

From: [Lanzisera, Penny](#)
To: [Williams, Matthew H](#)
Subject: Financial Assurance Documents
Date: Thursday, August 01, 2019 9:50:00 AM

Licensee: MedStar Georgetown Medical Center, Inc.
License No. 08-30577-01
Docket No. 03035409
Mail Control 602557

Mr. Williams, to complete our review of your Financial Assurance Documents, please provide the following:

1. Please amend the Decommissioning Cost Estimate to include the following revisions and confirmations. Re-submission of a complete Cost Estimate is unnecessary. A one page amendment similar to how you amended the Letter of Credit is sufficient.
 - a. Please correct the licensee name to match the current NRC license – “MedStar Georgetown Medical Center, Inc., D/B/A MedStar Georgetown University Hospital.”
 - b. It is unclear if the backup package receipt and shipment location on the 2nd Floor of the Gorman Building described in the Application dated April 25, 2011 or the Radioactive Waste Storage Building described in the June 21, 2013 letter are included. Please confirm that these facilities were included in your Cost Estimate.
 - c. Section 1 includes several incorrect regulatory references; e.g., 10 CFR 40.36(d)(2) and 50.75(e)(iii). Please confirm that Section 1 is corrected to reference 10 CFR 30.35(e)(2) and (f)(2).
 - d. In Item 4.2, the discussion of Potential Radionuclides of Concern is limited to H-3 and C-14. As you may be aware, the current license does not list quantities requiring financial assurance. However, during the split of hospital and university activities into two separate entities that occurred more than a decade ago; neither party could conclusively state that there had been no contamination events at the facilities since inception of licensing. Therefore, the Hospital was given the option to perform a Historical Site Assessment of radioactive material use and survey results for hospital facilities and provide those to support that no contamination events with long-lived radioactive material occurred or remained. Unfortunately, the records available for review only went back to the 1980s. We understand that you will continue to possess financial assurance pending further historical review and surveys. Therefore, please include in Item 4.2 a statement indicating “that other long-lived contaminants may be identified during initial surveys of the facilities based on historical uses when the Hospital operated with the University, which may require further decommissioning.”
2. Please resubmit Schedules A and B of the Standby Trust Agreement (STA) to include the revised cost estimate. Please ensure that the Licensee Name and Address of Use matches the current NRC license, e.g., “MedStar Georgetown Medical Center, Inc., D/B/A MedStar Georgetown University Hospital, 3800 Reservoir Road, N.W., Washington, D.C., excluding the lower level floor of the Lombardi Cancer Center.”
3. Please resubmit a revised Certification of Financial Assurance (CFA) that matches

the current NRC license (Amendment #29). For instance, the CFA dated June 6, 2005, includes 3750 Reservoir Road that was decommissioned and removed from the license in 2017. In addition, the licensed material listed does not match the current license. Please ensure that the CFA includes: Signatures and titles of officials of institution, Corporate seal, and Date.

Please submit the above information to my attention and reference Mail Control No. 602557 in your response. Samples of the Schedules and CFA may be found in Appendix A of NUREG-1757, Vol. 3 found at <https://www.nrc.gov/docs/ML1204/ML12048A683.pdf>.

In addition, as discussed and since your historical records are incomplete prior to the 1980s, site characterization surveys of Hospital facilities to support reduction or removal of Financial Assurance requirements would be required in a future request. Characterization surveys are described in more detail in NUREG-1757 found <https://www.nrc.gov/docs/ML0630/ML063000252.pdf>.