



UNITED STATES  
**NUCLEAR REGULATORY COMMISSION**  
REGION I  
475 ALLENDALE ROAD  
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

September 27, 2005

Docket No. 03006021  
Control No. 137564

License No. 37-01665-01

Alan M. Rothman, Ph.D.  
Radiation Safety Officer  
Rohm & Haas Co.  
Spring House Technical Center  
727 Norristown Road  
Spring House, PA 19477-0904

SUBJECT: ROHM & HAAS CO., REQUEST FOR ADDITIONAL INFORMATION  
CONCERNING FINANCIAL ASSURANCE DOCUMENTS, CONTROL NO.  
137564

Dear Dr. Rothman:

This is in reference to your letter dated August 25, 2005 providing financial assurance for decommissioning for Nuclear Regulatory Commission License No. 37-01665-01. In order to continue our review, we need the following additional information:

1. The letter of credit was issued by SanPaolo Imi. This financial institution does not appear to be qualified as an acceptable issuer of a letter of credit. Acceptable issuers of a letter of credit are listed on the FDIC's Institutional Directory on the World Wide Web at <http://www2.fdic.gov/structur/search>. Please provide information to demonstrate the issuing financial institution is an acceptable issuer of a letter of credit. Guidance may be found on page A-97 and A-98 in NUREG-1757, Volume 3, Financial Assurance, Recordkeeping, and Timeliness.
2. The letter of credit is required to contain the license number and docket number. The submitted letter of credit does not contain these numbers. Please submit a letter of credit with the required reference.
3. The letter of credit references 10 CFR Part 40 in several locations. The letter of credit is to fulfill the financial instrument for a 10 CFR Part 30 license. The letter of credit must state 10 CFR Part 30 where required. Please closely follow the Model Letter of Credit as shown on page A-100 of NUREG-1757, Volume 3.
4. Schedule A of the Standby Trust Agreement and the Certificate of Events needs to list all current locations as listed on the license. The facility location at Richmond Street, Philadelphia, Pennsylvania was not included in Schedule A or the Certificate of Events. The Spring House Technical Center should be described as it is described in license condition 10. Please include the location in these documents as described in the license.

A. Rothman  
Rohm & Haas Co.

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Current NRC regulations and guidance are included on the NRC's website at [www.nrc.gov](http://www.nrc.gov); select **Nuclear Materials; Medical, industrial, and academic uses of nuclear material**; then **toolkit index page**. Or you may obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-888-293-6498. The GPO is open from 7:00 a.m. to 9:00 p.m. EST, Monday through Friday (except Federal holidays).

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 137564. If you have any technical questions regarding this deficiency letter, please call Dennis Lawyer at (610) 337-5366 or me at (610) 337-5040.

Sincerely,

***Original signed by Elizabeth Ullrich***

Betsy Ullrich  
Senior Health Physicist  
Commercial and R&D Branch  
Division of Nuclear Materials Safety

cc:  
David E. Greenley, Ph.D., Director

A. Rothman  
Rohm & Haas Co.

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**SISP Review Complete: DRL 1**

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