

Radiation Safety Office  
106 Carrigan Drive, 004 Rowell Building  
Burlington, Vermont 05405  
(802) 656-2570  
FAX: (802) 656-8876  
[radsafe@uvm.edu](mailto:radsafe@uvm.edu)  
[www.uvm.edu/radsafe](http://www.uvm.edu/radsafe)



The  
UNIVERSITY  
of VERMONT

March 6, 2019

Division of Nuclear Materials Safety  
U.S. Nuclear Regulatory Commission, Region I  
2100 Renaissance Boulevard, Suite 100  
King of Prussia, PA 19406-2713

Attn: Mr. Dennis Lawyer

Re: Additional Information Requested for DFP and FA letter dated January 3, 2019.  
License No. 44-00728-13, Docket No. ~~0301022~~ 03013022

Mr. Lawyer,

This is in reference to your email dated February 14, 2019, requesting further information concerning the University of Vermont's decommissioning fund plan (DFP) and financial assurance letter dated January 3, 2019, License No. 44-00728-13, Mail Control No. 611158, Docket No. 0301322.

In reply to your questions and concerns:

1. Method for Adjusting Cost Estimates:

The University of Vermont will adjust their cost estimates and associated funding levels over the life of their facilities as needed annually or at least once every three years. The Radiation Safety Office will at the time of their annual self-audit review, determine if cost estimates and funding levels need to be adjusted prior to the triennial DFP update. Adjustments will be made to account for inflation, for changes in the prices of goods and services (e.g., disposal cost increases), for changes in facility conditions or operations, and for changes in expected decommissioning procedures.

More specifically, the following types of events will be evaluated annually during the Radiation Safety Office's review to determine if changes in the cost estimate is required.

- **New leaks and spills:** In the event, of leaks or spills that exceed the confinement capability of the facility or occur in an unconfined area and migrate into the environment the potential for increase decommissioning cost will be evaluated. If residual radioactivity is identified, the cost of remediating it will be included in the decommissioning cost estimate.

611158

Rec'd. in LAT-03/07/2019

NUCLEAR MATERIALS-001

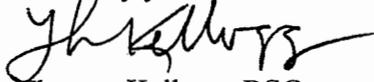
- **Newly detected soil or groundwater contamination:** If new locations of soil or groundwater contamination are identified during site characterization prior to decommissioning or during decommissioning, the materials present will be identified and the cost of cleanup will be included in the cost estimate.
- **Increased waste inventory:** If the volume of radioactive waste disposal exceeds the cost amount provided in the previous cost estimate, we will make an adjustment to account for this increase.
- **Increased disposal costs:** The cost estimate will include up-to-date disposal costs. If these prices change significantly, we will make adjustments to the cost estimate.
- **Facility modifications:** Major modifications to the facilities and/or an increased number of buildings containing laboratories using radioactive materials at UVM will be evaluated for their effects on decommissioning cost and the estimate will be adjusted appropriately.
- **Changes in authorized possession limits or scope of use:** License amendments with changes in the authorized possession limits may result in an increase in the cost of decommissioning due to larger expected inventories of waste material, extensions to the area of contaminated surfaces, or additional volume of contaminated material that must be disposed of during decommissioning. Cost estimates will be adjusted accordingly.

2. Inaccurate FA Letter: The Certification of Financial Assurance dated December 19, 2018, as well as in Appendix B of our DFP sent to you on January 3, 2019 did not accurately reflect the allowed possession limits of material on UVM's NRC materials license. Please use the previous Certification of Financial Assurance submitted by the University of Vermont that is dated, June 8, 2015.

3. Address Correction: The current NRC mailing address is noted and will be used for all future mailings.

I hope these answers are satisfactory. Please let me know if you require further information.

Sincerely yours,



Thomas Kellogg, RSO  
University of Vermont  
Radiation Safety Office  
004 Rowell Building  
Burlington, VT 05403  
Tel: 802-656-3283  
Email: Thomas.Kellogg@uvm.edu