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DOW

2020 DOW CENTER
September 15, 2000

The Dow Chemical Company
Midland, Michigan 48674

Robert A. Nelson
Captain, USNR (Ret)
Chief, Facilities Decommissioning Section
Division of Waste Management
U.S. Nuclear Regulatory Commission
Mail Stop T-7F27
Washington, DC 20555

RE: EXTENSION REQUEST FOR DECOMMISSIONING FOR NRC LICENSE STB-527

The Dow Chemical Company (TDCC) based on recent meetings and discussions with the U.S. Nuclear Regulatory Agency (NRC) is requesting an extension through December 2002 to complete the decommissioning of the Bay City site leading to termination of License STB-527.

The initial decommissioning plan for Bay City, approved on July 7, 1996, was for the removal of approximately 40,000 cubic yards from a thorium-magnesium slag pile stockpiled over an area of less than one acre in Bay City, Michigan at a cost of about $15 million. Most of the original scope of work described in the approved decommissioning plan was completed as scheduled by October 31, 1997.

New information regarding residual surface and subsurface contamination extending beyond the immediate slag pile area was obtained following the initiation of decommissioning activities at the site.

TDCC presented a status update, a proposed decommissioning schedule and proposed actions that would lead to license termination to you and other NRC staff during a September 14, 2000 meeting at NRC Headquarters. TDCC's presentation and the subsequent discussion and comments during the meeting concluded the current decommissioning plan would require a license amendment to address many factors of the remediation of residual radioactivity within the water table in order for license termination to occur.

TDCC will prepare and submit a proposal for how it proposes to conduct the saturated zone sampling to determine the source term for material within the water table for NRC review and comment. In addition, TDCC will prepare and submit for NRC review a conceptual plan on how it proposes to address the

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groundwater pathway along with a proposed schedule for when the license amendment will be submitted to the NRC.

However, to obtain the necessary information to prepare the Bay City license amendment, allow time for NRC staff review and final approval of the license amendment, and to implement the amendment, the Dow Chemical Company is requesting an extension to complete the license termination activities through December 2002.

If there are any questions regarding this request please let me know.

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