

**EHS&L Document**

**SNM-1227 - Chapter 10  
Decommissioning**

**Nature of Changes**

Item	Paragraph	Description	Justification
1.	Entire Document	Changed AREVA Inc. to Framatome Inc.	Company Name Change
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			
List Below any Documents, including Forms & Operator Aids which must be issued concurrently with this document revision:			

This Document contains a total of 6 pages excluding the signature page.

### DOCUMENT REVIEW/APPROVAL/DELETION CHECKLIST

All new and/or revised procedures shall be approved by the change author, cognizant manager(s) of areas affected by the changes, and by applicable manager(s) of any function that approved the previous revision of the document unless responsibility for such approval has been transferred to another organization. Also, the procedure shall be approved by manager(s) of functional organizations that provide technical reviews with the exception of the Training Department. Finally, Document Control shall verify that the required approvals have been properly obtained and that any documents that must be issued concurrently are ready to be issued.

Document Reviews			Document Approvals	
Purpose/Function of Review	Specify Reviewer(s) (Optional except for change author)	(Check all that apply)	Title of Approver	(Check all that Apply)
Document Control (Automatic)		<input checked="" type="checkbox"/>	Document Control (Automatic)	<input checked="" type="checkbox"/>
Change Author	CD Manning	<input checked="" type="checkbox"/>	Author	<input checked="" type="checkbox"/>
Independent Technical Review		<input type="checkbox"/>		
Operability Review(s)			Mgr, Richland Operations <sup>(1)</sup>	<input type="checkbox"/>
Conversion		<input type="checkbox"/>	Mgr, Uranium Conversion & Recovery Operations <sup>(1)</sup>	<input type="checkbox"/>
Recovery		<input type="checkbox"/>	Mgr, Ceramic Operations <sup>(1)</sup>	<input type="checkbox"/>
Ceramics		<input type="checkbox"/>	Mgr, Rods & Bundles <sup>(1)</sup>	<input type="checkbox"/>
Rods		<input type="checkbox"/>	Mgr, Component Fabrication <sup>(1)</sup>	<input type="checkbox"/>
Bundles		<input type="checkbox"/>	Mgr, Maintenance <sup>(1)</sup>	<input type="checkbox"/>
Components		<input type="checkbox"/>	Mgr, Production Support <sup>(1)</sup>	<input type="checkbox"/>
Maintenance Review		<input type="checkbox"/>	Mgr, Ops Strategy & Supply Chain	<input type="checkbox"/>
Lab Review		<input type="checkbox"/>	Mgr, EHS&L <sup>(2)</sup>	<input checked="" type="checkbox"/>
Transportation		<input type="checkbox"/>	Mgr, Nuclear Safety <sup>(2)</sup>	<input type="checkbox"/>
EHS&L Review(s)			Mgr, Safety <sup>(2)</sup>	<input type="checkbox"/>
Criticality		<input type="checkbox"/>	Mgr, Security & Emergency Preparedness <sup>(2)</sup>	<input type="checkbox"/>
Radiation Protection		<input type="checkbox"/>	Mgr, Licensing & Compliance <sup>(2)</sup>	<input type="checkbox"/>
Safety		<input type="checkbox"/>	Mgr, Mechanics Richland	<input type="checkbox"/>
Security/Emergency Prep.		<input type="checkbox"/>	Mgr, Thermal-Hydraulics Richland	<input type="checkbox"/>
Fire Safety		<input type="checkbox"/>	Mgr, Materials & Therm-Mechs	<input type="checkbox"/>
MC&A		<input type="checkbox"/>	Mgr, Project & Reliability Eng.	<input type="checkbox"/>
Transportation		<input type="checkbox"/>	Mgr, Richland Site Quality	<input type="checkbox"/>
Environmental	CD Manning	<input checked="" type="checkbox"/>	Mgr, PP&CPC	<input type="checkbox"/>
Mechanics Richland Review		<input type="checkbox"/>	Mgr, Richland Site/Other	<input type="checkbox"/>
Mechanics Lynchburg Review		<input type="checkbox"/>	Richland Records Management	<input type="checkbox"/>
Thermal-Hydraulics Richland Review		<input type="checkbox"/>	Training & Employee Dev. <sup>(3)</sup>	<input type="checkbox"/>
Thermal-Mechanics Richland Review		<input type="checkbox"/>		
Project & Reliability Review		<input type="checkbox"/>		
Quality Review		<input type="checkbox"/>		
Purchasing Review		<input type="checkbox"/>		
Others:		<input type="checkbox"/>		
Document Control		<input type="checkbox"/>		
Training & Employee Dev.: <sup>(3)</sup>		<input type="checkbox"/>		

<sup>(1)</sup>Note: If approvals include 2 or more product center managers, the Operations manager can be substituted for the applicable product center managers.

<sup>(2)</sup>Note: If approvals include 2 or more EHS&L functional managers, the EHS&L manager can be substituted for the applicable EHS&L functional managers.

<sup>(3)</sup>Note: Training department review is required for all procedures that require or affect a Learning Plan and if additional training materials or curriculum must be revised before issuing procedure.

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EHS&L CHANGE IMPACT EVALUATION FORM			
<p>The scope and content of this document have been determined by EHS&amp;L to not impact the safety disciplines checked below. Future revisions do not require review by those EHS&amp;L component(s) unless the scope changes such that a previously excluded safety discipline may be impacted.</p>			
<p> <input type="checkbox"/> Criticality   <input type="checkbox"/> Radiation Protection   <input type="checkbox"/> Safety/Security   <input type="checkbox"/> Emergency Preparedness   <input type="checkbox"/> MC&amp;A   <input type="checkbox"/> Transportation   <input type="checkbox"/> Environmental </p>			
DOCUMENT VERSION:	EHS&L REVIEW COMPONENT:	EVALUATION DATE:	CHANGE EVALUATOR*:
			2 <sup>ND</sup> PARTY APPROVAL*:

<p>The scope and content of this document have been determined by EHS&amp;L to not directly impact the safe handling of licensed materials (enriched uranium). Future revisions to this document do not require the <b>10CFR 70.72</b> change evaluation unless the scope of the document changes such that it directly impacts the handling of licensed materials.</p>			<input type="checkbox"/>
DOCUMENT / ECN No**:	EVALUATION DATE:	CHANGE EVALUATOR:	
E10-08-010	1/19/18	CD Manning	
Does the change potentially impact Criticality Alarm System (CAS) coverage?			<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>EVALUATION OF NRC PRE-APPROVAL:</b>			
<b>IS NRC PRE-APPROVAL ( LICENSE AMENDMENT ) NEEDED?</b> <ul style="list-style-type: none"> <li>➤ Based on "YES" answer to any of five questions below.</li> <li>➤ Based on "NO" answer to all five questions below.</li> </ul>			<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
1. Does the change create new types of accident sequences that, unless mitigated or prevented, would exceed the performance requirements of <b>10 CFR 70.61</b> (create high or intermediate consequence events) and that have not previously been described in Framatome's ISA Summary?			<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
2. Does the change use new processes, technologies, or control systems for which Framatome has no prior experience?			<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
3. Does the change remove, without at least an equivalent replacement of the safety function an item relied on for safety ( <b>IROFS</b> ) that is listed in the ISA Summary?			<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
4. Does the change alter any item relied on for safety, listed in the ISA Summary, that is the sole item preventing or mitigating an accident sequence of high or intermediate consequences?			<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
5. Does the change qualify as a change specifically prohibited by NRC regulation, order or license condition?			<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>Evaluation of Actions Required <u>PRIOR TO OR CONCURRENT</u> with Change Implementation:</b>			
6. Modification / Addition to CAS system or system coverage documentation			<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
7. Acquire NRC pre-approval (LICENSE AMENDMENT)			<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
8. Conduct/modify ISA			<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
9. Modify / update the following:	<input checked="" type="checkbox"/> None <input type="checkbox"/> Other	<input type="checkbox"/> ISA Database <input type="checkbox"/> Red-Line Drawings/P&ID	<input type="checkbox"/> NCSA <input type="checkbox"/> NCSS
		<input type="checkbox"/> NCSP <input type="checkbox"/> PHA	<input type="checkbox"/> RHA <input type="checkbox"/> FHA
			<input type="checkbox"/> ChHA <input type="checkbox"/> Procedures
<b>Evaluation of Actions Required <u>SUBSEQUENT TO</u> Change Implementation:</b>			
10. Modify / update the following:	<input checked="" type="checkbox"/> None <input type="checkbox"/> Other	<input type="checkbox"/> ISA Database <input type="checkbox"/> AS-Built Drawings/P&ID	<input type="checkbox"/> NCSA <input type="checkbox"/> NCSS
		<input type="checkbox"/> NCSP <input type="checkbox"/> PHA	<input type="checkbox"/> RHA <input type="checkbox"/> FHA
			<input type="checkbox"/> ChHA <input type="checkbox"/> Procedures
<p>Justification Section for "YES" preceding Questions 1 – 8 or other for 9, 10: Being prepared as part of a License Amendment, however pre-approval of the amendment prior to issuing is not required.</p>			

(\*) Only required if one or more of the boxes to exclude a particular safety discipline review is checked.

(\*\*) If this form exists as a part of a document, the document number is not required.

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### **Table of Contents**

10.0	Decommissioning .....	10-1
10.1	Decommissioning Funding Plan (DFP) .....	10-1
10.2	Decommissioning Cost Estimate.....	10-1
10.3	Decommissioning Financial Assurance.....	10-1

## 10.0 **Decommissioning**

Framatome Inc. (Framatome) shall fulfill the requirements of 10 CFR 70.25, "Financial Assurance and Recordkeeping for Decommissioning," by submittal of a decommissioning funding plan (DFP) to the U.S. Nuclear Regulatory Commission (NRC) and by the maintenance of records of information important to the decommissioning of the site until such time as the site is released for unrestricted use.

### 10.1 ***Decommissioning Funding Plan (DFP)***

The DFP submitted to the NRC shall contain the elements called for in 10 CFR 70.25(e), including a decommissioning cost estimate; a financial assurance mechanism; a means for adjusting the cost estimate and associated funding levels periodically over the life of the facility; and a certification that financial assurance has been provided in an amount that covers the current estimate for decommissioning. The DFP will address the decommissioning of facilities on the Richland, Washington site with potential for contamination with licensed materials. Framatome's DFP is provided to the NRC as E06-04-007, Version 2.0, dated December 19, 2005, or as subsequently revised.

### 10.2 ***Decommissioning Cost Estimate***

The decommissioning cost estimate shall be presented in the DFP. The estimate shall include a facility description, estimated decommissioning costs (labor, non-labor, and contingency), and key underlying assumptions. Consistent with 10 CFR 70.25(e), the cost estimate will be reviewed and updated at an interval not to exceed three years.

### 10.3 ***Decommissioning Financial Assurance***

Financial assurance for decommissioning will be provided by a methodology authorized in 10 CFR 70.25(f). Framatome will provide the NRC with signed originals of the financial instruments obtained to satisfy the requirements of 10 CFR 70.25(f).