



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION I  
2100 RENAISSANCE BLVD.  
KING OF PRUSSIA, PA 19406-2713

June 9, 2020

Glenn P. Sullivan, Corporate RSO  
Cardinal Health 414, LLC  
7000 Cardinal Place  
Dublin, OH 43017

SUBJECT: CARDINAL HEALTH 414, LLC, CORRECTION TO REVIEW OF FINANCIAL  
ASSURANCE SUBMITTAL; MAIL CONTROL NO. 617414

Dear Mr. Sullivan:

This is a correction to the letter dated May 21, 2020. When reviewing the superseded documents to be returned to you, we identified that the Fifth Amended and Restated Standby Trust Agreement (STA) was not a complete restatement of the STA. Therefore, we need to retain the Third Amended and Restated STA in order to have a complete financial assurance instrument. The change is shown in bold font below.

This financial assurance revision is in support of Amendment No. 25 to add a second cyclotron to your license (Mail Control Nos. 614053 and 618172) and Amendment No. 26 to authorize additional incidentally activated materials to the license (Mail Control No. 618743). We have no further questions at this time.

The following documents currently provide your financial assurance for License No. 34-32780-02:

Certification of Financial Assurance dated April 15, 2020 [ML20119B065]

Decommissioning Funding Plan Cost Estimate dated November 18, 2019  
[ML19338C852]

Surety Bond dated May 26, 2011 [ML112380052], Surety Bond Rider dated  
November 9, 2016 [ML17033B594], and Surety Bond Rider dated December 10, 2019  
[ML20023A314]

Agreement of Resignation, Appointment and Acceptance dated March 8, 2017  
[ML17194B033] and Page 1 replacement for the Resignation, Appointment, and  
Acceptance [ML17200D092]

**Third Amended and Restated STA dated February 2, 2018 (ML18053A250); and**  
Fifth Amended and Restated Standby Trust Agreement entered into as of March 3, 2020  
[ML20073J629]

Your organization uses a Decommissioning Funding Plan (DFP) to determine the amount of financial assurance necessary to fund all decommissioning activities. 10 CFR 30.35(e)(2) requires that, at the time of license renewal and at intervals not to exceed three years, the DFP

must be resubmitted with adjustments as necessary to account for changes in costs and the extent of contamination. Your currently approved DFP was submitted on December 10, 2019; therefore, your DFP must be re-submitted on or before December 10, 2022. The DFP must update the information submitted with the original or prior approved DFP, and must specifically consider the effect of the following events on decommissioning costs: (1) spills of radioactive material producing additional residual radioactivity in onsite subsurface material; (2) waste inventory increasing above the amount previously estimated; (3) waste disposal costs increasing above the amount previously estimated; (4) facility modifications; (5) changes in authorized possession limits; (6) actual remediation costs that exceed the previous cost estimate; (7) onsite disposal; and (8) use of a settling pond. If the amount of the financial assurance instrument will be adjusted to match the DFP, this cannot be done until the updated DFP is approved by the NRC. If the financial assurance instrument is revised (amended) to change the amount of financial assurance obligated, then you will need to also submit a revised Certificate of Financial Assurance (CFA) with the new amount.

Your cooperation is appreciated.

Sincerely,

Betsy Ullrich, Senior Health Physicist  
Commercial, Industrial, R&D  
and Academic Branch  
Division of Nuclear Materials Safety  
Region I

License No. 34-32780-02  
Docket No. 030-38331  
Mail Control No. 617414

cc: Arshad Mehmood, Radiation Safety Officer  
Evan T. Western, Manager, Health Physics

CARDINAL HEALTH 414, LLC, REVIEW OF FINANCIAL ASSURANCE SUBMITTAL, MAIL  
CONTROL NO. 617414 DATED JUNE 9, 2020

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SUNSI Review Complete: Betsy Ullrich

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DATE	6/9/20						

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