

**From:** Gaskins, Farrah  
**Sent:** Friday, February 17, 2012 11:26 AM  
**To:** Friedman.stephanie@epa.gov  
**Subject:** Financial Assurance

Dear Dr. Friedman,

On February 15, we discussed that the license for Environmental Protection Agency (Gulf Ecology Division) License No. 09-10672-03, requires financial assurance for decommissioning in the amount of \$225,000. The reason that your license requires financial assurance is because the quantities of tritium and carbon-14 (both are radionuclides whose half-lives exceed 120 days), listed on your license, exceed the quantities that require financial assurance pursuant to 10 CFR 30.35(d). Under this regulation, you would require FA if you were authorized to possess MORE THAN 1000 millicuries of tritium only; OR if you were authorized to possess MORE than 100 millicuries of carbon 14 only. Because you possess both radionuclides, you must perform a sum-of-fractions ratio to determine if you exceed unity (1); if so, FA is required. Your license authorizes 25 mCi of H3, and 100 mci of C14. So:

25 millicuries H3/1000 mCi H3 = 0.025  
100 mCi C14/100 mCi C14 = 1.0

$0.025 + 1.0 = 1.025$ . this value exceeds 1, therefore you are required to provide financial assurance.

I explained that your options were to either (1) provide financial assurance or (2) lower your possession limits (after confirming your current inventory) to less than those that exceed the financial assurance requirement. If you choose to lower your possession limits, it would have to be less than the amounts above that result in the sum-of-fractions exceeding unity.

You stated you were not familiar with the regulations requiring financial assurance. I suggested you read 10 CFR 30.35 and NUREG 1757 Vol. 3, Chapter 4 and Appendix A, which discusses financial assurance and what you would need to submit. Links to these references are listed below.

I am happy to discuss this with you and please feel free to call if you have any questions or concerns.

<http://www.nrc.gov/reading-rm/doc-collections/cfr/part030/part030-0035.html>

<http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1757/v3/sr1757v3.pdf>

Thanks,

*Farrah C. Gaskins*

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