



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2056 WESTINGS AVENUE, SUITE 400
NAPERVILLE, IL 60563-2657

December 17, 2025

EAF-RIII-2025-0146
EN 57657
NMED No. 250143 (closed)

Jason Tilly
Vice President and General Counsel
Curium US, LLC
111 Westport Plaza Drive, Suite 800
St. Louis, MO 63146

SUBJECT: NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTY -
\$72,000, NRC SPECIAL INSPECTION REPORT NO.
03038841/2025002(DRSS) – CURIUM US, LLC

Dear Mr. Tilly:

This letter refers to the reactive inspection activities conducted on April 11 and 17, 2025, at your Noblesville, Indiana, facility and a Special Inspection conducted at the facility the week of May 19, 2025, with continued in-office review through July 17, 2025. The purpose of the reactive inspection was to assess the immediate impact of an incident involving a loss of control over licensed activities on April 8, 2025, that had a potential to result in occupational exposures to radiation above regulatory limits and to observe and evaluate your efforts to restore full control over licensed activities. The purpose of the Special Inspection was to conduct a thorough and systematic evaluation of this incident and to collect, analyze, and document information and evidence sufficient to determine its causes, conditions, and circumstances. The in-office review included an independent assessment of occupational exposures from the incident, an independent root cause analysis, and an evaluation of the significance of inspection findings.

During the inspection, six apparent violations of NRC requirements were identified. The circumstances surrounding the apparent violations, the significance of the issues, and the need for lasting and effective corrective actions were discussed with your staff during an exit meeting on August 20, 2025. Inspection Report No. 03038841/2025002(DRSS) was issued on September 25, 2025, and can be found in the NRC's Agencywide Documents Access and Management System (ADAMS) at accession number ML25248A019. ADAMS is accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html>.

In the letter transmitting the inspection report, we informed you that these six apparent violations were being considered for escalated enforcement action, including a civil penalty. In the letter, we provided you with the opportunity to address the apparent violations identified in the report by either attending a predecisional enforcement conference (PEC) or engaging the NRC in Alternative Dispute Resolution (ADR) mediation. In an email dated October 1, 2025, (ML25321A410) you informed us that you were not requesting attending a PEC or engaging in ADR mediation.

Based on the information developed during the inspection, the NRC has determined that violations of NRC requirements occurred and is proceeding with enforcement action. These violations are cited in the enclosed Notice of Violation and Proposed Imposition of Civil Penalty (Notice), and the circumstances surrounding them are described in detail in the subject inspection report. The violations identified include the failure to: (1) control the occupational dose to the annual limits as required by Title 10 of the Code of Federal Regulations (10 CFR) 20.1201(a)(1)(i) and 10 CFR 20.1201(a)(2)(ii); (2) use procedures and engineering controls to achieve occupational doses that were as low as reasonably achievable (ALARA) as required by 10 CFR 20.1101(b); (3) conduct your program in accordance with your radioactive waste management procedures as required by License Condition 23.O; (4) make surveys that were reasonable under the circumstances to evaluate the magnitude and extent of radiation levels and potential radiological hazards as required by 10 CFR 20.1501(a)(2); (5) properly label containers of licensed material as required by 10 CFR 20.1904(a); and (6) perform audits as required by License Condition 23.P.

Your failure to control licensed activities, to achieve occupational doses that are ALARA and within occupational limits, including the failure to make appropriate surveys and follow waste management procedures, is a significant safety concern as it resulted in actual exposures to workers that significantly exceeded regulatory limits, though no immediate effects from these exposures were reported by either individual. Therefore, these violations are being categorized collectively in accordance with the NRC Enforcement Policy as a Severity Level (SL) II problem. The current Enforcement Policy is included on the NRC's website at <http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>.

In accordance with the Enforcement Policy, a base civil penalty in the amount of \$72,000 is considered for a single SL II violation or problem. The NRC considered whether credit was warranted for *Identification* and *Corrective Action* in accordance with the civil penalty assessment process in Section 2.3.4 of the Enforcement Policy.

As a result of the inspection activities, the NRC determined that all the violations requiring corrective action were either revealed as a result of the event or identified by the NRC through the reactive inspection. More specifically, although some of the violations were identified through your investigation, that investigation occurred as a result of the event. Because the problems were identified as a result of an event, credit was not given for *Identification*.

Following the event, you established a team to perform an investigation of the incident as well as identify and correct potential root causes. This team completed a draft investigation report on May 9, 2025, which acknowledged many of the above violations and recommended several corrective actions to address the violations. In your letter dated May 20, 2025 (ML25324A313), you committed to implementing the corrective actions proposed in the draft investigation report as well as any additional corrective actions requested by your Radiation Safety Committee during its review and approval of the draft investigation report. Some of the actions you have completed or were in progress include: Updating the workers' doses of record to consider the independent consultant's dose reconstruction results; Prohibiting the workers who received doses that exceeded regulatory limits from working in restricted areas for the remainder of the calendar year; Scheduling radioactive waste changeouts based on when containers are expected to be 80% full, rather than performing changeouts when containers reach capacity; Evaluating potential adjustments to decay-in-storage time in barrels, exposure limits on outgoing waste, and number of barrels; Assessing waste area piping and connections to reduce the potential for maintenance due to blockages or failures; Revising and consolidating waste management procedures; Establishing a new training and qualification system for on-the-job

training at the Noblesville, Indiana, facility; Creating and implementing a new procedure for Radiation Work Permits (RWP); Drafting and implementing task-specific dose and dose rate alarm setpoints for RWPs; Labeling all containers of radioactive waste and establishing a waste inventory to track labeled containers; Formalizing a Safety Commitment Policy and requiring annual training on its contents; Establishing and implementing a continuous audit plan for oversight of waste management activities, and Developing a case study on the event for training at the site and the broader manufacturing network.

In your letter dated December 5, 2025, you also provided the status of your implementation of corrective actions to date. Based on these actions that you have completed or have planned, credit was given for *Corrective Action*.

Therefore, to emphasize the importance of compliance with dose limits, procedural compliance, strong radiological controls, and prompt resolution of the acknowledged violations, I have been authorized, after consultation with the Acting Director, Office of Enforcement, to issue the enclosed Notice of Violation and Proposed Imposition of Civil Penalty (Notice) in the base amount of \$72,000 for an SL II problem. In addition, issuance of this Notice constitutes escalated enforcement action that may subject you to increased inspection effort.

You may choose to pay the proposed civil penalty in accordance with NUREG/BR-0254 (<https://www.nrc.gov/reading-rm/doc-collections/nuregs/brochures/br0254/index.html>). When using NUREG/BR-0254 to pay the civil penalty, the invoice number should be used as the "enforcement action identifier" when submitting your payment through one of the approved methods listed in the brochure. The NRC may consider a request for additional time to pay the proposed civil penalty, including the option to enter into an installment agreement, if payment of the civil penalty as a lump sum in the required timeframe would pose a financial hardship. To request additional time to pay, you must submit a written request, with appropriate justification explaining your financial hardship, to NRCCollections.Resource@nrc.gov. All requests should be submitted in sufficient time to allow the NRC the ability to review your request for additional time to pay before the 30-day payment period expires.

If you disagree with this enforcement sanction, you may deny the violation, as described in the Notice, or you may request ADR with the NRC in an attempt to resolve this issue. ADR is a general term encompassing various techniques for resolving conflicts using a neutral third party. The technique that the NRC has decided to employ is mediation. Mediation is a voluntary, informal process in which a trained neutral (the "mediator") works with parties to help them reach resolution. If the parties agree to use ADR, they select a mutually agreeable neutral mediator who has no stake in the outcome and no power to make decisions. Mediation gives parties an opportunity to discuss issues, clear up misunderstandings, be creative, find areas of agreement, and reach a final resolution of the issues. Additional information concerning the NRC's ADR program can be found at <http://www.nrc.gov/about-nrc/regulatory/enforcement/adr.html>.

The Institute on Conflict Resolution (ICR) at Cornell University has agreed to facilitate the NRC's program as a neutral third party. If you are interested in pursuing this issue through the ADR program, please contact: (1) the ICR at (877) 733-9415 and (2) Diana Betancourt-Roldan at (630) 810-4373 within 10 days of the date of this letter. You may also contact both ICR and Diana Betancourt-Roldan for additional information. Your submitted signed agreement to mediate using the NRC ADR program will stay the 30-day time period for payment of the civil penalties and the required written response, as identified in the enclosed Notice, until the ADR process is completed.

The NRC has concluded that information regarding: (1) the reason for the violations, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken, and (4) the date when full compliance was or will be achieved is already adequately addressed on the docket in Inspection Report No. 03038841/2025002(DRSS), and your letters dated May 9, 2025, May 20, 2025, and December 5, 2025. Therefore, you are not required to respond to this letter unless the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter, its enclosures, and your response, if you choose or are required to provide one, will be made available electronically for public inspection in the NRC Public Document Room and from the NRC's ADAMS, accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, any response you choose to provide should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction. The NRC also includes significant enforcement actions on its website at <https://www.nrc.gov/about-nrc/regulatory/enforcement/current>.

If you have any questions concerning this matter, please contact Diana Betancourt-Roldan of my staff at 630-810-4373.

Sincerely,



Signed by Giessner, Jack
on 12/17/25

John B. Giessner
Regional Administrator

Docket No. 030-38841
License No. 13-35179-02

Enclosure: Notice of Violation and Proposed
Imposition of Civil Penalty
Civil Penalty Invoice No. EAF-RIII-2025-0146
NUREG/BR-0254 Payment Methods (Licensee only)

Letter to J. Tilly from J. Giessner dated December 17, 2025.

SUBJECT: NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL PENALTY -
\$72,000, NRC SPECIAL INSPECTION REPORT NO.
03038841/2025002(DRSS) – CURIUM US, LLC

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OFFICE	RIII-EICS		RIII-DRSS		RIII-DRSS		OE	
NAME	JDraper:ve		REdwards		JHeck		JPeralta	
DATE	12/8/25		12/9/25		12/9/25		12/12/25	

OFFICE	OGC (NLO)		RIII-EICS		RIII-ORA		RIII	
NAME	MSimon		DBetancourt-Roldan		JGiessner			
DATE	12/16/25		12/17/25		12/17/25			

OFFICIAL RECORD COPY

NOTICE OF VIOLATION
AND
PROPOSED IMPOSITION OF CIVIL PENALTY

Curium US, LLC
Noblesville, Indiana

Docket No. 030-38841
License No. 13-35179-02
EAF-RIII-2025-0146

During an NRC reactive inspection conducted on April 11 and 17, 2025, and a Special Inspection conducted the week of May 19, 2025, with continued in-office review through July 17, 2025, violations of NRC requirements were identified. In accordance with the NRC Enforcement Policy, the NRC proposes to impose a civil penalty pursuant to Section 234 of the Atomic Energy Act of 1954, as amended (Act), 42 U.S.C. 2282, and 10 CFR 2.205. The violations and associated civil penalty are set forth below:

- A. Title 10 CFR 20.1201(a)(1)(i) states, in part, that the licensee shall control the occupational dose to individual adults to an annual total effective dose equivalent (TEDE) limit of 5 rems.

Title 10 CFR 20.1201(a)(2)(ii) states, in part, that the licensee shall control the occupational dose to individual adults to an annual shallow-dose equivalent (SDE) limit of 50 rem to the skin of the whole body or to the skin of any extremity.

Contrary to the above, during calendar year 2025, the Licensee did not control the occupational dose to two individual adults to an annual TEDE limit of 5 rem and did not control the occupational dose to one individual adult to the annual SDE limit of 50 rem to the skin of the lower extremities. Specifically, the Licensee determined that one individual received occupational doses of 13.8 rem TEDE and 240 rem SDE to the skin of the lower extremities between January 1, 2025, and April 8, 2025, and another individual received 9.9 rem TEDE between January 1, 2025, and April 8, 2025, while engaged in licensed activities at the Licensee's facility in Noblesville, Indiana.

- B. Title 10 CFR 20.1101(b) states that the licensee shall use, to the extent practical, procedures and engineering controls based upon sound radiation protection principles to achieve occupational doses and doses to members of the public that are as low as is reasonably achievable (ALARA).

Contrary to the above, between at least May 14, 2024, and April 8, 2025, the Licensee did not use, to the extent practicable, procedures and engineering controls based upon sound radiation protection principles to achieve occupational doses that were ALARA. Specifically, on several occasions the Licensee removed radioactive waste containers from shielded barrels and left them in the east basement, where employees subsequently handled and worked in the vicinity of the containers without using shielding, resulting in occupational doses that were not ALARA.

- C. Condition 23.O of NRC License No. 13-35179-02, Amendment No. 11, dated August 14, 2023, states in part that, except as specifically provided otherwise in this license, the Licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the letter dated June 29, 2022.

Enclosure

In Attachment C to the letter dated June 29, 2022, the Licensee stated that it developed and implements written waste disposal procedures for radioactive material that meet the requirements of the applicable sections of 10 CFR Part 20, Subpart K.

Section 2 of revision A.02 to EHS.0028, *Radioactive Waste Management*, effective November 1, 2023, provides, in part, the following instructions for liquid production waste:

- 2.3 Once low/high level liquid waste has reached capacity, trained employees must go into the East/West basement and disconnect low/high-level liquid waste barrels from hot cell liquid waste tubes.
- 2.4 Employees will move the disconnected waste barrel into either the east or west basement to remain there for a minimum of 6 months.
- 2.5 Liquid waste barrels are to be moved to the north pit after a minimum of 6 months has elapsed, or if deemed necessary by the radiation safety officer or designee.

Contrary to the above, since at least May 14, 2024, through April 8, 2025, the Licensee did not conduct its program in accordance with its radioactive waste management procedures described in the letter dated June 29, 2022. Specifically:

- (1) On at least two occasions, employees removed containers of high-level liquid waste from shielded waste barrels and left the unshielded containers in the east basement to decay.
- (2) On at least two other occasions, employees removed containers of low-level liquid waste and solid waste from waste barrels and transferred the unshielded containers to the iodine room to decay.

D. Title 10 CFR 20.1501(a)(2) states that each licensee shall make or cause to be made, surveys of areas, including the subsurface, that are reasonable under the circumstances to evaluate:

- (i) The magnitude and extent of radiation levels; and
- (ii) Concentrations or quantities of residual radioactivity; and
- (iii) The potential radiological hazards of the radiation levels and residual radioactivity detected.

Contrary to the above, on April 8, 2025, the Licensee made surveys of areas of its facility in Noblesville, Indiana, that were not reasonable under the circumstances to evaluate the magnitude and extent of radiation levels, and the potential radiological hazards of the radiation levels. Specifically:

- (1) The Licensee did not perform surveys to evaluate the change in radiation levels in an area occupied by two workers for 20 minutes after they removed a container of radioactive waste from shielding.

- (2) The Licensee provided an instrument to workers for monitoring radiation levels that was only capable of reliably reading up to 10 roentgen/hour (R/hr) when radiation levels above 1,000 R/hr were present after they removed a container of radioactive waste from shielding.
 - (3) The Licensee provided electronic dosimeters to workers for monitoring radiation levels but set the dose rate alarm at 100 mR/hr. This alarm did not provide the workers with a meaningful evaluation of the magnitude of radiation levels and potential hazards of these levels, as throughout the entire work area levels were above 100 mR/hr, even before they removed a container of radioactive waste from shielding.
- E. Title 10 CFR 20.1904(a) states that the licensee shall ensure that each container of licensed material bears a durable, clearly visible label bearing the radiation symbol and the words "CAUTION, RADIOACTIVE MATERIAL" or "DANGER, RADIOACTIVE MATERIAL." The label must also provide sufficient information (such as the radionuclide(s) present, an estimate of the quantity of radioactivity, the date for which the activity is estimated, radiation levels, kinds of materials, and mass enrichment) to permit individuals handling or using the containers, or working in the vicinity of the containers, to take precautions to avoid or minimize exposures.

Contrary to the above, between at least May 14, 2024, and April 8, 2025, the Licensee did not ensure that each container of licensed material bears a durable, clearly visible label providing sufficient information to permit individuals handling or using the containers, or working in the vicinity of the containers, to take precautions to avoid or minimize exposures. Specifically, the Licensee did not routinely label containers of liquid radioactive waste, including the container removed from a shielded barrel on April 8, 2025, with sufficient information on their contents and hazards to permit workers handling and working in the vicinity of these containers to take precautions commensurate with the quantities of radioactivity and radiation levels present.

- F. Condition 23.P of NRC License No. 13-35179-02, Amendment no. 11, dated August 14, 2023, states in part that, except as specifically provided otherwise in this license, the Licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the letter dated June 7, 2023.

In the letter dated June 7, 2023, the Licensee stated, in part, that it "follows the audit model provided in Appendix F of NUREG-1556, Volume 11, Revision 1. Curium performs in-depth audits of the program elements included in the audit model. The audits include reviews of the day-to-day operations to determine compliance risks and gaps with NRC regulations, the terms and conditions of the NRC license, the requirements of the RSC- or RSO-approved permits (as appropriate) as well as application of good health physics practices and ALARA principles."

Appendix F of NUREG-1556, Volume 11, Revision 1 includes Radioactive Waste Management and Independent and Confirmatory Measurements as program elements in the audit model.

Contrary to the above, between December 28, 2023, and November 25, 2024, the Licensee did not conduct its program in accordance with the statements, representations, and procedures contained in the letter dated June 7, 2023. Specifically:

- (1) The Licensee did not perform in-depth audits of the program elements Radioactive Waste Management and Independent and Confirmatory Measurements in its 2023 and 2024 audits.
- (2) The 2023 and 2024 audits did not include any evaluation of the Licensee's application of ALARA principles.

This is a Severity Level II problem (Sections 6.3 and 6.7).
Civil Penalty - \$72,000. EAF-RIII-2025-0146

The NRC has concluded that information regarding the reason for the violations, the corrective actions taken and planned to correct the violations and prevent recurrence, and the date when full compliance was or will be achieved is already adequately addressed on the docket in Inspection Report No. (03038841/2025002(DRSS)) and letters from the Licensee, dated May 9, 2025, May 20, 2025, and December 5, 2025. However, if the description therein does not accurately reflect the Licensee's position or corrective actions, the Licensee is required to submit a written statement or explanation pursuant to 10 CFR 2.201 within 30 days of the date of the letter transmitting this Notice of Violation. In that case, or if the Licensee chooses to respond, the Licensee should clearly mark its response as a Reply to a Notice of Violation, and send it to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, One White Flint North, 11555 Rockville Pike, Rockville, MD 20852-2738, with a copy to the Regional Administrator, U.S., Nuclear Regulatory Commission, Region III, and the Document Control Desk, Washington, DC 20555-0001.

The Licensee may pay the civil penalty proposed above by submitting the payment in accordance with NUREG/BR-0254.

The Licensee may protest the imposition of the civil penalty in whole or in part, by a written answer addressed to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, within 30 days of the date of this Notice. Should the Licensee fail to answer within 30 days of the date of this Notice, the NRC will issue an order imposing the civil penalty. Should the Licensee elect to file an answer in accordance with 10 CFR 2.205 protesting the civil penalty, in whole or in part, such answer should be clearly marked as an "Answer to a Notice of Violation" and may: (1) deny the violation(s) listed in this Notice, in whole or in part; (2) demonstrate extenuating circumstances; (3) show error in this Notice; or (4) show other reasons why the penalty should not be imposed. In addition to protesting the civil penalty in whole or in part, such answer may request remission or mitigation of the penalty.

In requesting mitigation of the proposed penalty, the response should address the factors addressed in Section 2.3.4 of the Enforcement Policy. Any written answer addressing these factors pursuant to 10 CFR 2.205 should be set forth separately from the statement or explanation provided pursuant to 10 CFR 2.201 but may incorporate parts of the 10 CFR 2.201 reply by specific reference (e.g., citing page and paragraph numbers) to avoid repetition. The attention of the Licensee is directed to the other provisions of 10 CFR 2.205 regarding the procedure for imposing civil penalties.

Upon failure to pay any civil penalty which subsequently has been determined in accordance with the applicable provisions of 10 CFR 2.205 to be due, this matter may be referred to the Attorney General, and the penalty, unless compromised, remitted, or mitigated, may be collected by civil action pursuant to Section 234c of the Act, 42 U.S.C. 2282c.

The responses noted above, i.e., Reply to Notice of Violation, Statement as to payment of civil penalty, and Answer to a Notice of Violation, should be addressed to: Bo Pham, Acting Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, One White Flint North, 11555 Rockville Pike, Rockville, MD 20852-2738, with a copy to the Regional Administrator, U.S. Nuclear Regulatory Commission, Region III, and the Document Control Center, Washington, DC 20555-0001.

If you choose to respond, your response will be made available electronically for public inspection in the NRC Public Document Room or in the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, classified or safeguards information so that it can be made available to the public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request that such material is withheld from public disclosure, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information).

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days of receipt.

Dated this 17 day of December 2025.



Curium US LLC
2703 Wagner Place
Maryland Heights, MO 63043



12/18/2025

Address/Customer Information

Curium US LLC
2703 Wagner Place
Maryland Heights, MO 63043

Customer Codes

Account Code: L000001362/1

Bill Information

Bill Number: EAF-RIII-2025-0146
Amount Due: \$72,000.00
Due Date: 01/17/2026

Contact Us

Phone Number: 301-415-7554
Fax Number: 301-415-4135
Email Address: Fees.Resource@nrc.gov

Remit Payment Online at:

www.pay.gov
(see NUREG/BR-0254,
Payment Methods brochure for
other electronic payment options)

Bill Summary

Initial Charges	\$72,000.00
Discount	0.00
Surcharge	0.00
Interest Charges	0.00
Penalty Charges	0.00
Admin Charges	0.00
Bill Amount	\$72,000.00
Collected	0.00
Applied Credit	0.00
Adjustments	0.00
Amount Due	\$72,000.00

Credit Summary

Applied Credit	\$0.00
Unapplied Credit	0.00
Credit Total	\$0.00

Comments:

For questions, contact (301) 415-7554 or by email at Fees.Resource@nrc.gov. For NRC debt collection procedures, including interest and penalty provisions, see 31 U.S.C. 3717, 4 CFR 101-105, AND 10 CFR 15.

For NRC debt collection procedures, including interest and penalty provisions, see 31 U.S.C. 3717, 4 CFR 101-105 and 10 CFR 15.

If this invoice is related to an Order Imposing a Civil Penalty, Curium US, LLC is required to pay the Civil Penalty within 30 days of the Order date. If payment is in response to a Notice of Violation and Proposed Imposition of a Civil Penalty, please follow the instructions in the Notice. The NRC may consider a request for additional time to pay the Civil Penalty, including the option to enter into an installment agreement, if appropriate. All requests for additional time to pay an invoice must be submitted in writing, with appropriate justification, to NRCCollections.Resource@nrc.gov, and should be submitted sufficiently ahead of time to allow the NRC time to review the request for additional time to pay within the 30-day payment period. This Invoice is related to the Civil Penalty proposed or imposed under EAF-RIII-2025-0146 issued to Curium US, LLC. Please include this reference number on your payment method (see attached Payments Methods Brochure).

Please see the NUREG/BR-0254, Payment Methods brochure for instructions on how to make domestic and international payments.

EFFECTIVE OCTOBER 1, 2024, THE NRC ONLY ACCEPTS ELECTRONIC PAYMENT METHODS. PAPER METHODS OF PAYMENT, INCLUDING CHECKS, ARE NO LONGER ACCEPTED. THE NRC LOCKBOX IS CLOSED. PAPER-BASED PAYMENTS WILL BE RETURNED TO THE SENDER. Please refer to the terms and conditions brochure for information on interest, penalties, and administrative fees associated with delinquent payments. Please reference the invoice number on the remittance.

Customer Information

L000001362/1
Curium US LLC
2703 Wagner Place
Maryland Heights, MO 63043

Change of Address:

Phone:

Remit Payment Online at:

www.pay.gov
(see NUREG/BR-0254,
Payment Methods brochure for
other electronic payment options)

This Payment References the following Bill:

EAF-RIII-2025-0146

Outstanding Amount Due: \$72,000.00

Amount Enclosed:

U.S. NUCLEAR REGULATORY COMMISSION (NRC)

LICENSE, ANNUAL, AND INSPECTION FEE INVOICE -- TERMS AND CONDITIONS

NOTICE: This invoice shows the fee assessed for a licensing action or inspection of your licensed program or the assessment of an annual fee. Fees are assessed in accordance with the pertinent schedules contained in the current 10 CFR Part 170 or 10 CFR Part 171. The revocation or termination of your license does not relieve you of the responsibility for any debt(s). The fee and associated interest, penalties, and administrative cost, if any, constitute a debt to the United States, and the invoice is the demand for payment required under Federal law and implementing regulations.

TERMS: Effective October 1, 2024, the NRC no longer accepts paper-based payments, including checks and paper credit card forms. The NRC lockbox is closed. Paper-based payments will be returned to the sender. Your electronic payment is due immediately and is payable via Pay.gov using a debit or credit card, PayPal account, Venmo account, or bank account (ACH), or electronic funds transfer (FedWire or ACH) made payable to the U.S. NRC. Federal agencies may make payment using the Intragovernmental Payment and Collection System (IPAC).

INTEREST: You will be assessed interest at the rate of 5% per year on debts owed to the NRC. The interest rate will remain fixed for the duration of the indebtedness. However, interest will be waived if payment is received within 30 days from the invoice date.

PENALTY: You will be assessed a penalty charge at the rate of 6% per year on any portion of a debt that is delinquent for more than 90 days. This charge will be calculated on or after the 91st day of delinquency but will accrue from the date the debt became delinquent. A debt is delinquent if it has not been paid by the invoice date.

ADMINISTRATIVE CHARGE: You will be assessed an administrative charge incurred for processing and handling your delinquent debt. This charge is \$15 a month and will be assessed each month the debt is delinquent. There will be an additional administrative charge of \$759 assessed if an Order Revoking License is issued to you for nonpayment of fees.

USE OF CONSUMER REPORTING AGENCIES AND CONTRACTING FOR COLLECTION SERVICES: All current consumer and commercial debt shall be reported to a credit reporting agency in accordance with 31 CFR Chapter IX, Part 901.5 and 10 CFR 15.26. When a debt is 120 days or more delinquent, the NRC is required to refer the debt to the Department of the Treasury (Treasury) for collections. Treasury may employ a variety of tools to collect your delinquent debt. These tools include administrative offset, Tax Refund Offset, wage garnishment, referral to a private collection agency and referral to the Department of Justice for litigation/collection. As a debtor, you are liable for all collection fees incurred with the collection of this debt.

10 CFR 170.41 FAILURE BY APPLICANT OR LICENSEE TO PAY PRESCRIBED FEES AND 10 CFR 171.23 ENFORCEMENT: If you fail to pay the prescribed fee or file a false certification for small entity status, the NRC will not process any applications for you and will revoke your license for nonpayment of the fee assessed. The filing of a false certification of small entity status could result in civil sanctions being imposed by the NRC under the Program Fraud Civil Remedies Act.

10 CFR 170.51 RIGHT TO DISPUTE ASSESSED FEES: Your request for review of the fees assessed, and appeal or disagreement with the prescribed fee, must be submitted in writing in accordance with the provisions of 10 CFR 15.31, "Disputed Debts."

CONTACTS: For questions about your invoice or to request a change of billing address, please call (301) 415-7554 or send an email to Fees.Resource@nrc.gov. To submit notice of bankruptcy, send written notification via email Fees.Resource@nrc.gov or by mail to:

LABOR ADMINISTRATION AND FEE BILLING BRANCH
OFFICE OF THE CHIEF FINANCIAL OFFICER
U.S. NUCLEAR REGULATORY COMMISSION
11545 ROCKVILLE PIKE
ROCKVILLE, MD 20852-2738

NRC PROCEDURES FOR EXTENDING PAYMENT DATES OF LICENSE, INSPECTION, AND ANNUAL FEE INVOICES

License, inspection, and annual fees are billed in accordance with the schedules contained in 10 CFR Part 170 and 10 CFR Part 171. Interest on the amount billed accrues from the invoice date but will be waived if the amount due is paid within 30 days after the invoice date. If an extension of time to pay is granted, interest will be waived if the debt is paid before the expiration of the extended period. The 45-day interest waiver period may be extended, at NRC's discretion, using the following procedures:

1. The NRC must receive your written request for an extension of the 45-day interest waiver period before expiration of the 45-day period. The request should explain why the debt is incorrect in fact or in law (10 CFR 15.31). If the request is not received within the 45-day interest waiver period, it will automatically be denied. Telephone requests for extensions will not be considered. Requests for extensions of the 45-day interest waiver period should be submitted to the Office of the Chief Financial Officer via the eBilling system, by email to FeeBillingInquiries.Resource@nrc.gov or by mail at:

LABOR ADMINISTRATION AND FEE BILLING BRANCH
(O-13A15) OFFICE OF THE CHIEF FINANCIAL OFFICER
U.S. NUCLEAR REGULATORY COMMISSION
11545 ROCKVILLE PIKE
ROCKVILLE, MD 20852-2738

2. Your explanation must have merit for the NRC to extend the 45-day

interest waiver period. A request is deemed to have merit if it causes the NRC to question whether the amount originally billed is correct.

A. If the explanation has merit, the NRC will notify you in writing that the request is granted and that the 45-day interest waiver period will be extended to a certain date. This date will be 30 days after the date the revised invoice is mailed. The amount on the revised invoice will constitute a final determination of the existence or amount of the debt. A final determination by NRC for this purpose need not await the outcome of litigation or further administrative review. Further extensions of the due date will not be granted. If the amount on the revised invoice is not paid within 30 days after the date the revised invoice is mailed, interest from the date of the original invoice will become due and payable.

B. NRC may, at its option, meet with your representatives to receive further evidence or arguments supporting your contentions.

C. Your request for an extension may be granted either for the entire amount originally billed or for a portion of the amount originally billed. If your request for an extension applies to only a portion of the originally billed amount, the remaining amount is due and payable and if it is not paid by the due date, interest from the date of the original invoice will be assessed.
(Continued on reverse)

D. If your explanation does not have merit and does not cause the NRC to question whether the amount originally billed is correct, your request will be denied. Failure of NRC to notify you before the end of the 45-day interest waiver period that a request for an extension has been denied will not constitute grounds for a waiver of interest.

E. The assertion that the invoice is unsupported by a sufficiently detailed breakdown of dates, hours, and other data does not constitute an explanation of why the amount billed is incorrect in fact or in law. If you view the information furnished with the invoice as insufficient for the purpose of a request for an extension, you should seek the necessary information as soon as possible in order that a request for extension can be submitted within the 45-day interest waiver period.

3. If an extension of the 45-day interest waiver period is granted and the amount originally billed remains unchanged, such extension will be stated on the revised invoice as provided in 2A above.

4. NRC records in support of billed fees are not subject to audit by non-Governmental entities. However, copies of records desired by you can be made available to you if they are reproduced at your expense. For any charges which may be assessed, refer to 10 CFR Part 9.

5. NRC will refund to you any amount which is later determined to be an overpayment, including interest, if any, which was paid by you on such amount. NRC is not authorized to pay interest on any part of a license, inspection, or annual fee which was paid to NRC and is later refunded.

PROCEDURES FOR ELECTRONIC FUNDS TRANSFER

The NRC can receive funds through the U.S. Department of the Treasury (Treasury) Fedwire Deposit System. The basic wire message format below complies with the Federal Reserve Board's standard structured third-party format for all electronic funds transfer (EFT) messages.

(1)		
021030004	(2)	
(3)	(4)	(5)
(6)	/	
(7) (8)		
TREAS NYC/CTR /		
(9)		
BNF=/AC-31000001 OBI=		
(10)		

A sample of an EFT message to Treasury and a narrative description of each field follow:

Field	Content
(1) <u>RECEIVER-DFI#</u>	- Treasury's ABA number for deposit messages is 021030004
(2) <u>TYPE-SUBTYPE-CD</u>	- The type and subtype code will be provided by the sending bank.
(3) <u>SENDER-DFI#</u>	- This number will be provided by the sending bank.
(4) <u>SENDER-REF#</u>	- The 16-character reference number is inserted by the sending bank at its discretion.
(5) <u>AMOUNT</u>	- The transfer amount must be punctuated with commas and decimal point; use of the "\$" is optional. This item will be provided by the depositor
(6) <u>SENDER-DFI-NAME</u>	- This information is automatically inserted by the Federal Reserve Bank.
(7) <u>RECEIVER-DFI-NAME</u>	- Treasury's name for deposit messages is "TREAS NYC." This name should be entered by the sending bank.

Field Content

PRODUCT CODE - A product code of "CTR" for customer transfer should be the first data in the RECEIVER-TEXT field. Other values may be entered, if appropriate, using the ABA's options. A slash must be entered after the product code.

AGENCY LOCATION CODE (ALC) - THIS ITEM IS OF CRITICAL IMPORTANCE. IT MUST APPEAR ON THE FUNDS TRANSFER DEPOSIT MESSAGE IN THE PRECISE MANNER AS STATED TO ALLOW FOR THE AUTOMATED PROCESSING AND CLASSIFICATION OF THE FUNDS TRANSFER MESSAGE TO THE AGENCY LOCATION CODE OF THE APPROPRIATE AGENCY. The ALC identification sequence can, if necessary, begin on one line and end on the next line; however, the field tag "BNF=" must be on one line and cannot contain any spaces. NRC's 8-digit ALC is

BNF=/AC-31000001

THIRD-PARTY INFORMATION - The Originator to Beneficiary Information field tag "OBI=" is used to signify the beginning of the free-form third-party text. All other identifying information to enable the NRC to identify the deposit, for example, NRC annual fee invoice number, description of fee - 10 CFR 171 annual fee, and licensee name, should be placed in this field.

The optimum format for fields 7, 8, 9, and 10 using an 8-digit ALC is as follows:

TREAS NYC/CTR/BNF=/AC-31000001 OBI=

The optimum format, shown above, will allow 219-character positions of information following the "OBI=" indicator.

If the licensee's bank is not a member of the Federal Reserve System, the non-member bank must transfer the necessary information and funds to a member bank, which then must transfer the information and funds to the local Federal Reserve Bank.

For transfer of funds from local Federal Reserve Banks to be recorded on the same day, the transfer must be received at the New York Federal Reserve Bank by 4 p.m., EST. Otherwise, the deposit will be recorded on the next workday.

If there are any questions, contact:

NRC Accounts Receivable Help Desk
U.S. NUCLEAR REGULATORY COMMISSION
TELEPHONE: 301-415-7554