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To: [Zimmerman, Jacob](#)
Cc: [Augustus, Reginald](#); [Naquin, Ty](#)
Subject: GEH/GNF-A surety bond updates
Date: Wednesday, April 17, 2019 4:07:28 PM

Jake,

Reggie Augustus has completed the acceptance review for GEH/GNF-A's financial assurance (FA) update of its surety bond amounts and found it acceptable. The financial assurance update submission included new surety bond riders which increased the total amount of surety coverage to account for inflation from 2018 to 2019.

We would like to note the following. GEH/GNF-A may have got confused by their changing from a parent company guarantee to the surety bond last year. As noted in the next paragraph, licensees not using a guarantee are not required to update their financial instruments every year, only after the triannual revised decommissioning funding plan.

The submission did not include an updated site-specific decommissioning cost estimate that is required as part of an update to a licensee's decommissioning funding plan (DFP). However, no DFP submission is required at this time. Pursuant to Title 10 of the *Code of Federal Regulations* (CFR) Sections 70.25 and 72.30 state, in relevant part, that licensees need to submit an updated decommissioning funding plan (DFP) at time of license renewal and at intervals not to exceed 3 years. In this instance, GEH/GNF-A is not renewing its license and has previously provided an updated (9/7/2016) and approved (3/7/2017) DFP within the past three years.

Please note that GEH/GNF-A should submit an updated DFP submission to the NRC by September 7, 2019. The previous DFP to the 2016 DFP by GEH/GNF-A was provided in 2013 and other licensees are tracked by submission date.

The ML #'s to the previously submitted and approved DFP are as follows:

GE DFP Transmittal Letter – ML16252A211
GE DFP – ML16252A212
NRC Approval Letter and SER – ML17061A080 (Package)

A reviewer work request (RWR) was submitted to RTAB to work on GEH/GNF-A's FA update. This approval of GEH/GNF-A's FA surety bond submission closes out that RWR.

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