



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

August 15, 2018

Glenn P. Sullivan, Corporate RSO
Cardinal Health 414, LLC
7000 Cardinal Place
Dublin, OH 43017

SUBJECT: CARDINAL HEALTH 414, LLC; REVIEW OF FINANCIAL ASSURANCE
SUBMITTAL; MAIL CONTROL NO. 609412

Dear Mr. Sullivan:

We have reviewed the Decommissioning Funding Plan Cost Estimate dated August 3, 2018, 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:

Certification of Financial Assurance dated January 16, 2018 [ML18053A250]
Decommissioning Funding Plan Cost Estimate dated August 3, 2018 [ML18207A236]
Surety Bond dated May 26, 2011 [ML112380052], Surety Bond Rider dated
November 9, 2016 [ML17033B594]
Amended and Restated Standby Trust Agreement dated March 15, 2012
[ML12083A116], Agreement of Resignation, Appointment and Acceptance dated March
8, 2017 [ML17194B033] and Page 1 replacement for the Resignation, Appointment, and
Acceptance [ML17200D092]; Second Amended and Restated Standby Trust Agreement
entered into as of July 17, 2017 [ML17216A215]; and Third Amended and Restated
Standby Trust Agreement entered into as of February 2, 2018 [ML18053A250]

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) 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 submitted on August 3, 2018; therefore, your DFP must be re-submitted on or before August 3, 2021. 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.

Your cooperation is appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis R. Lawyer". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

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

License No. 34-32780-02
Docket No. 03038331
Mail Control No. 609412

cc: Beau Dugas, Radiation Safety Officer
Evan T. Western, Manager, Health Physics

G. Sullivan

2

Your cooperation is appreciated.

Sincerely,

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

License No. 34-32780-02

Docket No. 03038331

Mail Control No. 609412

cc: Beau Dugas, Radiation Safety Officer
Evan T. Western, Manager, Health Physics

DOCUMENT NAME: G:\WBL Documents\WBL License Cover Letter\L34-32780-02.609412.docx

[LAT to enter ADAMS Accession No.]

SUNSI Review Complete: DLawyer

After declaring this document "An Official Agency Record" it will be released to the Public.

To receive a copy of this document, indicate in the box: "C" = Copy w/o attach/encl "E" = Copy w/ attach/encl "N" = No copy

OFFICE	RI:DNMS	N					
NAME	DLawyer						
DATE	8/15/2018						

OFFICIAL RECORD COPY