

Forster, Sara

From: Forster, Sara
Sent: Thursday, February 20, 2020 9:23 AM
To: Reid Gadziala
Subject: Re: Additional Information for Mid-America Isotopes and Radiopharmacy Incorporated, CNs 617160 and 617161
Attachments: NUREG1757Vol3r1sectionA2.4 Sample Cert of FA.docx

Dear Mr. Gadziala:

We will watch for that amendment. However, until those amendments including decommissioning cost estimates and associated financial assurance instruments are accepted, the \$225,000 certification with the existing financial assurance will continue to be required.

For acceptance of those previously submitted instruments, a certification of financial assurance statement for each of the licenses is required. Refer to NUREG 1757, Volume 3, revision 1; "Consolidated Decommissioning Guidance: Financial Assurance, Recordkeeping, and Timeliness," Section 2.4, for a model Certification statement. For your convenience, a template for such a statement is attached to this message.

For each of the referenced licensees, please submit a Certification of Financial Assurance under a signed and dated cover letter. Please submit the signed originals via regular or express mail, to my attention. We will let you know if any revisions are needed for the submitted Letter of Credit or Standby Trust Agreement, for each licensee.

Thank you in advance,

Sara Forster
U.S. NRC

From: Reid Gadziala <rgadziala@radiopharmacy.com>
Sent: Thursday, February 20, 2020 7:47 AM
To: Forster, Sara <Sara.Forster@nrc.gov>
Subject: [External_Sender] Re: Contact Person for Mid-America Isotopes and Radiopharmacy Incorporated, CNs 617160 and 617161

Good morning Sara,

Very timely email on this- as I just sent out an amendment request yesterday morning for these two licenses regarding their financial assurance. If additional information is needed, you can feel free to reach out to me.

The amendment requests include a full DFP, so if the office wants to wait to receive those requests, I believe they arrive sometime tomorrow.

Don't hesitate to reach out with any additional questions,

Reid Gadziala, PharmD., BCNP
Director of Pharmacy Operations
Pharmalogic Holdings Corp.
703.851.3025

From: Sara Forster <Sara.Forster@nrc.gov>

Date: Wednesday, February 19, 2020 at 12:22 PM

To: Reid Gadziala <rgadziala@pharmalogic.info>

Subject: Contact Person for Mid-America Isotopes and Radiopharmacy Incorporated, CNs 617160 and 617161

Dear Mr. Gadziala:

Our office is reviewing financial assurance submitted for the above referenced licensees, NRC License Nos. 13-26246-01MD and 24-26241-01MD. If additional information is needed to complete these reviews, are you the appropriate contact person? If not, could you please provide the contact information for individuals who would be able to respond to a request for information?

In addition, once the financial assurance is accepted, should we send confirmation of that directly to the license Radiation Safety Officers (RSOs), or should we send a letter including our confirmation to your attention?

Thank you very much for your assistance.

Sincerely,

Sara A. Forster, Health Physicist Licensing Reviewer

U.S. Nuclear Regulatory Commission - Region III

Division of Nuclear Materials Safety

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A.2.4 Model Certification of Financial Assurance

CERTIFICATION OF FINANCIAL ASSURANCE

Principal: *[Legal names and business address of licensee]*
NRC license number, name, and address of the facility

Issued to: U.S. Nuclear Regulatory Commission

I certify that *[insert name of licensee]* is licensed to possess the following types of *[insert all that apply: "sealed sources or plated foils with a half-life greater than 120 days licensed under 10 CFR Part 30," "unsealed byproduct material with a half-life greater than 120 days licensed under 10 CFR Part 30," "source material in a readily dispersible form licensed under 10 CFR Part 40," "unsealed special nuclear material licensed under 10 CFR Part 70" and "spent nuclear fuel, high-level radioactive waste, and reactor-related greater than Class C waste licensed under 10 CFR Part 72"]* in the following amounts:

<u>Type of Material</u>	<u>Amount of Material</u>
<i>[List materials and quantities of materials noted above. For byproduct materials and special nuclear materials, list separately the type and amount of each isotope authorized by the license.]</i>	

I also certify that financial assurance in the amount of *[insert the total of all prescribed amounts calculated from Checklist 2 or the amount of the site-specific cost estimate, in U.S. dollars]* has been obtained for the purpose of decommissioning as prescribed by 10 CFR Part *[insert 30, 40, 70, or 72]*.

[This paragraph is needed for a 10 CFR Part 72 licensee (10 CFR 72.30(e)(5)) only that qualifies to use an external sinking fund that is not coupled with another form of financial assurance.] I also certify that *[insert name of licensee]* is qualified to use the assurance method of 10 CFR 72.30(e)(5) or 10 CFR 50.75(e)(1)(ii), and *[insert name of licensee]* either (1) recovers the total cost of decommissioning through rates established by "cost of service" or similar ratemaking regulation or (2) has a source of revenues for its external sinking fund that is a "non-bypassable charge," the total amount of which will provide funds needed for decommissioning. As of *[insert date]*, *[\$[insert dollar amount]* has been collected for decommissioning. Therefore, *[\$[insert dollar amount]* remains to be collected for decommissioning. The remaining funds needed for decommissioning will be collected *[insert frequency (i.e., monthly, semi-annually, annually)]* over the next *[insert time period]* in the amount of *[\$[insert dollar amount]*.

[This paragraph is needed for 10 CFR Part 72 licensees (10 CFR 72.30(e)) only.] Contact information for this certification of financial assurance by *[insert name of licensee]* is the following: *[insert the licensee's name, license number, and docket number and the name, address, contact person, and phone number of the issuer or guarantor and of the trustee]*.

[Signatures and titles of officials of institution]

[Corporate seal]

[Date]