



CONVERSATION RECORD

04/11/2018

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU Gregory S. Hiatt, R.Ph/RSO		DATE OF CONTACT 04/11/2018	TYPE OF CONVERSATION <input type="checkbox"/> E-MAIL <input checked="" type="checkbox"/> TELEPHONE <input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING
E-MAIL ADDRESS TARQY@sbcglobal.net		TELEPHONE NUMBER (574) 298-9616	

ORGANIZATION Spectron mrc, LLC	DOCKET NUMBER(S) 030-38045
-----------------------------------	-------------------------------

LICENSE NUMBER(S) 13-32726-02	CONTROL NUMBER(S) 575631
----------------------------------	-----------------------------

SUBJECT
Additional Information for Decommissioning Cost Estimate

SUMMARY
After reviewing you decommissioning cost estimate, dated September 20, 2017, the following additional details will be needed in order to verify the adequacy of the cost estimate:

1. In your cost estimate, you have state that you are assuming that the Ge-68/Ga-68 generators that you would like to receive would need to be disposed of as waste, but you also provided a written agreement that the generators will be returned to the manufacturer. Please clarify if you are providing a DFP for the waste disposal costs, or if you plan to request the exemption from providing a DFP. In addition, please clarify the the costs assumed for the disposal of this material. If you are proposing to use the exemption, you should state that that the FA needed would either be \$225,000 (for 100 mCi) or \$1,125,000 (for up to 1,000 mCi).

Please not that the exemption requires the NRC approve the agreement letter between the licensee and the manufacturer.

Continue on Page 2

ACTION REQUIRED (IF ANY)
Please submit your response by May 11, 2018 and reference it to my attention as "additional information to control number 575631" to facilitate proper handling in our office. Your response must be currently dated and signed . If you have any questions or require clarification of any of the information stated above, please do not hesitate to contact me at 630-829-9607

In accordance with 10 CFR 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>.

Continue on Page 3

NAME OF PERSON DOCUMENTING CONVERSATION
Jennifer L. Dalzell-Bishop

SIGNATURE

CONVERSATION RECORD (continued)

SUMMARY: (Continued from page 1)

2. 10 CFR 30.35(e) requires that licensees identify and justify key assumptions contained in the decommissioning cost estimate. Guidance is provided in section A.3.1.3 of NUREG-1757, Volume 3, Appendix A, which states: "Key assumptions used in the decommissioning cost estimate should be identified and adequately justified." Additional detail is needed to justify the reasonableness of the assumptions upon which your decommissioning cost estimate is based.

Additional detail is necessary to justify the basis of the cost estimate and the assumptions used, as listed below:

- a. Please confirm that your cost estimate assumes that decommissioning will occur immediately on cessation of operations without multi-year storage for decay periods.
- b. Your cost estimate assumes \$20,000 will be used to hire an architectural firm for the planning and preparation phase of the decommissioning process. Please provide an explanation of how this cost estimate was determined and what activities would be conducted during this phase.
- c. Please provide a justification for the estimated costs for the packing materials and the types of containers that will be utilized.
- d. Please provide a justification for the estimated waste disposal costs for the cyclotron related waste and the waste with a half-life of greater than 120 days.

3. In accordance with 10 CFR 30.35(e) all licensees required to demonstrate financial assurance are required to submit a certification of financial assurance, including those licensees submitting a DFP (NUREG-1757, Appendix A, Sections A.1.3 and A.2). Please note that if the DFP cost estimate increases based on your response to the above questions, it may be necessary to provide a revised certification of financial assurance to reflect this increase. The model wording for a certification of financial assurance is presented in NUREG-1757, Appendix A, Section A.2.4.

4. You will need to provide updated financial assurance instruments to cover the entire cost of the decommissioning. Please note that these need to be an originally signed documents.