



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

August 2, 2013

Docket No. 03031174  
Control No. 581292

License No. 07-28386-01

Norman P. Lanier  
Corporate Radiation Safety Officer  
Tracerco  
a business unit of Johnson Matthey, Inc.  
31 Albe Drive, Suite 5  
Newark, DE 19702-1360

SUBJECT: TRACERCO, REQUEST FOR ADDITIONAL INFORMATION CONCERNING  
FINANCIAL ASSURANCE DOCUMENTS, CONTROL NO. 581292

Dear Mr. Lanier:

During a recent audit, it was determined that your financial assurance did not appear to contain the necessary information for Nuclear Regulatory Commission License No. 07-28386-01. In order to continue our review, we need the following additional information:

- 1) Your decommissioning cost estimate only calculated the cost of decommissioning from krypton 85 materials. In your letter dated December 23, 2010, you stated that you no longer possess tritium and that you would perform wipes to ensure that there is no residual activity. However, your license also authorized you to possess any byproduct material with atomic numbers 3 through 83 with half-life greater than 120 days which was not accounted in your decommissioning funding plan. Please include cost to decontaminate the areas affected by the possession of any byproduct material with atomic numbers 3 through 83 with half-life greater than 120 days.
- 2) The Certification of Financial dated December 23, 2010, did not include any byproduct material with atomic numbers 3 through 83 with half-life greater than 120 days which is authorized on your license. All byproduct unsealed materials with a half-life greater than 120 days authorized on your license needs to be included in the Certification of Financial Assurance. Please submit a new Certification of Financial Assurance which includes this material.
- 3) Your cost estimate was performed on August 30, 2010. Currently, 10 CFR 30.35(e)(2) requires, in part, at intervals not to exceed 3 years, the decommissioning funding plan must be resubmitted with adjustments as necessary to account for changes in costs and the extent of contamination. Since it has been approximately three years, it is recommended that you resubmit your decommissioning funding plan at this time with the above needed information. Please follow the guidance in NUREG-1757, Volume 3, "Consolidated NMSS Decommissioning Guidance, Financial Assurance, Recordkeeping, and Timeliness."

- 4) If you no longer wish to consider tritium in your decommissioning funding plan, you should request the material be removed from your license by filing an amendment request with surveys demonstrating that there is no residual tritium activity or include the area which would be affected by the tritium.

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. EST, Monday through Friday (except Federal holidays).

The NRC's Safety Culture Policy 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/enforcement/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. 581292. 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:  
William E. Mixon, Radiation Safety Officer

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**SUNSI Review Complete: DLawyer**

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