



Ashman Center
June 3, 2003

The Dow Chemical Company
Midland, Michigan 48674

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

SUBJECT: Clarification to March 17, 2003, TDCC Letter to NRC Regarding NRC Request for Information on the Supplement to the Decommissioning Plan (Docket No. 040-00017)

Dear, Mr. Nalluswami,

In a letter dated March 17, 2003, The Dow Chemical Company (TDCC) provided a partial response to the NRC request for additional information on the Supplement to the Decommissioning Plan. On page 10 of the enclosure to the letter, TDCC proposed to use the "average of the total radium concentration in the groundwater, at the 95% confidence level, to demonstrate compliance with the SDMP Action Plan NPDWS reference standard." During a June 2, 2003, teleconference NRC staff asked for clarification of this sentence.

The TDCC proposal referred to the spatial average of all onsite monitoring wells, where the concentration assigned to each well was the annual average from four quarterly samples. Compliance with this average would be demonstrated at the 95% confidence level using Equation 8-13 from NUREG/CR-5849. The NRC staff suggested that this could be acceptable if the following test is also included, i.e., the spatial average of the monitoring well results from each round of quarterly sampling is less than the NPDWS standard. Dow agrees to perform both averaging tests.

Please contact me at (989) 636-0787 or David Fauver at (772) 492-0163 if you have any questions.

Sincerely,

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