

From: [Lawyer, Dennis](#)
To: scott.claunch@cardinalhealth.com
Cc: michael.kelly01@cardinalhealth.com
Subject: Cardinal Health 414, LLC, Request for Additional Information Concerning Financial Assurance, Control 34-32780-02
Date: Friday, May 08, 2015 8:51:00 AM

Dear Mr. Scott W. Claunch,

This is in reference to your letter dated March 31, 2015, requesting for amendment to Nuclear Regulatory Commission License No. 34-32780-02, Docket No. 03038331. In order to continue our review, we need the following additional information:

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office (Address below) and refer to Mail Control No. 586463. If you have technical questions regarding this letter, please call me at (610) 337-5366.

1. According to 10 CFR 30.35(e)(2) in part, "At the time of license renewal and at intervals not to exceed 3 years, the decommissioning funding plan must be resubmitted with adjustments as necessary..." You stated that there has been no change in the decommissioning cost estimate. As required by regulation, this needs to be resubmitted even if there are no changes with the date that it was recalculated. In addition, the following items as required in 10 CFR 30.35(e)(1) did not appear to be addressed in the December 2011 Decommissioning Funding Plan when this reviewer looked at the plan: the volume of onsite subsurface material containing residual radioactivity that will require remediation to meet the criteria for license termination; identification of and justification for using the key assumptions contained in the detail cost estimate, including that the cost is based on an independent contractor to perform all decommissioning; and the means for adjusting cost estimates and associated funding levels periodically over the life of the facility.
2. You stated that there were no changes to the decommissioning cost estimate. Please confirm that you considered the following events on the decommissioning cost estimate: spills of radioactive material; waste inventory increasing above the amount previously estimated; facility modifications; and actual remediation costs that exceed the previous cost estimate.
3. You stated that there were no changes to the decommissioning cost estimate. Please provide evidence that the hourly salary rates, packaging and transport costs, equipment costs, and disposal rates have not changed from December 2011.
4. On the copy of the Standby Trust Agreement, it is marked Nuclear Pharmacy Services Confidential. If a submittal is considered as proprietary by the licensee, the licensee must submit an affidavit as required by 10 CFR 2.390. Licensees are encouraged to not submit proprietary information as proprietary information should not be needed to complete financial assurance. Please confirm that the Standby Trust Agreement is not proprietary and may be publically released. Additionally, this is a copy and the original is maintained at the region and thus is not needed to be submitted.

Please note that you may not reply to this letter by return e-mail. Your reply must be in writing by letter, facsimile (610-337-5269), or signed letter attached to an email. If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application.

Region 1 Office Mailing Address: Licensing Assistance Team, US Nuclear Regulatory Commission Region I, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406-2713.

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