



696-4949
October 31, 2018

Document Control Desk
Director, Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
ATTN: Mr. Merrit Baker, Senior Project Manager

Subject: Request to Terminate General Atomics' U.S. NRC Special Nuclear Materials License SNM-696, Docket No: 70-734

- References:
1. "General Atomics' Site Decommissioning Plan," dated September 1996, Revised December 1996, Revised April 1997 and Revised January 1998. Approved by NRC per SNM-696 License Amendment No. 45 dated April 29, 1998.
 2. General Atomics' "SVA Decommissioning Plan" dated April 1990. Approved by SNM-696 License Amendment No. 16, dated November 13, 1990.
 3. "General Atomics' Hot Cell Facility Decommissioning Plan," dated 1995. Interim NRC approval May 1, 1996 and Final NRC approval January 29, 1997; License amendment # 35.
 4. GA's "Plan for Obtaining Release of Certain Areas to Unrestricted Use," Submitted to the NRC by letter dated October 1, 1985. Approved by NRC letter FCUP:NK/70-734 (W. T. Crow), dated November 26, 1985.
 5. GA's "Plan for Obtaining Approval to Release Approximately 215 Acres from GA Technologies Inc. License SNM-696 to Unrestricted Use," dated December 15, 1986.

Dear Mr. Baker:

The purpose of this letter is to request termination of General Atomics' (GA's) Special Nuclear Materials license SNM 696 in accordance with 10 CFR70 38(d) following completion of decontamination and decommissioning activities in accordance with GA's NRC-approved site decommissioning plan (Ref. 1) dated April 29, 1998 and supplemental NRC-approved decommissioning plans (Refs. 2, 3, 4 and 5). Herein GA provides information demonstrating that all land areas comprising GA's entire site and all facilities thereon (which were once authorized locations under the jurisdiction of SNM-696) have been decontaminated, as needed, and released to unrestricted use by the NRC in accordance with criteria in 10 CFR 20 Subpart E. Further, GA has properly transferred to other licensees, the U.S. DOE, or authorized disposal facilities all SNM previously possessed under license SNM-696.

History

Following is a brief and somewhat abridged summary of the history of activities and SNM-696 license amendments related to GA site-decommissioning, releases to unrestricted use, and SNM inventory:

NM552D

The original SNM-696 license was initially issued (circa late 1950s) to the General Atomics Division of General Dynamics for a new nuclear research and development complex located on an ~ 415 acre site in the northern part of San Diego, CA. The General Atomics Division conducted a broad scope of nuclear related research & development activities such as: high temperature gas-cooled reactor systems; TRIGA® research reactor design and manufacturing; controlled thermonuclear reactions; direct conversion of heat to electricity; small self-regulating package power reactors; new high temperature materials; fabrication of advanced-type nuclear fuel elements; and many basic and applied science projects. SNM-696 was a broad-scope license that essentially authorized the General Atomics Division to conduct activities under the license anywhere on its site.

In the 1960's the General Atomics Division was sold to Gulf Oil who formed an ownership consortium with Royal Dutch Shell and the Division's name was changed to GA Technologies, Inc. In 1985, GA Technologies Inc. initiated a campaign to decontaminate and decommission its NRC licensed nuclear facilities and to delete those facilities and the entire ~ 415 acre site from its SNM-696 license with the final intent being to terminate license number SNM-696.

Late in 1985, GA Technologies, Inc. was sold to its current owners. The current owners purchased only the facilities and associated land, approximately 120 acres, necessary for the continued conduct of GA Technologies Inc.'s business. Thus, GA Technologies Inc.'s initial decommissioning activities focused on decontaminating, as needed, and obtaining the release to unrestricted use of the ~ 295 acres retained by the previous owners and deleting them from GA Technologies' SNM-696 license (Refs. 4 and 5). The ~ 295 acres was land surrounding the ~ 120 acres upon which GA Technologies Inc. conducted business and included ~ 215 acres of mostly undeveloped land (Ref. 5).

The Oak Ridge Associated Universities' (ORAU) Radiological Site Assessment Team conducted multiple confirmatory surveys of the parcels of land comprising the above mentioned ~ 215 acres, as well as the other ~ 80 acres included in the ~ 295 acres that was retained by the previous owners. ORAU also conducted confirmatory surveys in support of numerous subsequent release requests associated with the ~120 acres and buildings thereon (e.g., fuel fabrication and hot cell facilities) owned by GA Technologies.

GA Technologies Inc. changed its name to General Atomics (GA) in March of 1988. The release and deletion of the ~ 295 acres from License SNM-696 was accomplished in 1988 as documented by two license amendments: the first was Amendment # 9 dated June 22, 1988 (~277 acres) and the second was Amendment # 12 dated October 3, 1988 (~ 18 acres).

Following the release of the ~ 295 acres, GA continued to pursue its efforts to: 1) methodically decontaminate (if needed), 2) decommission facilities, 3) conduct radiological surveys to demonstrate meeting NRC-approved release criteria, 4) document the results, and 5) submit a survey results and request to the NRC to release the space (building, portion of building, or land area) to unrestricted use and delete from GA's SNM-696 license.

While GA was aware that the NRC preferred not to release and delete portions of a licensee's building from its license in piecemeal fashion, for many of GA's buildings it was not feasible to

release the entire building at one time. This was because of several significant logistical and business considerations. First, GA was not closing down, it was going to diversify into other non-SNM related projects, so GA's business activities had to continue throughout the decommissioning process. Second, GA had approximately 35 buildings on its site that had to be released and many of them housed multiple projects or business units, some involving the use of SNM, some not; some projects were closing, some were continuing with non-SNM activities. The logistical issues associated with conducting decommissioning activities is illustrated by the challenges posed by GA's laboratory building (Building 2). Building 2 houses more than 100 separate laboratory rooms plus associated offices. It was not feasible to empty the entire building and conduct decommissioning activities needed in order to submit a single request for the release and deletion from GA's license of all of Building 2. Before space could be decommissioned and decontaminated (D&D), projects had to go through an orderly close-out and then be re-located so as to free-up the space for D&D. The various projects had different schedules and/or performance commitments, thus not all projects could vacate their space on the same schedule. Furthermore, the various projects and business units could not vacate their laboratory and office space until they had other space available to move into. In many instances, lab space had to be released and deleted from GA's license before other occupants of laboratory space could be re-located into the released space to free-up their space for decommissioning activities. Consequently, GA had to methodically decommission many of its buildings and its land area in a piecemeal fashion over an extended period of time.

In 1996, GA was several years into its active site-decommissioning campaign. GA was conducting decommissioning activities following NRC-approved guidance consisting primarily of a site-wide decommissioning plan "General Atomics' Site Decommissioning Plan" (Ref. 1), plus two facility-specific decommissioning plans (Refs. 2 and 3, for the fuel fabrication and hot cell facilities, respectively).

In view of GA's written commitment to cease and desist all activities involving the use of SNM and GA's commitment and ongoing activities to decommission its entire site, the NRC approved a possession only license amendment on September 26, 1996 (Amendment # 37). SNM-696 license Amendment # 37 deleted all authorization for activities involving receiving and processing of SNM; the authorized activities only included those necessary to remove material from the site and to decontaminate and decommission the site.

From 1989 to 2007, GA conducted, in piecemeal fashion, decontamination and decommissioning activities, conducted radiologic surveys to demonstrate meeting NRC-approved release criteria, and submitted release requests to the NRC. The last request was made in December 2007 and the last SNM-696 license amendment (Amendment # 90) was issued on September 16, 2008. With the issuance of License Amendment # 90, the entirety of the land area (~120 acres) and every building thereon under the jurisdiction of SNM-696 was released to unrestricted use and deleted from License SNM-696.

Please refer to Attachment 1 to this letter to see a listing of all SNM-696 License Amendments that were issued from 1988 to 2008 that are associated with GA obtaining the release to unrestricted use of its entire site and all building thereon; and their deletion from SNM-696. For

each amendment, the attachment gives the License Amendment #, the corresponding date it was issued, and a corresponding brief description of the building, facility or land area released to unrestricted use and deleted from SNM-696.

Waste generated as a result of decontamination and remediation (e.g., solid and liquid radioactive waste, mixed waste and hazardous waste) was properly handled, stored, and disposed of (at authorized off-site disposal facilities) in accordance with applicable sections of the Code of Federal Regulations, Code of California Regulations, San Diego County and City Regulations, disposal site waste acceptance criteria, GA's license SNM-696, and applicable NRC-approved decommissioning plans and procedures. GA's proper management (e.g., characterization, storage, packaging, manifesting, and shipping) of the radioactive waste generated was a subject of numerous NRC inspections.

During the period from February 10, 2010 through August 30, 2010, when GA was shipping its TRIGA® reactor fuel off site, the NRC conducted an inspection of GA's site involving four site visits. Quoting from the resulting NRC inspection report No. 50-163/2010-01; 50-89/2010-01, dated November 1, 2010: "As a result of the three shipments of TRIGA® fuel, the inventory onsite as of September 30, 2010 included only material licensed to GA under their California license RML 0145-37. All uranium licensed by the NRC to GA under their SNM license has been removed from the site." And, "The three shipments included all plutonium, leaving a balance of zero on the material balance report as of September 30, 2010."

All SNM that had been on GA's site was transferred to other SNM licensees, to GA's radioactive materials license issued by the State of California, or to the Department of Energy.

As noted above, by 2008, GA had successfully obtained the NRC's release to "unrestricted use" for all of its facilities and land areas licensed by SNM-696, i.e., the entirety of GA's Main and Sorrento Valley sites except for a small portion of the TRIGA Reactors Facility (which is under separate NRC licenses; R-38 and R-67). Circa 2008/2009, GA informally requested relief/delay from timely license termination of SNM-696 because there was a remote possibility GA might request re-activation of the license in support of advanced reactor fuel development activities. At that time, other GA projects and business units viewed the potential for re-activating the SNM-696 license as a useful qualification when bidding on SNM-fuel related contracts.

GA management has since concluded that there is no further interest in conducting nuclear fuel-related projects on its San Diego site that would involve the need for an NRC SNM license. Hence this official request for termination of License SNM-696.

Rationale/Basis for Request

Very briefly, the bases for this request are (as derived from the above information):

- There is no SNM on GA's site that is possessed under License SNM-696.
- All facilities and land areas comprising the site that were under the jurisdiction of GA's SNM-696 license have been released to unrestricted use and deleted from the license.

- All radioactive, hazardous and mixed waste generated as a result of GA's site decontamination efforts has been removed from the site.
- GA management has no interest in conducting future nuclear fuel-related projects on its San Diego site that would involve the need for an NRC SNM license.
- Attachment 1 to this letter lists all SNM-696 License Amendments associated with decommissioning and obtaining the release of GA's entire site and all building thereon.
- NRC Form 314 "Certificate of Disposition of Materials," is attached (Attachment 2).

If you have questions or desire additional information regarding this request, please contact me at keith.asmussen@ga.com or (858) 455-2823, or Paul Pater at paul.pater@ga.com or (858) 455-2758.

Very truly yours,

Keith E. Asmussen

Keith E. Asmussen, Ph.D., Director
Licensing, Safety and Nuclear Compliance

Attachments: 1) Attachment 1 (SNM-696 Site Decommissioning License Amendments, Dated 1988 - 2008)
2) NRC Form 314 "Certificate of Disposition of Materials" with attachment.

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ATTACHMENT 1

SNM-696 License Amendments

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Date	Amendment #	Facility and Areas Released to Unrestricted Use
9/16/08	90	Building 30/31 Phase IV and Building 30 Phase V (TAC L32694) per GA letters CAL/696-3404 dated 9/6/01, CAL/696-3342 dated 3/22/01)
2/29/08	89	Underground Drain Line Piping Associated with the Former Building 31 Underground Liquid Radioactive Waste Tank (TAC L32663) (per GA letter 696/CAL-4151 dated December 20, 2007)
5/14/07	88	(1) Non-reactor Portion of the TRIGA (Building 21) Reactor Site, (2) Building 2, Service Corridor A, and (3) Former L-307 Tank Pit Site (per GA letters 696-4039 dated November 20, 2006, 696/CAL-4044 December 6, 2006 and 696/CAL-4058 February 7, 2007, respectively).
4/13/07	87	(1) Abandoned Rabbit Tube, (2) Building 2, Service Corridor B, and (3) Building 2, Service Corridor C (per GA letters 696/CAL-4062 dated March 6, 2007, 696/CAL-4064 dated March 7, 2007 and 696/CAL-4067 March 14, 2007)
5/18/06	85	Non-TRIGA Reactor Portion of General Atomics' Building 21 Roof (per GA letter 696-3957 dated February 6, 2006)
11/28/05	84	Former Building 25 Site to Unrestricted Use (previously the liquid waste filtration building, TAC L31905) (per GA letters 696/CAL- 3855 dated April 4, 2005, CAL/696-3622 dated July 10, 2003 and 696/CAL-3709 dated March 11, 2004)
8/25/05	83	(1) Remaining portion of Building 41, (2) DTSC Permitted Area (NWPF-1 Site) of the Nuclear Waste Processing Facility and (3) Remaining portions of the Sorrento Valley South Land Area (per GA letters 696/CAL-3852 dated March 18, 2005, 696/CAL-3853 dated March 23, 2005 and 696/CAL- 3871 dated May 25, 2005, respectively)
7/19/05	<i>Letter Only No Amendment</i>	Letter received agreeing with GA's request to transfer the lead agency for the NWPF and surrounding Areas from the State of CA to the NRC (State also agreed per letter dated May 18, 2005).
8/26/04	82	GA's Sewer System, includes the Main Site vaults and drain lines and the S-18 to Bldg 31-1 Sewer System, and the Sorrento Valley Sewer systems including vaults (per GA letter 696/CAL-3724 dated April 20, 2004 (Does not include S-13 to S-18 drain line or Building 2 Sewer System))
1/30/04	80	Area 5 of Sorrento Valley West Land Area and The Building 2 Roof (per GA letters 696/CAL-3660 dated October 23, 2003, and 696/CAL-3665 dated October 31, 2003)
10/6/03	79	Area 4 of Sorrento Valley West Land Area and Concrete Storage Bunker Located Within Area 5 of Sorrento Valley West Land Area (per KA letter 696/CAL-3579 dated March 18, 2003 and KA letters 696/CAL-3608 (June 11, 2003) and 696/CAL-3623 dated July 14, 2003)

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Date	Amendment #	Facility and Areas Released to Unrestricted Use
7/11/03	77	<p>(1) Torrey Pines North Land Area (Suspect affected area of Section C) per GA letter 696/CAL-3558 dated January 14, 2003</p> <p>(2) Building 31, Room 103A per GA letter 696/CAL-3552 dated December 18, 2002</p> <p>(3) Service Yard of Building 27 per GA letter 696/CAL-3540 dated November 20, 2002</p> <p>(4) TRIGA Reactor Facility Electrical Pad per GA letter 696-3525 dated October 9, 2002</p> <p>(5) Building 27-1 (EA-1 Bunker) per GA letter 696/CAL-3451 dated April 5, 2002</p> <p>(6) LINAC Land Area per GA letter 696/CAL-3395 dated August 2, 2001</p>
3/13/03	76	Reduces the possession limits (per GA letters 696-3538 dated November 7, 2002). The inventory was reduced from a Category II quantity of material (per 10 CFR 73.2) to a Category III quantity of material (per 10 CFR 73.2)
12/9/02	75	(1) TRIGA Trailer Land Area and (2) Torrey Pines North Hillside (Sections A, B, D and unaffected area of Section C) (per GA letter 696/CAL-3508 dated August 30, 2002 and 696/CAL-3517 dated September 27, 2002, respectively)
1/24/03	<i>Letter Only No amendment</i>	Letter received agreeing with GA's request to transfer the lead agency for the (1) LINAC Land Area, (2) Building 27-1 (EA-1 Bunker) land area, and (3) Building 27 service yard land area from the State of CA to the NRC (State also agreed per letter dated January 9, 2003).
6/19/02	74	(1) Sewer Line Trench S-18 to S-15 to S-13 and (2) Concurrence to Backfill Sewer Line Trench From S-18 to Building 31-1 , (per GA letter 696/CAL-3429 dated February 4, 2002)
2/4/02	73	Torrey Pines East (per GA letter 696/CAL-3420 dated November 20, 2001)
11/16/01	72	(1) Building 2 Service Corridor Drain Line Trench and (2) LINAC North Land Area (per GA letters 696/CAL-3353 dated April 4, 2001 and 696/CAL-3366 dated April 30, 2001, respectively)
7/10/01	71	(1) Sorrento Valley West Land Areas 2 and 3 and (2) TRIGA Fuel Fabrication Utility Corridor (per GA letters 696/CAL-3329 dated February 15, 2001 and CAL/696-3334 dated February 23, 2001)
5/17/01	<i>Letter Only No Amendment</i>	Concrete/soil/debris from the Soil Staging Area (SSA) Bins T-4, T-35, T-40, T-41 and releases soil and concrete/metal debris from SSA Bins T-9, T-29 and T-32 (per GA letters 696-3296 dated November 3, 2000 and 696-3303 dated November 13, 2000, respectively)

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SNM-696 License Amendments

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Date	Amendment #	Facility and Areas Released to Unrestricted Use
5/11/01	70	<p>(1) Outside areas Adjacent to Building 27 on the east and northeast (per GA letter CAL/696-3285 dated October 10, 2000)</p> <p>(2) Torrey Pines Northeast Land Area and Building 20 (per GA letter 696/CAL-3297 dated November 7, 2000)</p> <p>(3) Area 1 of Sorrento Valley West Land Area (per GA letter 696/CAL-3311 dated January 10, 2001)</p>
2/9/01	69	Group 13 labs of Building 2 (last group of labs in Building 2) (per GA letter 696/CAL-3266 dated August 25, 2000)
12/22/00	68	(1) Sorrento Valley North (SVN) Land Area, soil/asphalt staged at the SVN Land, and (2) "Group 12" Labs of Building 2 (per GA letters 696/Cal-3256 dated March 30, 2000 (SVN), and 696/CAL-3266 dated June 16, 2000)
11/16/00	<i>Letter Only No amendment</i>	Bins T-31 and T-48 soil and concrete from Building 2 service corridor from sewer drain line removal project. T-48 also included the concrete vaults from near Building 2 , per GA letter November 3, 2000 and letter dated November 16, 2000 signed by Mary Adams that allows GA to backfill the excavation pit outside Section "C" of Building 2. NRC
9/18/00	67	(1) Outside Area West, South and Southeast of Building 27 and (2) Phase III of Building 30 , per GA letters CAL/696-3179 dated January 26, 2000 and CAL/696-3181 dated January 27, 2000, respectively.
7/3/00	66	Hot Cell Site (including the former Building 23 site) per GA letter 696/CAL-3206 dated March 10, 2000. [NRC Inspection Report 70-734/00-01 dated June 20, 2000 performed March 14-15, 2000 has NRC's Confirmatory Survey]. TAC No. L31365.
12/28/99	<i>Letter Only No amendment</i>	Concrete/soil debris from the temporary staging area to SSA Bins S-1a, S-1b, S-4, S-5, T-5, T-7, T-14, T-15, T-17 and T-24. (per GA letter dated November 15, 1999 and NRC letter dated December 28, 1999 from T. Sherr) No license amendment was issued by the NRC. TAC No. L31183)
12/28/99	65	Torrey Pines South Land Area (per GA letter 696/CAL-3128 dated August 27, 1999)
12/17/99	64	Sorrento Valley Central Land Area (per GA letter 696/CAL-3117 dated July 29, 1999 and report dated July 28, 1999)
12/6/99	63	Building 31-1 (per GA letter 696/CAL-3130 dated August 27, 1999 and report dated August 25, 1999)
11/27/99	62	Building 2 "Group 11" laboratories (per GA letter 696/CAL3118 dated September 3, 1999)
10/4/99		Building 42 (QA Calibration Lab) (per GA letter 696-3123 dated August

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Date	Amendment #	Facility and Areas Released to Unrestricted Use
	60	18, 1999, it remains on GA's State of CA radioactive materials license)
8/12/99	59	Releases the area where 4 previous underground tanks were located (tank outside building 9, tank outside Building 31, tank outside Building 21 and the tank outside lab 540 of Building 2) per GA report dated February 1985 documenting the results of surveys conducted at that time and per GA letter 696/CAL-3081 dated May 17, 1999 requested the sites be removed from the license)
7/23/99	57	Building 35-1, Building 36, Building 45 and "Test Tower Land" TAC No. L31175 (per GA letter 696/CAL-3045 dated March 9, 1999 and letter dated June 23, 1999)
6/7/99	56	Building 9, Room 049B and Building 37, including Building 37 Tunnels - (TAC No. L31160) (per GA letter 696/CAL-3037 dated February 8, 1999)
5/14/99	55	Building 22 - TRIGA Fuel Fabrication Facility (TFFF) (TAC No. L31148) (per GA letter 696/CAL-3054 dated March 23, 1999 and letter 696/CAL-3019 dated December 22, 1998)
5/14/99	54	Building 27 (EA-1) and the Unaffected Office Areas of Building 21 (TAC No. L31131) (per GA letter SNM-3002 dated November 2, 1998)
4/22/99	53	Torrey Pines West Land Area (TAC No. L31114) (per GA letter 696/CAL-3029 dated January 12, 1999 and letter SNM-2984 dated October 1, 1998)
1/26/99	52	Bldg. 39 - Sorrento Valley B (SVB) Certain Portions (TAC No. L31149) (per GA letter 696/CAL-3021 dated December 12, 1999)
9/30/98	50	Phase II of Building 30 rooms (per GA letter 696-2949 dated July 30, 1998)
9/30/98	49	Group 10 labs of Building 2 (per GA letter 696-2963 dated August 14, 1998)
9/30/98	48	Building 27 roof (TAC No. L31106) (per GA letter 696-2968 dated August 25, 1998)
4/29/98	45	Approves GA's Site Decommissioning Plan (this plan is for all GA Nuclear Facilities except Hot Cell and TRIGA Reactor Facilities (Buildings 23 and 21, respectively), (submittal dated October 11, 1996 with letters dated December 5, 1996, April 18, 1997 and January 15, 1998)
4/29/98	44	Deletion of Fusion Experiment Facilities and Surrounding Areas from SNM-696 License (only under State license now), (per GA letter 696-2864 dated January 9, 1998)
3/11/98	42	Building 30 - Phase I (TAC NO. L31026), (per GA letter 696-2772 dated July 25, 1997)

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SNM-696 License Amendments

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Date	Amendment #	Facility and Areas Released to Unrestricted Use
3/2/98	41	Group 9 Labs in Building 2 (per GA letter 696-2769 dated July 17, 1997)
11/4/97	40	Certain "Non-Impacted" areas on GA's Main Site and Sorrento Valley Site (Yellow Areas) , (per GA letter 696-2717 dated April 30, 1997)
3/27/97	39 <i>*important amendment*</i>	<p>(1) Amended to include the revised Section 4 of the Specifications Volume "Radiation Safety" (per GA letter 696-2634 October 15, 1996 submittal). Safety License Condition S-1 revised to include October 15, 1996 date.</p> <p>(2) NRC staff concluded that renewal of GA's license is unnecessary due to the fact that out license is in a possession only status and that all activities are associated with decommissioning and ultimate site release.</p> <p>All sections of the license have been revised and approved by NRC.</p>
10/30/96	38	Group 8B labs (Building 2) (per GA letter 696-2601 dated August 23, 1996)
9/26/96	37 <i>*Very Important Amendment*</i>	<p>(1) Changes license to possession only license (D&D activities only)</p> <p>(2) Approves May 1996 changes to GA's Radiological Contingency Plan (revised S-23).</p> <p>(3) Approves revisions to SNM-696 license -- Section 2 (authorized activities) and Section 6 (Environmental Monitoring Program changes) per K. Asmussen letter dated 6/14/96.</p> <p>(4) Approves revisions to SNM-696 license -- Section 1 (Materials License Limits), Section 3 ("Organization and Administrative Procedures), Section 5 (Nuclear Safety - Technical Requirements, and Section 7 (Other Special Commitments) and Section 8 (Supporting Plans) per GA letter dated July 19, 1996.</p> <p>(5) SVA facility license conditions S-17, S-20, and S-22 deleted and the safeguards amendments SG-2 through SG-8 were also deleted.</p>
5/1/96 1/29/97	35	<p>Interim Approval of Hot Cell Decommissioning Plan (license condition S-1 revised to include the dates of July 6, November 20 and 30, and December 18, 1996).</p> <p>Hot Cell Facility Decommissioning Plan Approval Documentation</p>
4/25/96	34	Group 7 Laboratories (per GA letter 696-2511 dated December 5, 1995)
8/1/95	32	Phase II of SVA Decommissioning Project (per GA letter 696-2264 dated August 18, 1984)
7/18/95		Group 6 Labs in Building 2 (per GA letter 696-2275 dated August 12,

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SNM-696 License Amendments

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Date	Amendment #	Facility and Areas Released to Unrestricted Use
	31	1994)
8/18/92	22	Building 31-2 and some of the "Group 5" labs of Building 2 (per GA letter 696-1805 dated September 27, 1991 (Group 5 labs were removed in 2 amendments, #18 and #22)
3/31/92	18	Building 2, Some of the "Group 5 labs" and Building 31-2 , Accordingly, Condition 9 was revised to include the dates of April 30, 1991, and Sept. 27, 1991. (Group 5 labs were removed in 2 amendments, #18 and #22)
12/11/90	17	Buildings 2 and 9 as follows: "Group 1", Group 2", "Group 3" and "Group 4" of Building 2 and Stages 1 and 2 in Building 9" (per GA letter 696-1472 dated November 17, 1989) (old TRIGA Fuel Fabrication "Hot Suite")
11/13/90	16	Amendment and incorporation of the SVA Decommissioning Plan , (per GA request March 30, 1990 and August 24, 1990)
10/3/88	12	Approximately 18 acres (Hillside generally west and north of GA's TRIGA reactor facility a.k.a. Area B1 and Callan Ponds a.k.a. Area B3) (per GA letter dated August 22, 1988)
6/22/88	9	Approximately 277 acres of land, per GA letter dated March 4, 1988. These 277 acres were a.k.a. Phases I, II and III . Phase I and Phase II were ~80 acres which were related to the decommissioning of the old Nuclear Waste Processing Facility. Phase III was the ~215 acres of undeveloped land surrounding GA's main site (excludes 18 acres of land known as "Area B1" which is 15 acres of undeveloped land behind EA-1, Hot Cell, TRIGA and TFF), "Area B2" (sewage pump house) and "Area B3" (Callan Ponds).



CERTIFICATE OF DISPOSITION OF MATERIALS

Estimated burden per response to comply with this mandatory collection request 30 minutes. This submittal is used by NRC as part of the basis for its determination that the facility is released for unrestricted use. Send comments regarding burden estimate to the FOIA, Privacy, and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to InfoCollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0028), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

LICENSEE NAME AND ADDRESS

General Atomics
P.O. Box 85608
San Diego, CA 92186-9748

LICENSE NUMBER

SNM-696

DOCKET NUMBER

70-734

LICENSE EXPIRATION DATE

December 31, 1989

A. LICENSE STATUS (Check the appropriate box)

- ☐ This license has expired. ☒ This license has not yet expired; please terminate it.

B. DISPOSAL OF RADIOACTIVE MATERIAL

(Check the appropriate boxes and complete as necessary. If additional space is needed, provide attachments)

The licensee, or any individual executing this certificate on behalf of the licensee, certifies that:

- ☐ 1. No radioactive materials have ever been procured or possessed by the licensee under this license.
- ☒ 2. All activities authorized by this license have ceased, and all radioactive materials procured and/or possessed by the licensee under this license number cited above have been disposed of in the following manner:
- ☒ a. Transfer of radioactive materials to the licensee listed below:
- State of California Radioactive Materials License 0145-37 and U.S. DOE.
- ☐ b. Disposal of radioactive materials:
- ☐ 1. Directly by the licensee:
- ☒ 2. By licensed disposal site:
- Please see Attachment
- ☐ 3. By waste contractor:
- ☒ c. All radioactive materials have been removed such that any remaining residual radioactivity is within the limits of 10 CFR Part 20, Subpart E, and is ALARA.

C. SURVEYS PERFORMED AND REPORTED

- ☒ 1. A radiation survey was conducted by the licensee. The survey confirms:
- ☒ a. the absence of licensed radioactive materials
- ☒ b. that any remaining residual radioactivity is within the limits of 10 CFR 20, Subpart E, and is ALARA.
- ☒ 2. A copy of the radiation survey results:
- ☐ a. is attached; or ☐ b. is not attached (Provide explanation); or ☒ c. was forwarded to NRC on: 1988 - 2008
- Date
- ☐ 3. A radiation survey is not required as only sealed sources were ever possessed under this license, and
- ☐ a. The results of the latest leak test are attached; and/or ☐ b. No leaking sources have ever been identified.

The person to be contacted regarding the information provided on this form:

NAME	TITLE	TELEPHONE (Include Area Code)	E-MAIL ADDRESS
Keith Asmussen	Director, LSNC	858-455-2823	keith.asmussen@ga.com

Mail all future correspondence regarding this license to:

Paul Pater, Manager of Health Physics, P.O. Box 85608, Building 10/705, San Diego, CA 92186-9748

C. CERTIFYING OFFICIAL

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT

PRINTED NAME AND TITLE	SIGNATURE	DATE
Keith Asmussen, Ph.D., Director of LSNC	<i>Keith E. Asmussen</i>	October 31, 2018

WARNING: FALSE STATEMENTS IN THIS CERTIFICATE MAY BE SUBJECT TO CIVIL AND/OR CRIMINAL PENALTIES. NRC REGULATIONS REQUIRE THAT SUBMISSIONS TO THE NRC BE COMPLETE AND ACCURATE IN ALL MATERIAL RESPECT. 18 U.S.C. SECTION 1001 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

**Attachment to NRC Form 314
Attached to General Atomics
Letter No. 696-4949, dated October 31, 2018**

Disposal of Low Level Radioactive and Mixed Waste (LLRW and MW) generated in the process of decontaminating and decommissioning General Atomics' site over the period of circa 1986 to 2008 was a topic of inspections by the U.S. Nuclear Regulatory Commission (NRC) during numerous inspections and confirmatory surveys and was addressed in requests submitted to the (NRC) for releases to unrestricted use. No waste was disposed of on-site. LLRW and MW was sent off site to various licensed and authorized disposal facilities, including the following:

National Nuclear Security Site
Waste Disposal at the NNSS
www.nnss.gov
emnv@emcbc.doe.gov
702-295-3521

Barnwell Disposal Facility
Benjamin S. Smith, P. E.
Director, Barnwell Disposal Operations
740 Osborn Road
Barnwell, SC 29812
Phone: (803) 541-5051
bssmith@energysolutions.com

U.S. DOE
Westinghouse Hanford Co.
P.O. Box 1970
Richland, WA 99352

Envirocare now known as
EnergySolutions
299 South Main Street, Ste. 1700
Salt Lake City, UT 84111
Phone: (801) 649-2000
Fax: (801) 880-3006
Email: info@energysolutions.com

Beatty Low Level Radioactive Waste Site
Division of Public and Behavioral Health (DPBH)
4150 Technology Way
Carson City, NV 89706
Phone: 775-684-4200 | FAX: 775-684-4211
Email: dpbh@health.nv.gov