

May 21, 1996

Dr. Susan Butts  
The Dow Chemical Company  
Chair, Reactor Operations Committee  
1602 Building  
Midland, Michigan 48667

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (TAC NO. M89940)

Dear Dr. Butts:

We are continuing our review of your amendment request for Facility Operating License No. R-108 for the Dow Chemical Company TRIGA Mark I Research Reactor which you submitted on May 5, 1994, as supplemented. During our review of your amendment request, questions have arisen for which we require additional information and clarification. Please provide responses to the enclosed Request for Additional Information within 30 days of the date of this letter. Following receipt of the additional information, we will continue our evaluation of your amendment request. If you have any questions regarding this review, please contact me at (301) 415-1127.

In accordance with 10 CFR 50.30(h), your response must be executed in a signed original under oath or affirmation.

This requirement affects nine or fewer respondents and, therefore, is not subject to Office of Management and Budget review under P. L. 96-511.

Sincerely,

Original signed by:

Alexander Adams, Jr., Senior Project Manager  
Non-Power Reactors and Decommissioning  
Project Directorate  
Division of Reactor Program Management  
Office of Nuclear Reactor Regulation

Docket No. 50-264

Enclosure:  
As stated

cc w/enclosure:  
See next page

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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In accordance with 10 CFR 50.30(b), your response must be executed in a signed original under oath or affirmation.

This requirement affects nine or fewer respondents and, therefore, is not subject to Office of Management and Budget review under P. L. 96-511.

Sincerely,

A handwritten signature in cursive script, reading "Alexander Adams, Jr.", is written over the typed name.

Alexander Adams, Jr., Senior Project Manager  
Non-Power Reactors and Decommissioning  
Project Directorate  
Division of Reactor Program Management  
Office of Nuclear Reactor Regulation

Docket No. 50-264

Enclosure:  
As stated

cc w/enclosure:  
See next page

Dow Chemical Company

Docket No. 50-264

cc:

Office of the Mayor  
333 West Ellsworth  
Midland, Michigan 48640

Office of the Governor  
Room 1 - Capitol Building  
Lansing, Michigan 48913

Stan Dombrowski  
Chair, Radiation Safety Committee  
Dow North America  
1803 Building  
Midland, Michigan 48667

REQUEST FOR ADDITIONAL INFORMATION

DOW CHEMICAL COMPANY TRIGA RESEARCH REACTOR

DOCKET NO. 50-264

1. Answer number four in your letter of August 7, 1995, discussed changes you proposed to the basis of Table 3.3.A. However, your proposed technical specification (TS) page did not reflect the changes. Please submit a revised page that contains your proposed changes.
2. Please consider correcting the alignment of numbers under the heading "Minimum Number Operable" in Table 3.3B.
3. The word "considered" is misspelled in TS 4.5. In TS 6.2.3 the word "that" is split on two lines. Please correct and submit a new TS page.
4. Please ensure that all changes you have made to the TS are discussed and justified. For example, you have made some changes to TSs 1.29 a. (proposed TS says "safety system" while current TS says "safety-system"), 6.1 (proposed TS says "Analytical Sciences Laboratory" while current TS says "Analytical Laboratory"), and 6.1.1 (proposed TS says "Facility Director" while current TS says "Analytical Laboratory Research Manager"), that you have not discussed.
5. Please provide additional detail about your proposed changes to Figure 6.1. Please discuss and justify the changes made to the figure. Is there any reduction in management responsibility for the reactor with the changes in the line management? Please show both reporting and communication lines on your diagram. For example, your proposed diagram shows that the Reactor Supervisor and Facility Director report to the Reactor Operations Committee (ROC). Are these really communication lines? Does the ROC report to Dow management? If so, please show the reporting line. TS 6.1.1 refers to the Radiation Safety Committee. Does this committee have any responsibility for the reactor? If so, please show its relationship to the organizational structure.
6. Your proposed TSs contain what appears to be an index that you added at the back of the document. While this would simplify locating TS, this index would become part of the official TS and require NRC approval to change. You may wish to consider maintaining this index apart from the official NRC approved TS to allow quick amendment of the index.
7. In TS 6.5.2 a. should the word "and" be at the end of the TS to be consistent in format? If so, please correct.
8. In TS 6.6.2 you changed the submission of reports to NRC Headquarters from the Document Control Desk to the Director of Nuclear Reactor Regulation. The Document Control Desk is the proper point of contact for the submission of written reports to NRC. Please revise your proposed TS pages to reflect this.