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Decommissioning Funding Meeting Summary (Public)

Date: April 25, 2005

Place: U.S. Nuclear Regulatory Commission (NRC) Offices; Rockville, Maryland.

Attendees:

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Purpose:

The purpose of this part of the meeting, which was open to the public, was to discuss USEC Inc.'s (USEC's) non-sensitive responses to the NRC's requests for additional information (RAI) related to the decommissioning funding plan pertaining to USEC's license application for the American Centrifuge Plant (ACP).

Discussion:

Several responses to the NRC's RAIs were discussed during the meeting. A summary of these discussions is provided below.

1. In response to a request for additional detail in Table C.3.7 explaining the decommissioning method to be utilized, USEC explained that it planned to use dry decommissioning, including wiping, vacuuming, and light and heavy abrasion. Costs of those methods were reflected in Tables C.3.14 (waste components), C.3.15 (purchase of waste boxes), and C.3.17 (miscellaneous). USEC would perform little demolition,

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because it would use Department of Energy (DOE) buildings and be required to return the buildings to DOE. A small number of USEC-constructed buildings also were included in the cost estimate. Equipment would be removed and sent for disposal without decontamination whereas the centrifuge casings would be decontaminated. Building areas would be cleaned largely through vacuuming. Waste from vacuuming would be placed in waste box void areas. Vacuuming of floors was included in the estimate; cleaning of walls and ceilings was not included because the facility during operations would adhere strictly to ALARA and maintain a high level of cleanliness. The floors of all cylinder yards would be scarified, as needed, and waste from the scarification would also be disposed in the voids of the waste boxes.

USEC was requested to provide additional detail on the unit costs to remove and package equipment, to scarify, and to vacuum (compared if possible to modeled representative costs in NUREG-6477).

2. In response to a request for additional detail on the labor overhead rate, USEC explained that proprietary information had been provided that contained the requested information. The NRC informed USEC that ICF Consulting would review this information and USEC would be contacted if any further clarifications were needed.
3. In response to a request for additional detail on how USEC had derived the two consolidated labor categories (i.e., salary and hourly) from the eleven labor groupings stated to have been included in the cost estimate, USEC explained that proprietary information had been provided that contained the requested information. The NRC informed USEC that ICF Consulting would review this information and USEC would be contacted if any further clarifications were needed.
4. In response to a request for additional detail on waste disposal costs for any wastes generated by decontamination of the facility, USEC explained that such wastes would include primarily waste from vacuuming floors, waste from scarifying floors, and wastes from wipes used to sample for contamination. The estimated amounts of such wastes were well within the container limits of the waste boxes, and the small articles would occupy free volume in those boxes. USEC agreed to add a statement to the decommissioning cost estimate (DCE) stating those assumptions.
5. In response to a request for additional justification for the estimated costs of packaging, shipping, and disposing of tails expressed in dollars per kgU, USEC explained the following: The estimate of the contract price with the Department of Energy was in 1998 dollars, which USEC believes is still accurate. USEC was aware of a higher estimate given to Louisiana Energy Services (LES) by DOE for tails disposal. However, USEC had validated the cost per kgU that it was using, based on a proprietary bid that it had submitted to DOE for the contract to build the Uranium Disposition Services (UDS')

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facility for tails conversion. USEC's estimate was based on: (1) cost information from its bid; (2) cost information from the UDS contract; (3) the amount that USEC would be willing to pay the DOE, taking into consideration that USEC could build its own facility; and (4) the fact that USEC would not have transportation costs because of the proximity of its proposed ACP to the UDS conversion facility.

6. In response to a request for additional justification for the use of a 10 percent rather than a 25 percent contingency factor on the cost of tails conversion, USEC explained that it believed the smaller contingency was justified because: (1) it was committing to prepare annual revisions rather than revisions every three years to the DCE following full installation of all centrifuges in 2010; and (2) the amount of tails generated is a consistent function of the number of machines and can be determined by a simple mass balance calculation. USEC confirmed that it did not intend to use an inflation adjustment to recalculate its DCE, but rather in all cases to recalculate based on the estimated costs of the activities.
7. In response to a request for additional justification for the absence of sampling costs (except urinalysis), USEC explained that it did not expect to perform any sampling, such as soil analysis or core sampling, that would require analysis by an off-site laboratory. Sampling costs were captured in Table C.3.9 for labor for surveys, wipe tests, and on-site analysis of wipes, and in Table C.3.17 for supplies. The storage yard would be surveyed and then scabbled, with the process repeated as many times as necessary. USEC stated that this approach was based on experience with the GDP yards, but that the ACP yards were expected to be newer and cleaner.

Action Items

USEC to provide written responses to close the NRC issues contained in items 1,4, 5, 6 and 7 above. NRC to review information associated with items 2 and 3 above and provide USEC any additional need for clarification/confirmation.

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