



January 8, 1981

Dr. Harold R. Denton Director of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Attention: James R. Miller

Re: Union Carbide Corporation Tuxedo Reactor

Docket No. 50-54

Facility License No. R-81

Dear Dr. Denton:

This letter is a request to amend Facility License No. R-81 and Special Nuclear Materials License No. 639 on which Union Carbide Corporation (UCC) appears as licensee. We request that the license be amended to change the name of the licenses from Union Carbide Corporation to Union Carbide Subsidiary B, Inc. (Company B).

Company B is a Delaware Corporation formed December 12, 1980, for the purpose of owning all the assets dedicated to the operation of the Tuxedo Reactor. Company B is a wholly-owned subsidiary of Union Carbide Corporation. Under agreement, Company B will lease back to UCC the assets dedicated to the operation of the Tuxedo Reactor. UCC will operate the Tuxedo Reactor using the same operating personnel currently employed by UCC.

This amendment is requested for commercial and tax reasons and will result in no substantive change in control of the reactor or in the personnel who now manage and operate it.

We enclose, pursuant to 10 C.F.R. SS 170.22 and 170.31 amendment fees of six hundred (\$600) dollars (Class II - Research Reactor) plus one hundred and fifty (\$150) dollars (Special Nuclear Material-Administrative).

Please advise us if further information or documentation is required.

Sincerely, Business Manager Radiochemicals