

## Lawyer, Dennis

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**From:** Lawyer, Dennis  
**Sent:** Thursday, December 24, 2015 8:57 AM  
**To:** 'Diaz, Eduardo'  
**Subject:** RE: Re: Lantheus Medical Imaging, Request for Additional Information Concerning Financial Assurance, Control 588543

Mr. Diaz,

Thank you for your correspondence. Sorry this got buried with my other activities.

Yes you may have a 30 day extension.

I wish you Happy Holidays.

Dennis Lawyer  
Health Physicist  
U.S. Nuclear Regulatory Commission  
Division of Nuclear Material Safety  
610-337-5366  
610-337-5269 (F)

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**From:** Diaz, Eduardo [mailto:Eduardo.Diaz-Montes@lantheus.com]  
**Sent:** Friday, December 18, 2015 2:20 PM  
**To:** Lawyer, Dennis <Dennis.Lawyer@nrc.gov>  
**Subject:** [External\_Sender] Re: Lantheus Medical Imaging, Request for Additional Information Concerning Financial Assurance, Control 588543

Dear Mr. Lawyer,

We request an extension of additional 30 days for the submission of the requested information. Some of the information need to be discuss in detail with Philotechnics because major cost changes can occur because of new labor rates and waste disposal cost. We want to be responsible with the information given to NRC.

Thanks,

Eduardo Diaz, R.Ph., BCNP, RSO  
Lantheus Medical Imaging

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**From:** Lawyer, Dennis <[Dennis.Lawyer@nrc.gov](mailto:Dennis.Lawyer@nrc.gov)>  
**Sent:** Wednesday, November 18, 2015 12:55 PM

**To:** Diaz, Eduardo

**Subject:** Lantheus Medical Imaging, Request for Additional Information Concerning Financial Assurance, Control 588543

Dear Mr. Diaz,

This is in reference to your letter dated October 22, 2015, providing a decommissioning funding plan for Nuclear Regulatory Commission License No. 52-25361-02, Docket No. 03038114. In order to continue our review, we need the following additional information:

1. You are not required to submit financial assurance for your Nuclear Regulatory Commission License No. 52-25361-01MD. You may deduct the cost for decommissioning this license from your decommissioning funding plan. No response is needed for this item.
2. 10 CFR 30.35(e)(1)(iv) requires that each decommissioning funding plan requires a certification by the licensee that financial assurance for decommissioning has been provided in the amount of the cost estimate for decommissioning. Please provide a Certification of Financial Assurance. Guidance is provided in NUREG-1757, Volume 3, Appendix A.
3. The estimates of the annual salary labor rates appears low. 10 CFR 30.35(e)(1)(i)(A) requires that the decommissioning funding plan be calculated using the cost of an independent contractor to perform all decommissioning activities. Please provide evidence that you can pay an independent contractor these rates as listed in table 3.12, Worker Unit Cost Schedule.
4. The number of containers in section 3.14 (a) packing material costs seems to be inaccurate. A B-25 box typically holds 90 cubic feet and thus you would need 11 containers for the concrete. Also, 65 cubic feet of waste would need normal sized drums, instead of 2. Please review this section, provide additional justification or make corrections.
5. The shipping costs in section 3.14(b) seems inaccurate. It appears the \$2.00 per mile was not included in the calculation for transportation. Please recalculate the table.
6. The shipping costs of ocean transport is unclear. The note states to add \$50,000 for final transport. There are two truckloads and the cost shown is \$75,000 instead of \$100,000 that would be expected. Please clarify or recalculate.
7. The unit cost of waste is shown to be \$0.5 per pound. This is based on the material being acceptable to the US Ecology Grandview, Idaho. Please provide evidence of the cost of disposal and a discussion why your waste would be acceptable for US Ecology Grandview, Idaho location.

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. 588543. If you have technical questions regarding this letter, please call me at (610) 337-5366.

*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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