



SAINT LOUIS UNIVERSITY

Office of the
Associate Vice President
and Treasurer

November 19, 1990

Mr. A. Bert Davis
Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Re: Docket No. 03011623
License No. 24-04581-19

Dear Mr. Davis:

This letter is in response to your letter dated November 2, 1990 with regard to the above referenced item.

I have enclosed a letter written to me by Dr. J. Wendell Davis, Director of the University's A/R Safety Office dated 9 July 1990.

As you will note, Dr. Davis refers to the referenced license in the fourth paragraph of his letter to me. The concluding sentence of the paragraph states that according to Dr. Davis' interpretation of the regulations "this license...will require no financial assurance to the...Commission".

If you dispute this interpretation, please contact me immediately.

Thank you very much.

Sincerely,

Robert N. Altholz
Associate Vice President
and Treasurer

9102220221 910208
REG3 LIC30
24-04581-19 PDR

RNA/ams

cc: Frank Bachich
Dr. J. Wendell Davis
Karen Davis

NOV 28 1990



St. Louis University Medical Center

3556 Caroline St., St. Louis, MO 63104 314/577-8127 or 577-8609

9 July 1990

A/R Division Safety Office
J. Wendell Davis, Ph.D. - Director
Rodger Munday - Radiation Safety Officer

Mr. Robert N. Altholz, C.P.A.
Treasurer,
St. Louis University
Fitzgerald Hall
2500 Lindell Blvd.
St Louis, MO 63103-1024

Rob:

The following is my assessment of the fiscal requirements that we will have to find in order to comply with terms of the Nuclear Regulatory Commission's Decommissioning Standard.

License Number 24-25819-01, due to expire 30 April 1993, is for sealed sources of ^{137}Cs in the Blood Irradiator. This license for possession of 5,610 Curies is below the 100,000 Curie lower limit for sealed sources found in the table that is in Appendix A of the "Decommissioning Packet". This license therefore will require no financial assurance to the Nuclear Regulatory Commission.

License Number 24-1979 due to expire 30 April 1993 is for cardiac pacemakers containing a total of 645 mg of ^{238}Pu . Since these pacemakers are installed in patients who are not resident in our institution, we could not incur decommissioning costs as a result of some future need to abandon or raze any of our structures.

License Number 24-04581-19, due to expire 28 February 1994, permits us to have in our possession a single sealed source of ^{60}Co of not more than 9,000 Curies for use in the Siemens' Gammatron S, Model FK. The limit for sealed sources of this nuclide at which liability is incurred under the Decommissioning Funding Plan is 10,000 Curies. This license therefore will require no financial assurance to the Nuclear Regulatory Commission.

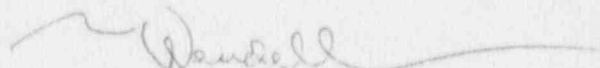
License Number 24-00196-07, due to expire 31 October, 1993, permits the University to have in its possession a great variety of radionuclides in a multitude of different quantities. It appears that the major nuclides for which we exceed the decommissioning limits are unsealed sources of ^{14}C , ^{137}Cs , ^{60}Co , and ^3H . Our possession limits of all other nuclides covered by this license appear to be below the threshold values for which we would be required to establish assurance of decommissioning costs.

Robert N. Altholz
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It is therefore my judgement that the University's need to provide financial assurances of the capability of paying for any future decommissioning relates only to the one license (Number 24-00196-07) and that the other three licenses do not require financial assurances.

I am sending copies of this letter to the Chairman of the Radiation Safety Committee and to our Radiation Safety Officer. Should they have any different interpretation of the Decommissioning Standard, I am hopeful that they will respond to one of us within the week so that we may bring this matter to completion.

Sincerely yours.



J. Wendell Davis, Ph.D.
Director of Safety for the
Medical Center

Copies: Francis K. Herbig
Rodger Munday
A. Stephen Coburn