

REPLY TO:
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May 31, 2005

Mr. John Nicholson
Commercial and R&D Branch
Division of Nuclear Materials Safety
US Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

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Ref: License No. 37-01665-01
Mail Control No. 136973 Docket No. 03006021
Letter dated April 26, 2005, Rothman to Nicholson
Letter dated May 27, 2005, Rothman to Nicholson

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Dear Mr. Nicholson:

Here are some additional answers to your questions regarding our amendment request to remove the Philadelphia Plant from our license. I spoke to a retiree, Bill Lyman, who became involved with radiotracers at the plant in 1958, and my letter of April 26th is not completely accurate. There was very low level ³H and ¹⁴C synthesis work done in one of the labs much earlier than the 1974 work. Dr. Lyman was Radiation Safety Officer for much of the period from 1958 to 1973.

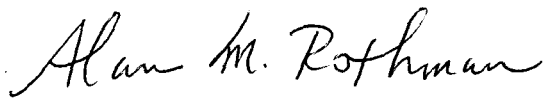
1. He confirmed that the The Philadelphia Plant was probably licensed in the 50's as your records indicate. He was certainly involved with radiotracers in 1958 and there had been some work done with low level radiotracers a short time prior to that.
2. He worked in 60 Building from April 1958 to December 1960 (2 years), moving to Bristol early January 1961. He told me that he worked only with microcurie amounts in one lab at the Philadelphia Plant. Our involvement at that time with radiotracers was to spray radiolabeled material in the field for AG studies. He worked mainly at that time with tritium and he would perform low level tagged synthesis runs (microcurie amounts) of pesticides to test the yield of the reaction and procedures. He would then do the actual high level synthesis (millicurie amounts) at Bristol in Building 64. Then the tagged pesticide would be used in the

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field. He did not do any high level synthesis in 60 building. His predecessor (presumably from 1956 to 1958) went to contract labs to synthesize the radiolabeled pesticides. Dr. Lyman did his work in one lab module on the first floor.

Sincerely,

A handwritten signature in cursive script that reads "Alan M. Rothman".

Alan M. Rothman, Ph.D.
Radiation Safety Officer
Spring House Technical Center
Rohm and Haas Company
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FAX: 215-641-7254