



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION I  
2100 RENAISSANCE BLVD.  
KING OF PRUSSIA, PA 19406-2713

May 8, 2017

Benjamin Polak, Ph.D., Yale University  
Provost  
Yale University  
Radiation Safety Section – OEHS  
135 College Street, First Floor Suite 100  
New Haven, CT 06510-2411

**SUBJECT: YALE UNIVERSITY, ACCEPTANCE OF FINANCIAL ASSURANCE, MAIL CONTROL NOS. 590432, 592054, 590434, AND 592052**

Dear Dr. Polak:

This is in reference to your letters dated March 24, 2017, December 21, 2016, September 27, 2016, September 26, 2016, and June 25, 2015, providing financial assurance documents.

We have reviewed the Decommissioning Funding Plan dated June 2015, the letter dated March 20, 2017, submitting the annual financial test, the Self-Guarantee effective March 20, 2017, and the First Amendment to the Yale University Standby Trust Agreement dated effective April 26, 2017, to meet the financial assurance requirements for your license. We have no further questions at this time.

The following documents currently provide your financial assurance:

Decommissioning Funding Plan for License No. 06-00183-03 dated June 2015 (ML16082A444);  
Decommissioning Funding Plan for License No. 06-00183-08 dated July 23, 2013, and revised August 20, 2013 (ML13256A412), and cost estimate update letter dated September 27, 2016 (ML16280A177), and letter dated December 21, 2016 (ML17005A230);  
Certification of Financial Assurance dated March 20, 2017 (ML17095A725);  
Self-Guarantee dated March 20, 2017 (ML17095A725), and  
Yale University Standby Trust Agreement dated July 24, 2013 (ML13217A418), and First Amendment to the Yale University Standby Trust Agreement dated April 26, 2017 (ML17124A083), and Letter of Acknowledgement in letter dated May 29, 2014 (ML14163A045).

In the future, please ensure that the annual test letter contains the date for closure of your fiscal year. This day is needed as the basis for some notification criteria in your Self-Guarantee.

The special report from independent accountants dated September 26, 2016 (ML16280A205) was determined to be acceptable for the annual test submitted because the annual test letter dated March 20, 2017 (ML17095A725), contained the same bonds and information and it has not been a full year since the time the independent accountants was submitted.

Your organization uses a Decommissioning Funding Plan (DFP) to determine the amount of financial assurance necessary to fund all decommissioning activities. 10 CFR 30.35(e)(2) and 70.25(e)(2) requires that, at the time of license renewal and at intervals not to exceed three years, the DFP must be resubmitted with adjustments as necessary to account for changes in costs and the extent of contamination. Your currently approved DFP was dated June 2015 for License No. 06-00183-03 and September 27, 2016 for License No. 06-00183-08; therefore, your DFP must be re-submitted on or before June 1, 2018, and September 27, 2019, respectively. The DFP must update the information submitted with the original or prior approved DFP, and must specifically consider the effect of the following events on decommissioning costs: (1) spills of radioactive material producing additional residual radioactivity in onsite subsurface material; (2) waste inventory increasing above the amount previously estimated; (3) waste disposal costs increasing above the amount previously estimated; (4) facility modifications; (5) changes in authorized possession limits; (6) actual remediation costs that exceed the previous cost estimate; (7) onsite disposal; and (8) use of a settling pond. If the amount of the financial assurance instrument will be adjusted to match the DFP, this cannot be done until the updated DFP is approved by the NRC. If the financial assurance instrument is revised (amended) to change the amount of financial assurance obligated, then you will need to also submit a revised Certificate of Financial Assurance (CFA) with the new amount.

We will return the original copies of superseded documents under separate cover

Your cooperation is appreciated.

Sincerely,

*/RA/*

Dennis R. Lawyer, Health Physicist  
Commercial, Industrial, R&D  
and Academic Branch  
Division of Nuclear Materials Safety  
Region I

License Nos. 06-00183-03, 06-00183-08  
Docket Nos. 03000582, 03038333  
Mail Control Nos. 590432, 592054, 590434, 592052

cc: Stephanie S. Spangler, M.D. Deputy Provost for Health Affairs  
& Academic Integrity  
Tammy Stemen, CHP, Radiation Safety Officer

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License Nos. 06-00183-03, 06-00183-08  
 Docket Nos. 03000582, 03038333  
 Mail Control Nos. 590432, 592054, 590434, 592052

cc: Stephanie S. Spangler, M.D. Deputy Provost for Health Affairs  
 & Academic Integrity  
 Tammy Stemen, CHP, Radiation Safety Officer

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ML17130A838

SUNSI Review Complete: DLawyer

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