



UNITED STATES
NUCLEAR REGULATORY COMMISSION

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

MAY 09 2017

Maha Srinivasan, M.S.
Radiation Safety Officer
Wayne State University
Health Physics Department
5425 Woodward Ave., 3rd Floor
Detroit, MI 48202

Dear Ms. Srinivasan:

Based on Title 10 of the Code of Federal Regulations (10 CFR) Part 30, Section 35, you provided the NRC a financial assurance for decommissioning. We have reviewed the information provided and will need the following information to complete our review.


- 1) Section A.2.2 to the NUREG-1757, Volume 3, Revision 1, provided that all licensees who are required to provide financial assurance must prepare a certification of financial assurance. However, you have not submitted a certification of financial assurance to the NRC. Please provide an original signed Certification of Financial Assurance. For your reference, a sample of the certification of financial assurance is listed in NUREG-1757, Volume 3, Revision 1, under Section A.2.4.
- 2) Section A.11 to the NUREG-1757, Volume 3, Revision 1, provided that a statement of intent should demonstrate that a government licensee can request special funding from its funding body when necessary. This is different from a guarantee or commitment of a licensee's own funds. Therefore, it is not satisfactory for a licensee to demonstrate that it is authorized to enter into contracts and guarantees committing its own funds or to promise to allocate funds from its operating budget, from other general appropriations (either current or future), or from other internal resources. Contrary to the above, in the Statement of Intent dated September 19, 2012, Mr. Allan Gilmour provided that he, the President of Wayne State University, will request the fund from University funds for decommissioning activities associated with the NRC License No. 21-00741-08. Please resubmit an original signed Statement of Intent in accordance with the NUREG-1757, Volume 3, Revision 1. For your reference, a sample of the Statement of Intent is listed in Section A.11.4 in the NUREG-1757, Volume 3, Revision 1.
- 3) Your license is currently authorized for 250 millicuries of sodium-22 in form of unsealed byproduct material. Sodium-22 is not listed in Appendix B to 10 CFR Part 30; therefore, the default quantity will be 0.1 microcurie. Based on 10 CFR 30.35(a), you must provide a decommissioning funding plan. If you would like to submit a decommissioning financial assurance in accordance with 10 CFR 30.35(b), you must lower the quantity of the possession limit currently listed in your license to greater than 10^4 but less than or equal to 10^5 times the applicable quantities of appendix B to part 30 in unsealed form (For a combination of isotopes, if R, as defined in § 30.35(a)(1), divided by 10^4 is greater than 1 but R divided by 10^5 is less than or equal to 1). Please provide the decommissioning funding plan or an update to your licensed material possession limit.

For your information, NUREG-1757, Volume 3, Revision 1, "Consolidated Decommissioning Guidance: Financial Assurance, Recordkeeping, and Timeliness", is available on the NRC website at <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1757/v3/>.

To continue the review of your decommissioning financial assurance, we request that you submit your written response to this letter by June 12, 2017. Your response must be dated and signed by authorized personnel and please refer Mail Control Number 576849 in your response to facilitate proper mail handling in our office. If you have any questions or require clarification on any of the information stated above, please do not hesitate to contact me at 630-829-9887 or frank.tran@nrc.gov.

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

Sincerely,


Frank P.D. Tran
Health Physicist
Materials Licensing Branch

License No. 21-00741-08
Docket No. 030-01995