

## Walt, GERALYN

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**From:** Miller, John  
**Sent:** Wednesday, September 09, 2015 10:39 AM  
**To:** jose\_arroyo\_rivera@baxter.com  
**Subject:** Request for Additional information - Mail Control No. 586763

Baxter Healthcare of Puerto Rico  
License No. 52-21175-01  
Docket No. 03019882  
Control No. 586763

Mr. Arroyo

In order to continue the review of your decommissioning financial assurance action, we need additional information. If you have any questions, please contact me 610-337-5089

1. The copy of the third amendment to the Standby Trust Agreement dated May 21, 2015, between you and JPMorgan Chase Bank, N.A. has not been signed by a representative of the bank. Please submit a copy with a bank representative's signature.
2. Since you have re-calculated your decommissioning funding plan (DFP) to be \$3,605,862, please submit a revised Certificate of Financial Assurance that reflects the revised DFP.
3. Section A.3.2 of Appendix A of NUREG-1757, Vol. 3, Rev. 1, "Consolidated Decommissioning Guidance", indicates that licensees who use a Decommissioning Funding Plan must specify the means, method and frequency, by which they will periodically adjust their cost estimates and associated funding levels over the life of their facility. Please describe how you will periodically adjust your cost estimates and associated funding levels over the life of your facility. Please refer to the aforementioned NUREG for guidance.
4. In the Letter of Credit dated April 28, 2015, the beneficiary should be listed as follows;

U.S. Nuclear Regulatory Commission  
Region I  
2100 Renaissance Boulevard, Suite 100  
King of Prussia, PA 19406

Please submit an amended Letter of Credit with the aforementioned beneficiary.

5. In Section A.3.17, "Miscellaneous Costs," of your submitted DFP, a math error was made and the total should be \$128,000 as opposed to \$125,000. That results in a \$3,750 error when the 25% contingency factor is included. This is 0.5% of the total current contingency factor and is considered negligible with regard to this submittal. However, please correct this error in any future calculations of your total decommissioning costs.

Please respond in writing with a **signed and dated letter**. You may submit the signed response document by hard copy, or as a pdf copy attached to an email, or by facsimile to 610-337-5269. Please be sure to include

the Control No. 586763 on your response. We would appreciate a response within 60 days in order to expedite review of your submittal.

Thank you for your cooperation.

John J. Miller  
Health Physicist  
Division of Nuclear Materials Safety

Phone: 610-337-5089  
Fax: 610-337-5269  
E-mail: [john.miller@nrc.gov](mailto:john.miller@nrc.gov)