

Docket No. 70-687

12 AUG 1981

Union Carbide Corporation
ATTN: Mr. James J. McGovern
Business Manager
Medical Products Division
P.O. Box 324
Tuxedo, NY 10987

Distribution: ~~Return original concurrence~~

~~Docket File 70-687~~

NMSS r/f
FCAF r/f
PDR *attached*
SHO
DCS
RECunningham
TFCarter
LCRouse
IE HQ (2)
WTing
LA File

JMiller, NRR
RFonner, ELD
DWeiss
JScinto



Gentlemen:

This refers to your letter of January 8, 1981 requesting that Special Nuclear Material License No. SNM-639 be amended to change the name of the licensee from Union Carbide Corporation to Union Carbide Subsidiary B, Inc. (Company B).

Your request for a "change in name" is, in fact, a request for transfer of the license to a separate corporate entity. We have had this request under review to consider the relationships of the entities identified. We have concluded that it is inappropriate to amend License No. SNM-639 at this time because, under a leaseback arrangement with Company B, Union Carbide (UCC) is the person in possession and using the special nuclear materials pursuant to this license. Therefore, UCC must be the licensee under the Atomic Energy Act, as amended, and Commission regulations.

If you have any questions regarding this matter, please contact me or Mr. Robert L. Fonner of our Office of the Executive Legal Director at (301) 492-8692.

Sincerely,

Original signed by
Leland C. Rouse

Leland C. Rouse, Chief
Advanced Fuel and Spent Fuel
Licensing Branch
Division of Fuel Cycle and
Material Safety

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*Telecon concurrence
from R.L. Fonner
8/11/81*

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