

March 5, 2021

**For the State of Oklahoma**

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**For the United States**

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Washington, D.C. 20460

Re: Docket 90-725, License SNM-928  
Cimarron Environmental Response Trust  
Scope of Work and Budget for Calendar Year 2021

Dear Recipient:

Solely as Trustee for the Cimarron Environmental Response Trust (CERT), Environmental Properties Management LLC (EPM) submits herein a scope of work and budget for work to be performed for the CERT in 2021 and the first quarter of 2022. Work performed for the Trust is herein categorized into six "Tasks". The following is a summary of the allocation of costs for each Task by trust account:

- Task 1 – Administration activities will be funded exclusively by the Cimarron Trust Administrative Cost Account (“Administrative Account”)
- Task 2 – License Compliance activities will be funded exclusively by the Cimarron Trust Federal Environmental Cost Account (“Federal Account”)
- Task 3 – Federal Agency Fees will be funded exclusively by the Federal Account
- Task 4 – Site Decommissioning activities will be funded by both the Federal Account and the Cimarron Trust State Environmental Cost Account (State Account). The same allocation used in the past will be applied through 2020 (i.e., 93.2% of the costs will be paid out of the Federal Account and 6.8% of the costs will be paid out of the State Account).
- Task 5 – State Agency Fees will be funded exclusively by the State Account
- Task 6 – Unanticipated Work will be funded by either the Federal Account, the State Account, or both, as agreed upon by the beneficiaries

A description of the scope of work assigned to each Task is provided in Attachment 1, “Scope of Work and Itemized Costs”. Attachment 1 describes the work activities that will be performed for each Task. Task 2, “License Compliance”, and Task 4, “Decommissioning”, are further broken down to describe the work activities that will be performed by each of the three primary contractors retained by the CERT:

- Burns & McDonnell Engineering Company, Inc.
- Enercon Services, Inc.
- Veolia Nuclear Solutions – Federal Services LLC.

Changes were made to costs for various tasks made since the initial proposed draft budget was submitted in November 2020. Most of these changes are due to scope of work or expenses which had not been identified until after that proposed budget was submitted. The basis for these changes have been added to the breakdown of the scope of work and cost in italicized font.

Attachment 2, “Budget for 2021”, summarizes the costs for each of the above-listed Tasks. Costs for labor, travel, and incidentals incurred by EPM are shown in the left side of the table. Costs for materials or services provided by contractors and other vendors and regulatory agency fees are shown in the right side of the table.

Should it become necessary to perform work outside the defined scope of work provided in this budget submittal (Out of Scope Work), EPM will prepare a scope of work and cost estimate. If the work can be performed within the allotted funding for Task 6, EPM will proceed with the work. Costs incurred will not be allocated to the Trust Accounts until the beneficiaries agree upon the allocation of costs.

March 5, 2021

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Section 3.2.1 of the Trust Agreement requires the Trustee to project administrative expenditures for a three-year period. EPM expects administrative expenditures to remain essentially the same as projected from 2021 through 2023.

Please contact me at [bhalli@burnsmcd.com](mailto:bhalli@burnsmcd.com) or (816) 304-6428, or Jeff Lux at [jlux@envpm.com](mailto:jlux@envpm.com) or (405) 642-5152 if you desire further clarification of the scope of work or funding included in this budget.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Halliburton". The signature is fluid and cursive, with a large loop at the end.

Bill Halliburton, Trust Administrator

Cc: James Smith, NRC  
Paul Davis, DEQ

Attachments:

- Attachment 1 – Scope of Work and Itemized Costs
- Attachment 2 – Proposed Budget for 2021

ATTACHMENT 1  
SCOPE OF WORK AND ITEMIZED COSTS

**CIMARRON ENVIRONMENTAL RESPONSE TRUST  
SCOPE OF WORK AND ITEMIZED COSTS  
BUDGET FOR 2021**

The Cimarron Environmental Response Trust (CERT) is administered by Environmental Properties Management LLC (EPM) as Trustee. EPM submits herein a description of the scope of work that is planned for the period beginning January 1, 2021 through March 2022. This budget summary is broken down into the following “Tasks”:

1. Administrative
2. License Compliance
3. Federal Agency Fees
4. Site Decommissioning
5. State Agency Fees
6. Unanticipated Work

This document describes the consulting, design, and field services that each Contractor will provide for Task #2, “License Compliance” and Task #4, “Site Decommissioning”. The scope of work for each Contractor is based upon the following assumptions:

- *Facility Decommissioning Plan – Rev 2* (the DP) will present a phased approach to decommissioning. Groundwater remediation infrastructure and treatment systems that will be utilized in the first phase of remediation will be described as well as the potential groundwater remediation infrastructure and treatment systems that may be utilized in a second phase of remediation. The DP was submitted to the NRC and the DEQ (the agencies) on February 27, 2021.
- The DP includes all changes previously submitted to the agency in response to previous requests for supplemental information and resulting from data obtained during field work performed since the submittal of the 2018 *Facility Decommissioning Plan – Rev 1*. It is our understanding that changes previously submitted in responses to requests for supplemental information have already been reviewed by NRC personnel. This scope of work and cost estimate is based on an assumed schedule in which NRC completes the detailed technical review of the DP and issues requests for additional information (RAIs) by the end of July 2021.
- It is also assumed that RAIs will not require additional field investigation, pilot tests, significant revision of groundwater flow models, or significant changes to facility design, and that responses to RAIs will be submitted to the agencies by the end of October 2021.
- Contractors will begin to advance design drawings to “Issue for Bid” status and specifications to “Issue for Construction” status after submitting responses to RAIs. If RAIs do not result in design changes, this work may begin upon receipt of RAIs.
- If after agencies review the DP and provide authorization to proceed prior to formal approval of the plan in a license amendment, EPM will engage its contractors to begin preparing and sending requests for bids (RFBs) and evaluating bids while the NRC goes through the license

amendment process. This could cut the schedule for beginning construction by up to six months, saving hundreds of thousands of dollars. Preparation of RFBs for construction is not included in the scope of work for 2021. Should EPM be able to initiate preparation of RFBs in 2021, additional funding will be requested.

EPM defined a scope of work based on the above assumptions and requested proposals from each Contractor for work anticipated to be completed by the end of March 2022. Contractors submitted proposals containing detailed breakdowns of the work required for each scope of work assigned to them, and the cost associated with each. The scopes of work and cost estimates provided herein summarize the tasks and sub-tasks, and the cost for each task, which were agreed upon by EPM and the Contractors.

The following Contractors provided itemized costs for Tasks #2 and #4:

- Burns & McDonnell Engineering Company, Inc. (Burns & McDonnell)
- Enercon Services, Inc. (Enercon)
- Veolia Nuclear Solutions Federal Services LLC (VNSFS)

#### **TASK #1 – ADMINISTRATION – \$283,002**

Provides funding to manage the Trust and maintain the Trust's assets, including:

1. Pay taxes and utility bills and maintain the site office and Trust property.
2. Submit quarterly financial reports.
3. Conduct monthly status teleconferences.
4. Maintain files and a document repository

#### **TASK #2 – LICENSE COMPLIANCE – \$782,183**

Provides funding to maintain compliance with all license and federal regulatory requirements. This includes:

1. Implement and maintain a Radiation Protection (RP) program, including performing annual environmental monitoring.
2. Implement and maintain a Quality Assurance (QA) program.
3. Implement and maintain a Safety & Health Program
4. Attending and responding to NRC inspections.

##### **Basis for change for EPM support:**

*EPM labor needed to be added to License Compliance to cover time to provide site specific training, increasing the cost for EPM's License Compliance labor by approximately \$12,000.*

The following provides a description of the scope of work for each Task, and the estimated costs to perform that work.

**Burns & McDonnell – \$157,000**

- 1) Project Reporting and Management – \$23,000 – Provides funding for the following:
  - a) Prepare and submit monthly reports providing a description of work completed, and upcoming activities, with task-specific cost and schedule status.
  - b) Conduct periodic teleconferences to status action items.
  - c) Prepare and execute contracts and change orders (if needed).
  - d) Prepare and submit invoices and monitor accounts receivable.
- 2) Dose Model Development – \$51,000 – Provides funding for:
  - a) Development of a draft probabilistic dose model report and finalization of the report following review and comment by Enercon and EPM.
  - b) Evaluation of the impact of the dose model on the schedule for decommissioning to achieve license termination.
- 3) Annual Environmental Monitoring – \$7,000 – Provides funding to perform data quality review and database management, with assignment of data qualifiers as needed, import of data into the CERT EQUIS database management system, and export of data
- 4) Training – \$13,000 – Provides funding for Burns & McDonnell personnel to attend or refresh applicable site specific Radiation Safety, Quality Assurance, and Safety & Health training at a level commensurate with work they may perform.
- 5) Licensing Support – \$63,000 – Provides funding for the following:
  - a) Support revision of the license amendment request to redefine the licensed area, consisting of preparation of figures and review of documents.
  - b) If the license amendment is issued before the end of the year, generate an activity plan for and subcontract the installation of cairns as needed to define the licensed site.
  - c) Print, compile, and ship documents related to licensing to regulatory agencies. Prepare all documents to regulatory agencies to comply with NRC requirements for electronic submission and upload them to the NRC Public Document Room (PDR).

**Basis for change for Burns & McDonnell support:**

*A portion of the subcontract cost for dose model development was paid in 2020, reducing the cost to complete the dose model report. Consequently, the cost for Burns & McDonnell's License Compliance support decreased from \$176,000 to \$157,000.*

**Enercon Services – \$340,000**

- 1) Licensing Support – \$41,000 – Provides funding for the following:
  - a) Support a license amendment request to redefine the licensed area.
  - b) Respond to Requests for additional Information (RAIs) related to Section 6, “Revisions to the License” of *Facility Decommissioning Plan – Rev 2* (the DP).

- c) Provide miscellaneous support as needed on licensing issues.
- 2) Radiation Protection (RP) Program Support – \$211,000 – Provides funding for the following:
- a) Implement and revise as appropriate the radiation protection program, including the Radiation Protection Plan and associated procedures and desk instructions.
  - b) Provide or arrange radiological orientation, general worker, radiation worker, procedure, and instrument training. Train and/or update personnel as needed.
  - c) Implement the ALARA, instrumentation, and dosimetry programs.
  - d) Respond to RAIs related to radiation protection, including Sections 5.7, 7, 11, 12, 13, or 15 of the DP. Responses may include revisions to these sections of the DP. Prepare responses to RAIs related to Appendices I, N, or P of the DP. Responses may include revisions to the Appendices.
  - e) Provide review and comment on the draft Safety Evaluation Report and/or Environmental Assessment if issued.
  - f) Perform routine radiological surveys and RP surveys in support of field activities.
  - g) Prepare and implement an activity plan for the environmental monitoring program. Comment on and approve activity plans for other field activities.
  - h) Collect, package, and ship surface water and groundwater samples for annual environmental monitoring program.
  - i) Attend NRC or DEQ inspections and/or meetings.
  - j) *Acquire new alpha and beta check sources.*
- 3) Quality Assurance (QA) Program Support – \$88,000 – Provides funding for the following:
- a) Implement and revise as appropriate the quality assurance program, including the Quality Assurance Program Plan and associated procedures.
  - b) Finalize QA program training materials and provide or arrange QA program training.
  - c) Maintain training and task qualification records
  - d) Comment on and approve activity plans and other quality critical documents.
  - e) Respond to agency RAIs related to quality assurance, specifically Section 14 of the DP. Responses may include revisions to Section 14 of the DP. Prepare responses to RAIs related to Appendix O of the DP. Responses may include revisions to the Appendix.
  - f) Provide QA support during NRC or DEQ inspections and/or meetings.
  - g) Perform periodic observations and/or audits.



*Basis for Change for Enercon Support:*

*The cost for both Radiation Protection and Quality Assurance increased by \$4,000 because the formulae Enercon used to develop their proposal inadvertently omitted one column. There is no change to the planned scope of work.*

*\$4,000 was added to License Compliance to provide for the acquisition of new alpha and beta check sources; the need to replace these sources had not yet been identified when the proposed budget was submitted in November 2020.*

*Finally, the labor and expenses for Project Management and Administration and Safety & Health Support was all included within the License Compliance Budget. However, Project Management and Administration and Safety & Health Support apply both to activities performed under License Compliance and Decommissioning. Consequently, \$93,000 was transferred from Enercon's License Compliance support to Enercon's Decommissioning support so that both the Federal and State Environmental Cost Accounts fund this work.*

*Although approximately \$8,000 were added to address the first two changes identified above, the transfer of 93,000 from License Compliance to Decommissioning resulted in a net overall decrease. The total cost for Enercon's License Compliance support decreased from \$418,000 to \$340,000.*

**BUDGET CATEGORY #3 – FEDERAL AGENCY FEES – \$800,000**

Provides funding for:

- 1) Performing inspections.
- 2) Meeting with the licensee and contractors as needed.
- 3) Providing regulatory oversight of the license.
- 4) Reviewing a license amendment request and issuing Amendment 22.
- 5) Reviewing and responding to licensee submittals associated with *Facility Decommissioning Plan – Rev 1*.

**BUDGET CATEGORY #4 – SITE DECOMMISSIONING – \$2,414,905**

Provides funding for design and field activities associated with the planning and/or implementation of work performed to decommission the site.

*Basis for change for EPM support:*

*The cost for EPM's oversight and participation in the OPDES sampling events, and for actual time spent on the revision of Facility Decommissioning Plan – Rev 2 was added to the budget. The cost for EPM support for License Compliance increased from \$254,305 to \$307,153.*

The following provides a description of the scope of work for each Task by Contractor, and the estimated costs to perform that work.

**Burns & McDonnell – \$1,040,000**

- 1) Project Management & Project Execution Planning – \$187,000 – Provides funding for the following:
  - a) Prepare and submit monthly reports providing a description of work completed, and upcoming activities, with task-specific cost and schedule status.
  - b) Prepare and execute contracts and change orders (as needed) and prepare and submit invoices and monitor accounts receivable.
  - c) Provide project schedule and cost control support.
  - d) Prepare Draft Engineer-Procure-Construct (EPC) Project Execution Plan. Support preparation of a proposal for approval of the EPC Project Execution Plan by the NRC and the DEQ.
  - e) Prepare a Construction Quality Assurance (CQA) Plan.

Note: Items 1(d) and 1(e) may be performed if the advancement of designs to an “Issue for Bid” design level is completed without significant revision in response to RAIs. If Items 1(d) and 1(e) are not performed, funding for these items will be included in the proposed budget for 2022.

- 2) Redox Evaluation, Site Maintenance, Permitting, and Utility Coordination – \$250,000 – Provides funding for the following:
  - a) Redox Evaluation
    - i) Develop activity plans for five quarterly rounds of groundwater samples from approximately 30 monitor wells in Burial Area #1 (BA1). Samples collected during the 1<sup>st</sup>, 3<sup>rd</sup>, and 4<sup>th</sup> quarters will be analyzed only for specific redox parameters and uranium. Samples collected during the 2<sup>nd</sup> quarter will be analyzed for an expanded list of analytes.
    - ii) Order sample containers and contract with GEL laboratory for analysis of all redox evaluation samples.
    - iii) Perform data quality review and compile quarterly data into a redox evaluations database.
    - iv) Following the evaluation of data from the 1<sup>st</sup> quarter 2021 sampling event, update the March 2020 report on the oxidation-reduction conditions created in Burial Area #1, the consequent immobilization of uranium in groundwater, and the subsequent re-oxidation of groundwater and re-mobilization of uranium.
  - b) Permitting
    - i) Complete permitting activities associated with SPCC, SWPPP, NOI, and General Permit for construction activities as needed.

- ii) Complete United States Army Corps of Engineers (USACE) Nationwide Permit 12 (NWP 12) permitting activities.
  - iii) Revise OPDES permit renewal application if requested prior to 2022.
  - iv) Complete local permitting (e.g., floodplain) permitting activities.
  - v) Complete water resource use/diversion permitting activities.
  - vi) Complete air permitting if required for standby generators.
  - vii) *Prepare activity plan(s) for monthly OPDES surface water sampling; revise procedures as needed to comply with NPDES sampling and/or analytical methods; contract with laboratory for laboratory analysis; perform data quality review.*
- c) Utility Coordination
- i) Coordinate fiber optic landline installation.
  - ii) Complete water service coordination with Logan County Rural Water District #2.
  - iii) Obtain Oklahoma Gas & Electric (OG&E) easement encroachment authorizations for utility crossings (over natural gas mains).
  - iv) Obtain OG&E easement modifications as required for overhead power service routing.
- d) Site Maintenance
- i) Contract for and oversee maintenance of site, including site mowing, maintaining access to monitoring wells and environmental dosimeters, and other site maintenance activities as needed.
- 3) Prepare and Submit Decommissioning Plan – Rev 2 – \$100,000 – Provides funding for the following:
- a) Complete preparation of the revised DP, based on a phased approach to decommissioning. Prepare a submittal describing all substantive changes to the decommissioning plan since submittal of the November 2018 *Facility Decommissioning Plan – Rev 1*.
  - b) Print compile, bind, and deliver hard copies of the DP as directed by EPM. Prepare those files which make up the DP to comply with NRC requirements for electronic submission and upload them to the NRC Public Document Room (PDR).
  - c) Prepare and deliver a presentation on groundwater extraction, treated water injection and discharge, and decommissioning schedule and cost if requested.
- 4) Advance Design to “Issue for Bid” – \$390,000 – Provides funding for the following:
- a) Conduct “internal” Burns & McDonnell design team meetings as needed both for development of the DP and responses to RAIs, and coordination meetings with Veolia Nuclear Solutions – Federal Services (VNSFS) design team as needed.
  - b) Conduct a Hazard and Operability (HAZOP) Evaluation.

- c) Conduct annual code review and update codes and standards matrix accordingly.
  - d) Support Finalization of VNSFS architectural design. Solicit and evaluate bids for the pre-engineered treatment system building. Contract with a pre-engineered building supplier to obtain shop drawings for the building.
  - e) Contract with a pre-engineered structural steel platform supplier to obtain remote terminal unit (RTU) platform shop drawings. Update RTU foundation drawings.
  - f) Prepare an injection skid bid package and conduct design coordination with prospective suppliers.
  - g) Prepare a control systems integration bid package and conduct design coordination with prospective suppliers.
  - h) Complete Engineering Basis of Design deliverable and Issue for Bid Design revisions. Consolidate the Project Manual containing specifications for water treatment and well field systems construction.
  - i) Up to three personnel will attend one three-day meeting in Oklahoma City for design coordination with VNSFS.
- 5) Task 5 – Respond to RAIs – \$113,000 – Provides funding for the following:
- a) Prepare responses to RAIs related to Sections 2, 3, 5, 8, 9, or 16 of the DP. Responses may include revisions to these sections of the DP.
  - b) Prepare responses to RAIs related to Appendices B, C, E, G, H, J, L, or M of the DP. Responses may include revisions to the Appendices.
  - c) Prepare and deliver a presentation on Burns & McDonnell’s responses to RAIs if needed.

*Basis for change for Burns & McDonnell support:*

*Approximately \$46,000 was added to Permitting to provide for additional services associated with the OPDES sampling, including the laboratory cost for sample analysis.*

*The actual time needed for the revision of Facility Decommissioning Plan – Rev 2 increased the cost for this activity by approximately \$10,000.*

*When the draft budget was developed the scope of work for design revision had not been determined. Therefore, approximately \$14,000 was added to Advance Drawings to “Issue for Bid”. As contractors completed the revision of the DP, additional issues related to design coordination and production of design drawings and specifications were identified.*

*The net result is that the total cost for Burns & McDonnell’s Decommissioning support increased from \$969,000 to \$1,040,000.*

**Enercon Services – \$244,000**

1. Project Management – \$38,000 – Provides funding for the following:
  - a. Prepare and submit monthly reports providing a description of work completed, and upcoming activities, with task-specific cost and schedule status.
  - b. Conduct periodic teleconferences to status action items.
  - c. Prepare and execute contracts and change orders (if needed).
  - d. Prepare and submit invoices and monitor accounts receivable.
  - e. Provide on-site administrative support to assist with document management.
2. Administrative and Safety & Health Program Support – \$55,000 – Provides funding for the following:
  - a. Support the review and/or revision of Safety & Health (S&H) training materials. Document designation of personnel who are qualified to provide S&H training. Train and/or update Enercon personnel as needed.
  - b. Maintain hard copy and electronic documentation of S&H training records for the Trust.
  - c. Provide S&H program support as needed (e.g., conduct monthly fire extinguisher inspections and annual service, maintain Safety Data Sheet documentation, etc.)
3. Redox Sampling – \$103,000 – Provides funding for the following:
  - a. Perform low-flow measurement of field parameters for redox evaluation for five quarterly sampling events. Collect, package, and deliver for shipment groundwater samples for five sampling events.
  - b. Procure low-flow sampling equipment.
4. OPDES Sampling and Procedure Development – \$35,000
  - a. *Collect, package, and ship surface water samples for background measurements each month per OPDES Permit OK0100510.*
  - b. *Review and revise all SAP procedures as needed, and task qualify field personnel on revised procedures.*
5. Respond to RAIs – \$17,000 – Provides funding for the following:
  - a. Prepare responses to RAIs not covered under License Compliance.
  - b. Meet with EPM, the NRC and the DEQ to present the DP should the NRC or the DEQ consider such a meeting appropriate.

*Basis for change for Enercon support:*

*The cost for Project Management increased by approximately \$3,000 because the formulae Enercon used to develop their proposal inadvertently omitted one column. There is no change to the planned scope of work.*

*The cost for Redox Evaluation increased by approximately \$4,000 to purchase low-flow sampling equipment which will provide a life cycle cost savings for the project. Although this impacts the 2021 budget, the purchase of this equipment will significantly reduce the life-cycle costs for redox sampling, because at current rental rates, rental costs will exceed the purchase cost after 5 sampling events.*

*OPDES Sampling and Field Support was added to the scope of work, adding approximately \$35,000 to the Decommissioning Support category.*

*Transferring funding for Project Management and Administration & Safety & Health Support from License Compliance to Decommissioning Support reduced the cost for Enercon's License Compliance support by \$93,000 and increased the cost for Enercon's Decommissioning support by the same amount.*

*The net result is that the total cost for Enercon's Decommissioning support increased from \$116,000 to \$248,000.*

**Veolia Nuclear Solutions – Federal Services – \$1,070,000**

1. Project Management, Reporting, and Contracting – \$ 124,000 – Provides funding for the following:
  - a. Prepare and submit monthly reports providing a description of work completed, and upcoming activities, with task-specific cost and schedule status.
  - b. Conduct periodic teleconferences to status action items.
  - c. Prepare and execute contracts and change orders (if needed).
  - d. Prepare and submit invoices and monitor accounts receivable.
  - e. Contract with and manage subcontractors.
2. Support for Cimarron Facility Decommissioning Plan – Rev 2 – \$227,000 – Provides funding for the following work:
  - a. Complete preparation of the revised DP, based on a phased approach to decommissioning.
  - b. Prepare and deliver a presentation on water treatment, in-process monitoring, and waste processing if needed.
  - c. Prepare responses to RAIs related to water treatment, in-process monitoring, and processing of wastes generated by water treatment. Responses may include revisions to sections of the DP and/or design drawings presented in Appendix K to the DP.
  - d. Prepare and deliver a presentation on VNSFS' responses to RAIs if needed.

3. Advance Drawings to “Issue for Bid” – \$657,000 – Provides funding for the following:
  - a. Conduct “internal” VNSFS design team meetings as needed both for development of the DP and responses to RAIs and conduct coordination meetings with Burns & McDonnell design team as needed.
  - b. Conduct a Hazard and Operability (HAZOP) Evaluation.
  - c. Conduct annual code review and update codes and standards matrix accordingly.
  - d. Update Western Area Treatment Facility (WATF) building details Per Final Building Manufacturer Selection and Architectural Reviews.
  - e. Coordinate with Burns & McDonnell design team on the development of the control / electrical design system, preparation of a control systems integration bid package, and conducting design coordination with prospective suppliers.
  - f. Conduct design interface coordination with BMcD (all disciplines).
  - g. Advance design to “Issue for Construction” design level.
4. Project Execution Planning – \$62,000 – Provides funding for the following:
  - a. Collaborate w/ EPM and Burns & McDonnell for final design coordination and development of a Project Manual.
  - b. Support preparation of a proposal for approval of the EPC Project Execution Plan by the NRC and the DEQ and development of a Construction Quality Assurance (CQA) Plan.
  - c. Bring all specifications to “Issue for Construction” status.

#### **BUDGET CATEGORY #5 – STATE AGENCY FEES – \$66,000**

Provides funding for:

1. Paying the annual fee for the OPDES permit.
2. Performing inspections.
3. Meeting with the licensee and contractors as needed.
4. Providing regulatory oversight of wastewater and stormwater permits.
5. Reviewing a license amendment request.
6. Reviewing and responding to licensee submittals associated with *Facility Decommissioning Plan – Rev 1*.

#### **BUDGET CATEGORY #6 – UNANTICIPATED WORK – \$138,540**

Provides funding for work not anticipated at the time this budget was finalized.

1. Should it become necessary to perform work outside the defined scope of work provided in this budget submittal (unanticipated work), EPM will prepare a scope of work and budget.
2. Provided the work can be performed within the allotted funding for Task 6, EPM will proceed with the work.
3. Costs incurred will not be allocated to the Trust Accounts until the beneficiaries agree upon the allocation of costs.



**CIMARRON ENVIRONMENTAL RESPONSE TRUST  
SCOPE OF WORK AND ITEMIZED COSTS  
BUDGET FOR 2021**

<b>Task 2 - License Compliance</b>		
<b>Vendor</b>	<b>Description</b>	<b>Cost</b>
<b>Burns &amp; McDonnell</b>		
	Project Management	\$23,000
	Dose Model Development	\$51,000
	Annual Environmental Monitoring	\$7,000
	Training	\$13,000
	Licensing Support	\$63,000
	<b>TOTAL</b>	<b>\$157,000</b>
<b>Enercon Services</b>		
	Licensing Support	\$41,000
	Radiation Protection	\$211,000
	Quality Assurance	\$88,000
	<b>TOTAL</b>	<b>\$340,000</b>

<b>Task 4 - Decommissioning Support</b>		
<b>Vendor</b>	<b>Description</b>	<b>Cost</b>
<b>Burns &amp; McDonnell</b>		
	Project Management and Project Execution Planning	\$187,000
	Redox Evaluation, Site Maintenance, Permitting, and Utility Cordination	\$250,000
	Prepare and Submit Decommissioning Plan - Rev 2	\$100,000
	Advance Drawings to "Issue for Bid"	\$390,000
	Respond to RAIs	\$113,000
	<b>TOTAL</b>	<b>\$1,040,000</b>
<b>Enercon Services</b>		
	Project Management	\$38,000
	Administration and Safety & Health Program Support	\$55,000
	Redox Evaluation	\$103,000
	OPDES Sampling & Field Support	\$35,000
	Respond to Agency RAIs	\$17,000
	<b>TOTAL</b>	<b>\$248,000</b>
<b>Veolia Nuclear Solutions - Federal Services</b>		
	Project Management, Reporting, and Contracting	\$124,000
	Prepare and Submit Decommissioning Plan - Rev 2	\$227,000
	Advance Drawings to "Issue for Bid"	\$657,000
	Project Execution Planning	\$62,000
	<b>TOTAL</b>	<b>\$1,070,000</b>

ATTACHMENT 2  
PROPOSED BUDGET FOR 2021

**CIMARRON ENVIRONMENTAL RESPONSE TRUST  
PROPOSED BUDGET FOR 2021**

Expense Category	Hourly Rate	Hours	Cost	Item	Quantity	Unit	Cost per Unit	Total Cost
<b>Budget Task 1 - Administration</b>								
Associate (15)	\$269.00	340	\$91,460	Burns & McDonnell Support	1	Lump	\$30,000	\$30,000
Associate (2)	\$227.00	546	\$123,942	Office Expense (Mat'l & Maintenance)	12	Mo	\$550	\$6,600
Travel & Incidentals			\$6,000	Utilities	16	Mo	\$500	\$8,000
				Taxes	1	Lump	\$2,000	\$2,000
				Site Maintenance	1	Lump	\$5,000	\$5,000
				Legal Expenses	1	Lump	\$10,000	\$10,000
	Trustee Support		\$221,402	Contractor Support and Expenses				\$61,600
				Total Budget for Task 1 (Including Trustee Support)				<b>\$283,002</b>
<b>Budget Task 2 - License Compliance</b>								
Associate (15)	\$269.00	113	\$30,397	Burns & McDonnell Support	1	Lump	\$157,000	\$157,000
Associate (2)	\$227.00	674	\$152,998	Enercon Support	1	Lump	\$340,000	\$340,000
Travel & Incidentals			\$4,000	Lab Analysis	1	Lump	\$12,000	\$12,000
				Sampling Expense	1	Lump	\$1,500	\$1,500
	Trustee Support		\$187,395	Contractor Support and Expenses				\$510,500
				Total Budget for Task 2 (Including Trustee Support)				<b>\$697,895</b>
<b>Budget Task 3 - Federal Agency Fees</b>								
				NRC Fees	1	Lump	\$800,000	\$800,000
							Total NRC Fees	<b>\$800,000</b>
<b>Budget Task 4 - Site Decommissioning</b>								
Associate (15)	\$269.00	236	\$63,484	Burns & McDonnell Support	1	Lump	\$1,040,000	\$1,040,000
Associate (2)	\$227.00	1047	\$237,669	Enercon Support	1	Lump	\$248,000	\$248,000
Travel & Incidentals			\$6,000	VNS-FS Support	1	Lump	\$1,070,000	\$1,070,000
				Sampling Expense	1	Lump	\$3,200	\$3,200
				Miscellaneous Supplies	1	Lump	\$2,400	\$2,400
	Trustee Support		\$307,153	Contractor Support and Expenses				\$2,363,600
				Total Budget for Task 4 (Including Trustee Support)				<b>\$2,670,753</b>
<b>Budget Task 5 - State Agency Fees</b>								
				DEQ Fees	1	Lump	\$66,000	\$66,000
							Total DEQ Fees	<b>\$66,000</b>
<b>Budget Task 6 - Out of Scope Work</b>								
Associate (15)	\$269.00	20	\$5,380	Outside Services	1	Lump	\$100,000	\$100,000
Associate (2)	\$227.00	80	\$18,160	Materials & Supplies	1	Lump	\$10,000	\$10,000
Travel & Incidentals			\$5,000					
	Trustee Support		\$28,540	Contractor Support and Expenses				\$110,000
				Total Budget for Task 6 (Including Trustee Support)				<b>\$138,540</b>
<b>Total 2021 Budget (Including Trustee Support)</b>								<b>\$4,656,190</b>