

**From:** [Weidner, Tara](#)  
**To:** [Newman, Nancy \(NIH/OD/ORS\) \[E\]](#)  
**Subject:** NRC request for additional information  
**Date:** Tuesday, October 08, 2013 1:59:00 PM

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License No. 19-00296-19  
Docket No. 030-01786  
Control No. 577840

\*\*\*\*\* PLEASE CONFIRM THE RECEIPT OF THIS E-MAIL AS SOON AS POSSIBLE \*\*\*\*\*

Good afternoon Nancy,

Working or furloughed? I wasn't sure, so I thought I would send this request for information in the hope that you are considered an excepted employee. As of Friday, the NRC will have run out of money and we will be furloughed. In any case, I look forward to hearing from you following the resolution of things. In the interim, here are a few last items that need to be resolved concerning the financial assurance.

1. The facility description in your Decommissioning Funding Plan (DFP) does not address the 24 irradiators authorized by License No. 19-00296-17. Please add the irradiators to your facility description and include the cost of disposal in the DFP.
2. Table A.3.9 (Final Radiation Surveys) states that the estimation for levels of effort for campus wide decommissioning is based on the most recent surveys completed by DRS. Specify the facilities, and the year(s) in which the decommissioning activities were performed, that are used as the basis for determining the level of effort.
3. The Facility Components section of your DFP mentions the use of plutonium and americium in Room B2-5533 of the Clinical Research Building and states that the overall impact on the decommissioning effort would be negligible. Historically, laboratories where alpha-emitters have been used require more sensitive surveys than laboratories in which beta- or gamma-emitting radionuclides were used. Either confirm that the decommissioning of this laboratory has been taken into account in your current DFP or revise the costs to account for surveys of this particular laboratory.
4. Tables A.3.14, A.3.15, and A.3.16 identify the total costs associated with the packaging and disposal of radioactive waste, equipment/supplies, and laboratory costs. The total costs for these items have not changed from the costs quoted in the current DFP dated March 24, 2012. Please confirm that the values specified in Tables A.3.14, A.3.15, and A.3.16 were reviewed as part of the revised DFP or revise the costs to account for an increase in the price of these materials and services.
5. The values in Table A.3.11 are taken from the estimates in Tables A.3.6, A.3.7, and A.3.9. However, the Table A.3.11 do not match the values in Tables A.3.6, A.3.7, and A.3.9. Also, if the values in Table A.3.11 are incorrect than the values in Table A.3.13 would also be incorrect. Based on my calculations, the total labor costs in Table A.3.13 would be \$8,832,548, not \$7,251,691.20. Consequently, the values in Table A.3.18 would be off as well. By my calculation, the total cost of decommissioning would be \$14,801,185, not 12,826,364. Please review the above stated Tables and revise as necessary.

6. The Statement of Intent provided did not include a copy of the document which grants authority to the signatory. Please submit a copy of the section of the statute (or equivalent relevant regulations) that provides the signatory the authority to sign the Statement of Intent.
7. The Certification of Financial Assurance (CFA) specifies that \$12,826,364 will be available to fund decommissioning activities for License Nos. 19-00296-10 and 19-00296-21. Based on the review of the DFP it appears that number may not be correct. Please update the CFA to include the revised cost estimate for the stated licenses.

Thanks in advance,

Tara L. Weidner  
Senior Health Physicist  
U.S. Nuclear Regulatory Commission