

**From:** [Ullrich, Elizabeth](mailto:Ullrich.Elizabeth@hhs.gov)  
**To:** ["nstinson@cdc.gov"](mailto:nstinson@cdc.gov)  
**Subject:** DFP revision dated June 13, 2017, request for additional information.  
**Date:** Tuesday, December 26, 2017 11:19:00 AM

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December 26, 2017

HHS/CDC  
License No. 10-06772-01  
Docket No. 030-04001  
Control No. 600202

Mr. Stinson,

Please provide the following additional information regarding your revised decommissioning funding plan (DFP):

1 – Although you are correct on page 3 that financial assurance is not required for the source material authorized on your license (a total of 4 millicuries of source material), confirm that you understand that the release criteria in 10 CFR 20, Subpart E, “Radiological Criteria for License Termination” applies to materials used, not just those for which financial assurance is required.

2 - Neither the DFP nor the license application address your survey criteria for alpha emitters, such as the source material listed on the license and the special nuclear material (SNM) for which financial assurance is required. The NRC’s SNM screening values for total residual contamination, of which not more than 10% is removable, are as follows: U-233 88 dpm; U-233 + C 5 dpm; U-235 97 dpm; U-235 + C 1.5 dpm; Pu-239 31 dpm; Pu-239 28 dpm; Pu-240 28 dpm; Pu-242 29 dpm. The screening values for source material are similarly low. Please describe the typical surveys currently done to assess alpha contamination and the action levels you are currently using. If necessary, review the DFP to account for decommissioning surveys of facilities where SNM and source materials were used.

3 – Table A.3.16 on page 33 contains the exact same costs as provided in 2013. Confirm if these costs are still correct, or provide updated information and revise the cost estimate.

4 – The current amount of financial assurance listed in your Statement of Intent (SI) and in your Certification of Financial Assurance (CFA) is less than the amount of the cost estimate in your June 13, 2017 DFP. After the responses to the above questions are reviewed, and if necessary, a new cost estimate is provided and accepted, you will need to provide a new SI and new CFA. No response to this item is necessary at this time.

If you have any questions regarding this request for additional information, you can contact me by telephone or email is listed below.

Thanks,  
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