



## CONVERSATION RECORD

DATE OF SIGNATURE

04/09/2018

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU

Michael Kurth

DATE OF CONTACT

04/09/2018

TYPE OF CONVERSATION

☐ E-MAIL☒ TELEPHONE☐ INCOMING☒ OUTGOING

E-MAIL ADDRESS

michael.f.kurth.civ@mail.mil

TELEPHONE NUMBER

(309) 782-8423

ORGANIZATION

Headquarters, U.S. Army Joint Munitions Command

DOCKET NUMBER(S)

030-36094

LICENSE NUMBER(S)

12-00722-15

CONTROL NUMBER(S)

300407

SUBJECT

Additional Information Needed for Decommissioning Financial Assurance

SUMMARY

After reviewing your decommissioning cost estimate, dated June 28, 2017, the following additional details will be needed in order to verify the adequacy of the cost estimate:

1. Your cost estimate does not reflect the radionuclides currently authorized on your license. Your DFP should be based on the materials you currently possess and in the amounts you typically possess.

Please review your current material usage and either provide a revised cost estimate or a justification for the possession of materials currently listed in your DFP. In addition, please provide a current inventory of materials that are possessed under this license.

**Continue on Page 2**

ACTION REQUIRED (IF ANY)

Please submit your response by May 11, 2018 and reference it to my attention as "additional information to control number 300407" to facilitate proper handling in our office. Your response must be currently dated and signed. If you have any questions or require clarification of any of the information stated above, please do not hesitate to contact me at 630-829-9607

In accordance with 10 CFR 2.390 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 NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

**Continue on Page 3**

NAME OF PERSON DOCUMENTING CONVERSATION

SIGNATURE

## CONVERSATION RECORD (continued)

SUMMARY: (Continued from page 1)

2. 10 CFR 30.35(e) requires that licensees identify and justify key assumptions contained in the decommissioning cost estimate. Guidance is provided in section A.3.1.3 of NUREG-1757, Volume 3, Appendix A, which states: "Key assumptions used in the decommissioning cost estimate should be identified and adequately justified." Additional detail is needed to justify the reasonableness of the assumptions upon which your decommissioning cost estimate is based.

Additional detail is necessary to justify the basis of the cost estimate and the assumptions used, as listed below:

- a. Please confirm that your cost estimate assumes that decommissioning will occur immediately on cessation of operations without multi-year storage for decay periods.
- b. Please confirm that your cost estimate assumes that decommissioning activities will allow for a third party to assume responsibility for and carry out decommissioning of the facility.
- c. Please provide a justification for the assumed salary and overhead costs used to determine the total labor costs.
- d. Please provide a justification for the assumed waste disposal costs, including the costs for packaging of the waste and any waste containers used.
- e. Please confirm that your cost estimate does not take into account any salvage value.

3. In accordance with 10 CFR 30.35(e) all licensees required to demonstrate financial assurance are required to submit a certification of financial assurance, including those licensees submitting a DFP (NUREG-1757, Appendix A, Sections A.1.3 and A.2). Please note that if the DFP cost estimate increases based on your response to the above questions, it may be necessary to provide a revised certification of financial assurance to reflect this increase. The model wording for a certification of financial assurance is presented in NUREG-1757, Appendix A, Section A.2.4.

4. If there is a change in the estimated costs based on your response to the questions above, please note that you will need to provide an updated Statement of Intent.