



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

April 8, 2014

Surendra K. Gupta, Ph.D.
American Radiolabeled Chemicals, Inc.
101 ARC Drive
Saint Louis, MO 63146

Dear Dr. Gupta:

We have completed our review of American Radiolabeled Chemical's, Inc., (ARC) Decommissioning Funding Plan dated June, 2012, and decommissioning cost estimate of \$865,819.00 dollars. We also reviewed ARC's Trust Agreement dated March 21, 2013.

The U.S. Nuclear Regulatory Commission (NRC) staff has determined that in order to complete our review, ARC will need to submit the following additional information:

1. Third Party Contractor Costs

Your decommissioning funding plan (DFP) does not include costs associated with third party contractor costs for all activities. Title 10 of the *Code of Federal Regulations* (CFR) 30.35, "Financial assurance and recordkeeping for decommissioning" states that "[e]ach decommissioning funding plan ... must contain ... a detailed cost estimate for decommissioning, in an amount reflecting: [t]he cost of an independent contractor to perform all decommissioning activities." Your submission does not include costs associated with a third party contractor to perform all activities. The submission states that "[i]t is ARC's intent to use outside contractors only for the final survey phase of the decommissioning."

Please revise your cost estimate to include costs associated with decommissioning based on a third party contractor.

2. Shipping Costs

Your DFP does not include a basis for the shipping cost per mile. 10 CFR 30.35(e)(1)(ii) that a DFP must contain "[i]dentification of and justification for using the key assumptions contained in the decommissioning cost estimate." In Section 2 "Assumptions Used" you state that "[t]he shipping cost is taken to be \$2.25 per mile."

Please provide a basis or justification for the shipping cost estimate.

3. Trust Agreement

Schedule C of the trust agreement does not include the trustee's name, address, and phone number. NUREG-1757, Vol. 3, Rev. 1, Appendix A, provides guidance and model language for an acceptable trust agreement submission.

S. Gupta

- 2 -

Specifically, Appendix A.4.5, requests that the licensee include the name, address, and phone number of the Trustee in the Schedule C section of the submission.

Please revise Schedule C in the trust agreement to include the trustee's name, address, and phone number.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter 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>.

In your response, please reference as additional information to Control Number 300408. Please contact me at 630-829-9854 if you have any questions.

Sincerely,

/RA/

Kevin G. Null
Materials Licensing Branch
Division of Nuclear Materials Safety

Docket No.: 030-20567
License No.: 24-21362-01

S. Gupta

- 2 -

Specifically, Appendix A.4.5, requests that the licensee include the name, address, and phone number of the Trustee in the Schedule C section of the submission.

Please revise Schedule C in the trust agreement to include the trustee's name, address, and phone number.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter 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>.

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