



4 March 2008

Steven Courtemanche
Division of Nuclear Materials Safety
U.S. Nuclear Regulatory Commission, Region I
475 Allendale Road
King of Prussia, PA 19406-1415

MS 16
K-4

03003759

RE: Byproduct License No. 06-00221-08
Mail Control No. 141505

Dear Mr. Courtemanche:

As you requested, I am returning the original Letter of Credit dated 10/14/2004, and amendment numbers 1 and 2 dated 11/17/2004 and 12/31/2005, respectively. The first two items are the originals. The second amendment looks like a fax, but it was apparently what was in your file, since it has two holes punched at the top.

If there are any questions concerning these documents, please contact me. Thank you for your attention to this matter.

Sincerely,

Robin Charlton

Robin R. Charlton, Ph.D.
Radiation Safety Officer
Product Development—NA 1-2
Chemtura Corporation
199 Benson Road
Middlebury, CT 06749-0001

Phone: 203-573-3692
Fax: 203-573-3660
Email: robin.charlton@chemtura.com

Attachments

CC: Dr. Uwe Wanner, Mr. Jayanta Nag, and Mr. Matt Sokol

RECEIVED
REGION I
2008 MAR -5 AM 9:23

141505

NMSS/RGN1 MATERIALS-002

Deutsche Bank



DEUTSCHE BANK AG, NEW YORK BRANCH
GLOBAL LOAN OPERATIONS
STANDBY LETTER OF CREDIT, 38TH FLOOR
60 WALL STREET, MAIL STOP NYC60-3812
NEW YORK, NY 10005

ISSUE DATE: OCTOBER 14, 2004

U.S. NUCLEAR REGULATORY COMMISSION
ATT: REGIONAL ADMINISTRATOR
REGION #1
475 ALLENDALE ROAD
KING OF PRUSSIA, PA

04 SEP 20 P 1
RECEIVED
REGION 1

DEAR SIR OR MADAM:

WE HEREBY ESTABLISH OUR IRREVOCABLE STANDBY LETTER OF CREDIT NO. [REDACTED] IN YOUR FAVOR, AT THE REQUEST AND FOR THE ACCOUNT OF CROMPTON CORPORATION, 199 BENSON ROAD, MIDDLEBURY, CT 06749 ON THE BEHALF OF UNIROYAL CHEMICAL CO., INC. UP TO THE AGGREGATE AMOUNT OF ONE HUNDRED FIFTY THOUSAND U.S DOLLARS \$150,000.00 AVAILABLE UPON PRESENTATION OF:

(1) YOUR SIGHT DRAFT DRAWN ON US, BEARING REFERENCE TO THIS LETTER OF CREDIT NO. [REDACTED], AND

(2) YOUR SIGNED STATEMENT READING AS FOLLOWS:

“I CERTIFY THAT THE AMOUNT OF THE DRAFT IS PAYABLE PURSUANT TO REGULATIONS ISSUED UNDER AUTHORITY OF THE ATOMIC ENERGY ACT OF 1954”

THIS LETTER OF CREDIT IS ISSUED IN ACCORDANCE WITH REGULATIONS ISSUED UNDER THE AUTHORITY OF THE U.S. NUCLEAR REGULATORY COMMISSION (NRC), AN AGENCY OF THE U.S. GOVERNMENT, PURSUANT TO THE ATOMIC ENERGY ACT OF 1954, AS AMENDED, AND THE ENERGY REORGANIZATION ACT OF 1974. THE NRC HAS PROMULGATED REGULATIONS IN TITLE 10, CHAPTER 1 OF THE CODE OF FEDERAL REGULATIONS, PART (30, 40, 70 OR 72), WHICH REQUIRE THAT A HOLDER OF, OR AN APPLICANT FOR, A LICENCE ISSUED UNDER 10 CFR PARTS (30, 40, 70 OR 72) PROVIDE ASSURANCE THAT FUNDS WILL BE AVAILABLE WHEN NEEDED FOR DECOMMISSIONING.

THE LETTER OF CREDIT IS EFFECTIVE AS OF OCTOBER 14 2004 AND SHALL EXPIRE ON OCTOBER 14, 2005, BUT SUCH EXPIRATION DATE SHALL BE AUTOMATICALLY EXTENDED FOR A PERIOD OF AT LEAST ONE (1) YEAR ON OCTOBER 14, 2005 AND ON EACH SUCCESSIVE EXPIRATION DATE, UNLESS AT LEAST 90 DAYS BEFORE THE CURRENT EXPIRATION DATE, WE NOTIFY BOTH YOU AND CROMPTON CORPORATION BY CERTIFIED MAIL AS SHOWN IN THE SIGNED RETURN RECEIPTS THAT WE DO NOT CHOOSE TO EXTEND THIS LETTER OF CREDIT FOR ANY SUCH ADDITIONAL PERIOD. IF CROMPRON CORPORATION IS UNABLE TO SECURE ALTERNATIVE FINANCIAL ASSURANCE TO REPLACE THIS LETTER OF CREDIT WITHIN 30 DAYS OF NOTIFICATION OF CANCELLATION THE NCR MAY DRAW UPON THE FULL VALUE OF THIS LETTER OF CREDIT PRIOR TO CANCELLATION. THE BANK SHALL GIVE

NONNEGOTIABLE



IMMEDIATE NOTICE TO CROMPTON CORPORATION AND THE U.S. NUCLEAR REGULATORY COMMISSION OF ANY NOTICE RECEIVED OR ACTION FILED ALLEGING (1) THE INSOLVENCY OR BANKRUPTCY OF DEUTSCHE BANK AG NEW YORK BRANCH OR ANY VIOLATIONS OF REGULATORY REQUIREMENTS THAT COULD RESULT IN SUSPENSION OR REVOCATION OF DEUTSCHE BANK AG NEW YORK BRANCH'S CHARTER OR LICENSE TO DO BUSINESS. DEUTSCHE BANK AG NEW YORK BRANCH ALSO SHALL GIVE IMMEDIATE NOTICE IF DEUTSCHE BANK AG NEW YORK BRANCH, FOR ANY REASON, BECOMES UNABLE TO FULFILL ITS OBLIGATION UNDER THIS LETTER OF CREDIT.

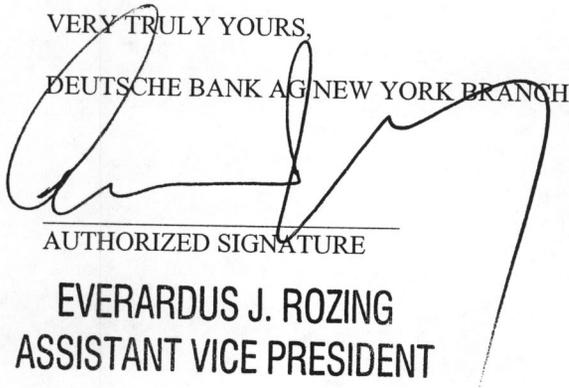
WHENEVER THIS LETTER OF CREDIT IS DRAWN ON UNDER AND IN COMPLIANCE WITH THE TERMS OF THIS LETTER OF CREDIT, WE SHALL DULY HONOR SUCH DRAFT UPON PRESENTATION TO US WITHIN 30 DAYS, AND WE SHALL PAY THE AMOUNT OF THE DRAFT INTO THE STANDBY TRUST FUND OF CROMPTON CORPORATION IN ACCORDANCE WITH YOUR INSTRUCTIONS.

EACH DRAFT MUST BEAR ON ITS FACE THE CLAUSE: "DRAWN UNDER LETTER OF CREDIT NO. [REDACTED] DATED OCTOBER 14, 2004 AND THE TOTAL OF THIS DRAFT AND ALL OTHER DRAFTS PREVIOUSLY DRAWN UNDER THIS LETTER OF CREDIT NO. [REDACTED] DOES NOT EXCEED \$150,000.00."

EXCEPT AS OTHERWISE EXPRESSLY STATED HEREIN, THIS LETTER OF CREDIT IS ISSUED SUBJECT TO THE UNIFORM CUSTOMS AND PRACTICE FOR DOCUMENTARY CREDITS (1993 REVISION), INTERNATIONAL CHAMBER OF COMMERCE PUBLICATION NO. 500.

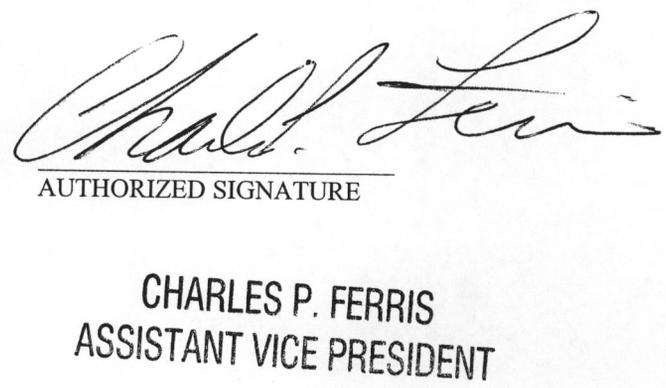
VERY TRULY YOURS,

DEUTSCHE BANK AG NEW YORK BRANCH



AUTHORIZED SIGNATURE

EVERARDUS J. ROZING
ASSISTANT VICE PRESIDENT



AUTHORIZED SIGNATURE

CHARLES P. FERRIS
ASSISTANT VICE PRESIDENT

RECEIVED
Deutsche Bank



'04 NOV 22 P1:21

DEUTSCHE BANK AG, NEW YORK BRANCH
GLOBAL LOAN OPERATIONS
STANDBY LETTER OF CREDIT, 38TH FLOOR
60 WALL STREET, MAIL STOP NYC60-3812
NEW YORK, NY 10005

NOVEMBER 17, 2004

U.S. NUCLEAR REGULATORY COMMISSION
ATT: REGIONAL ADMINISTRATOR
REGION #1
475 ALLENDALE ROAD
KING OF PRUSSIA, PA

DEAR SIR OR MADAM:

WE HEREBY AMEND OUR IRREVOCABLE STANDBY LETTER OF CREDIT NO. [REDACTED] IN YOUR FAVOR, AT THE REQUEST AND FOR THE ACCOUNT OF CROMPTON CORPORATION, 199 BENSON ROAD, MIDDLEBURY, CT 06749 ON THE BEHALF OF UNIROYAL CHEMICAL CO., INC. AS FOLLOWS:

THE LETTER OF CREDIT AMOUNT IS HEREBY INCREASED BY \$75,000.00 TO \$225,000.00.

THE THIRD PARAGRAPH IS DELETED AND REPLACED AS FOLLOWS:

THE LETTER OF CREDIT IS EFFECTIVE AS OF OCTOBER 14 2004 AND SHALL EXPIRE ON OCTOBER 14, 2005, BUT SUCH EXPIRATION DATE SHALL BE AUTOMATICALLY EXTENDED FOR A PERIOD OF AT LEAST ONE (1) YEAR ON OCTOBER 14, 2005 AND ON EACH SUCCESSIVE EXPIRATION DATE, UNLESS AT LEAST 90 DAYS BEFORE THE CURRENT EXPIRATION DATE, WE NOTIFY BOTH YOU AND CROMPTON CORPORATION BY CERTIFIED MAIL AS SHOWN IN THE SIGNED RETURN RECEIPTS THAT WE DO NOT CHOOSE TO EXTEND THIS LETTER OF CREDIT FOR ANY SUCH ADDITIONAL PERIOD. IF CROMPTON CORPORATION IS UNABLE TO SECURE ALTERNATIVE FINANCIAL ASSURANCE TO REPLACE THIS LETTER OF CREDIT WITHIN 30 DAYS OF NOTIFICATION OF CANCELLATION THE NRC MAY DRAW UPON THE FULL VALUE OF THIS LETTER OF CREDIT PRIOR TO CANCELLATION. THE BANK SHALL GIVE IMMEDIATE NOTICE TO CROMPTON CORPORATION AND THE U.S. NUCLEAR REGULATORY COMMISSION OF ANY NOTICE RECEIVED OR ACTION FILED ALLEGING (1) THE INSOLVENCY OR BANKRUPTCY OF DEUTSCHE BANK AG NEW YORK BRANCH OR ANY VIOLATIONS OF REGULATORY REQUIREMENTS THAT COULD RESULT IN SUSPENSION OR REVOCATION OF DEUTSCHE BANK AG NEW YORK BRANCH'S CHARTER OR LICENSE TO DO BUSINESS. DEUTSCHE BANK AG NEW YORK BRANCH ALSO SHALL GIVE IMMEDIATE NOTICE IF DEUTSCHE BANK AG NEW YORK BRANCH, FOR ANY REASON, BECOMES UNABLE TO FULFILL ITS OBLIGATION UNDER THIS LETTER OF CREDIT.

ALL OTHER TERMS AND CONDITIONS REMAIN UNCHANGED.

VERY TRULY YOURS,

DEUTSCHE BANK AG NEW YORK BRANCH

AUTHORIZED SIGNATURE

AUTHORIZED SIGNATURE

NONNEGOTIABLE

Deutsche Bank



DEUTSCHE BANK AG, NEW YORK BRANCH
GLOBAL LOAN OPERATIONS
STANDBY LETTER OF CREDIT, 38TH FLOOR
60 WALL STREET, MAIL STOP NYC60-3812
NEW YORK, NY 10005

DECEMBER 31, 2005

U.S. NUCLEAR REGULATORY COMMISSION
ATT: REGIONAL ADMINISTRATOR
REGION #1
475 ALLENDALE ROAD
KING OF PRUSSIA, PA

DEAR SIR OR MADAM:

WE HEREBY AMEND OUR IRREVOCABLE STANDBY LETTER OF CREDIT NO. [REDACTED] IN
YOUR FAVOR AS FOLLOWS:

THE NAME OF THE APPLICANT HAS BEEN AMENDED TO READ AS:

CHEMTURA CORPORATION ON BEHALF OF CHEMTURA USA CORPORATION.

ALL OTHER TERMS AND CONDITIONS REMAIN UNCHANGED.

VERY TRULY YOURS,

DEUTSCHE BANK AG NEW YORK BRANCH

AUTHORIZED SIGNATURE

AUTHORIZED SIGNATURE

NONNEGOTIABLE