

OCT 9 1979

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(08798)

Dow Chemical Company
ATTN: Dennis L. Barsten
1803 Building
Midland, MI 48640

Gentlemen:

This refers to your letter dated May 17, 1979, providing additional information concerning the renewal of License No. STB-527 (Docket No. 040-00017). Your letter has raised additional questions concerning your activities under License No. STB-527.

Your May 17, 1979 letter refers to storage only at your Bay City, Michigan plant whereas your current license also references your facilities in Midland, Michigan and Madison, Illinois. If you have abandoned or returned to unrestricted use facilities in which licensed material was used and/or stored at your Midland, Michigan and/or Madison, Illinois plants, we need information concerning your decontamination and radiation survey activities in accordance with the enclosed guide, GUIDELINES FOR DECONTAMINATION OF FACILITIES AND EQUIPMENT PRIOR TO RELEASE FOR UNRESTRICTED USE OR TERMINATION OF LICENSES FOR BYPRODUCT, SOURCE, OR SPECIAL NUCLEAR MATERIAL. For areas in your Midland, Michigan and/or Madison, Illinois facilities which contained soil contamination, we need information showing that all source material present in the soils was identified and removed from those areas prior to abandonment or return to unrestricted use.

Your May 17, 1979 letter also states that magnesium-thorium wastes are stored in the northeast corner of your plant site in Bay City, Michigan, and that these wastes were... "covered with several inches of earth and coated with a road sealant." Our review of your applications referenced in your license revealed no information concerning storage of magnesium-thorium wastes in the manner described in your May 17, 1979 letter. Your application dated February 23, 1968, for example, specifies that thorium wastes are "generally" disposed of in compliance with 20.303 and 20.304. We are not certain that the method for storage of magnesium-thorium wastes described in your May 17, 1979 letter is an adequate method for storage of wastes containing licensed material and may constitute burial of waste in a manner which is beyond the scope of Section 20.30 in 10 CFR Part 20. In any event, our records show that you have been authorized

to store wastes containing source materials for more than seven years and for this reason we do not believe that it is in the public interest to continue this authorization. In view of this, we request that you submit, for our approval, a

SURNAME ▶

DATE ▶

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