DOW CORNING

February 5, 2008

U.S. NRC Region III
Material Licensing Section
2443 Warrenville Road
Suite 210
Lisle, Illinois 60532-4352

Subject: License #21-08362-12

To Whom It May Concern

The purpose of this letter is to request an amendment of our NRC License #21-08362-12 to reflect a change in the named Radiation Safety Officer of the Dow Corning Corporation Midland Plant. We request that Kevin W. Glenna be removed and Bruce D.S. Reed put in place as RSO with Michael D. Whelton as back-up. Please see attached for resumes

Sincerely,

Ken Kaufman
Midland Site Manager

Dow Corning Corporation
Midland, Michigan 48686-0995
Phone: (517) 496-4000

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Bruce D. S. Reed II
1010 N. 7 mile road
Sanford, MI 48657
Bruce.Reed@dowcorning.com

Career Objective

Work in partnership with team members and leaders to bring value to the organization and community through the utilization of operational and maintenance processes, safety standards, and personal experience.

Dow Corning Advanced Engineering Materials:

Maintenance department 5 years experience working with various trades as a trade helper.

Production Operator 3 years experience which includes using process systems such as IBatch, SCADA, PI, and SAP. This role also entailed running various mixers, assisting in commercialization of new products and inventory controls.

Dow Corning Midland Plant

Loss Prevention Officer 2.5 years experience which includes emergency response for medical, chemical, and fire emergencies along with safety planning / overseeing confined space, excavation work with atmospheric testing and Industrial Hygiene checks.

Site Shift Leader 1 year in this role which includes writing excavation permits, confined space permits, authorizing hazardous material line opening. On nights and weekends I'm acting management and environmental contact for the site and responsible for trouble shooting processes and bringing in various trades or computer support to keep processes running.

Education / Certifications

Delta College – Associates Degree in Science, PPCT Basic, Loss Prevention Officer
Engelhardt & Associates, Inc – Radiation Safety Officer
Michigan State Police – Haz-Mat Technician
MidMichigan Regional Hospital - Emergency Medical Technician
New Mexico Tech – Incident Response to Terrorist Bombing Awareness Training Course
Lambton College NFPA 600 Evaluations to Advanced Interior / Exterior 1
FEMA –IS-00100 Introduction to Incident Command System, IS-00200 ICS for single Resources and Initial Actions Incidents, IS-00700 National Incident Management Systems, IS-00800.A National Response Plan
Dow Chemical – Incident Command System
Construction Safety Council – Online Excavation Competent Person Class

Certificate of Completion

awarded to

Bruce Reed

for participation in

Radiation Safety Officer Course – Madison, WI

October 22-26, 2007

ENGELHARDT & ASSOCIATES, INC.
RADIATION CONSULTANTS
6400 Gisholt Dr., Suite, 111 Madison, WI 53713
Phone: 800.525.3078 Fax: 608.224.0821
E-mail: engel@chorus.net
www.radexperts.com

Susan J. Engelhardt, M.S.

Joshua Walkowicz, M.S., CHP

Ralph Grunewald, Ph.D.

Judith Grunewald, R.N., M.S.

Michael Smith, Health Physics Associate

Michael D. Whelton
Dow Corning Corporation
P.O. Box 994
Midland,MI. 48686

Education

Ferris State University, Big Rapids, MI.
B.S. Occupational Safety & Health.

Professional Experience

Dow Corning Corp., Midland, MI. **9/80-Present**

Safety Analyst – Midland Plant. **2002-Present**

Responsibilities include:
-Safety Responsibility for four Supply Chains
-Safety expertise in Confined Space Entries & Safe Work Permits
-Lead investigations of injuries/incidents throughout the plant
-Assist with proactive Safety efforts such as JSA's, audits etc.

Safety/Environmental Team Leader- Auburn, Mi Plant **1995-2002**

Responsibilities include:
-Lead all Safety & Environmental efforts for the Auburn Plant.

Safety/Environmental Team Leader-Hemlock Medical Plant **1990-1995**

Responsibilities include:
-Lead all Safety & Environmental efforts for the Hemlock Medical Plant.

Safety Rep. for the Midland Plant **1985-1990**

Responsibilities include:
-Day to day Safety Responsibilities for the Basic & Finishing Units
-Radiation Safety Officer for the Plant
-Industrial Hygiene Rep for the plant
-Management of the Respirator Program.

Project Industrial Hygienist **1980-1985**

Responsibilities include:
-Plan & conduct I.H. surveys for Chemical Vapors, Dust, & Noise, Heat Stress etc.
-Audit I.H. programs for Dow Corning plants in the United States.

Certificate of Completion

awarded to

Michael Whelton

for participation in

Radiation Safety Officer Course – Madison, WI
October 22-26, 2007

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Ralph Grunewald, Ph.D.

Judith Grunewald, R.N., M.S.

Michael Smith, Health Physics Associate

Radiation Safety Officer Course

October 22-26, 2007

Madison, Wisconsin

Day One	Description	Objectives	Trainer(s)
07:30 – 08:00 AM	Continental Breakfast		
08:00 – 08:15	Seminar Objectives/Overview	Explain seminar objectives and meet trainers.	Sue Engelhardt
08:15 – 08:40	Radiation and Its Uses (Chapter 1) • Ionizing radiation and radioactive decay • Contemporary applications	Identify common applications of ionizing radiation in industry, research and medicine.	Sue
08:40 – 09:00	Regulatory Agencies and Licensing (Chapter 2) • Where regulatory standards come from • NRC vs. Agreement States • Other agencies (e.g., OSHA, FDA, EPA, DOT)	Relate how the NRC regulations are developed. Define difference between Agreement vs. Non-Agreement states. Recognize how other agencies regulate radiation.	Sue
09:00 – 09:10	Break		
09:10 – 10:00	Math Review (Chapter 4) • Basic mathematical functions (algebra, exponents, logarithms, unit conversions) • Counting statistics • Common health physics applications	Describe basic functions involving exponents, logarithms, conversion factors, etc. Apply math functions used in common health physics applications (e.g., efficiencies, inverse square law, decay, attenuation, specific activity)	Josh Walkowicz
10:00 – 10:10	Break		
10:10 – 11:30	Radiation Physics (Chapter 5) • Atomic composition, structure, and terms • Radioactive decay and half-life • Properties of common decay products	Relate the basic atomic structure and components (protons, neutrons, and electrons), and common terms. Define half-life and radioactive decay. Describe basic properties of particulate (alpha, beta) and electromagnetic (x-ray, gamma) decay products.	Ralph Grunewald
11:30 – 12:45 PM	Lunch		
12:45 – 02:50 (10 min break)	Radiation Physics (Chapter 5), continued • Radioactive decay modes and schemes • Interactions with matter	Recognize the basic decay modes and characteristics for alpha, beta, x- and gamma emissions. Compare interaction mechanisms (directly vs. indirectly ionizing).	Ralph
02:50 – 03:00	Break		
03:00 – 04:00	Group Sessions	See group objectives	All

Day Two	Description	Objectives	Trainer(s)
07:30 – 08:00 AM	Continental Breakfast		
08:00 – 08:30	Radiation Units (Chapter 6) • Exposure units • Dose and dose equivalent units • Energy transfer (LET, QF)	Identify the difference between exposure and dose. Relate the traditional and SI units for exposure (R C/kg), dose (rad, Gy), and dose equivalent (rem, Sv). Examine linear energy transfer and quality factors as these pertain to biological effectiveness.	Josh Walkowicz
08:30 – 10:20 (10 min. break)	Radiation Detection and Measurement (Chapter 10) • Types of equipment • Appropriate uses • Demonstration of equipment • Self-reading dosimeters	Describe how to select and operate equipment for the different types of radiation. Identify the basic design principles of various detectors.	Ralph
10:20 – 10:30	Break		
10:30 – 11:30	Group Sessions	See group objectives	All
11:30 – 12:45 PM	Lunch		
12:45 – 01:40	Regulatory Dose Limits and Radiation Dosimetry (Chapter 7) • Dose limits (public vs. occupational) • Types of dosimeters; how they work • Personnel monitoring requirements • Dosimetry reporting requirements	Identify the regulatory dose limits for radiation workers, the embryo/fetus of a declared pregnant woman, and members of the public. Explain types and limitations of personnel dosimeters. Relate monitoring and reporting requirements.	Josh
01:40 – 01:50	Break		
01:50 – 02:30	Radiation Protection (Chapter 11) • ALARA • Methods for protection • Posting requirements	Explain what ALARA is and how to implement. Describe methods used for radiation protection (e.g., time, distance, shielding, contamination control). Apply inverse square law.	Sue
02:30 – 02:40	Break		
02:40 – 03:00	Common Sources of Radiation (Chapter 6) • Naturally occurring • Medical	Relate typical levels of radiation from common sources.	Sue
03:00 – 04:00	Group Sessions	See group objectives	All

Day Three	Description	Objectives	Trainer(s)
07:30 – 08:00 AM	Continental Breakfast		
08:00 – 09:00	Radiation Biology (Chapter 9) • Cellular, tissue, and systemic effects • Delayed effects, early somatic effects • Acute radiation syndrome • Hormesis, threshold vs. non-threshold • Risk vs. benefit	Describe the biological effects of radiation and the dose levels where these effects occur. Contrast perceived vs. real risk.	Sue
09:00 – 09:10	Break		
09:10 – 10:20	Radiation Incidents and Emergency Response (Chapter 13) • Types (gauge, medical, academic) • Procedures • Source leakage, loss • Emergency personnel as responders • Performance based training • Interactions with public, media, and employees	Define the RSO's role in planning for and preventing accidents. Examine key components of an emergency plan.	Judy Grunewald
10:20 – 10:30	Break		
10:30 – 11:30	Group Sessions	See group objectives	All
11:30 – 12:45 PM	Lunch		
12:45 – 02:00	Radiation Protection Programs (Chapter 3) • Written programs • Key elements (e.g., RSO/RSC, facility design, PPE, procedures, records, audits) • Annual reviews • Topical discussions – security and current regulatory concerns on terrorism	Examine key elements of an effective radiation protection program. Assess record keeping requirements	Sue
02:00 – 02:10	Break		
02:10 – 02:50	Responsibilities for Radiation Protection (Chap 16) • Who is responsible • Legal issues	Relate various responsibilities for radiation protection and regulatory compliance.	Michael Smith
02:50 – 03:00	Break		
03:00 – 04:00	Group Sessions	See group objectives	All

Day/Time	Description	Objectives	Teacher(s)
07:30 – 08:00 AM	Continental Breakfast		
08:00 – 08:50	NRC Regulations (Chapter 2) • Part 19, Notices, Instructions to Workers • Part 20, Radiation Protection Standards • Parts 30-35, license types and provisions • Special requirements (gauges and licenses)	Identify critical provisions of Part 19 and 20 worker information and protection standards. Identify NRC license and registration requirements (e.g., exempt, general, specific). Interpret basic provisions for specific license categories	Josh
08:50 – 09:00	Break		
09:00 – 09:50	Radiation Producing Equipment (Chapter 12) • Physics • Regulations • Programs • Dangers and biological effects	Learn differences between radiation producing equipment and radioactive material as far as regulations, licensing and programs are concerned.	Josh
09:50 – 10:00	Break		
10:00 – 10:25	Radioactive Waste (Chapter 14) • Types of waste • Disposal options • Transfer vs. storage	Relate radioactive waste disposal regulations and options (e.g., sewer, DIS). Explain waste transfer and storage requirements (e.g., facility needs).	Josh
10:25 – 11:15	Packaging, Transport, and Receipt of Radioactive Materials (Chapter 15) • Shipper's responsibilities • Transportation regulations (NRC, DOT, IATA) • Classification and packaging • Transport on public roads • Receipt of radioactive materials	Define shipper's responsibilities. Identify when radioactive materials are regulated for transportation purposes, and basic provisions for limited and Type A quantities of radioactive materials. Describe DOT provisions for employee training and transport on public roads. Procedures for safe receipt/opening of packages.	Michael
11:15 – 12:30 PM	Lunch		
12:30 – 04:00 (15 min break)	Laboratory Workstations • Lab A - Radioactive decay measurements • Lab B - Solid scintillator detector • Lab C - Geiger counter operation/measurements • Lab D – Survey and decontamination techniques • Lab E – Direct/scatter radiation measurements and leak testing	See Laboratory Agenda (handout)	All

Day Five	Description	Objectives	Terms(s)
07:30 – 08:00 AM	Continental Breakfast		
08:00 – 09:00	Regulatory Inspections (Chapter 17) • How to prepare for NRC/state inspections • How to deal with inspectors • What to do if the inspection is going badly • What to do if called for an enforcement conference	Relate the inspection process. Explain how to prepare for and respond to enforcement activities.	Sue
09:00 – 09:10	Break		
09:10 – 09:30	Interactions with the Public and Media • Discussion of media contacts and public information on the sensitive issue of radiation	Define the NRC's media notification criteria. Define key aspects of communicating with the public and media.	Sue
09:30 – 10:10	Group Sessions - Writing a License/Do's & Don'ts • New, renewal, & amendment applications • NRC Form 313 or equivalent for Agreement states • Content • Fees	See group objectives	All
10:10 – 10:20	Break		
10:20 – 11:20	Group Sessions - Reportable Incidents • When to/not to report an incident • Interactions with the public and media	See group objectives	All
11:20 – 12:00	Examination and wrap-up	Complete exam and score 85% or better	All

Radiation Safety Officer Course
Performance Objectives for the Medical Group

These performance objectives are tailored to the group and individual participants' needs. Each session is approximately 1 hour.

Day One: PM Session
- Demonstrate how to use your calculator.
- Complete common health physics applications and sample math problems (see Chapter 4).
- Restate the regulatory structure for various types of radiation and radioactive materials commonly used in medicine.
- Examine alpha, beta, and gamma decay processes and interactions with matter.
- Define and convert between various radioactivity units (Ci, Bq, dpm, dps, cpm).
- Calculate radioactive decay both forward and backward in time.
- Calculate attenuation of radiation.

Day Two: AM Session
- Recognize various types of detectors for beta and gamma radiation (e.g., GM, LEG, HEG), and how to select appropriate detectors (e.g., for dose surveys vs. contamination surveys).
- Demonstrate how to perform function tests (hands-on) and understand calibration requirements for survey meters commonly used in medical settings.
- Explain basic counting statistics – distributions of a single count, standard deviation, and minimum detectable count.

Day Two: PM Session
- Examine NRC dose limits and personnel dosimetry requirements - who needs dosimeters, when, why, etc.
- Describe practical radiation protection measures (time, distance, shielding, contamination control) and ALARA strategies for medical settings.
- Demonstrate how to conduct wipe tests and leak tests for removable contamination.
- Differentiate NRC required radiation warning signs, labels, postings, etc. needed in experimental settings.
- Calculate dose from a point source.

Day Three: AM Session
- Explain personnel bioassays for radioactive materials commonly used in medicine.
- Compare patient release after nuclear medicine procedures vs. non-release of radioactivity from the research setting.
- Identify RSO responsibilities and the critical components of a radiation safety program in a medical facility.
- Describe Quality Management Program requirements and effective auditing techniques.
- Describe NRC requirements for training (frequency, content, etc.).
- Explain how to receive/ship a radioactive package (e.g., for Nuclear Medicine).
- Describe radioactive waste management and setting up a decay in storage procedure.

Day Three: PM Session
- Examine emergency preparedness and response.

Day Four: PM Session (Laboratory Workstations with all groups)

- *Lab A (Radioactive Decay Measurements)* – Measure the radioactivity of an unknown radioactive sample at two different time points. Calculate the half-life and determine the radionuclide from a list of possibilities. Complete worksheet and discuss findings.
- *Lab B (Solid Scintillator Detector)* – Count background, standard, and sample (leak test) using a single channel analyzer with solid scintillator. Calculate detector efficiency, minimum detectable activity, and sample activity. Complete worksheet and discuss findings.
- *Lab C (Geiger Counter Operation and Measurements)* – Inspect survey instruments for proper calibration and operation. Survey exposure rates from several beta and gamma emitting sources and observe inverse square law and effect of various shielding materials. Complete worksheet and discuss findings.
- *Lab D (Survey and Decontamination Techniques)* – Survey source/work area for radiation exposure rates and possible radioactive contamination. Demonstrate techniques for using a survey meter and performing a wipe test, and discuss response procedures for possible contamination. Complete worksheet and discuss findings/observations.
- *Lab E (Direct/Scatter Radiation Measurements and Leak Testing)* – Measure radiation levels around a sealed source through various scattering materials, and observe meter calibration and sealed source leak test procedures. Complete worksheet and discuss findings/observations.

Day Five: AM Session

- Writing a License
  - Identify regulatory requirements and NRC/state licensing process for medical uses.
  - Identify the do's and don'ts when writing a license.
  - Identify what references are available for assistance (e.g., NRC Regulatory Guides).
- Reportable Incidents
  - Complete/discuss reportable incident scenarios.
  - Summarize NRC requirements for reporting incidents and misadministrations.
  - Describe the NRC's media notification criteria.

Performance Objectives for the Gauge Group

These performance objectives are tailored to the group and individual participants' needs. Each session is approximately 1 hour.

Day One: PM Session

- Demonstrate how to use your calculator.
- Complete common health physics applications and sample math problems (see Chapter 4).
- Restate physics and interactions of radiation with matter as it pertains to common radionuclides used in gauges.
- Compare slides on specific operation of many types of gauges (to understand common types of gauges and how they work).
- Recognize general characteristics of source capsule configuration and shutter designs.
- Explain basic counting statistics - distributions of a single count, standard deviation, and minimum detectable count.
- Define and convert between various radioactivity units (Ci, Bq, dpm, dps, cpm).
- Calculate radioactive decay.

Day Two: AM Session

- Recognize the various types and uses of survey meters.
- Demonstrate gauge types/uses.
- Differentiate what you can and cannot do with gauges with regards to maintenance and repair – routine vs. non-routine (installation, relocation, repair)
- Demonstrate (hands-on) opening and closing shutters (both cylinder and flat swing type).

Day Two: PM Session

- Describe ALARA strategies for mills/gauges.
- Demonstrate time, distance, and shielding principles.
- Differentiate what signs are needed in experimental settings.
- Examine badge requirements - who needs them, why, etc.
- Calculate dose from a point source.

Day Three: AM Session

- Examine emergency preparedness and response.

Day Three: PM Session

- Demonstrate proper lockout/tagout and then lockout/tagout a gauge (hands-on).
- Demonstrate survey procedures - exposure rate monitoring, leak tests, and wipe tests.
- Demonstrate and do hands-on radiation measurements with a Geiger counter and an ionization chamber around sources to observe how radiation is shielded, collimated, and scattered.
- Demonstrate radiation measurements through various shielding materials and at various distances to observe attenuation and understand inverse square law.
- Identify responsibilities of the RSO for the radiation safety program.
- Describe non-routine source/gauge installation, relocation & repair (hands-on)

- *Lab A (Radioactive Decay Measurements)* – Measure the radioactivity of an unknown radioactive sample at two different time points. Calculate the half-life and determine the radionuclide from a list of possibilities. Complete worksheet and discuss findings.
- *Lab B (Solid Scintillator Detector)* – Count background, standard, and sample (leak test) using a single channel analyzer with solid scintillator. Calculate detector efficiency, minimum detectable activity, and sample activity. Complete worksheet and discuss findings.
- *Lab C (Geiger Counter Operation and Measurements)* – Inspect survey instruments for proper calibration and operation. Survey exposure rates from several beta and gamma emitting sources and observe inverse square law and effect of various shielding materials. Complete worksheet and discuss findings.
- *Lab D (Survey and Decontamination Techniques)* – Survey source/work area for radiation exposure rates and possible radioactive contamination. Demonstrate techniques for using a survey meter and performing a wipe test, and discuss response procedures for possible contamination. Complete worksheet and discuss findings/observations.
- *Lab E (Direct/Scatter Radiation Measurements and Leak Testing)* – Measure radiation levels around a sealed source through various scattering materials, and observe meter calibration and sealed source leak test procedures. Complete worksheet and discuss findings/observations.

Day Five: AM Session

- Writing a License
  - Explain device registrations and general vs. specific licenses for gauges.
  - Identify the do's and don'ts when writing a license.
  - Identify what references are available for assistance (e.g., NRC Regulatory Guides).
- Reportable Incidents
  - Complete/discuss reportable incident scenarios.
  - Summarize NRC requirements for reporting incidents.
  - Describe the NRC's media notification criteria.

Radiation Safety Officer Course
Performance Objectives for the Research Group

These performance objectives are tailored to the group and individual participants' needs. Each session is approximately 1 hour.

Day One: PM Session
- Demonstrate how to use your calculator.
- Complete common health physics applications and sample math problems (see Chapter 4).
- Restate the regulatory structure for various types of radiation and radioactive materials commonly used in research.
- Examine alpha, beta, and gamma decay processes and interactions with matter.
- Define and convert between various radioactivity units (Ci, Bq, dpm, dps, cpm).
- Calculate radioactive decay.
- Calculate attenuation of radiation.

Day Two: AM Session
- Recognize various types of detectors for beta and gamma radiation (e.g., LSC, GM, LEG), and how to select appropriate equipment (e.g., for exposure rate monitoring vs. radioanalyses).
- Demonstrate how to perform function tests (hands-on) and understand calibration requirements for survey meters commonly used in research facilities.
- Explain basic counting statistics - distributions of a single count, standard deviation, and minimum detectable count.

Day Two: PM Session
- Examine NRC dose limits and personnel dosimetry requirements - who needs dosimeters, when, why, etc.
- Describe practical radiation protection measures (time, distance, shielding, contamination control) and ALARA strategies for research settings.
- Demonstrate how to conduct wipe tests and leak tests for removable contamination.
- Differentiate NRC required radiation warning signs, labels, postings, etc. needed in experimental settings.
- Calculate dose from a point source.

Day Three: AM Session
- Explain personnel bioassays for radioactive materials commonly used in research.
- Contrast radiation risk vs. benefit issues.
- Identify RSO responsibilities and the critical components of a radiation safety program in a research facility.
- Describe effective auditing techniques.
- Describe NRC requirements for training (frequency, content, etc.).
- Explain how to receive/ship a radioactive package.
- Describe radioactive waste minimization, management, and disposal (including decay in storage) for radioactive materials commonly used in research.

Day Three: PM Session
- Examine emergency preparedness and response.

Day Four: PM Session (Laboratory Workstations with all groups)

- *Lab A (Radioactive Decay Measurements)* – Measure the radioactivity of an unknown radioactive sample at two different time points. Calculate the half-life and determine the radionuclide from a list of possibilities. Complete worksheet and discuss findings.
- *Lab B (Solid Scintillator Detector)* – Count background, standard, and sample (leak test) using a single channel analyzer with solid scintillator. Calculate detector efficiency, minimum detectable activity, and sample activity. Complete worksheet and discuss findings.
- *Lab C (Geiger Counter Operation and Measurements)* – Inspect survey instruments for proper calibration and operation. Survey exposure rates from several beta and gamma emitting sources and observe inverse square law and effect of various shielding materials. Complete worksheet and discuss findings.
- *Lab D (Survey and Decontamination Techniques)* – Survey source/work area for radiation exposure rates and possible radioactive contamination. Demonstrate techniques for using a survey meter and performing a wipe test, and discuss response procedures for possible contamination. Complete worksheet and discuss findings/observations.
- *Lab E (Direct/Scatter Radiation Measurements and Leak Testing)* – Measure radiation levels around a sealed source through various scattering materials, and observe meter calibration and sealed source leak test procedures. Complete worksheet and discuss findings/observations.

Day Five: AM Session

- Writing a License
  - Identify regulatory requirements and NRC/state licensing process for research related use.
  - Identify the do's and don'ts when writing a license.
  - Identify what references are available for assistance (e.g., NRC Regulatory Guides).
- Reportable Incidents
  - Complete/discuss reportable incident scenarios.
  - Summarize NRC requirements for reporting incidents.
  - Describe the NRC's media notification criteria.

Dow Corning Corporation
Midland, MI 48686-0994

U.S. NRC Region III
Material Licensing Section
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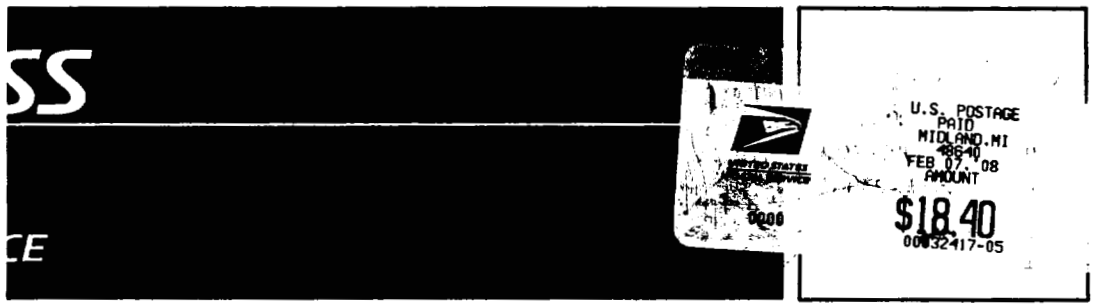
Lisle, Illinois 60532-4352



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