

**From:** [Ullrich, Betsy](#)  
**To:** [Gerard Strugala](#)  
**Subject:** current status of financial assurance for PharamLogic Puerto Rico  
**Date:** Tuesday, June 29, 2021 2:21:00 PM

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Gerard,

The current approved financial assurance for the cyclotron license is based on the following:

- Certification of Financial Assurance dated September 22, 2020 [ML20294A229]
- Surety Bond dated March 2, 2017 [ML17080A340], Surety Bond Rider dated April 3, 2020 [ML20135H156]
- Standby Trust Agreement dated August 24, 2012 [ML12265A067],
- Standby Trust Agreement Amendment dated October 16, 2020 [ML20337A068]
- Decommissioning Cost Estimate dated April 29, 2019, but revised and re-submitted with email dated April 28, 2020 [ML20119B001]

We received a new Letter of Credit dated January 29, 2021 and its supporting Standby Trust Agreement also dated January 29, 2021. A financial assurance licensing action was opened with Mail Control No. 624610. To date, I have been in correspondence with Jonathan Lucas (you told me he is no longer involved), Laura Plourde and Charlie Flores.

The new instrument (Letter of Credit and STA) is in the name of Lantheus MI Radiopharmaceuticals, and I believe were intended to replace the Surety Bond and its STA. There was no letter of explanation and the new instruments did not include the new name of the company to Lantheus Medical imaging. We have not accepted the new instruments yet, and now that the name has changed again, either these will need to be amended; or the Surety and its STA will need to be amended, or another new instrument will be needed in the name of PharmaLogic Puerto Rico.

One of the reasons that I had not yet accepted the instruments (after received additional supporting documents) was the difficulty I was having finding US Bank National Association on a list of valid trust entities. About the time I thought I had that settled, the name changed again, so I need to know how you wish to proceed next.

I know that you also need to provide financial assurance for the Ga/Ge generators under the radiopharmacy -01MD license. That can be provided under a separate instrument. Alternately, a single instrument could be used for both licenses, but the instrument then has to reference both licenses and be in the amount of the total required for both licenses. It is up to you, separate or combined have difference advantages and disadvantages.

Please let me know if you want to discuss any of this, and how you wish to proceed with providing financial assurance for the -02 cyclotron license.

Betsy

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