACTED]/lb to \$ [REDACTED]/lb.

4. Facility modifications.

Since the previous DFP (Ref. 10), the licensee expanded the UF₆ storage pad (Ref. 11).

5. Changes in authorized possession limits.

The expansion of the UF₆ storage pad (see Item 4) was done to store, not process, additional UF₆ cylinders for customers (Ref. 11).

6. Actual remediation costs that exceed the previous cost estimate.

Westinghouse adjusted its estimate for contaminated soil from its previously approved 2012 cost estimate.

The licensee estimates [REDACTED] cubic feet of soil will be removed, packed and stored until all soil has been remediated and shipments can be made to the disposal facility. The estimated volume of contaminated soil accounts for historic and recent contamination. The licensee indicates it will collect, sample and process through a liquid treatment system all liquids encountered during soil remediation. The licensee has also stated it has a monitoring well located down gradient approximately 75 feet from the affected area which has not indicated any elevated levels of contamination based on routine sampling. The cost estimate assumes the

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soil will be disposed at the U.S. Ecology disposal facility located in Grand View, Idaho.

Table 90 of the DFP listed the total Uranium Recycling and Recovery Services (URRS) contaminated soil remediation cost as \$ [REDACTED].

7. Onsite disposal.

The licensee indicates, for purposes of this cost estimate, it has been assumed that all waste forms will be packaged and sent to a licensed low level radioactive waste processing facility or to a licensed radioactive materials disposal facility for direct disposal. The waste disposal costs have been developed using the current industry disposal rates.

8. Use of a settling pond.

No changes in the use of settling ponds occurred since the previous DFP.

3.1.3. NRC Staff Evaluation

Westinghouse had submitted an application dated December 17, 2015, (Ref. 12) to renew license SNM-1107 for a period of 40 years. The application did not have a revised DFP. Given that the DFP was to be revised soon after the renewal application, uncertainties in the submitting of the renewal application, and scheduling to revise the DFP, the NRC staff allowed the licensee to submit the DFP at 3-year intervals. Westinghouse previously submitted a DFP dated June 8, 2012. The subject DFP was submitted by letter dated June 5, 2015. The DFP was updated at an interval that did not exceed 3 years. Therefore, the NRC staff concludes that the triennial update to the DFP is timely.

The amount of financial assurance documented in the June 2015 submittal was adjusted downward relative to the amount documented in the June 2012 DFP by \$ [REDACTED]. During the review of the subject DFP, Westinghouse had changed the financial instrument from a parent company guarantee (Refs. 13 and 14) to a letter of credit (Ref. 15) for that amount of \$ [REDACTED]; the NRC staff approved the letter of credit (Ref. 16) that is based on the DFP dated June 8, 2012 (Ref. 10). The licensee did not implement the lower cost until the updated DFP was approved.

- Spills of radioactive material

As stated above, no spills of radioactive material have occurred that would increase the cost of decommissioning.

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- Waste inventory increases and waste disposal costs increases

Westinghouse has adjusted its estimate for waste management costs from its previously approved 2012 cost estimate (pages 4-46 through 4-48 of the DFP). The DFP states, "In the previous version of the DFP, the decontamination of the Chemical Areas, the Structures and Outside Areas, and the URRS Contaminated Soil were casted with the activities all performed in series. Applying a parallel path between the Chemical Areas decontamination and the URRS Soil removal and the structures and outside areas reduced the total project duration as follows: The 2012 update identified an onsite duration of 731 days. By applying the parallel path to the URRS soil it reduced the onsite duration by 136 days. Then applying another parallel path to the Structures and Outside Areas resulted in another reduction of 290 days which then brought the onsite duration to 305 days. With the addition of the 2012-2015 Additional Equipment, the resultant duration is 320 days."

- Facility modifications

Since the previous DFP (Ref. 10), the significant change to the CFFF is the change to the UF₆ storage pad to accommodate about [REDACTED] UF₆ cylinders. The NRC staff determined that the expansion of the UF₆ storage pad would not result in additional contamination of the CFFF site (Ref. 11).

- Changes in authorized possession limits

By letter dated November 2, 2015 (Ref. 11), the NRC staff approved a request from Westinghouse to increase the passion limit of ²³⁵U, allowing Westinghouse to store about [REDACTED] UF₆ cylinders in the UF₆ cylinder storage pad. As discussed in the SER, the NRC staff determined that the increase in the possession limit does not add additional contamination to the CFFF site. Nonetheless, the additional UF₆ cylinders are additional special nuclear material (SNM) that would need to be dispositioned. Dispositioning the additional UF₆ are taken into account in the DFP.

- Actual remediation costs that exceed the previous cost estimate

The licensee updated its remediation costs since the last DFP. The licensee's approach is acceptable as the licensee has accounted for known areas of contaminated soil both recent and historic and has included costs for packaging, loading and disposal of contaminated soil at a facility which can accept this soil.

- Onsite disposal

The NRC staff determined that the licensee has taken adequate measures to account for the disposal of wastes. All waste forms will be packaged and sent to a licensed low-level radioactive waste processing facility. The waste disposal costs have been developed using the current industry disposal rates updated as part of the DFP 2015 Update.

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- Use of a settling pond

Since the previous DFP (Ref. 10), the licensee has made no changes in the use of settling ponds.

3.1.4. NRC Findings

As discussed in their preceding evaluation, the NRC staff reviewed the timing and scope of the DFP as required by 10 CFR 70.25(e)(2). On the basis of the review, the NRC staff has determined that the licensee submitted the DFP in a timely manner. The DFP addresses the topics that the NRC staff views as necessary to ensure that decommissioning can be accomplished in a manner to protect health and minimize danger to life or property. Therefore, the NRC staff finds that the licensee meets the requirement of 10 CFR 70.25(e)(2).

3.2. Detailed Cost Estimate

3.2.1. Regulatory Requirements

10 CFR 70.25(e)(1)(i) requires that each DFP must contain a detailed cost estimate for decommissioning in an amount reflecting: (1) the cost of an independent contractor to perform all decommissioning activities; (2) the cost of meeting the 10 CFR 20.1402 criteria for unrestricted use; (3) the volume of onsite subsurface material containing residual radioactivity that will require remediation; and (4) an adequate contingency factor.

3.2.2. Licensee Submittal

The DFP includes a detailed cost estimate (DCE) that was determined by following NRC guidance (Ref. 9), which amounts to an itemized estimate of the decommissioning cost. The licensee states that the DFP cost estimate assumes that all work will be performed by an independent third-party contractor.

As acknowledged by the licensee, in order to terminate a radioactive material license and release a site, a licensee must demonstrate that the site is suitable for release in accordance with the criteria for decommissioning in Subpart E, "Radiological Criteria for License Termination," of 10 CFR Part 20, "Standards of Protection Against Radiation." Thus, termination of a license and release of a site for unrestricted use requires that residual radioactivity distinguishable from background radiation results in a total effective dose equivalent to an average member of the critical group that does not exceed 25 mrem/yr and that the residual radioactivity has been reduced to levels that are as low as reasonably achievable. The decommissioning cost was estimated such that when decommissioning is completed, Westinghouse will be allowed to release the CFFF site for unrestricted use.

The DFP submitted by letter dated June 5, 2015, lacked a contingency factor (Ref. 1). The licensee stated that the 25 percent contingency factor would be added by way of a Westinghouse financial assurance mechanism submittal. In subsequent submittal, the licensee added the contingency factor (Refs. 7 and 8).

3.2.3. NRC Staff Evaluation

The NRC staff determined that the licensee followed NRC guidance in developing their cost estimate. The costs are consistent with those of an independent contractor.

The DFP accounts for reducing contamination to meet the 10 CFR 20.1402 criteria for unrestricted use.

The initial submittal lacked a contingency factor, leaving this to be added when the DFP was submitted. When informed by the NRC staff of adequate contingency factor, the licensee revised the DFP accordingly.

3.2.4. NRC Staff Finding

As discussed in their preceding evaluation, the NRC staff reviewed the cost estimate for sufficient detail. On the basis of the review, the NRC staff has determined that the licensee followed NRC guidance, thus, assuring that the detail is sufficient. The cost estimate accounts for relevant factors such that no significant costs have been overlooked, thereby assuring sufficient funds to decommission in a manner to protect health and minimize danger to life or property. Therefore, the NRC staff finds that the licensee meets the requirement of 10 CFR 70.25 (e)(1)(i).

3.3. Key Assumptions

3.3.1. Regulatory Requirements

10 CFR 70.25 (e)(1)(ii) requires that each DFP must contain an identification of and justification for using the key assumptions contained in the DCE.

3.3.2. Licensee Submittal

Disposition of SNM

By the submittal (Ref. 1) dated June 5, 2015, the licensee assumed that all production activities had ceased and the decommissioning activities take place upon cessation of operations without extended storage periods. Westinghouse stated that SNM will be removed from the site prior to the start of decommissioning. As Westinghouse has contracts in place to cover these costs the costs were excluded from the DFP to package, load, and transport SNM from the CFFF. Westinghouse stated that SNM will be removed from the CFFF site in a timely manner prior to the start of decommissioning. Dispositioning is performed in the same manner, whether decommissioning is planned or sudden.

Customer-owned UF₆ cylinders will be retrieved by their rightful owner at the owner's expense and in a timely manner. Typical contract language states that Westinghouse and the owner will agree to a schedule for the prompt return of UF₆ cylinders; Westinghouse will make UF₆ cylinders available for collection.

Westinghouse-owned UF₆ cylinders will be transferred in a timely manner to other

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Westinghouse fuel assembly locations such as Vasteras, Sweden, or Springfields, UK. The receiving site pays for material, packaging and transportation costs; the CFFF would not have any additional costs. Westinghouse has a current export license in place that expires on December 31, 2023. Shipments are routinely done several times a year as a normal course of business.

SNM powder, pellets, and rods, will be processed into finished fuel assemblies by Westinghouse personnel. This processing time will take approximately 60 days. The finished product fuel assemblies and any residual inventory will be retrieved by the customer at the customer's expense.

In the event of a sudden shutdown of the CFFF, Westinghouse has a business interruption plan and a global insurance program to provide financial protection from unplanned events. For the CFFF, the insurance coverage includes event such as, but limited to, fire, lightning, aircraft crash, explosion, earthquake, windstorm, flood, theft, machinery breakdown, acts of terrorism, and radioactive contamination.

Within Westinghouse, each fuel assembly plant is independent in operations and finances.

3.3.3. NRC Staff Evaluation

The NRC staff determined that the DFP is based on reasonable assumptions. The key assumption is that SNM will be dispositioned prior to decommissioning as the licensee has contracts in place to remove the material prior to decommissioning, thus excluding the cost from the DFP of packaging, loading, and transporting SNM off of the CFFF site. The licensee based their plan to disposition SNM on legal title of the SNM, not on the market value of the SNM. The licensee discussed a plan to disposition three categories of SNM — customer-owned UF₆ cylinders, Westinghouse-owned UF₆ cylinders, and SNM in processing.

Customer-owned UF₆ cylinders will returned to their legal owners. The contract language states that the UF₆ cylinders will be made available to the owners, who have legal title to the UF₆ cylinders; the owners have ultimate responsibility for the UF₆ cylinders, including transporation.

Westinghouse-owned UF₆ cylinders will be transferred to other Westinghouse fuel assembly locations such as Vasteras, Sweden or Springfields, UK. The business practices of Westinghouse has the receiving facility covering the cost of packaging, loading, and transportation costs; the CFFF would not have any additional costs. Westinghouse has a current export license in place that expires on December 31, 2023 (Ref. 17). Such shipments are routinely done several times a year.

Other SNM materials, such as powder, pellets, and fuel rods, will be processed into finished fuel assemblies by Westinghouse personnel. The time from when UF₆ is vaporized to when a fuel assembly is finished is within 60 days. This stated duration is consistent with prior understandings of the NRC staff of the CFFF processes. To assure that funds are available to complete the processing, Westinghouse has a business interruption plan and a global insurance program as financial protection from unplanned events. For the CFFF, the insurance coverage includes events such as, but limited to, fire, lightning, aircraft crash, explosion, earthquake,

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windstorm, flood, theft, machinery breakdown, acts of terrorism, and radioactive contamination. Though the purpose of the business interruption plan and insurance is to assure both domestic and foreign customers of nuclear fuel, the statements regarding the plan and the insurance provide a basis that the in-process SNM will be dispositioned from the CFFF site.

The NRC determined that the statement of the fuel assembly plants being independent in operations and finances is reasonable. Though the facilities are under one corporate entity, the three facilities are in three countries. Each facility has its own plant manager. Each facility is manufacturing fuel assemblies independent of the others. This is a deliberate business strategy to assure their customers of nuclear fuel.

3.3.4. NRC Findings

As discussed in their preceding evaluation, the NRC staff reviewed key assumptions of the DFP. On the basis of the review, the NRC staff has determined that the licensee has reasonable key assumptions to ensure that decommissioning can be done in a manner to protect health and minimize danger to life or property. Therefore, the NRC staff finds that the licensee meets the requirement of 10 CFR 70.25 (e)(1)(ii).

3.4. Description of the Methods for Assuring Funds

3.4.1. Regulatory Requirements

10 CFR 70.25 (e)(1)(iii) requires that each DFP must contain a description of the method of assuring funds.

3.4.2. Licensee DFP Submittal

During the review of the subject DFP, Westinghouse was unable to demonstrate continued eligibility to use a parent company guarantee. As financial assurance, Westinghouse instead submitted a letter of credit (Ref. 15) that is based on the DFP dated June 8, 2012 (Ref. 10).

3.4.3. NRC Staff Evaluation

The NRC staff approved the letter of credit (Ref. 16).

3.4.4. NRC Findings

As discussed in their preceding evaluation, the NRC staff reviewed the method of assuring funds for decommissioning. On the basis of the review, the NRC staff has determined that the licensee has assurance that funds will be available to decommission in a manner to protect health and minimize danger to life or property. Therefore, the NRC staff finds that the licensee meets the requirement of 10 CFR 70.25 (e)(1)(iii).

3.5. Certification of Financial Assurance

3.5.1. Regulatory Requirements

10 CFR 70.25 (e)(1)(iv) requires that each DFP must contain a certification that financial assurance for decommissioning has been provided in the amount of the cost estimate.

3.5.2. Licensee DFP Submittal

The licensee submitted a certification of financial assurance stating the following:

- Address of the corporate headquarters
- Address of the licensed facility
- NRC license number
- Statement certifying the possession limits
- Statement certifying the amount of funds, corresponding to that in the DFP and the letter of credit, that have been obtained for decommissioning.

The certification is signed and dated.

3.5.3. NRC Staff Evaluation

3.5.4. NRC Findings

As discussed in their preceding evaluation, the NRC staff reviewed the certification of financial assurance. On the basis of the review, the NRC staff has determined that the licensee has certified that adequate decommissioning funds will be available such that decommissioning can be accomplished in a manner to protect health and minimize danger to life or property. Therefore, the NRC staff finds that the licensee meets the requirement of 10 CFR 70.25 (e)(1)(iv).

3.6. Signed Financial Instrument

3.6.1. Regulatory Requirements

10 CFR 70.25 (e)(1)(v) requires that each DFP must contain a signed original, or, if permitted, a copy of the financial instrument.

3.6.2. Licensee Submittal

Westinghouse submitted a letter of credit dated August 20, 2015 (Ref. 18).

3.6.4. NRC Staff Evaluation

By letter dated February 4, 2016, the NRC staff approved the letter of credit (Ref. 19).

3.6.5. NRC Findings

As discussed in their preceding evaluation, the NRC staff reviewed the signed financial instrument. On the basis of the review, the NRC staff has determined that the licensee signed financial instrument for decommissioning to unrestricted use, thereby protecting health and minimize danger to life or property. Therefore, the NRC staff finds that the licensee meets the requirement of 10 CFR 70.25 (e)(1)(v).

3.7. Constituents of the Financial Instrument

3.7.1. Regulatory Requirements

10 CFR 70.25(f) states that the financial instrument must include the licensee's name, license number, and docket number; and the name, address, and other contact information of the issuer, and, if a trust is used, the trustee. When any of the foregoing information changes, the licensee must, within 30 days, submit financial instruments reflecting such changes. Financial assurance for decommissioning must be provided by one or more of specific methods.

3.7.2. Licensee Submittal

Westinghouse submitted a letter of credit dated August 20, 2015 (Ref. 18).

3.7.3. NRC Staff Evaluation

By letter dated February 4, 2016, the NRC staff approved the letter of credit (Ref. 19).

3.7.4. NRC Findings

The NRC staff previously approved the letter of credit. As such, for the subject review, the NRC staff does not make a finding.

4. CONCLUSION

Based on the preceding reviews of the Triennial Update of the DFP dated June 5, 2015, the NRC staff concludes that there is reasonable assurance that Westinghouse will have adequate funds to decommission the CFFF for unrestricted use. Hence, approval of the DFP will not constitute an undue risk to public health and safety. The NRC staff finds that the DFP meets the requirements of 10 CFR 70.25. The NRC staff concludes that the DFP dated May 12, 2016, (Ref. 8) should be approved.

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REFERENCES

1. Letter from N. Parr, Westinghouse Electric Company LLC, "Westinghouse Columbia Fuel Fabrication Facility Decommissioning Funding Plan," June 5, 2015. Agencywide Documents Access and Management System (ADAMS) accession number ML15156B312.
2. Letter from C. Ryder, U.S. Nuclear Regulatory Commission, "Acceptance for Technical Review: Triennial Update of the Decommissioning Funding Plan (Technical Assignment Control Number L33376)," July 30, 2015. ADAMS Accession Number ML15196A589.
3. Letter from C. Ryder, U.S. Nuclear Regulatory Commission, "Request For Additional Information: Triennial Update Of The Decommissioning Funding Plan (Technical Assignment Control Number L33376)," November 17, 2015. ADAMS accession number ML15264B004.
4. Note from C. Ryder, U.S. Nuclear Regulatory Commission, "Summary of Conference Call — Westinghouse Triennial Update Of The Decommissioning Funding Plan", January 8, 2016. ADAMS accession number ML16011A206.
5. Note from C. Ryder, U.S. Nuclear Regulatory Commission, "Conference Call: Westinghouse Triennial Update of the Decommissioning Funding Plan - Expectations of Response to Request for Additional Information," February 12, 2016. ADAMS accession number ML16043A481.
6. Note from C. Ryder, U.S. Nuclear Regulatory Commission, "Conference Call On March 22, 2016: Expectations Of Westinghouse In Response To Requests For Additional Information Regarding The Decommissioning Funding Plan Dated June 5, 2015," April 18, 2016. ADAMS accession number ML16109A234.
7. Letter from N. Parr, Westinghouse Electric Company LLC, "Westinghouse Response to Request for Additional Information: Triennial Update of the Decommissioning Funding Plan (TAC # L33376,)" December 17, 2015. ADAMS accession number ML15351A393.
8. Letter from N. Parr, Westinghouse Electric Company LLC, "Westinghouse Response to Request for Additional Information and Submittal of Revised Decommissioning Funding Plan (TAC # L33376)," May 12, 2016. ADAMS accession number ML16134A095.
9. U.S. NRC, "Consolidated Decommissioning Guidance: Financial Assurance, Recordkeeping, and Timeliness, Final Report," NUREG-1757, Vol. 3, Rev. 1, February 2012. ADAMS accession number ML12048A683.
10. Letter from D. Precht, "Westinghouse Columbia Fuel Fabrication Facility Decommissioning Funding Plan, June 8, 2012. ADAMS accession number ML121650753.
11. Letter to N. Parr, Westinghouse Electric Company LLC, "Amendment 18 – Exemption From 10 CFR Part 30, Appendix A, Section II.C.1; Exemption From 10 CFR, Part

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- 20.1703(C)(5); Change In The Calibration Interval Of Portable Radiation Survey Instrumentation; Increase In Possession Limits; Approval Of Physical Security Plan, Revision 45; Change In Principal Officers; Removal Of Completed License Conditions (Technical Assignment Control Number L33353),” November 2, 2015. ADAMS accession number ML15125A279.
12. Letter from N. Parr, Westinghouse Electric Company, “SNM-1107 License Renewal Supplement,” December 17, 2014. ADAMS accession number ML14352A111.
 13. Letter to M. Gutman, Westinghouse Electric Company LLC, “Approval Of Request To Use A Parent Company Guarantee As Financial Assurance For Decommissioning (TAC L33096),” August 29, 2011. ADAMS accession number ML112350837.
 14. Letter to N. Parr, Westinghouse Electric Company LLC, “Amendment 18 – Exemption From 10 CFR Part 30, Appendix A, Section II.C.1; Exemption From 10 CFR, Part 20.1703(C)(5); Change In The Calibration Interval Of Portable Radiation Survey Instrumentation; Increase In Possession Limits; Approval Of Physical Security Plan, Revision 45; Change In Principal Officers; Removal Of Completed License Conditions (Technical Assignment Control Number L33353),” November 2, 2015. ADAMS accession number ML15125A279.
 15. Letter from M. Gutman, Westinghouse Electric Company LLC, “Decommissioning Project (License SNM-33) and the Columbia Fuel Fabrication Facility (License SNM- 1107) (Proprietary and Non-Proprietary versions) and Letter of Credit (Non-Proprietary version) and Affidavit,” August 20, 2015. ADAMS accession number ML15244B331.
 16. Letter to M. Gutman, Westinghouse Electric Company LLC, “Approval of a Letter of Credit as Financial Assurance for Decommissioning – Westinghouse Electric Company, LLC (Cost Activity Code L33394,)” February 4, 2016. ADAMS accession number ML16027A041.
 17. U.S. Nuclear Regulatory Commission, NRC License XSNM3163, Amendment No. 04. NRC Docket 11005224. ADAMS accession number ML12129A449.
 18. Letter from M. Gutman, Westinghouse Electric Company LLC, “Decommissioning Financial Assurance - Standby Trust Agreement for the Hematite Decommissioning Project (License SNM-33) and the Columbia Fuel Fabrication Facility (License SNM- 1107) (Proprietary and Non-Proprietary versions) and Letter of Credit (Non-Proprietary version) and Affidavit,” August 20, 2015. ADAMS accession number ML15244B331.
 19. Letter to M. Gutman, Westinghouse Electric Company LLC, “Approval of a Letter of Credit as Financial Assurance for Decommissioning – Westinghouse Electric Company, LLC (Cost Activity Code L33394,)” February 4, 2016. ADAMS accession number ML16027A041.