

Office of the Vice President for Finance and Operations Environmetical Health & Safety 410 Church Street S.E. Minneapolis, Minnesota 55455

(612) 626-6002

November 8, 1990

Mr. A. Bert Davies, Regional Administrator Region III, USNRC 799 Roosevelt Road Glen Ellyn, IL 60137

Dear Mr. Davies:

On November 7, 1990, I called your office in regard to your November 2, 1990 letter concerning possible violation of 10 CFR 30.35 (financial assurance for decommissioning) under NRC License #22-00187-08 (University of Minnesota Gamma Irradiation Facility). I was referred to Dr. William Adam of your office, and explained to Dr. Adam that License #22-00187-08 allows for possession of 10,000 curies of Cs-137 and 2,000 curies of Co-60 in the form of sealed sources.

Appendix II of NUREG-1337, "Standard Review Plan for the Review of Financial Assurance Mechanisms for Decommissioning Under 10 CFR, Parts 30, 40, 70 and 72," lists >100,000 curies for sealed Cs-137 sources and >10,000 curies for sealed Co-60 sources as the activity at which financial assurance for decommissioning is required. Dr. Adam agreed that it appears that this requirement does not apply to License #22-00187-08 because the Cs-137 possession limit is 1/10th of the Appendix II value and th Co-60 possession limit is 1/5th of the Appendix II value.

If you have any questions concerning this determination or if you require additional information, please contact me.

Sincerely,

Jorom a. Starger

Jerome W. Staiger Radiation Protection Officer

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