

SEP 21 1993

License No. 06-00221-08  
Docket No. 30-03759  
Control No. 113025

Uniroyal Chemical Company, Incorporated  
World Headquarters  
ATTN: William Harned, Ph.D.  
Radiation Safety Officer  
Benson Road  
Middlebury, Connecticut 06749

Dear Dr. Harned:

Subject: Financial Assurance

This is in reference to your letter dated August 9, 1993 and the telephone conversation between yourself and David Everhart of this office on June 21, 1993 regarding your certification of financial assurance for License No. 06-00221-08. We have reviewed your submittal and request that you modify your submission to address the specific matters described below:

1. You requested permission to store radioactive waste for five years. Your license will be modified to include a condition which requires that you dispose of all licensed material contained in waste within two years of the date the waste is generated unless you submit an acceptable waste storage plan containing the information described in Information Notice 90-09 (enclosed). Please state whether all waste will be disposed of within two years of generation or submit a waste storage plan for review.
2. We are unable to increase your possession limits for carbon-14 to 1,000 millicuries as requested in Item 1 of your letter and limit your possession of materials as requested in Item 2 of your letter since the 1,000 millicuries of carbon-14 is 10<sup>4</sup> times the quantity in Appendix C to 10 CFR 20 or unity with regard to the "R rule." Possession of 1,000 millicuries of carbon-14 in combination with the license condition limiting your total possession as requested in Item 2 of your letter means you could not possess any other isotopes with half lives greater than 120 days. Please confirm that increasing your carbon-14 possession limit to 900 millicuries is acceptable.

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3. You stated in the above mentioned telephone conversation that you would "check on the status of the stand-by trust fund with the financial people." Please submit a Stand-by Trust Agreement. You will find the recommended wording for a Stand-by Trust Agreement on pages 4-18 through 4-27 of Regulatory Guide 3.66 (enclosed). Please closely follow the recommended wording and include all appropriate attachments.

We will continue our review upon receipt of this information. Please reply in duplicate to my attention at the Region I office and refer to Mail Control No. 113025. If you have any questions regarding this letter please call David Everhart at (215) 337-6936.

Since your license requires financial assurance, we request that you respond within 30 calendar days from the date of this letter.

Sincerely,

Original Signed By:  
**John D. Kinneman**

John D. Kinneman, Chief  
Research & Development and  
Decommissioning Section  
Division of Radiation Safety  
and Safeguards

Enclosures:

1. Information Notice 90-09
2. Regulatory Guide 3.66