

From: [Lawyer, Dennis](#)
To: [Stemen, Tammy \(tammy.stemen@yale.edu\)](mailto:tammy.stemen@yale.edu)
Subject: YALE UNIVERSITY, REQUEST FOR ADDITIONAL INFORMATION CONCERNING FINANCIAL ASSURANCE DOCUMENTS, CONTROL NOS. 580867 AND 580868
Date: Thursday, August 08, 2013 6:38:00 AM

This is in reference to your letter dated July 26, 2013, submitting financial assurance documents for Nuclear Regulatory Commission License No. 06-00183-03, Docket No. 030-00582 and License No. 06-00183-06, Docket No. 030-38333. This additionally refers to the Certification of Financial Assurance that was enclosed in your letter dated July 25, 2013 for both of the above listed licenses. In order to continue our review, we need the following additional information:

1. In your Decommissioning Funding Plan (DFP) Section 3.2, you state the current authorization of materials on License No. 06-00183-06. You include the wording on Condition 13, of your license whose purpose is to limit the amount of material on the license to a prescribe value. It is recommended to consider submitting an amendment request to remove that condition from your license as you are providing this DFP. Please request to remove the limiting condition wording from the DFP.
2. Section 7.6 of your DFP states that you will re-evaluate your DFP at least every three years. The guidance in NUREG-1757 Volume 3, Rev. 1, "Consolidated NMSS Decommissioning Guidance, Financial Assurance, Recordkeeping, and Timeliness," Section A.3 states to determine the means that will be used to adjust the cost estimate and associated funding levels periodically over the life of the facility. Section A.3.2 discusses this item. It is recommended to submit a statement that your DFP will be updated with current prices of goods and services at least every 3 years or when the amounts or cost of decommissioning will significantly change (>10%) due to changes in facility conditions, operations, or decommissioning procedures.
3. Of the Self-Guarantee, recital 12 refers to recital 9. Recital 9 is blank. It is recommended to be changed to recital 10.
4. Schedule A of the Standby Trust Agreement does not have the address of licensed activity for the Main and Medical School Campuses. Please add the address of licensed activity for Main and Medical School Campuses to Schedule A of the Standby Trust Agreement.
5. The Certification of Financial Assurance (CFA) that was included as Appendix B to Attachment 1 of your July 25, 2013 letter did not have Condition 16 of License No. 06-00183-03 written on the CFA which is a limiting condition which further restricts the license material you are authorized to possess. Please include this statement on your CFA.

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 Nos. 580867 and 580868. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5366.

Please note that you may not reply to this letter by return e-mail. Your reply must be in writing by letter or facsimile (610-337-5269). If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application.

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