



The Dow Chemical Company
Midland, Michigan 48667

Mr. Geoffrey Wertz
Research and Test Reactors Licensing Branch
Division of Policy and Rulemaking
Office of Nuclear Reactor Regulation

Subject: The Dow Chemical Company- License No. R-108; Docket No. 50-264

Enclosed is the revised Requalification Program submitted in support of the license renewal.

Should you have any questions or need additional information, please contact the Facility Director, Paul O'Connor, at 989-638-6185.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 16, 2011

Paul O'Connor, Ph.D.
Director
Dow TRIGA Research Reactor

Subscribed and sworn to before me this 16 day of June, 2011

Notary Public
Midland County, Michigan
My Commission Expires:

6/28/2017

cc: Wayne Konze, R&D Director - Analytical Sciences
Siaka Yusuf, Reactor Supervisor

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DOW TRIGA RESEARCH REACTOR
REQUALIFICATION PROGRAM

2011

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All licensed reactor operators and senior reactor operators of the Dow TRIGA Research Reactor shall participate within each calendar year in a Reactor Operator Requalification Program consisting of the following parts:

- A. A series of lectures following closely the material covered in the up-to-date version of the Instruction Manual for the Dow TRIGA Research Reactor facility on the following subjects:
 - 1. Physical layout of the facility and specific operating characteristics, and changes of the facility during the preceding 12 months.
 - 2. Reactor instrumentation, control and safety systems.
 - 3. Administrative procedures; Plant Protection systems; emergency procedures, technical specifications, changes in the technical specifications during the previous 12 months.
 - 4. Operating procedures, normal, abnormal and emergency. Changes in operating procedures which became effective during the previous 12 months.
 - 5. Radiological safety; 10 CFR 20 and other items of Title 10.
 - 6. Reactor physics, theory.
- B. The lectures shall be given by one or more persons holding senior reactor operator licenses for the facility or have similar qualifications for the subject they are covering.
- C. A 1 to 2 hour "walk through the facility" with discussion led by the reactor supervisor.
- D. A simulated emergency situation with evacuation exercise.
- E. All operators shall participate, to the extent possible, in the yearly check of the facility; the annual fuel inspection, the inspection and recalibration of the control elements.
- F. The above parts of the program shall be followed by a written examination containing at least 12 questions which can be answered in approximately two hours and will demonstrate the familiarity of the operator with the subjects covered.
- G. Each licensee shall actively perform the functions of an operator or senior operator for a minimum of four hours per calendar quarter and to the extent possible, attend the quarterly ROC meetings.

The results of the requalification program shall be evaluated by the reactor supervisor and the designated alternate. Appropriate records including the scored written examination, documentation of requirements above, etc., for each operator shall be kept by the facility all the time the individual is employed or until license is renewed.

Operators who were unable to obtain a passing grade of 70% on the written examination [Item (F) above] shall be offered an accelerated review/training program set up to meet the individual's need by the reactor supervisor. This remedial program will be concluded by a two hour oral examination in the form of a walk through the facility administered by the reactor supervisor and a second licensed senior reactor operator of the facility. Reports on the type of remedial program given and the evaluations made during the oral examination shall be kept in the individual's file at the facility.

Licensed operators who have not been able to meet Item (G) above will be given a brief updating course under the direction of the reactor supervisor and shall be a minimum of six hours to include a walk through the facility, a review of the state of the facility including recent changes in design, instrumentation, operating procedures, technical specifications, and other items pertaining to the facility and its operation. Satisfactory completion of the update including a certification of the readiness of the operator to resume his duties shall be documented by the reactor supervisor and the certification document shall be placed in the operator's file in the facility prior to resumption of reactor operation by the individual.