



## CONVERSATION RECORD

NAME OF PERSON(S)/TITLE CONTACTED OR IN CONTACT WITH YOU <b>Neil Stubbs, CNMT, RT(N)</b> Regional Health Physicist		DATE OF CONTACT 07/18/2019	TYPE OF CONVERSATION <input checked="" type="checkbox"/> E-MAIL <input type="checkbox"/> TELEPHONE <input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING	
E-MAIL ADDRESS neil.stubbs@siemens-healthcare.com		TELEPHONE NUMBER (484) 986-7681		
ORGANIZATION PETNET Solutions, Inc.		DOCKET NUMBER(S) 030-38347		
LICENSE NAME AND NUMBER(S) 41-32720-06		MAIL CONTROL NUMBER(S) 580747		
SUBJECT <b>Additional Information Request concerning the licensee's request to update decommissioning financial assurance instruments and cost estimate</b>				
<p><b>SUMMARY AND ACTION REQUIRED (IF ANY)</b> This record concerns the licensee's updated Financial Assurance including a May 15, 2019 Standby Trust Agreement amendment and April 30, 2019 Letter of Credit amendment (FA; NRC Accession No. ML19161A191), submitted to meet requirements listed in Title 10 of the <i>Code of Federal Regulations</i> Section 30.36(e) and per guidance in NUREG 1757, Volume 3, revision 1, "Consolidated Decommissioning Guidance: Financial Assurance, Recordkeeping, and Timeliness," dated February 2012.</p> <p>Upon review, we have determined that the cost estimate of \$434,636 is adequate. Accordingly, it will be appropriate for financial instruments submitted in support of this license to reflect that amount.</p> <p>This record also concerns the licensee's Letter of Credit (LOC) and Standby Trust Agreement (STA) submissions via letters dated May 14, 2013, March 1, 2016, and August 8, 2016 (NRC Accession Nos. ML13135A612, ML16061A323, and ML16222A690) and omission of a Certification of Financial Assurance.</p> <p>Although the LOC and STA have been updated to reflect the \$434,636 cost estimate, additional information is needed to complete our review, as detailed on the attached sheet:</p> <ul style="list-style-type: none"><li>- LOC references to docket number and Part 30 (refer to NUREG 1757, Vol. 3, rev. 1, pp. A-64 to A-69)</li><li>- Accurate Amendment No. for the STA (refer to NUREG 1757, Vol. 3, rev. 1, pp. A-127 to A-140)</li><li>- updated Certification of Financial Assurance (refer to NUREG 1757, Vol. 3, rev. 1, pp. A-19 to A-20)</li></ul> <p>Upon receipt of acceptable updates, the NRC will return all superceded financial assurance instruments.</p>				
NAME OF PERSON DOCUMENTING CONVERSATION Sara A. Forster, M.S., Health Physicist, Materials Licensing Branch, DNMS, RIII office, sara.forster@nrc.gov				
SIGNATURE 			DATE OF SIGNATURE 07/18/2019	

CONVERSATION RECORD (continued)

LICENSE NAME AND NUMBER(S)

41-32720-06

MAIL CONTROL NUMBER(S)

580747

SUMMARY AND ACTION REQUIRED (IF ANY) (Continued)

1. We have noted that the April 30, 2016 Amendment to the Standby Letter of Credit (LOC) No. TFTS-155308 is to an LOC that is dated February 22, 2016. In that February 22, 2016 document, there is a reference to a governing regulation in Title 10 of the Code of Federal Regulations Part 40. However, the activities authorized under the referenced radioactive materials license are pursuant to 10 CFR Part 30. In addition, the LOC references only the License Number and omits the Docket number.

Due to challenges in amending the LOC, there is no need to update the LOC at this time. However, please assure that the LOC is updated with the references to 10 CFR Part 30 and to the Docket Number, at the next time the LOC is amended.

2. We have noted that the May 15, 2019 amendment to the Standby Trust Agreement (STA) is entitled "First Amendment to the Standby Trust Agreement," and references only the STA dated February 25, 2013. However, we have received a second "First Amendment to the Standby Trust Agreement," which is dated February 25, 2013. It appears that the May 15, 2019 STA should be retitled.

In accordance with the redundant title, please clarify or update the title for the May 15, 2019 STA, as needed.

3. In our April 4, 2019 request for information, we requested an updated Certification of Financial Assurance. To date, no such certification has been received in our office. A certification is needed to complete our review.

In accordance with the omitted information, please submit - or resubmit - a current certification, reflecting all activities being conducted under the license.

## Forster, Sara

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**From:** Forster, Sara  
**Sent:** Thursday, July 18, 2019 3:41 PM  
**To:** Neil.Stubbs@siemens-healthineers.com  
**Subject:** Additional Information Request re PETNET Solutions, Inc. Decommissioning Financial Assurance, Lic. No. 41-32720-06, CN580747  
**Attachments:** 03210.580747.41-32720-01 etc. RFAI3 via NRC 699 signed.pdf

Dear Mr. Stubbs:

Our office has reviewed the updates to the submitted Decommissioning Financial Assurance instruments and finds that additional information is needed to complete our review. Accordingly, please see the attached request for a certification of financial assurance and for a corrected amendment to the Standby Trust Agreement, in accordance with applicable regulatory requirements. A response is appreciated within 30 days of this message (on or before August 17, 2019). If you are unable to respond in full by that date, an update as to the date by which you expect to be able to respond is appreciated.

For additional information, please refer to [NUREG 1757, Volume 3, revision 1, "Consolidated Decommissioning Guidance: Financial Assurance, Recordkeeping, and Timeliness," dated February 2012.](#)

If you have any questions, please do not hesitate to contact me by phone or email, as specified below.

Sincerely yours,

**Sara A. Forster, Health Physicist Licensing Reviewer**

U.S. Nuclear Regulatory Commission - Region III

Division of Nuclear Materials Safety

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