

UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION I 2100 RENAISSANCE BLVD. KING OF PRUSSIA, PA 19406-2713

August 20, 2018

Jonathan C. Young, Sr. Advisor, Radiation Technology STERIS Isomedix Puerto Rico, Inc. Dba STERIS Applied Sterilization Technologies 9 Apollo Drive Whippany, New Jersey 07981

SUBJECT:

STERIS ISOMEDIX PUERTO RICO, INC., REQUEST FOR ADDITIONAL

INFORMATION, MAIL CONTROL NO. 602561

Mr. Young:

This is in reference to your Decommissioning Funding Plan (DFP) dated June 21, 2017, for NRC License No. 52-24994-01. This licensing action was opened as a result of an internal self-assessment which a perceived discrepancy between your funding compared to other similar facilities. The perceived discrepancy was resolved with the acceptance of the above DFP and Surety Bond on November 27, 2017. However, a statement made in the DFP needs to be periodically revisited by you to ensure that your financial assurance is not adversely impacted.

Page 2, Section D, "Source Disposal," states, in part, that "There is currently no formal disposal path for sources manufactured by REVISS Services."

In your DFP, you stated that Nordion purchased the remaining REVISS assets but Nordion's extent of responsibility for REVISS sources in the US was unknown. Assumptions were made that Nordion would take full responsibility and the disposal costs of REVISS sources equal that of Nordion sources. Any overages would be covered by the DFP's contingency fund.

Please contact Nordion and confirm one of the following:

- (1) Nordion's extent of responsibility is still unknown;
- (2) Nordion accepts responsibility and the cost of the disposal of the REVISS sources does not exceed the current contingency fund;
- (3) Nordion accepts responsibility and the cost of the disposal of the REVISS sources exceeds the current contingency fund (Submit an amended Surety Bond, Schedule to the Standby Trust Agreement, and an explanation for the change [alternative is a revised DFP]); or
- (4) Nordion does not accept responsibility. Determine another means of disposal. (Submit revised financial assurance documents, as necessary).

Please submit your response to this letter within 30 calendar days from the date of this letter.

An electronic version of the NRC's regulations is available on the NRC Web Site at: www.nrc.gov. Additional information regarding use of radioactive materials may be obtained on the NRC Web Site at: http://www.nrc.gov/materials/miau/mat-toolkits.html. This site also provides the link to the toolbox for updated information on the revised regulations for naturally-occurring and accelerator-produced radioactive materials (NARM).

In accordance with 10 CFR 2.390 of the NRC's "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 document system (ADAMS). ADAMS is accessible from the NRC Web Site at: http://www.nrc.gov/reading-rm/adams.html. Please be aware that you may request that certain portions of your submittal to NRC be withheld form public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390. You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.

If you have any questions regarding this request for additional information, please contact me at 610-337-5075 or via electronic mail at steven.courtemanche@nrc.gov.

Thank you for your cooperation.

Sincerely,

Steven Courtemanche, Health Physicist

Commercial, Industrial, R&D,

and Academic Branch
Division of Nuclear Materials Safety

Region I

License No. 52-24994-01 Docket No. 030-30578 Mail Control No. 602561 Please submit your response to this letter within 30 calendar days from the date of this letter.

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Sincerely.

/RA/

Steven Courtemanche, Health Physicist Commercial, Industrial, R&D. and Academic Branch **Division of Nuclear Materials Safety** Region I

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SUNSI Review Complete: SCourtemanche

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