



The Dow Chemical Company
Midland, Michigan 48667

August 10, 2012

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 DTRR Amended Page 46 of the Revised Technical Specifications dated June 11, 2012, in support of the license renewal. This one page document is submitted as an attachment 1 and it replaces in its entirety, the page 46 of the Revised Technical Specification dated June 11, 2012.

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 August 10, 2012

Paul O'Connor

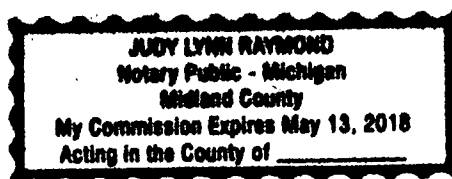
Paul O'Connor, Ph.D.
Director
Dow TRIGA Research Reactor

Subscribed and sworn to before me this 10 day of August, 2012

Judy Lynn Raymond

Notary Public
Midland County, Michigan
My Commission Expires:

May 13, 2018



cc: Wayde Konze, R&D Director - Analytical Sciences
Paul O'Connor, Director
Siaka Yusuf, Reactor Supervisor

AD20

Attachment 1

The DTRR Revised Technical Specifications Page 46
08/10/2012

6.6 Required Actions

6.6.1. Actions to Be Taken in Case of Safety Limit Violation

In the event a safety limit (fuel temperature) is exceeded:

- a. The reactor shall be shut down and reactor operation shall not be resumed until authorized by the U.S. NRC; and
- b. An immediate notification of the occurrence shall be made to the Reactor Supervisor, DTRR Director, Level 1, ROC, U.S. NRC Headquarters Operations Center; and
- c. A report, and any applicable follow-up report, shall be prepared and reviewed by the ROC. The report shall describe the following:
 - i. Applicable circumstances leading to the violation including, when known, the cause and contributing factors;
 - ii. Effects of the violation upon reactor facility components, systems, or structures and on the health and safety of personnel and the public; and
 - iii. Corrective action to be taken to prevent recurrence.

6.6.2. Actions to Be Taken in the Event of an Occurrence of the Type Identified in Section 6.7.2 Other than a Safety Limit Violation

For all events which are required by regulations or Technical Specifications to be reported to the U.S. NRC within 24 hours under Section 6.7.2, except a safety limit violation, the following actions shall be taken:

- a. The reactor shall be secured and the Reactor Supervisor and Director notified;
- b. Operations shall not resume unless authorized by the Reactor Supervisor and the Director;
- c. The Reactor Operations Committee shall review the occurrence at their next scheduled meeting; and
- d. A report shall be submitted to the U.S. NRC in accordance with Section 6.7.2 of these Technical Specifications.