

# Memorandum

## U.S. Nuclear Regulatory Commission

To: File  
From: Panter, Andrew  
Date: 7/26/2022  
Re: PharmaLogic Michigan, L.L.C. Decommissioning Cost Estimate Review and Hold

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Comments: Describes the status of the financial assurance review for PharmaLogic Michigan.

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On September 29, 2020, PharmaLogic Michigan submitted a decommissioning funding plan alongside an amendment request to add two germanium/gallium generators (CN 264233). Subsequently, the NRC communicated approval of the request to the licensee, noting that the financial assurance review would take place separately.

During the financial assurance (FA) review conducted in July 2022, the office found the cost estimate quoted to be acceptable. This decision was based on other similar cost estimates submitted by other radiopharmacies. The FA reviewer left a voicemail to the licensee's office phone number on July 25, 2022, communicating that the cost estimate was approved, and that the licensee is now required to submit FA instrument(s) in the amount of the cost estimate to the NRC.

After the message was passed along, the corporate RSO emailed the FA reviewer on July 26, 2022, communicating confusion on the licensee's end and requesting a phone call to clarify the course of action. The reviewer called back the same day.

During the phone call, the licensee's RSO expressed a desire to have the cost estimate redone in preparation for the addition of additional generators, and therefore a greater quantity of licensed material requiring financial assurance. The RSO communicated that this would be submitted to the NRC within 30 days, alongside the appropriate license amendment request, FA instruments in the amount of the revised estimate, and generator return agreements.

Based on the quick turnaround, the FA reviewer expressed that this sequence of events would likely be acceptable in lieu of issuing the FA instruments in the amount of the original estimate. After the phone call ended, the reviewer confirmed that this process would be acceptable and emailed confirmation to the licensee.

The FA action in question is currently on hold as the licensee acquires the updated documents. The action will be resumed upon NRC's receipt of the documents listed above.

*Andrew Panter*