

August 26, 2019

Mr. David L. Pelton, Director
Division of Nuclear Materials and Safety, Region III
U.S. Nuclear Regulatory Commission
2443 Warrenville Road
Lisle, Illinois 60532

Request for Pickard Hall Alternate Decommissioning Schedule in Response to NRC Letter
ML19183A425

Dear Mr. Pelton:

The University of Missouri (MU) respectfully requests an alternate decommissioning schedule for Pickard Hall as outlined in this letter. The most recently submitted Characterization Plan (referred to as the Decommissioning Plan [DP] by the NRC) describes procedures to collect characterization data to support a decommissioning cost benefit analyses for three potential decommissioning scenarios, i.e., building demolition, building remediation/renovation, and partial demolition with renovation. As discussed with your staff on June 14, 2019, MU has decided to forgo renovation scenarios and proceed with building demolition due to encountering unexpected structural issues when renovating similar-era nearby buildings (i.e., Swallow Hall and what is now the Reynolds Journalism Institute) which resulted in substantial cost overruns compared to original estimates. MU has determined that proceeding directly to building demolition presents the least risk and therefore is in the best interest of safety for project personnel, staff, faculty, students, and the public.

MU is confident that building demolition can be safely managed under the existing broad scope NRC license, and requests approval of alternate schedule for submittal of a DP per 10 CFR 30.36(g)(2). The DP last submitted by MU stopped short of final decommissioning actions for site release and was focused on characterization of the building and soils in order to determine final actions. MU's decommissioning contractor is currently developing a DP that will encompass site characterization, building demolition, soil remediation, waste disposal, and final status surveys. The DP currently under development will accelerate the project schedule under the safest decommissioning scenario; both factors being in the best interest of all stakeholders.

MU submitted an informational schedule via email on May 20, 2019 to Mr. LaFranzo for the DP revision and resubmittal. This schedule delineated a timeline that culminated in the commitment to submit the revised DP to the NRC by November 8, 2019. During the development of this revised DP, MU and its decommissioning contractor will develop a detailed decommissioning schedule delineating the timeframes for building demolition, below slab soil characterization, soil remediation, and final status

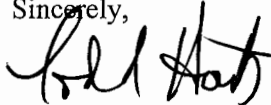
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surveys. Pursuant to 10 CFR 30.36(h), MU is aware of, and committed to, the requirement for decommissioning to be completed within 24 months of approval of the DP by the NRC.

This alternate schedule for submittal of the DP is necessary to effectively conduct decommissioning operations, presents no undue risk from radiation to the public health and safety, and is in the public's best interest because this request effectively accelerates the current decommissioning timeline and chooses the safest decommissioning scenario.

If you have any questions or concerns please contact me, at 573-882-7018 or houtst@missouri.edu.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd Houts", written in a cursive style.

Todd Houts, Director

cc: Gary Ward, Vice Chancellor Operations
RSO File
Pickard Hall Decom File