

From: [Lanzisera, Penny](#)
To: [Michael Bohan](#)
Cc: [Dwyer, James](#)
Subject: Yale New Haven Hospital Financial Assurance
Date: Friday, November 08, 2013 10:13:00 AM

License No. 06-00819-03
Mail Control Nos. 575183, 581664, & 580435

Mr. Bohan,

Based on our telephone conversation on November 7, 2013, I understand that you will update your Certification of Financial Assurance (CFA) to include:

1. The currently licensed quantity for Sr-90, Cs-137, and Gd-153.
2. The licensed material listed in Item 6.B. of License Number 06-00819-03. For example
 - a. List item 6.A. on the CFA - Any byproduct material with atomic numbers 1 through 83; and
 - b. L.C. 12 on the CFA
 - i. If only one radionuclide is possessed, the possession limit is the quantity specified for that radionuclide in 10 CFR 33.100, Schedule A, Column II. If two or more radionuclides are possessed, the possession limit is determined as follows: For each radionuclide, determine the ratio of the quantity possessed to the applicable quantity specified in 10 CFR 33.100, Schedule A, Column II, for that radionuclide. The sum of the ratios for all radionuclides possessed under the license shall not exceed unity.
 - ii. Notwithstanding Paragraph A of this Condition and 10 CFR 33.100, Schedule A, Column II, the applicable quantities for the following radionuclides are reduced to:

Carbon 14	100 millicuries
Krypton 85	100 millicuries
Iodine 129	100 microcuries
Any byproduct material other than alpha emitting byproduct material not listed in 10 FR 33.100, Schedule A	100 microcuries

I also understand that in place of submitting a decommissioning funding plan as described in NUREG-1757, you plan to submit:

1. scoping surveys (e.g., leak tests of sources and area surveys in storage locations) to assure that the radium sources have retained their encapsulation; and
2. a commitment to continue to perform these surveys in the radium source storage areas at

some periodicity (e.g., annually) to assure the conditions remain the same.

Finally, we discussed that the Financial Assurance estimates provided did not address decommissioning of areas and disposal of unsealed material listed in Item 6.A. of the license. I understand that you do not currently possess any material under this condition, but that you will provide a decommissioning estimate for this material as part of your financial assurance.

Please call to discuss further if your understanding differs from that stated above.

Penny Lanzisera
Senior Health Physicist
U.S. NRC, Region I