

July 21, 2000

Mr. Ben Baker  
Project Manager  
The Dow Chemical Company  
1261 Building  
Midland, Michigan 48667

SUBJECT: ACKNOWLEDGMENT OF REQUESTS FOR AN ALTERNATE SCHEDULE FOR  
COMPLETION OF DECOMMISSIONING AND TO CHANGE THE RADIATION  
SAFETY OFFICER

Dear Mr. Baker:

I am responding to your letter dated June 1, 2000, which requested that your license be amended to change the Radiation Safety Officer (RSO). In addition, I am responding to your letter dated May 23, 2000, which forwarded a request to extend the deadline for completion of decommissioning until October 31, 2003. Such extensions, if granted, are documented in the form of a license amendment. Therefore, we are treating your May 23, 2000, letter as a license amendment request. We have completed the initial processing of your requests which is an administrative review.

We have determined that the information provided is sufficient to begin the technical review. Please note that the technical review may identify omissions in the submitted information or technical issues not identified during the administrative review that require additional information. We will inform you separately of our schedule for completing the technical review.

Concerning your request for an alternate schedule, we need the detailed schedule for completion of the work discussed in your May 23, 2000, letter before we can complete the technical review.

Concerning your request to change the RSO, the our current practice is to include qualification requirements as license conditions rather than naming a specific individual. This practice will reduce the administrative burden on both the licensee and NRC in the event of future RSO changes. Our standard conditions are enclosed for your information.

Mr. B. Baker

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If you have any questions, please call Mr. Sam Nalluswami of my staff at (301) 415-6694.

Sincerely,

***/RA/***

Larry W. Camper, Chief  
Decommissioning Branch  
Division of Waste Management  
Office of Nuclear Material Safety  
and Safeguards

Docket No.: 040-00017

License No.: STB-527

Enclosure: Standard License Conditions

cc: D. Minnaar, MDEQ  
Dow Dist. List

Mr. B. Baker

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## Standard License Condition For RSOs

11. A. Licensed materials shall be kept under the supervision of the Radiation Safety Officer, who shall have the following education, training, and experience:
  1. Education: A bachelor's degree in the physical sciences, industrial hygiene, or engineering from an accredited college or university or an equivalent combination of training and relevant experience in radiological protection. Two years of relevant experience are generally considered equivalent to one year of academic study.
  2. Health physics experience: At least one year of work experience in applied health physics, industrial hygiene, or similar work relevant to radiological hazards associated with site remediation. This experience should involve actually working with radiation detection and measurement equipment, not strictly administrative or "desk" work.
  3. Specialized knowledge: A thorough knowledge of the proper application and use of all health physics equipment used for thorium and its daughters, the chemical and analytical procedures used for radiological sampling and monitoring, methodologies used to calculate personnel exposure to thorium and its daughters, and a thorough understanding of how thorium was used at the location and how the hazards are generated and controlled.
- B. The licensee, without prior NRC approval, may appoint a RSO provided: a) the licensee maintain documentation demonstrating that the requirements of condition 11A are met; and b) the NRC is informed of the name of the new RSO by letter to the Regional Administrator, [Region III], within 30 days of the appointment.

ENCLOSURE