

UNITED STATES NUCLEAR REGULATORY COMMISSION REGION I 475 ALLENDALE ROAD KING OF PRUSSIA, PENNSYLVANIA 19406-1415

September 6, 2006

License No. 29-15354-01

Docket No. 03008963 Control No. 138691

Larry E. Baugh Bridgewater Site Director sanofi-aventis U.S. Inc. 1041 Route 202-206 Bridgewater, NJ 08807

SUBJECT: SANOFI-AVENTIS U.S. INC., REQUEST FOR ADDITIONAL INFORMATION CONCERNING FINANCIAL ASSURANCE DOCUMENTS, CONTROL NO. 138691

Dear Mr. Baugh:

This is in reference to your letter dated July 28, 2006 providing financial assurance for decommissioning for Nuclear Regulatory Commission License No. 29-15354-01. We have received as part of this action amendment 6, 7, and 8 to your Letter of Credit, Certificate of Events, and Certificate of Resolution as part of this licensing action. In order to continue our review, we need the following additional information:

- 1. The current Certification of Financial Assurance dated April 27, 2005 does not reflect the prescribed value of \$225,000. Please submit a new Certification of Financial Assurance. Please follow closely the recommended wording as listed in our Model Certification of Financial Assurance found on page A-23 in Appendix A, to Volume 3 of NUREG-1757. Guidance for Certification of Financial Assurance may be found starting on page A-17 to Volume 3 of NUREG-1757.
- 2. The current Standby Trust Agreement dated January 22, 1991 needs a supplemental letter or amendment which states that the "Grantor" is now sanofi-aventis U.S. Inc. Additionally, a new Trust agreement Schedule A needs submitted which reflects the new prescribed amount and name of licensee. Please follow closely the Model Standby Trust Agreements Schedules listed on page A-165 to Volume 3 of NUREG-1757.

Alternatively, you may submit a new Standby Trust Agreement to replace the January 22, 1991 agreement. Guidance for Standby Trust Agreement is located starting on page A-153 to Volume 3 of NUREG-1757.

Current NRC regulations and guidance are included on the NRC's website at <u>www.nrc.gov</u>; select **Nuclear Materials; Medical, Academic, and Industrial Uses of Nuclear Material;** then **Toolkit Index Page.** Or you may obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-888-293-6498. The GPO is open from 7:00 a.m. to 8:00 p.m. EST, Monday through Friday (except Federal holidays).

L. Baugh sanofi-aventis U.S. Inc.

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 138691. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5366.

Sincerely,

Original signed by Dennis R. Lawyer

Dennis R. Lawyer Health Physicist Commercial and R&D Branch Division of Nuclear Materials Safety

CC:

Rosemary Pasquino, Radiation Safety Officer

L. Baugh sanofi-aventis U.S. Inc.

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SUNSI Review Complete: <u>DLawyer</u> After declaring this document "An Official Agency Record" it <u>will</u> be released to the Public.

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