



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
2100 RENAISSANCE BLVD.
KING OF PRUSSIA, PA 19406-2713

April 8, 2021

Barry Crawford, Vice-President of Operations
FMC Corporation
2929 Walnut Street
Philadelphia, Pennsylvania 19104

**SUBJECT: FMC CORPORATION, ACCEPTANCE OF FINANCIAL ASSURANCE
SUBMITTAL, MAIL CONTROL NO. 622983**

Dear Mr., Crawford:

We have reviewed the Decommissioning Funding Plan (DFP) - Updated Cost Estimate application dated August 20, 2020, the Certification of Financial Assurance dated September 4, 2020, the amendment of the Irrevocable Standby Letter of Credit dated September 2, 2020, the amendment of the Irrevocable Standby Letter of Credit dated February 9, 2021, the Standby Trust Agreement with completed Schedules A, B, and C dated August 20, 2020, and the amended Schedules A, B, and C received February 9, 2021, to meet the financial assurance requirements for your license. We have no further questions at this time.

The following documents currently provide your financial assurance:

Certification of Financial Assurance dated September 4, 2020 [ML20260H222],

Irrevocable Standby Letter of Credit dated October 16, 2017 [ML17300A579], as amended September 2, 2020 [ML20260H213], and as amended February 9, 2021 [ML21956A137],

Standby Trust Agreement dated October 17, 2017 [ML17300A579], and Schedules A, B and C, as amended February 9, 2021 [ML21096A168], and

Decommissioning Funding Plan and Updated Cost Estimate dated August 20, 2020 [ML20252A179].

We will return the original copies of superseded documents under separate cover.

Your organization uses a Decommissioning Funding Plan (DFP) to determine the amount of financial assurance necessary to fund all decommissioning activities. 10 CFR 30.35(e)(2) requires that, at the time of license renewal and at intervals not to exceed three years, the DFP must be resubmitted with adjustments as necessary to account for changes in costs and the extent of contamination. Your currently approved DFP was submitted on August 20, 2020; therefore, your DFP must be re-submitted on or before August 20, 2023. The DFP must update the information submitted with the original or prior approved DFP, and must specifically consider the effect of the following events on decommissioning costs: (1) spills of radioactive material producing additional residual radioactivity in onsite subsurface material; (2) waste inventory

increasing above the amount previously estimated; (3) waste disposal costs increasing above the amount previously estimated; (4) facility modifications; (5) changes in authorized possession limits; (6) actual remediation costs that exceed the previous cost estimate; (7) onsite disposal; and (8) use of a settling pond. If the amount of the financial assurance instrument will be adjusted to match the DFP, this cannot be done until the updated DFP is approved by the NRC. If the financial assurance instrument is revised (amended) to change the amount of financial assurance obligated, then you will need to also submit a revised Certificate of Financial Assurance (CFA) with the new amount

Your cooperation is appreciated.

Sincerely,

Steven Courtemanche, Health Physicist
Commercial, Industrial, R&D
and Academic Branch
Division of Nuclear Materials Safety
Region I

License No. 37-35439-01
Docket No. 030-39063
Mail Control No. 622983

cc: K. Petrillo, Radiation Safety Officer
D. Groux, Director, EHS Remediation and Governance

FMC CORPORATION, ACCEPTANCE OF FINANCIAL ASSURANCE SUBMITTAL, MAIL CONTROL NO. 622983 DATED APRIL 8, 2021

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SUNSI Review Complete: LKauffman

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