



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION III  
2443 WARRENVILLE RD. SUITE 210  
LISLE, IL 60532-4352

03/06/2015

Mack L. Richard, M.S., CHP  
Radiation Safety Officer  
Indiana University/ Purdue University Medical Center  
541 Clinical Dr.  
Indianapolis, IN 46202-5111

Dear Mr. Richard:

On March 25, 2013, Indiana University/ Purdue University Medical Center submitted to the U.S. Nuclear Regulatory Commission (NRC) a revised decommissioning funding plan (DFP) including an updated statement of intent (SOI) dated March 19, 2013, to fulfill its requirements under 10 CFR Part 30. The financial instrument and DFP will require additional information to be acceptable.

A review of the DFP, SOI, and related documents was conducted using the guidance included in NUREG-1757, Volume 3, Revision 1, Appendix A, which applies to licenses granted under 10 CFR Part 30. A brief summary of the staff's evaluation of the DFP is below. Indiana University/ Purdue University Medical Center will need to modify the submittal in the following ways:

**(1) Submit additional detail to support the cost estimate (NUREG-1757, Volume 3, Revision 1, Appendix A)**

NUREG-1757, Volume 3, Revision 1, Appendix A, Section A.3.1.1 recommends that a detailed facility description be included in the DFP which contains the following: "specific quantities and types of materials authorized by the license (e.g., by specific isotope)"

Your NRC license allows for radionuclides that are not specifically referenced in your cost estimate. All radionuclides listed on your license with a half-life greater than 120 days must be addressed in the DFP.

Please revise the cost estimate to include the additional details necessary to justify the cost of disposing of all of the isotopes on your license with a half-life greater than 120 days.

**(2) Clarify the means to be used for adjusting the cost estimate and associated funding levels over the life of the facility (10 CFR 30.35(e))**

10 CFR 30.35(e) requires licensees to describe the means they will use to adjust decommissioning cost estimates and associated funding levels over the lifetime of their facilities. In the DFP that you provided, you did not include the planned frequency or scope of updating the cost estimate.

Please clarify the method you will use to adjust the cost estimate and associated funding levels. The method should be consistent with the recommendations in NUREG-1757, Volume 3, Revision 1, Appendix A, which recommends that "cost estimates should be updated with the

current prices of goods and services at least every 3 years or when the amounts or types of material at the facility change. Triennial adjustments should be made to account for inflation, for other changes in the prices of goods and services (e.g., disposal cost increases), for changes in facility conditions or operations, and for changes in expected decommissioning procedures."

Please revise the DFP to include the frequency and scope of updating the cost estimate.

**(3) Submit a certification of financial assurance (NUREG-1757, Volume 3, Revision 1, Appendix A)**

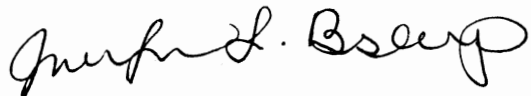
10 CFR 30.35(e) requires the submission of a certification of financial assurance from all licensees required to demonstrate financial assurance, including those submitting a DFP (NUREG-1757, Volume 3, Revision 1, Appendix A, Sections A.1.3 and A.2). In the certification of financial assurance, the licensee certifies that it has obtained financial assurance in the appropriate amount and provides the details needed to verify that the amount is accurate under NRC regulations (NUREG-1757, Volume 3, Revision 1, Appendix A, Section A.2.2). The model wording for a certification of financial assurance is presented in NUREG-1757, Volume 3, Revision 1, Appendix A, Section A.2.4.

Please provide a separate certification of financial assurance as required by 10 CFR 30.35(e)

**In your response letter, please indicate that you are providing additional information to Control Number 300399. If you have any questions, please feel free to contact me at (630) 829-9607.**

In accordance with Title 10 *Code of Federal Regulations* (CFR) 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC's Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC's website at <http://www.nrc.gov/readingrm/adams.html>.

Sincerely,



Jennifer L. Bishop  
Materials Licensing Branch

Docket No. 030-01609  
License No. 13-02752-03