



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
2100 RENAISSANCE BLVD.  
KING OF PRUSSIA, PA 19406-2713

February 13, 2019

Myoshi C. Aubain, DuPont Site Facilities Manager  
E. I. du Pont de Nemours and Company, Inc.  
Experimental Station  
200 Powder Mill Road  
PO Box 8352  
Wilmington, DE 19803

SUBJECT: E. I. DU PONT DE NEMOURS AND COMPANY, INC., EXPERIMENTAL  
STATION, REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO.  
611166

Dear Ms. Aubain:

This is in reference to your letter dated January 25, 2019, notifying the NRC in accordance with 10 CFR 30.34(b) of an upcoming change of control for NRC License No. 07-13441-02. In order to continue our review, we need the following additional information:

1. In accordance with NUREG-1556, "Consolidated Guidance About Materials Licenses", Volume 15, "Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses" (NUREG-1556, Volume 15), Section 5.1, "Description of Transaction," provide organizational charts for current organization, and the the new organization; charts should show the corporate structure of the license holder and its parent company(ies). Also, describe any other changes in the organization that exercises control over the licensed activities.
2. In accordance with NUREG-1556, Volume 15, Section 5.2, "Changes of Personnel," describe any changes in personnel that will require a license amendment or a new license. If new individuals will be listed on the NRC license, also provide the training and experience of the new individuals.
3. We understand that a location on License No. 07-13441-02 will be removed from the license simultaneously with its addition to the Dow AgroSciences License No. 13-26398-01. We also understand that the test plot at the Stine-Haskell location remains under License No. 07-13441-02 and is under review for release for unrestricted use. We further understand that you are preparing a license application for the certain activities that are currently performed under License No. 07-13441-02 that subsequently will be performed under one of the new wholly-owned subsidiary companies. In accordance with NUREG-1556, Volume 15, Section 5.3, "Changes of Location, Equipment, and Procedures," describe any other changes in facilities or equipment currently authorized under License No. 07-13441-02, as well as any relevant procedural changes.

4. In accordance with NUREG-1556, Volume 15, Section 5.4., "Surveillance Records," confirm that all required surveys were performed, documented and results reviewed; and any corrective actions are completed.
5. In accordance with NUREG-1556, volume 15, Section 5.5, "Decommissioning and Related Records Transfers", please provide the following:
  - a. State the following: "Pursuant to 10 CFR 30.35(g), we shall maintain drawings and records important to decommissioning and will transfer these records to an NRC or Agreement State licensee before licensed activities are transferred; or we will transfer the records to the appropriate NRC regional office before the license is terminated."
  - b. Describe the method and proposed timetable for the transfer of required records.
  - c. Provide a commitment by the transferee to maintain the records received from the transferor.
  - d. Provide a description of the facility with regard to contamination and ambient radiation levels.
  - e. Describe any decontamination to prepare the facility for decommissioning prior to the change of control.
  - f. If decommissioning will not occur until after the change of control, describe any contamination and confirm that the transferee is knowledgeable of the extent and levels of contamination, and applicable decommissioning requirements
  - g. Indicate whether operations will continue during the transfer; if so, provide either an agreement to perform a survey confirming that the facility is free of contamination or agreement by the transferee to accept the facility "as is" on the date of transfer.
6. In accordance with NUREG-1556, Volume 15, Section 5.6, "Transferee's Commitment to Abide by the Transferor's Commitments," provide an agreement to abide by all constraints, license conditions, requirements, representations, and commitments identified in and attributed to the existing license, or a description of the transferee's program to ensure compliance with the license and regulations.

We will continue our review upon receipt of this information. Please reply to my attention at:

Betsy Ullrich, Senior Health Physicist  
Mail Control No. 611166  
USNRC, Region I  
Division of Nuclear Materials Safety  
2100 Renaissance Boulevard  
King of Prussia, PA 19406

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

An electronic version of the NRC's regulations is available on the NRC Web Site at: [www.nrc.gov](http://www.nrc.gov). Additional information regarding use of radioactive materials may be obtained on the NRC Web Site at: <http://www.nrc.gov/materials/miau/mat-toolkits.html>. This site also provides the link to the toolbox for updated information on the revised regulations for naturally-occurring and accelerator-produced radioactive materials (NARM).

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web Site at: <http://www.nrc.gov/reading-rm/adams.html>. Please be aware that you may request that certain portions of your submittal to NRC be withheld from public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390. You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.

If you have any questions regarding this request for additional information, please contact me at (610) 337-5040 or via electronic mail to [Elizabeth.Ullrich@nrc.gov](mailto:Elizabeth.Ullrich@nrc.gov).

Thank you for your cooperation.

Sincerely,



Betsy Ullrich, Senior Health Physicist  
Commercial, Industrial, R&D  
and Academic Branch

License No. 07-13441-02  
Docket No. 030-20681  
Mail Control No. 611166

cc: John Brisbin, Radiation Safety Officer

E. I. DU PONT DE NEMOURS AND COMPANY, INC., EXPERIMENTAL STATION, REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 611166 DATED FEBRUARY 13, 2019

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**SUNSI Review Complete: Betsy Ullrich**

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