



CONVERSATION RECORD

NAME OF PERSON(S)/TITLE CONTACTED OR IN CONTACT WITH YOU Kevin Smith, Environmental Health & Safety Specialist & Radiation Safety Officer	DATE OF CONTACT 12/19/2019	TYPE OF CONVERSATION <input type="checkbox"/> E-MAIL <input checked="" type="checkbox"/> TELEPHONE <input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING
E-MAIL ADDRESS kevin.smith@corteva.com	TELEPHONE NUMBER 317-337-3466	
ORGANIZATION Dow AgroSciences	DOCKET NUMBER(S) 030-32714	
LICENSE NAME AND NUMBER(S) Dow AgroSciences, Lic. No. 13-26398-01	MAIL CONTROL NUMBER(S) 612617, 617192	

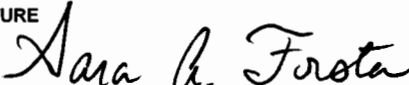
SUBJECT
 Additional Information Request concerning renewal application dated June 28, 2019 (ADAMS Accession No. ML19182A028) and Request for Consent to Transfer of Control dated December 9, 2019 (ADAMS Accession No. ML19343A576)

SUMMARY AND ACTION REQUIRED (IF ANY)

The reviewer discussed additional information needed to update the referenced radioactive materials license, including to update the licensee name and to remove previous tie-downs associated with the previous renewal and interim amendments to the license. Upon discussion with the licensee, it is expected that additional information will be received within 30 days of the license being amended (prior to January 25, 2019) and the license will be amended with the licensee name change upon consent to the Transfer of Control. The written request for information will be transmitted as part of the cover letter to the renewal amendment. Information was requested in accordance with NUREG 1556, Vol. 11, revision 1, "Program-Specific Licenses of Broad Scope," dated February 2017. Items discussed are noted below:

LICENSEE NAME AND TRANSFER OF CONTROL CONSENT REQUEST:

1. The licensee name currently listed on the license is Dow AgroSciences. However, the name listed on the application is Corteva Agriscience Dow AgroSciences LLC. As discussed, the licensee will confirm the name to be listed on the license, in its response to the written request for information. The licensee name will be updated upon completion of the NRC review and approval of the Transfer of Control Consent request.

NAME OF PERSON DOCUMENTING CONVERSATION Sara A. Forster, M.S., Health Physicist, U.S. NRC, Region III office, Materials Licensing Branch	
SIGNATURE 	DATE OF SIGNATURE 12/26/2019

CONVERSATION RECORD (continued)

LICENSE NAME AND NUMBER(S)

MAIL CONTROL NUMBER(S)

Dow AgroSciences, Lic. No. 13-26398-01

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SUMMARY AND ACTION REQUIRED (IF ANY) (Continued)

RADIOACTIVE MATERIALS AUTHORIZATIONS:

2. The license renewal application requested possession limits of 9.8 curies of carbon-14 and 4 curies of tritium. That same application also stated that no Decommissioning Funding Plan (DFP) would be required for these Possession Limits. However, using the sum of the fractions rule, the reviewer determined that a DFP would be required for these tritium and carbon-14 possession limits. Upon discussion with the licensee, the reviewer and the licensee agreed that the tritium possession limit could be reduced to 1 curie, in which case the existing \$1.125 million certification of financial assurance meets requirements in 10 CFR 30.35. The licensee will provide a written confirmation of the reduced possession limit, in its RFI response letter.

PURPOSE OF RADIOACTIVE MATERIALS USE AND POSSESSION:

3. The license renewal application requested a purpose of use of licensed material to include "distribution" to specific licensees. Upon discussion, it was determined that such distribution was limited to transfers allowed under the license and Department of Transportation requirements and included no exempt distribution transfers, etc. The license will be updated to reflect the same, and the licensee will provide written confirmation of the limited transfer program, in its response to the written RFI.

FACILITIES DESCRIPTIONS AND DIAGRAMS:

4. The license renewal application contained site maps for the Dow AgroSciences locations in Indianapolis, Indiana and Newark, Delaware. However, the application lacked sample facility diagrams for the building layouts, waste holding and processing areas, medium level iodine-125 areas of use, medium level carbon-14 radiosynthesis labs, and shipping and receiving areas. The reviewer determined that the existing license contains detailed facility diagrams as part of tie-down application and letters dated February 25, 2009, April 28, 2010, November 13, 2012, and January 24, 2019. Accordingly, those letters will be retained on the license until the licensee submits updated diagrams or other facility descriptions, as part of its response to the written RFI.

OVERSIGHT OF THE LICENSEE'S PROGRAM:

5. The license renewal application was unclear as to the process by which the Radiation Safety Committee would update procedures and program reviews, including criteria used for making those changes and how the changes would be documented. The licensee agreed that it would clarify this process in its response to the written RFI.
6. The renewal application lacked a copy of a Memorandum of Understanding and Delegation of Authority showing the RSO's acknowledgement and acceptance of assigned duties. The licensee agreed to provide an updated document in its response to the written RFI.

CONVERSATION RECORD (continued)

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SUMMARY AND ACTION REQUIRED (IF ANY) (Continued)

7. The renewal application was unclear in requesting flexibility to update the licensee's training program, audit program, instrument specifications, procurement and materials control procedures, occupational dose program, and safe use procedures, etc. In its response to the written RFI, the licensee will provide a description of the RSC review process and a formal request for such flexibility.
8. The renewal application was unclear as to how executive management would oversee the licensee's program. The licensee agreed to clarify how the oversight would be accomplished in its response to the written RFI.

RADIATION SAFETY PROGRAM:

9. The renewal application was unclear as to calibration of instruments being done by a licensed entity. The licensee agreed that it would clarify the same in its response to the written request for information.
10. The renewal application was unclear as to the licensee's commitments to ensuring accountability of licensed material and complying with National Source Tracking System requirements, if any. The licensee agreed that it would clarify its commitments regarding the same in its response to the written RFI.
11. The renewal application was unclear as to the licensee's commitments to maintaining its analysis for individuals not monitored, as part of the occupational dose program. The licensee agreed it would provide such commitments in its response to the written RFI.