



UNITED STATES  
**NUCLEAR REGULATORY COMMISSION**  
REGION I  
2100 RENAISSANCE BOULEVARD, SUITE 100  
KING OF PRUSSIA, PENNSYLVANIA 19406-2713

December 17, 2012

Docket No. 03013627  
Control No. 577736

License No. 08-03114-05

Howard J. Federoff  
Executive Vice President  
Georgetown University  
EH&S/Radiation Safety:LM-12  
Preclinical Science Building  
3900 Reservoir Road, N.W.  
Washington, DC 20057-1431

SUBJECT: GEORGETOWN UNIVERSITY, REQUEST FOR ADDITIONAL INFORMATION  
CONCERNING FINANCIAL ASSURANCE DOCUMENTS, CONTROL NO.  
577736

Dear Mr. Federoff:

This is in reference to your letter dated August 30, 2012, providing your reevaluation of the Decommissioning Plan for our review. We have no questions about the submitted cost estimates. In order to continue our review because of the changes in the Decommissioning Rule effective December 17, 2012, we need the following additional information:

1. Your current instrument to demonstrate financial assurance is in the form of an Escrow Account. With the changes in the Decommissioning Rule, an Escrow Account is no longer an acceptable option and must be replaced by one on the instruments outlines in NUREG-1757, Volume 3, Revision 1. Please note that the documents submitted should be originally signed duplicates.
2. If you do not choose a Trust Fund for your financial assurance instrument, then you must also submit a Standby Trust Fund. This is necessary because the Commission cannot receive funds directly as those funds would be placed in the Treasury and would not be available for decommissioning activities. When decommissioning becomes necessary, the financial assurance instrument would be cashed and placed in the Standby Trust Fund with any capital necessary being disbursed from the Fund.
3. Please review your Certification of Financial Assurance and assure that the licensed materials and amounts authorized on the license that require financial assurance are current as well as the amount of financial assurance to which you are committed.

Current NRC regulations and guidance are included on the NRC's website at [www.nrc.gov](http://www.nrc.gov); select **Nuclear Materials; Med, Ind, & Academic Uses**; then **Licensee Toolkits, see our toolkit index page**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m.

H. Federoff

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EST, Monday through Friday (except Federal holidays).

The NRC's Safety Policy Culture Statement became effective in June 2011. While a policy statement and not a regulation, it sets forth the agency's *expectations* for individuals and organizations to establish and maintain a positive safety culture. You can access the policy statement and supporting material that may benefit your organization on NRC's Safety Culture Web Site at <http://www.nrc.gov/about-nrc/regulatory/enforcemant/safety-culture.html>. We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

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. 577736. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5075.

Sincerely,

***Original signed by Steve Courtemanche***

Steven Courtemanche  
Health Physicist  
Commercial and R&D Branch  
Division of Nuclear Materials Safety

cc:  
Catalina Kovats, Radiation Safety Officer

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**SUNSI Review Complete: SCourtemanche**

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