



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION III  
2443 WARRENVILLE RD. SUITE 210  
LISLE, IL 60532-4352

JUL 11 2014

Nirav N. Mehta  
Dow Corning Corporation  
Global Treasury Operations  
2200 West Salzburg Road  
Auburn, MI 48611

Dear Mr. Mehta:

On July 29, 2008, Dow Corning Company submitted to the U.S. Nuclear Regulatory Commission (NRC) Amendment No. 01 to the Letter of Credit (LOC) to fulfill its requirements under Title 10 of the Code of Federal Regulations (CFR) Part 30. In addition, on August 20, 2013, you contacted the NRC regarding a second Standby Trust Agreement that you have obtained. The NRC will require the following additional information for the Amended LOC and Standby Trust Agreement to be acceptable. The additional information was discussed in a phone conversation with Jennifer Bishop on July 11, 2014.

**A. Submit a certification of financial assurance (NUREG-1757, Volume 3, Revision 1, Appendix A)**

NUREG-1757, Appendix A calls for the submission of a certification of financial assurance from all licensees required to demonstrate financial assurance under 10 CFR Part 30, including those submitting a DFP (NUREG-1757, Volume 3, Revision 1, Appendix A, Sections A.1.3 and A.2). In the certification of financial assurance, the licensee certifies that it has obtained financial assurance in the appropriate amount and provides the details needed to verify that the amount is accurate under NRC regulations (NUREG-1757, Volume 3, Revision 1, Appendix A, Section A.2.2). The model wording for a certification of financial assurance is presented in NUREG-1757, Appendix A, Section A.2.4.

Please provide an **original**, separate certification of financial assurance as recommended by NUREG-1757, Appendix A.

**B. Submit a revised standby trust agreement (NUREG-1757, Volume 3, Revision 1, Appendix A, Section A.12)**

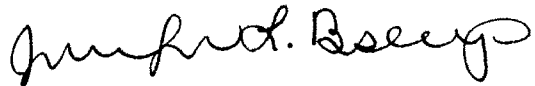
NUREG 1757, Volume 3, Revision 1, Appendix A, Section A.12 provides the model language for a licensee's standby trust fund agreement. The current standby by trust fund agreement will need to be amended to reflect the change in the name of the issuing party. 10 CFR 30.35(f) requires that for any information changes, such as a change in the issuing party address, financial assurance instruments reflecting such changes must be submitted within 30 days. **In addition, the current standby trust fund agreement Schedules A, B, and C as well as The**

**Specimen Certification of Events and Specimen Certification of Resolution will need to be amended to reflect the change in the value of the LOC.** Please note that the Specimen Certification of Events and Specimen Certification of Resolution should be unexecuted.

- Please provide an amended standby trust agreement that reflects the change in the name of the issuing party (NUREG 1757, Volume 3, Revision 1, Appendix A, Section A.12).
- Please provide amended Schedules A, B, and C to the standby trust agreement that reflects the changes in the value of the letter of credit (NUREG 1757, Volume 3, Revision 1, Appendix A, Section A.12.5).
- Please include the Specimen Certificate of Events, and the Specimen Certificate of Resolution (NUREG 1757, Volume 3, Revision 1, Appendix A, Sections A.12.6, A.12.7, and A.12.8).

When responding to the above, please reference as additional information to Control Number 300397. Please ensure that the original instruments are submitted when responding to this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer L. Bishop".

Jennifer L. Bishop  
Materials Licensing Branch

License No. 21-08362-08  
Docket No. 030-04858