



The Dow Chemical Company
Midland, Michigan 48667

Mr. Geoffrey Wertz
Research and Test Reactors Licensing Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Subject: The Dow Chemical Company- License No. R-108; Docket No. 50-264

Enclosed is a revised response for the July 11, 2011 NRC letter "REQUEST FOR ADDITIONAL INFORMATION REGARDING FINANCIAL QUALIFICATIONS FOR THE DOW CHEMICAL COMPANY TRIGA RESEARCH REACTOR LICENSE RENEWAL (TAC NO.ME1595)" submitted in support of the license renewal.

Should you have any questions or need additional information, please contact the Facility Director, Paul O'Connor, at 989-638-6185.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 12, 2011

Paul O'Connor, Ph.D.
Director
Dow TRIGA Research Reactor

Subscribed and sworn to before me this 12 day of October, 2011

Notary Public
_____ County, Michigan
My Commission Expires:



cc: Wayne Konze, R&D Director - Analytical Sciences
Toby Threet, Counsel - Legal
Siaka Yusuf, Reactor Supervisor

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NRR

October 12, 2011

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Dow is providing a response in support of its Application for License Renewal for the Dow TRIGA research reactor.

RAI 2: Foreign ownership, control, or domination:

Sections 103d and 104d of the Act provide, in relevant part, that: No license may be issued to any corporation or other entity if the Commission knows or has reason to believe it is owned, controlled, or dominated by an alien, a foreign corporation or a foreign government. In any event, no license may be issued to any person within the United States if, in the opinion of the Commission, the issue of a license to such person would be inimical to the common defense and security or to the health and safety of the public. Section 50.38 of 10 CFR implements this statutory prohibition.

a) *Note: the RAI 2a specific question is omitted in this document because it contains Dow Proprietary Information.*

DTRR Response to RAI 2a:

As noted in the August 10, 2011 RAI responses from Dow, a teleconference was held on July 27, 2011 between The Dow Chemical Company and NRC personnel. Present for Dow Chemical were Paul O'Connor (DTRR Facility Director), Wayde Konze (ROC Chair), Toby Threet (Attorney), Michele Osmun (Paralegal), Siaka Yusuf (Reactor Supervisor). Present for NRC were: Walt Meyer, Renewal Project Manager; Jo Ann Simpson, Financial Analysis Branch; Chris Regan, Branch Chief, Financial Analysis Branch; Susan Uttal, Office of General Counsel; Beth Mizuno, Office of General Counsel; and Tom Fredrichs, Financial Analysis Branch.

At the July 21, 2011 meeting the NRC requested clarification of the Dow response of December 7, 2010 to address Dow's ownership and control with respect to the DTRR. NRC staff indicated that the Agency had reconsidered the previously-recommended approach which was reflected in Dow's then-current proposed Negotiation Action Plan. As a result, NRC staff suggested an alternative approach to the December 7, 2010 negotiation plan.

In a RAI response sent to NRC on August 10, 2011 Dow requested a 60 day extension to explore these options.

Dow had a teleconference meeting on August 11, 2011 with members of the NRC to review negation plan approaches and establish timing for a response. Present for Dow at this meeting were Toby Threet and Paul O'Connor; present for NRC were Walt Meyer, Jo Ann Simpson and Tom Fredrichs. Subsequent teleconference meetings between the NRC and Dow were held on September 9, 2011 and October 4, 2011.

As progress is being made toward a negation plan, Dow requests an additional 60 day extension to the July 11, 2011 RAI 2a.