Financial Assurance and Recordkeeping for Decommissioning

Pursuant to 10 CFR 70.25(g) and 10 CFR 70.51(b)(3), SRERC will maintain records important to decommissioning and transfer these records to an NRC or Agreement State licensee before licensed activities are transferred or assigned, in accordance with 10 CFR 70.36. Furthermore, pursuant to 10 CFR 70.51(a)(3), we will forward the records required by 10 CFR 70.25(g) to the appropriate NRC regional office before the license is terminated.

SRERC is owned by a local government body and as such submits financial assurance in the form of a statement of intent which is attached below.
Checklist 1 Master Checklist for Decommissioning Financial Assurance

Name of Licensee/Applicant: Seven County Infrastructure Coalition C/O Eric Johnson

Mailing Address: 5995 S. Redwood Rd, Salt Lake City, Utah 84123

Facility Address: 1230 N Coal Haul Rd, Orangeville, Utah 84537

License Number(s): New License

Date of Submission

Applicable Parts of 10 CFR (check all that apply): ☑ Part 30 ☐ Part 40
☐ Part 70 ☐ Part 72

Type of Submission:
☒ Certification of Financial Assurance → attach Checklist 2
☐ Decommissioning Funding Plan → attach Checklist 3
☐ Decommissioning Plan → attach Checklist 13-A

Type of Mechanism:

☐ Prepayment
  ☐ Trust → attach Checklist 4-A

☐ Surety, Insurance, or Other Guarantee Method
  ☐ Surety Bond → attach Checklist 5-A
  ☐ Letter of Credit → attach Checklist 6-A
  ☐ Insurance → attach Checklist 7-A
  ☐ Parent Company Guarantee → attach Checklist 8-A
  ☐ Self-Guarantee → attach Checklist 9-A

☐ External Sinking Fund → attach Checklist 10

☒ Statement of Intent → attach Checklist 11-A

☐ Special Arrangement with a Government Entity → attach Checklist 13-B
## Checklist 2  Certifications of Financial Assurance Using a Prescribed Amount

**License Number(s):** New License

**Applicable Parts of 10 CFR (check all that apply):**

<table>
<thead>
<tr>
<th>Part 30</th>
<th>Part 40</th>
<th>Part 70</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- Determine the appropriate prescribed amount(s) (see Section A.2.1)
  - Amount required under Part 30 for sealed sources: $0
  - Amount required under Part 30 for unsealed sources: $1,125,000
  - Amount required under Part 40: $0
  - Amount required under Part 70: $1,125,000
  - Total of all prescribed amounts for all licenses: $2,250,000

✓ Prepare certification statement (see Section A.2.2)

✓ Include the necessary documentation (see Section A.2.3):
  - Certification statement (see Section A.2.4)
  - Financial instrument and supporting documentation
CERTIFICATION OF FINANCIAL ASSURANCE

Principal: Seven County Infrastructure Coalition C/O Eric Johnson
5995 S. Redwood Rd, Salt Lake City, Utah 84123

Facility: San Rafael Energy Research Center
1230 N Coal Haul Rd.
Orangeville, Utah 84537

Issued to: Utah Department of Environmental Quality Division of Waste Management and Radiation Control

I certify that the Seven County Infrastructure Coalition is licensed to possess the following types of unsealed byproduct material with a half-life greater than 120 days licensed under 10 CFR Part 30, and unsealed special nuclear material licensed under 10 CFR Part 70 in the following amounts:

### Byproduct Material

<table>
<thead>
<tr>
<th>Type of Material</th>
<th>Amount of Material</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cobalt 60</td>
<td>0.1 Curies</td>
</tr>
<tr>
<td>Technetium 99</td>
<td>1 Curie</td>
</tr>
</tbody>
</table>

The limits are given in this Byproduct Material Table in curies for possession of a single radioactive isotope at the SRERC facility. If more than one of the listed licensed materials in this Byproduct Material Table is possessed at the SRERC facility the amount possessed will be scaled so that the sum of the ratios between the quantity (in Curies) of the licensed material possessed and the limit listed in this Byproduct Material Table for that material will not exceed one. Additionally, SRERC will not possess amounts of Cobalt 60 and Technetium 99 beyond what is listed in Section 5. of the Corresponding Materials Use License. This is done to ensure that the total amount of byproduct material qualifies for the $1,125,000 financial assurance level for byproduct material according to the guidelines in NUREG-1757, Vol 3, Rev 1, “Consolidated Decommissioning Guidance: Financial Assurance, Recordkeeping, and Timeliness.”

### Source Material

<table>
<thead>
<tr>
<th>Type of Material</th>
<th>Amount of Material</th>
</tr>
</thead>
<tbody>
<tr>
<td>Thorium 232</td>
<td>0.0011 Curies (10 kg)</td>
</tr>
<tr>
<td>Uranium 234</td>
<td>0.00013 Curies (0.02 grams)</td>
</tr>
<tr>
<td>Uranium 238</td>
<td>0.0034 Curies (10kg)</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>0.0046 Curies</strong></td>
</tr>
</tbody>
</table>
## Special Nuclear Material

<table>
<thead>
<tr>
<th>Type of Material</th>
<th>Amount of Material</th>
</tr>
</thead>
<tbody>
<tr>
<td>Uranium 233</td>
<td>0.00019 Curies (0.02 grams)</td>
</tr>
<tr>
<td>Uranium 235</td>
<td>0.00022 Curies (100 grams)</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>0.00041 Curies</td>
</tr>
</tbody>
</table>

I also certify that financial assurance in the amount of $2,250,000 has been obtained for the purpose of decommissioning as prescribed by 10 CFR Parts 30, and 70.

____________________  
Lynn Sitterud  
Co-Chair, Seven County Infrastructure Coalition  

[Corporate seal]
TO: Utah Department of Environmental Quality  
Division of Waste Management and Radiation Control  
P.O. Box 144880  
Salt Lake City, Utah 84114-4880

STATEMENT OF INTENT

As Co-Chair of the Seven County Infrastructure Coalition, I exercise express authority and responsibility to request from the Seven County Infrastructure Coalition funds for decommissioning activities associated with operations authorized by Utah Department of Environmental Quality, Division of Waste Management and Radiation Control under the license accompanying this statement. This authority is established by [insert name of documents governing control of funds]. Within this authority, I intend to request that funds be made available when necessary in the amount of $2,250,000 to decommission the San Rafael Energy Research Center located at 1230 N Coal Haul Rd., Orangeville, Utah 84537 in the following amounts:

- $1,125,000 for decommissioning costs related to byproduct material under 10 CFR 30.
- $1,125,000 for decommissioning costs related to source material under 10 CFR 70.

I intend to request and obtain these funds sufficiently in advance of decommissioning to prevent delay of required activities. A copy of the Authorization is attached as evidence that I am authorized to represent the Seven County Infrastructure Coalition in this transaction.

___________________
Lynn Sitterud
Co-Chair, Seven County Infrastructure Coalition

___________________
Date

Attachment: As stated