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**To:** ["bill.galdenzi@boehringer-ingenheim.com"](mailto:bill.galdenzi@boehringer-ingenheim.com)  
**Subject:** Boehringer Ingelheim Pharmaceuticals, Inc., Request for Additional Information Concerning Financial Assurance, Control 594341, License No. 06-19183-01, Docket 03017101  
**Date:** Wednesday, April 05, 2017 9:21:00 AM

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Dear Mr. Galdenzi,

This is in reference to your letter dated March 9, 2017, submitting financial assurance information for Nuclear Regulatory Commission License No. 06-19183-01, Docket No. 03017101. In order to continue our review, we need the following additional information:

1. For future revision of your decommissioning funding plan, please reference and follow the guidance in NUREG-1757, Volume 3, Revision 1, "Consolidated Decommissioning Guidance Financial Assurance, Recordkeeping, and Timeliness," which replaced NUREG-1727.
2. Section 3.0 of your decommissioning funding plan (DFP), Table 2 did not seem to appear to include the Solvents Storage Building which was in the letter dated March 19, 2014, nor did it seem to appear in Table 3 as a decommissioned location. Please include this area in your Table 2 and recalculate your cost estimate, or explain why this should not be included in Table 2 or 3.
3. Section 3.0 of your DFP, Table 3 did not include the following rooms which were shown to have been decommissioned in your March 19, 2014, letter: 2411, 2416, 2512, 2431, LDT 124, LDT 119, 10463, 110466. Please include these rooms in your Table 3 or explain why they should not be added.
4. Section 4.0 of your DFP states that the majority of key assumptions for decommissioning was detailed in your January 9, 2008, April 12, 2008, and April 12, 2011 letters. After reviewing these letter, it appears that most of the assumptions are included in the cost calculations stated in Tables A.3.6 through A.3.17. Additionally, the actual cost calculation was not submitted which includes the information as stated in Tables A.3.6 through A.3.17 of NUREG-1757, Volume 3, Rev. 1. Please submit the full calculation along with the key assumptions that was previously included in your DFP.
5. In addition, 10 CFR 30.35 (e) requires, in part, that each decommissioning funding plan submitted for review and approval must contain the cost of an independent contractor to perform all decommissioning activities; the volume of onsite subsurface material containing residual radioactivity that will require remediation; the means for adjusting cost estimates and associated funding level periodically over the life of the facility; consideration of spills of radioactive material producing additional residual radioactivity in onsite subsurface material; and waste inventory increased above the amount previously estimated. Please ensure your DFP specifically addresses these items.

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office (Address below) and refer to Mail Control No. 594341. If you have technical questions regarding this letter, please call me at (610) 337-5366.

Your reply must be an originally signed and dated letter. The letter may be scanned and submitted as a pdf document attached to an email; or it may be transmitted by facsimile to (610) 337-5269; or it may be sent by regular mail. Please respond within 30 calendar days from the date of this e-mail.

Please respond by e-mail to acknowledge that you have received the e-mail request for additional information.

Region 1 Office Mailing Address: Licensing Assistance Team, US Nuclear Regulatory Commission Region I, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406-2713.

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