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**MONSANTO COMPANY**

800 NORTH LINDBERGH BOULEVARD

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<http://www.monsanto.com>

James Mullauer  
U. S. Nuclear Regulatory Commission Region III  
2443 Warrenville Road  
Suite 210  
Lisle, Illinois 60532-4352

Dear James,

Please see attached letter concerning Monsanto's acceptance of responsibility for compliance with NRC regulations for the Waste Handling Area at the Chesterfield Research Facility. Pharmacia (a wholly owned subsidiary of Pfizer) will not be including decommissioning data and analysis for this area in its NRC license termination submission to the NRC. This letter is not intended as an amendment to Monsanto's NRC license as all areas of the Chesterfield Research Facility, including the Waste Handling Area, are covered under Monsanto's current license.

Thank you,

Joe Eades  
Radiation Safety Officer  
Monsanto St. Louis  
314-694-8517

RECEIVED JUN 16 2010

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June 15, 2010

James Mullauer  
U.S. Nuclear Regulatory Commission Region III  
2443 Warrenville Road  
Suite 210  
Lisle, Illinois 60532-4352

**Re: Monsanto Company Materials License No. 24-32488-01: Notification of Responsibility for Radiological Operations in the Waste Handling Area at 700 Chesterfield Parkway, Chesterfield, Missouri**

Dear James:

As you may recall from previous communications, Monsanto Company (“Monsanto”) and Pharmacia Corporation (“Pharmacia”) have each held their own separate radioactive materials licenses for the 700 Chesterfield Parkway Research Facility located at 700 Chesterfield Parkway, in Chesterfield, Missouri (the “Facility”). Monsanto acquired the Facility from Pharmacia on April 9, 2010 (the “Closing Date”). In connection with this transaction, Pharmacia is pursuing the termination with unrestricted use of Pharmacia’s Materials License No. 24-32439-01. Accordingly, Pharmacia conducted decommissioning activities at the Facility, and it is our understanding that Pharmacia submitted its license termination documentation on June 14, 2010. This letter intends to clarify Monsanto’s and Pharmacia’s roles specifically with respect to the Waste Handling Area (see attached map) of the Facility.<sup>1/</sup>

Effective June 14, 2010, Monsanto intends to assume sole responsibility for compliance with NRC requirements associated with current and past use of radioactive materials in the Waste Handling Area, an area of the Facility in which both Monsanto and Pharmacia had historically managed radioactive waste. Because Monsanto intends to take responsibility for the Waste Handling Area under its existing license, Pharmacia will not include decommissioning survey data and analysis for that area in its license termination submission to NRC.

If we do not hear from you within thirty days of the date of this letter, we will assume that NRC has accepted Monsanto’s clarification of responsibility concerning the Waste Handling Area. Please do

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<sup>1/</sup> To be clear, Monsanto’s existing License No. 24-32488-01 does and will continue to apply to Monsanto’s use of radioactive materials throughout the Facility.

not hesitate to contact me if you have any questions or concerns. Thank you for your attention to this matter.

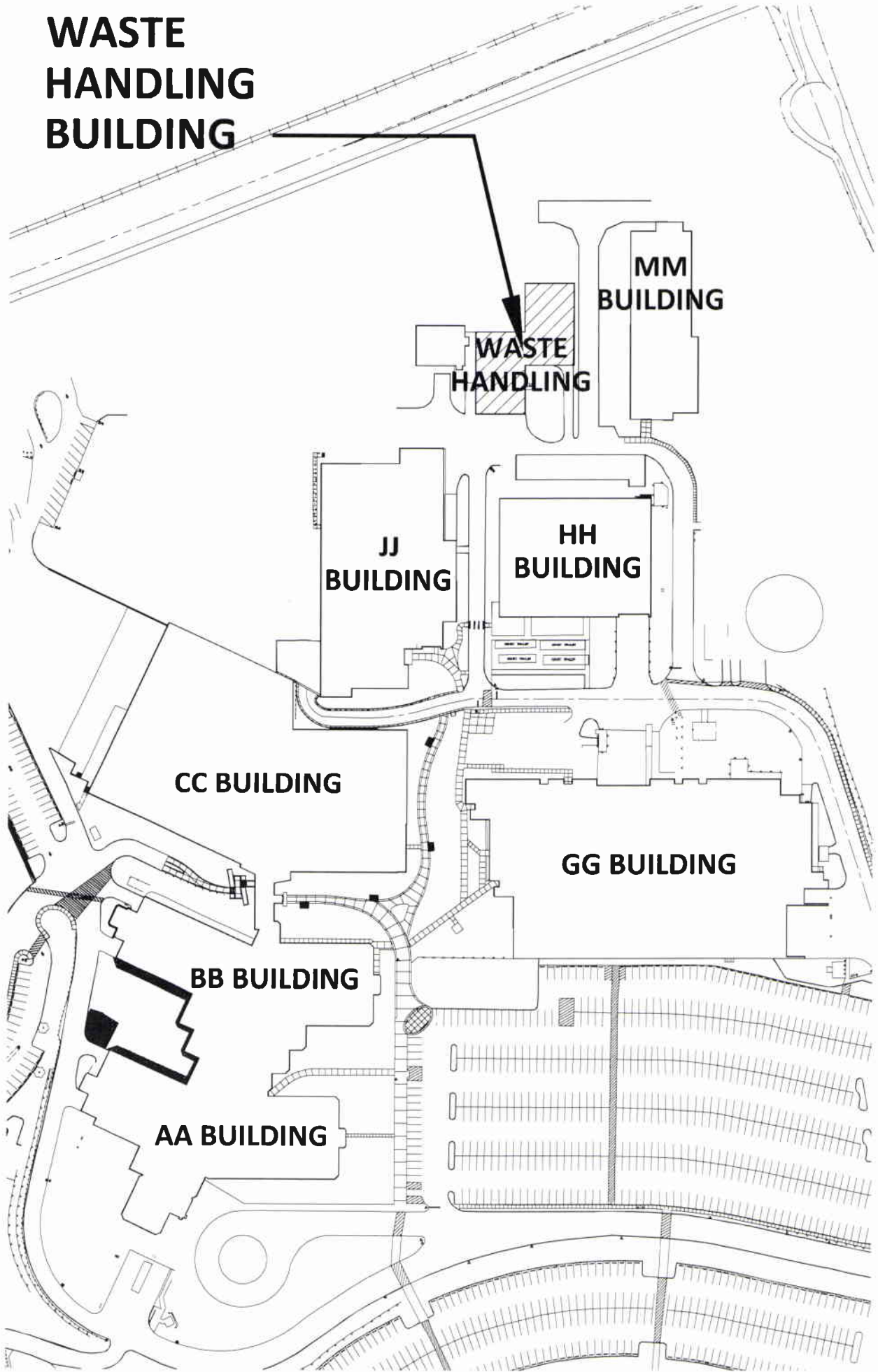
Sincerely,

A handwritten signature in dark ink that reads "Joseph W. Eades". The signature is written in a cursive style with a large, looping initial "J".

Joseph W. Eades  
Radiation Safety Officer  
Monsanto Company  
St. Louis, Missouri  
314-694-8517  
joseph.w.eades@monsanto.com

cc: Mike McCann  
Mark Ferin (Pfizer)  
Tim Popp (Pfizer RSO)

# WASTE HANDLING BUILDING



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Page 1 of 1

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