



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

September 8, 2026

Matthew Trusner
Radiation Safety Officer
Novartis Manufacturing LLC
8520 Challenger Dr.
Indianapolis, IN 46241

Dear Matthew Trusner:

The U.S. Nuclear Regulatory Commission (NRC) staff have completed review of the Decommissioning Funding Plan adjustment and financial instrument (ADAMS Accession No. ML26230A083) submitted to meet requirements listed in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 30.36(e) and per guidance in NUREG 1757, Volume 3, revision 1, "Consolidated Decommissioning Guidance: Financial Assurance, Recordkeeping, and Timeliness," dated February 2012. This document was provided to supplement the original decommissioning funding plan and financial instrument provided to the NRC in the letter dated June 23, 2022 (ML22255A034).

Following review of the original June 23, 2022 decommissioning funding plan and financial instrument and the August 13, 2026 adjustment, it was determined that several significant deficiencies are present. It is requested that you revise the provided submission in accordance with the guidance provided in NUREG 1757, Volume 3, revision 1, "Consolidated Decommissioning Guidance: Financial Assurance, Recordkeeping, and Timeliness," dated February 2012.

Specifically, the decommissioning funding plan and financial instrument should be revised to address the following items:

1. The current cost estimate does not provide a detailed description or supporting basis for the costs arrived at for each line item. Please review the detailed guidance available in Sections A.3 – A.3.18 of NUREG 1757 Vol. 3 Rev. 1 when preparing your response.
2. A signed original or signed original duplicate of the financial instrument is required by 10 CFR 30.35(f). The NRC received an electronically signed copy of the original surety bond in 2022 and a scanned copy of the revised bond rider in 2026, both via email.
3. A surety bond must be accompanied by a standby trust agreement, which does not appear to have been previously prepared. Detailed guidance for Standby Trust Agreements is available in Sections A.12 – A.12.8 of NUREG 1757 Vol. 3 Rev. 1.

Due to the upcoming transition of the State of Indiana to Agreement State status, it is requested that you prepare these documents for submittal to the Indiana Dept. of Homeland Security following the Oct. 1, 2026 transition date.

In accordance with Title 10 Code of Federal Regulations 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,

LAURA CENDER

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CENDER
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Laura B. Cender
Sr. Health Physicist
Inspection & Licensing Branch - Central

License No. 13-35658-01MD
Docket No. 030-39292
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