



July 8, 2021

Nuclear Materials Licensing Branch
US Nuclear Regulatory Commission Region I
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713
Attention: Elizabeth Ullrich

RE: Amendment No. 4 for License Number 07-13441-03

Dear Ms. Ullrich,

This letter is in regards to the Radioactive Materials License 07-13441-03 of Performance Materials NA Inc, located at the DuPont Experimental Station in Wilmington, Delaware. For Amendment No. 4, I am requesting a change to the Licensee Name.

Performance Materials NA Inc., the current Licensee Name, is a subsidiary of The Dow Chemical Company. This subsidiary was created as a result of the Dow and DuPont merger, which completed in 2019. On 11/1/2021, The Dow Chemical company will be consolidating smaller legal entities, and the legal entity of Performance Materials NA will become The Dow Chemical Company.

In reviewing the guidance in NUREG 1556 Volume 15, Chapter 5, I do not believe this change triggers a Transfer of Control. Control of the license and persons responsible for maintaining the license, including the RSO and Site Leader will remain the same. Physical location and operations will also remain the same. In summary, please review our request for updating the Licensee Name from Performance Materials NA Inc., to The Dow Chemical Company.

Thank you for your assistance. If you have any questions, contact information is provided below.

Sincerely,

Grace E. Battista
Radiation Safety Officer
Performance Materials NA Inc
The Dow Chemical Company
(610) 244-6418
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Curvel Hypolite
R&D Site Leader
Performance Materials NA Inc
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DOW RESTRICTED

General Business