

From: [Ullrich, Betsy](#)
To: philip.o.brown@nasa.gov
Subject: additional information needed for the NRC license amendment request.
Date: Tuesday, July 20, 2021 12:57:00 PM

Mr. Brown,

Combining the line items 6/7/8.P for U/DU in dispersible forms, and 6/7/8.Q for DU in non-dispersible form, into a single line item in “any” form results in that sum total amount now being considered “non-dispersible” form. Quantities of source material greater than 10 millicuries in a readily dispersible form require financial assurance. If I did my calculations correctly, Line Item P at 14.6 kg did not require financial assurance, but the amount in line item Q definitely does.

You would have financial assurance requirements from 3 of 4 types of materials that require financial assurance if you combine P and Q:

- Part 30 for line items A and B, in any form, under 30.35. [The amounts of Part 30 sealed sources do not meet the separate requirement for financial assurance for sealed sources, also under 30.35]
- If you combine P and Q [or simply change Q to “any” or “dispersible” forms], then you require financial assurance under 40.36
- Part 70 for line item O under 70.25

You should review your decommissioning funding plan and cost estimate, to see if combining line items P and Q and having the total in “any” form requires revision of your cost estimate. The use of the additional rooms for use of this material also should be considered. If you determine that additional financial assurance will be required and a new Statement of Intent will need to be submitted, please either

1. Retract the request for this change until the financial assurance is revised and submitted for approval, or
2. Request that we do NOT combine P and Q at this time, but amend the license to authorize the additional rooms.

If you do not believe that any change in the decommissioning funding plan and cost estimate are necessary, please provide the bases for that conclusion.

Please let me know how you wish to proceed. Email is fine for this at this time. If you have any additional questions, feel free to contact me.

Betsy

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