

November 14, 1990

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

License No. 24-04206-01  
Docket No. 03000001

Dear Mr. Davis:

This letter is in response to your letter dated November 2, concerning compliance with the new 10 CFR 30.35 on decommissioning.

Mallinckrodt Medical chose to modify our license rather than supply the necessary financial instruments discussed in Part 30.35. We submitted a license amendment to modify the possession limits in our license to avoid reaching the levels that would trigger the need for financial assurance. This license amendment application was filed with NRC on July 26, 1990. All of the radionuclides we use in the manufacture of our radiopharmaceuticals are short half life and would not be expected to be a concern in the decommissioning of our plant. However, our license is a broad scope license and we are authorized to use any material from atomic number 1 through 83.

Region III issued us Amendment 48 to our license on October 15 which contained a license condition, whereby we would restrict the use of material to quantities below the minimum limit specified in Part 30.35(d). We understand that this license condition satisfies compliance and relieves us from any of the required financial assurance requirements. This original Amendment 48 contained a typographical error and was later replaced on October 29, 1990. We realize we are still required to keep appropriate records as required in Part 30.35(g). These will be kept on file until the license is terminated. A copy of our license Amendment 48 is included as an attachment.

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Based on the information furnished above, we feel we are in compliance with the requirements of Part 30.35. Our application for a license amendment was received by the NRC before the July 27, 1990 effective date. If you need additional information, please contact me at (314) 344-3977.



Roy W. Brown, Manager  
Regulatory Compliance

Attachment

cc: Director, Division of Low-Level Waste  
Management and Decommissioning  
Office of Nuclear Material Safety and Safeguards  
Washington, D.C. 20555

MATERIALS LICENSE  
SUPPLEMENTARY SHEET

License number

24-04206-01

Docket or Reference number

030-00001

Amendment No. 48

CORRECTED COPY

Mallinckrodt, Inc.  
2705 Wagner Place  
Maryland Heights, MO 63043

In accordance with application dated July 26, 1990, License Number 24-04206-01 is amended as follows:

Items 6., 7. and 8. are amended to read:

6. Byproduct, source, and/or special nuclear material	7. Chemical and/or physical form	8. Maximum amount that licensee may possess at any one time under this license
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A. Any byproduct material with Atomic Nos. 1 through 83	A. Any	A. Not to exceed 100 curies of each radionuclide except as listed below:
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- Molybdenum-99 10,000 curies
- Technetium-99m 10,000 curies
- Iodine-131 500 curies
- Selenium-75 200 curies
- Xenon-133 200 curies

B. Cesium-137	B. Sealed Sources	B. Not to exceed 100 curies total
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Conditions 21. and 22. are added:

21. In addition to the possession limits in item 8, the licensee shall further restrict the possession of licensed material to quantities below the minimum limit specified in 10 CFR 30.35(d) for establishing decommissioning financial assurance.
22. The licensee shall maintain records of information important to safe and effective decommissioning at 2703 Wagner Heights, Missouri, per the provisions of 10 CFR 30.35(g) until this license is terminated by the Commission.

For the U.S. Nuclear Regulatory Commission

Date: October 29, 1990

By [Signature]  
Materials Licensing Section, Region III

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