



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION III
2056 WESTINGS AVENUE, SUITE 400
NAPERVILLE, IL 60563-2657

September 26, 2024

Nick Irvine
Radiation Safety Committee Chair
Corteva Agriscience, LLC
9330 Zionsville Rd.
Indianapolis, IN 46268

SUBJECT: ADDITIONAL INFORMATION REQUEST REGARDING AMENDMENT TO
CORTEVA AGRISCIENCE, LLC, CN 641248

Dear Nick Irvine:

The NRC has reviewed your June 6, 2024 letter requesting to list Diane Haseman as the Radiation Safety Officer (RSO) on Corteva Agriscience, LLC's (your) U.S. Nuclear Regulatory Commission (NRC) Materials License No. 13-26398-01. Additional information is needed to complete our review. If the requested additional information cannot be provided within 14 days of this message, please let us know the date by which such information can be provided as soon as possible. Your application is available electronically from the NRC's Agencywide Documents Access and Management System (ADAMS) at Accession No. ML24158A221. NRC's ADAMS is accessible from the NRC Web site at <https://www.nrc.gov/reading-rm/adams.html>.

ADDITIONAL INFORMATION NEEDED TO COMPLETE OUR REVIEW:

RADIATION SAFETY OFFICER MEMORANDUM OF UNDERSTANDING:

The request to add the new Radiation Safety Officer included a Delegation of Authority Memorandum signed by your Executive Vice President, Chief Technology and Digital Officer, as well as a list of RSO Duties and Responsibilities. However, the request was incomplete in that it was not signed by the proposed RSO, and so was inconsistent with the following:

- A Memorandum of Understanding and Delegation of Authority that contains the elements in NUREG 1556, Vol 11, Rev. 1, Appendix D, p. D-1 to which the NRC would find acceptable, needs to be signed by the proposed RSO as well as your management.
- The Delegation of Authority that was submitted for the RSO listed on Amendment No. 34 to your license, via application dated August 18, 2021 (ML21230A301) includes the signatures of RSO Kenneth Beavers and Management.
- The Renewal Application dated June 28, 2019 (ML19182A028) included commitments that, among others, the RSO should be willing to perform the functions required to be RSO.

To assure that the proposed RSO understands the duties, and is willing to perform the functions required to be RSO, please provide an updated Memorandum of Understanding and Delegation of Authority signed by both the proposed RSO and the Licensee's management, in accordance with the license, past applications, and NRC guidance.

Please provide the additional requested information as a signed and dated letter, as a pdf file attached to an email, on or before October 10, 2024. If you have any questions regarding this request, or if you need additional time to respond, please do not hesitate to reach out to me via phone or email.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice and Procedure," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the NRC's ADAMS.

Sincerely,

**SARA
FORSTER**

Digitally signed by SARA
FORSTER

Date: 2024.09.26
13:06:01 -05'00'

Sara A. Forster, MS, Senior Health Physicist
Materials Licensing Branch
Division of Radiological Safety and Security
Region III

License No. 13-26398-01
Docket No. 030-32714

Control No.: 641248

CC: Kimberly Decker, Indianapolis EH&S
Leader, Corteva Agriscience,
kimberly.decker@corteva.com
Diane Haseman, Proposed Radiation
Safety Officer, Corteva Agriscience,
diane.haseman@corteva.com

From: [Sara Forster](#)
To: nicholas.irvine@corteva.com
Cc: kimberly.decker@corteva.com; diane.haseman@corteva.com
Subject: Additional Information Request re Corteva Agriscience, NRC License No. 13-26398-01, CN 641248
Date: Thursday, September 26, 2024 1:15:00 PM
Attachments: CN641248 Request for Information Corteva Lic 13-26398-01.pdf

Good afternoon,

Please see the attached request for information, regarding the request to change the RSO to be listed on the licensee's license. If you have any questions, please do not hesitate to reach out.

Sincerely,

Sara

Sara A. Forster, Senior Health Physicist
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