



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
475 ALLENDALE ROAD  
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

June 3, 2008

Docket No. 03031174  
Control No. 141759

License No. 07-28386-01

Norman P. Lanier  
Corporate Radiation Safety Officer  
Tracerco,  
a business unit of Johnson Matthey, Inc.  
4106 New West Drive  
Pasadena, TX 77507

SUBJECT: TRACERCO,, REQUEST FOR ADDITIONAL INFORMATION CONCERNING  
FINANCIAL ASSURANCE DOCUMENTS, CONTROL NO. 141759

Dear Mr. Lanier:

This is in reference to your letter dated January 9, 2007 providing financial assurance for decommissioning for Nuclear Regulatory Commission License No. 07-28386-01. A recent NRC audit of your financial assurance documents has identified that we need the following additional information:

1. Please submit a Decommissioning Funding Plan (DFP) in accordance with the Guidance in NUREG 1757, Vol. 3, Appendix A.3. Your letter of January 9, 2007 refers to a reassessment of the cost but the documentation showing how you derived that cost in accordance with NUREG-1757, Vol. 3 was never submitted. The 1995 Decommissioning Funding Plan does not meet the guidance outlined in Appendix A.3, pages A-25 to A-42. Your DFP should include the tables as outlined in Appendix A.3.
2. Depending upon the Cost Estimate derived from the DFP, please revise and submit a Letter of Credit, a Standby Trust Agreement, and a Certification of Financial Assurance. Please ensure that your legal names and business address of your company as listed on the current NRC license is reflected in the appropriate place on each financial assurance document. For example, see Section A.2.4 Model Certification of Financial Assurance in NUREG 1757, Vol 3., Appendix A, page A-23. We noted that documents submitted with the January 9, 2007 letter stated Johnson Matthey, Inc., rather than Tracerco, a business unit of Johnson Matthey, Inc., as stated on your license.

Current NRC regulations and guidance are included on the NRC's website at [www.nrc.gov](http://www.nrc.gov); select **Nuclear Materials; Medical, Academic, and Industrial Uses of Nuclear Material**; then **Regulations, Guidance, and Communications**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 7:00 a.m. to 8:00 p.m. EST, Monday through Friday (except Federal holidays).

We will continue our review upon receipt of this information. Please reply within 30 days of the date of this letter to my attention at the Region I Office and refer to Mail Control No. 141759. If

N. Lanier  
Tracerco,

2

you have any technical questions regarding this deficiency letter, please call me at (610) 337-5071.

Sincerely,

***Original signed by Jenny Johansen***

Jenny Johansen  
Health Physicist  
Materials Security and Industrial Branch  
Division of Nuclear Materials Safety

N. Lanier  
Tracerco,

DOCUMENT NAME: C:\FileNet\ML081560349.wpd

**SUNSI Review Complete: JJohansen**

After declaring this document "An Official Agency Record" it will be released to the Public.

To receive a copy of this document, indicate in the box: "C" = Copy w/o attach/encl "E" = Copy w/ attach/encl "N" = No copy

OFFICE	DNMS/RI	N	DNMS/RI		DNMS/RI			
NAME	JJohansen /JMJ/							
DATE	6/3/08							

OFFICIAL RECORD COPY