



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.

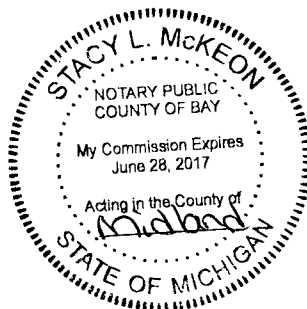
I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 07, 2011

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

Subscribed and sworn to before me this 7 day of December, 2011

Notary Public
_____ County, Michigan
My Commission Expires:



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

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NLR

December 07, 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:

Progress is being made toward a negation plan, and at this time, Dow requests an additional 30 day extension to the July 11, 2011 RAI 2a.