



ROHM AND HAAS COMPANY
727 NORRISTOWN ROAD, P.O. BOX 904, SPRING HOUSE, PA 19477-0904 USA
TELEPHONE (215) 641-7000

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November 30, 2005

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James Dwyer
Commercial and R&D Branch
Division of Nuclear Materials Safety, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1415

03006021

Re: Operating Name Change for License No. 37-01665-01 (Control No. 137564)

Dear Mr. Dwyer:

Rohm and Haas Company recently notified the NRC stating our intention to change the operator of the Rohm and Haas Company, Spring House Technical Center (the "Licensed Site") to a new legal entity, Rohm and Haas Chemicals LLC. Rohm and Haas Chemicals LLC is wholly owned by Rohm and Haas Company. As a follow-up to that notification, Rohm and Haas Company wishes to explain that essentially nothing will change with regard to our daily operation, programs and policies. There will be no changes in personnel or transfers one way or the other. The following points address concerns you may have:

- a. As part of an internal reorganization, Licensed Site assets, not real estate, will transfer from the Rohm and Haas parent company to the new legal entity Rohm and Haas Chemicals LLC. The Licensed Site will still be fully owned by Rohm and Haas Company.
- b. No name change is planned for the Licensed Site, although the operator name will obviously change with the change in the operator to Rohm and Haas Chemicals LLC. I will still be the main contact for our license, along with Dr. Dave Greenley, as stated on our previous license renewal. For any questions on this operator change, I can refer you to the appropriate people.
- c. There are no planned changes in personnel or duties that relate to the licensed program.
- d. There are no planned changes in the organization, location, facilities, equipment or procedures of the Licensed Site that relate to the licensed program.
- e. There will be no changes in the surveillance program (surveys, wipe tests, quality control) as a result of this internal restructuring.
- f. All records concerning the safe and effective decommissioning of the Licensed Site will remain archived in their present locations, under the same control of the current Radiation Safety Officer. These records include documentation of surveys

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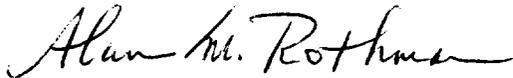
of ambient radiation levels and fixed and/or removable contamination, including methods and sensitivity.

- g. Rohm and Haas Company and its Rohm and Haas Chemicals LLC subsidiary will continue to abide by all constraints, conditions, requirements and commitments of the current licensed program. The licensed program will be unchanged by the legal entity change.
- h. As noted above, there is no change in ownership of the facility and Rohm and Haas Company as owner will continue to assume all financial responsibility under applicable NRC regulations as owner for the Licensed Site and license.

To summarize, this operator transfer is part of an internal restructuring to consolidate the North American chemical businesses of Rohm and Haas Company and its subsidiaries within a single operating entity, Rohm and Haas Chemicals LLC. The purpose of this restructuring is merely to align the legal entity structure of these businesses with Rohm and Haas Company's historical practice of consolidating the financial reporting of these operations.

If you have any questions, please contact me.

Sincerely,



Alan M. Rothman, Ph.D.
Radiation Safety Officer
Spring House Technical Center
Rohm and Haas Company

Phone: (215) 641-7229
FAX: (215) 641-7254
e-mail: arothman@rohmmaas.com



David E. Greenley, Ph.D.
Director of Technology Operations
Site Manager
Spring House Technical Center
Rohm and Haas Company

This is to acknowledge the receipt of your letter/application dated

11/30/2005, and to inform you that the initial processing which includes an administrative review has been performed.

Notification 37-01665-01
There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

Please provide to this office within 30 days of your receipt of this card

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned **Mail Control Number** 138058.
When calling to inquire about this action, please refer to this control number.
You may call us on (610) 337-5398, or 337-5260.