



2020 Dow Center

The Dow Chemical Company
Midland, Michigan 48674

March 3, 2000

Mr. Sam Nalluswami
U.S. Nuclear Regulatory Commission
11545 Rockville Pike
Rockville, MD 20852

Dear Mr. Nalluswami:

Subject: RESPONSE TO NRC COMMENTS ON THE REVISED RADIOLOGICAL HEALTH AND SAFETY COMMENTS SUBMITTED BY DOW ON FEBRUARY 1, 2000 FOR AN AMENDMENT TO LICENSE STB-527 IN A PHONE CONVERSATION BETWEEN DOW AND NRC ON FEBRUARY 28, 2000

In a phone conversation between the Nuclear Regulatory Commission Agency (NRC) and The Dow Chemical Company (Dow) comments or questions the NRC had about Dow's February 1, 2000 response to the NRC's December 8, 1999 letter were discussed. At the end of the phone conversation the NRC requested Dow to provide a written commitment to address the unresolved questions raised. The intent of this letter is to provide Dow's intent as requested.

In the phone conversation each of Dow's February 1, 2000 responses to the December 8, 1999 letter was reviewed and Dow was informed if the NRC accepted the comment or had additional questions or required additional clarification. Below is a number listing which comments the NRC accepted. That list will be followed with Dow's plans to address the balance of the NRC's questions.

The following comments were approved as submitted:

General Comments: Dow's response was acceptable for all NRC questions or comments. However, for NRC general comment 6 Dow will commit to provide a listing of which March 1996 SOPs are still applicable and will incorporate them into the RHSP. This will be submitted by April 15, 2000, prior to the start of any intrusive field activity in 2000.

Specific Comments: Dow's responses for comments 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 13, 15, 16, 19, 22.

Dow will provide additional information for comments 3, 12, 14, 17, 18, 20, and 21 by April 15, 2000. The additional information will be discussed with the NRC prior to incorporation into the final stand along RHSP to insure the final RHSP will be approved in time for the 2000 fieldwork to start.

Based upon the February 29 phone conference, the questions raised by the NRC for the responses not accepted by the NRC will be addressed as indicated below.

Comment 3: As Dow understands the question raised by the NRC is that they would like to have at least three people designated with authority to oversee laboratory activities. The current plan only has two people designated – the RSO and assistant RSO. Based upon the project

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needs it is Dow's intent to suspend laboratory activity if the RSO and assistant RSO are both unavailable to oversee laboratory operations.

Comment 12: Dow will either obtain a copy of the bioassay procedures to be kept on site or will obtain the appropriate references to the procedures for incorporation into its RHSP.

Comment 14: Dow will check all MDA calculations and the function and use for each field and laboratory instrument used for this project.

Comment 18: Dow will review and incorporate the appropriate surface contamination limits after evaluating the 1996 Response to Comments.

Comment 20: Dow will provide a summary table of the training the on-site employees receives that will include what is covered on responding to on and off-site emergencies.

Comment 21: Dow will provide what training is provided on what to do in the event the project site requires evacuation.

In addition to the providing the above information Dow will also notify the local emergency response officials prior to re-commencement of field activities.

As indicated previously, Dow will prepare the above information and discuss with the appropriate NRC personnel prior to final incorporation into the RHSP. The final RHSP will be a stand-alone document upon its completion. All of these activities will be completed by May 1, 2000.

Please let me know if clarification or additional discussion is required on what is presented above.



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