



40-17

2020 Dow Center  
March 29, 2000

The Dow Chemical Company  
Midland, Michigan 48674

Mr. Sam Nalluswami  
U.S. Nuclear Regulatory Commission  
11545 Rockville Pike  
Rockville, MD 20852

RE: REQUEST FOR EXTENSION OF TIME FOR IMPLEMENTATION OF SITE  
DECOMMISSIONING MANAGEMENT PLAN FOR LICENSE STB-527

The Dow Chemical Company (TDCC) has exceeded the two-year time limit for completing the Site Decommissioning Management Plan (SDMP) for License STB-527. Decommissioning activities were first approved through a July 19, 1996 amendment (Amendment No. 6) to the license. TDCC is requesting an extension of time in order to complete the implementation of the SDMP due to unforeseen circumstances. The initial SDMP was only for the removal of approximately 40,000 cubic yards of material stockpiled in Bay City, Michigan and the excavation and removal of approximately 12,000 cubic yards in Midland, Michigan. This work has been completed.

However, additional material has been detected in various areas surrounding the location of the former stockpile in Bay City, Michigan, which will necessitate additional surveying and removal of various areas. Some of these areas may require subsurface removal within a wetland, which will require obtaining a wetlands disruption permit.

TDCC is currently evaluating the remaining work and preparing a schedule for completion of the work necessary to terminate License STB-527. TDCC is tentatively scheduled to meet with NRC staff in Bay City on May 11, 2000, during which several SDMP and LTR issues relevant to license termination will be discussed. TDCC anticipates submitting a formal SDMP extension request within 30 days of this meeting.

If you have questions please let me know.

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NMSSD/PUB/IC