



WHITEHEAD INSTITUTE

Dr. Gerald R. Fink  
*Director*

John Pratt  
*Associate Director*  
617/258-5104

December 6, 1993

Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Sir:

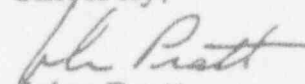
This letter offers comment on the proposed revision to 10 CFR Part 30 regarding self-guarantee for financial assurance for costs of decommissioning licensed facilities.

Under current regulations, self-guarantees may only be made by parent organizations. Under the proposed revision, companies with assets in excess of \$1 billion could also provide self-guarantees. There are also other requirements that indicate the revision is aimed at companies and does not recognize the fact that many licensees are non-profit research institutions or universities with endowments of considerable size when compared to the amount needed for decommissioning.

The Whitehead Institute is a non-profit independent research institute. Under the NRC rules, it must provide a financial assurance for \$150,000. The Institute has invested unrestricted capital acting as endowment of \$149 million. Under the rules, it cannot offer a self-guarantee. It is taking six months of effort plus ongoing annual fees to secure a standby letter of credit to satisfy the current financial assurance requirements. The fact that NRC regulations do not allow an organization with \$149 million of unrestricted invested assets to guarantee the availability of \$150,000 seems unreasonable.

It is suggested that holders of licenses under 10 CFR Part 30 be allowed to offer self-guarantees if they have unrestricted liquid assets in an amount several times (such as 10 times) the decommissioning costs.

Sincerely,

  
John Pratt

9402250018 940202  
PDR PR  
30 58FR3515 PDR