



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

September 20, 1995

95-29

MEMORANDUM TO: John R. Madera, Chief
Materials Licensing Section
Division of Radiation Safety
and Safeguards, Region III

FROM: Louis M. Bykoski *Louis Bykoski*
Materials Decommissioning Section
Low-Level Waste and Decommissioning
Projects Branch
Division of Waste Management, NMSS

SUBJECT: THE OFFICE OF GENERAL COUNSEL AND CONTRACTOR COMMENTS ON
STANDARD FINANCIAL ASSURANCE SUBMITTALS

Our contractor, ICF Incorporated, and the Office of General Counsel (OGC) have reviewed and provided comments on two nonstandard financial assurance submittals sent to us for review. These are Merrell Dow Pharmaceuticals Inc. and Quanterra Incorporated.

The ICF comments are presented in two parts. The first part deals with specific recommendations to current deficiencies. The second part (Other Issues) provides a discussion of changes to the standard wording that are acceptable and are not considered to be deficiencies. The OGC comments may include additional deficiencies that need to be corrected by the licensee and comments for our internal use.

You should carefully review all the comments before preparing the deficiency letter. We have enclosed both the ICF and OGC comments to assist you in your review.

Attachments: As stated

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LIST OF INSTRUCTIONS

Merrell Dow Pharmaceuticals Inc.

In reviewing the comments the reviewer will note that there will be some overlap between ICF and OGC comments. The following comments should be included in the basis for the deficiency letter:

1. ICF comments 1 through 7 plus last paragraph.
2. All OGC comments.

All other comments and discussions are for reviewer information.