

## Springs, Chanel

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**From:** John Miller [jjmiller@intisoid.com]  
**Sent:** Monday, July 18, 2011 8:03 AM  
**To:** thomasjh@comcast.net; Bartlett, Matthew  
**Subject:** RE: Call summary for clarification on Financial Assurance and possible Exemption

Minutes are fine with me.

### **Call Summary for Clarification on Financial Assurance and Possible Exemption**

July 13, 2011

#### **Participants:**

NRC	
INIS	
Roman Przygodzki, NRC	John
Miller, INIS	
Matthew Bartlett, NRC	
Laurie McKenzie-Carter	Jim
Thomas, INIS	
	Mike
Davis, INIS	

#### **Meeting Summary:**

The purpose of the call was to discuss the follow-up RAs for the financial assurance review. The NRC staff received clarification on several issues including the basis for the cost estimates for decommissioning the DUF6 Inventory. The NRC staff will notify INIS in writing if the clarifications need to be docketed.

The participants also discussed whether INIS plans to request an exemption to 10 CFR 40.36(d) in order to conduct incremental funding of the financial assurance instruments. The NRC staff expressed difficulty envisioning how incremental funding would be implemented for the INIS process, since the entire facility would be involved in operations from the beginning.

The NRC staff acknowledged that a sinking fund is allowed under 10 CFR 40.36(e)(3), provided the balance

in the sinking fund, plus the surety method or insurance, is at least as great as the decommissioning cost estimate, consistent with 40.36(e)(2). INIS discussed the possibility of using an environmental insurance policy as the surety method. The NRC staff recommended INIS provide a draft of the surety method prior to implementation, in order to identify and resolve any concerns before the financial instruments are finalized. This may help avoid costly modifications.

Sincerely,

Matt Bartlett  
Project Manager  
U.S. Nuclear Regulatory Commission  
NMSS/FCSS/AFCB  
(301)-492-3119

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**From:** Przygodzki, Roman  
**Sent:** Thursday, July 14, 2011 2:57 PM  
**To:** Bartlett, Matthew  
**Subject:** RE: Call summary for clarification on Financial Assurance and possible Exemption

Looks good. Some minor comments for your consideration. I don't think anything in your summary is proprietary.

Regarding INIS's question concerning the amount of assurance provided with an external sinking fund, NUREG-1757, Volume 3, Appendix A.15.2, Page A-147 has some additional detail:

- "An external sinking fund must be in an amount that, in total, is at least equal to the licensee's prescribed amount or estimated cost of decommissioning. The prepayment mechanism may be funded initially in any amount. The surety method or insurance must then assure the difference between the prepaid amount and the prescribed amount or estimated cost of decommissioning"