

June 6, 2012

Deputy Director  
Office of International Programs  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Re: Voluntary Self-Disclosure and Request for Amendment of Licenses

Dear Deputy Director,

Sigma-Aldrich is writing to voluntarily self-disclose an inaccuracy made in shipping of deuterium under five licenses issued by the U.S. Nuclear Regulatory Commission ("NRC") and to request that those five licenses be amended to reflect additional licensees in Block 1. Sigma-Aldrich discovered this error when reviewing the current specific licenses as part of new employee training. The five licenses addressed in this letter are attached hereto as Exhibit 1. In addition, five amended versions of Form 7 have been attached as Exhibit 2.

Section 110.32 of the NRC regulations sets forth the information required in an application for a specific license under NRC Form 7. Section 110.32(b) requires that the applicant provide the name and address of any other party, including the supplier of the material, if different from the applicant. While the regulations do not explain whether a subsidiary of the applicant will be considered a "party... different from the applicant," the general instructions to Form 7 clarify that the applicant should "For each license, amendment or renewal application, identify all foreign and domestic locations where exports or imports will be handled, sorted, repackaged and/or processed in any way." Furthermore, the instructions to Block 7 indicate that the applicant must disclose the names of any suppliers and other parties to the transaction not listed in the remainder of the form along with complete physical addresses where correspondence should be sent and where exports can be inspected. Finally, the instructions to Block 1 of Form 7 require that the licensee provide the "name and complete physical address of the corporation or other entity with direct control over distribution of proposed export(s)..."

When applying for these licenses, Sigma-Aldrich provided the requested information regarding the corporate parent, Sigma-Aldrich Corporation, and in some cases noted "and subsidiaries" in Block 1, but inadvertently failed to provide the names and physical addresses of its 100%-owned subsidiaries which had direct control over distribution of the exports. Sigma-Aldrich will be providing a second submission to the NRC with additional information relating to this voluntary self-disclosure but wanted to request amendments to existing licenses on an expedited basis.

Sigma-Aldrich requests amendment to five licenses pursuant to 10 CFR 110.51 (Amendment and renewal of licenses). Under Section 110.51, Sigma-Aldrich must submit the Form 7, specify the respects in which the licensee desires the license to be amended, and the grounds for such amendment. Exhibit 2 contains the required copies of Form 7. Sigma-Aldrich requests that the NRC update these licenses to include the following 100% owned subsidiaries as licensees:

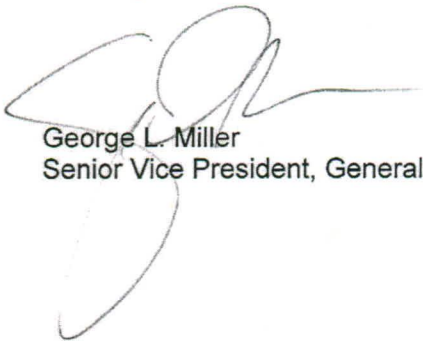
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- Aldrich Chemical Co. LLC, 6000 N. Teutonia Ave, Milwaukee, WI 53209
- Aldrich Chemical Co. LLC, 3858 Benner Rd, Miamisburg, OH 45342
- Aldrich Chemical Co. LLC, 6950 Ambassador Drive, Allentown, PA 18106
- Sigma-Aldrich Co. LLC, 3050 Spruce Street, St Louis, MO 63103

In addition, Sigma-Aldrich requests that the NRC update the physical addresses to include those listed above and in the attached copies of Form 7. Sigma-Aldrich is not requesting any amendment to other aspects of these licenses. Because the amendments to these licenses are technical in nature and do not involve material changes to the original license, we ask that the NRC grant these requests on an expedited basis.

If the International Programs Office has any questions regarding this submission, please contact Shannon MacMichael of Steptoe & Johnson LLP at (202) 429-8085 or [smacmichael@steptoe.com](mailto:smacmichael@steptoe.com).

Best regards,



George L. Miller  
Senior Vice President, General Counsel and Secretary

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JUN 08 2012  
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