



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

July 10, 2006

Docket No. 03000638
04006329
07000190
Control No. 137357
137358
137359

License No. 08-02075-03
SUD-157
SNM-164

Joseph Beres
Director, Environmental Health & Safety
The Catholic University of America
Marist Annex Building
Cardinal Station
Washington, DC 20064

SUBJECT: THE CATHOLIC UNIVERSITY OF AMERICA, REQUEST FOR ADDITIONAL
INFORMATION CONCERNING FINANCIAL ASSURANCE DOCUMENTS,
CONTROL NO. 137357, 137358, and 137359

Dear Mr. Beres:

This is in reference to your letter dated June 27, 2006 providing the decommissioning funding plan as part of your financial assurance for decommissioning for Nuclear Regulatory Commission License No. 08-02075-03. In order to continue our review, we need the following additional information:

1. 10 CFR 35(e) requires that the decommissioning funding plan must contain a certification by the licensee that financial assurance for decommissioning has been provided in the amount of the cost estimate for decommissioning and a signed original of the financial instrument obtained to satisfy the requirements of paragraph (f) of this section. Guidance in completing a certification of financial assurance is contained section A.2.5 of NUREG-1757, Volume 3, "Consolidated NMSS Decommissioning Guidance, Financial Assurance, Recordkeeping, and Timeliness." The format for the certification should closely follow section A.2.4 of NUREG-1757.
2. Item 3 of your basic assumptions on page 3 of your decommissioning funding plan states that you have returned areas to service without restrictions. Additionally, on page 6 of the decommissioning funding plan, you state that all residual contamination is removed beyond the table limit of Regulatory Guide 1.86. When final decommissioning is performed, all areas where unsealed materials were used since licensed operations began in 1957 will be required to demonstrate that they are below the criteria of subpart E of 10 CFR 20. Although Regulatory Guide 1.86 guidelines generally meets subpart E criteria for beta and gamma emitting radionuclides, it is non-conservative for alpha emitting radionuclides. Table 5.19 from NUREG/CR-5512 is enclosed for your reference. In addition, in accordance with 10 CFR 30.35(g), you are required to maintain records important to decommissioning. Areas you have released must have

documentation of the surveys and release criteria used. Please review the status of records on hand for previously released areas and the ability of these records to meet current standards for release. If records are not available, then are may be required to have additional surveys, and this may cost must be included in your decommissioning funding plan. Please evaluate the cost to retrieve these records, perform surveys as needed. and include them in your cost estimate.

3. In the table entitled, "Total Decommissioning Costs" on page 5 of your decommissioning funding plan, you have line item costs for equipment rentals, equipment purchase, supplies, and survey equipment. Please include the basis for these values and how they will be adjusted for future inflation.
4. In the table entitled, "Total Decommissioning Costs" on page 5 of your decommissioning funding plan, the line item for "Packaging, shipping & disposal of radioactive waste" was \$171,000; however the value listed on page 15, was \$173,500 for total estimated cost for radioactive waste disposal. Please correct this number to \$173, 500 in the table on page 5.
5. In Appendix A, page 7, Table 1 lists Room 262 twice. Please correct the table with room 213 information.
6. In Appendix B and page 12 of your decommissioning funding plan, the vendor disposal cost of the plutonium is \$3700. Please explain where this is included in the costs listed within Table 2 on page 15 or within the Total Decommissioning Cost table on page 5.
7. The Cost Estimating Table 1 on page 14, appears to use different labor rates than used in Table 3 on page 15. Please detail the labor rate structure and why there would be a different rate in planning and preparation and in dismantling.

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Nuclear Materials; Medical, Academic, and Industrial Uses of Nuclear Material**; then **Toolkit Index Page**. Or you may obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-888-293-6498. 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 to my attention at the Region I Office and refer to Mail Control No. 137357. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5040.

J. Beres
The Catholic University of America

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Sincerely,

Original signed by Elizabeth Ullrich

Betsy Ullrich
Senior Health Physicist
Commercial and R&D Branch
Division of Nuclear Materials Safety

Enclosure:
Table 5.19 of NUREG/CR-5512 Volume 3 [ML003726967]

cc:
Mahmoud S. Haleem, Radiation Safety Officer

DOCUMENT NAME: E:\Filenet\ML061920044.wpd

SUNSI Review Complete: DLawyer

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