



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

August 23, 2019

Ms. Kelly Wegener
Radiation Safety Officer
Dow Corning Corporation
2200 W. Salzburg Road
Auburn, Michigan 48611

SUBJECT: DOW CORNING CORPORATION, REQUEST FOR ADDITIONAL INFORMATION -
ACCEPTANCE REVIEW OF DECOMMISSIONING PLAN SUBMITTED IN
ACCORDANCE WITH TITLE 10 OF THE *CODE OF FEDERAL
REGULATIONS* 30.36(g) UNDER LICENSE NO. 21-08362-08 (MAIL CONTROL
NUMBER 609668)

Dear Ms. Wegener:

This letter is in response to your submittal of a Decommissioning Plan dated April 8, 2019, and our letter dated June 5, 2019 (ML19157A202) acknowledging receipt of the Decommissioning Plan. Within our letter, we had stated that the U.S. Nuclear Regulatory Commission (NRC) will perform an Acceptance Review of the submitted document prior to initiating our Technical Review.

Upon review, the NRC has determined that the following additional information is needed to complete our Acceptance Review prior to initiating our Technical Review:

1. Under Title 10 of the *Code of Federal Regulations* (CFR) 30.36(g)(4)(i), the licensee must provide a description of the separate building sufficient to evaluate the acceptability of the decommissioning plan. For the NRC to determine such acceptability, a detailed history of use in the DC-3 building at the 2200 W. Salzburg location of use is needed. As described in Section 16.2.1 of NUREG-1757 "Consolidated Decommissioning Guidance," Vol. 1, Rev. 2, titled "License Number/Status/Authorized Activities," the licensee should provide a detailed description of all areas of use and storage where radioactive materials were used under the license. From the submitted decommissioning plan, it was unclear whether the information included all areas where licensed material had been used. Accordingly, please provide additional details as necessary, and a statement confirming that to the best of the licensee's knowledge all areas associated with the removal of this building from the license have been addressed.
2. Under 10 CFR 30.36(g)(4)(v), the licensee must provide an updated detailed cost estimate for decommissioning including all activities associated with the submitted decommissioning plan. The updated cost estimate must be compared with present funds set aside for decommissioning, including the licensee's plan for assuring the availability of adequate funds for completion of decommissioning. However, no such updated cost estimate was identified in the submitted decommissioning plan. Accordingly, please provide an updated decommissioning cost estimate for the DC-3 building at the 2200 W. Salzburg location of use. Please include a comparison of the present funds set aside with the cost estimate, and the licensee's plans to assure the availability of adequate funds.

3. Under 10 CFR 30.36(g)(5), the submitted decommissioning plan must demonstrate that the decommissioning will be completed as soon as practicable. For the NRC to determine whether the decommissioning will be determined as soon as practicable, Section 16.1.2, of NUREG-1757, "Consolidated Decommissioning Guidance," Vol. 1, Rev. 2, titled "Acceptance Criteria," the licensee should provide the proposed initiation and completion dates of decommissioning. Further, for the NRC to fully understand what activities will be performed to complete the decommissioning, the amount of time required to perform each activity, and the timeframe for performing those activities, the information outlined in Section 17.1.5, of NUREG 1757, "Consolidated Decommissioning Guidance," Vol. 1, Rev. 2, titled "Schedules," should be included as part of the decommissioning plan. Accordingly, please provide the proposed initiation and end dates of decommissioning, together with a detailed outline of timeframes and schedules for decommissioning of the DC-3 building at the 2200 W. Salzburg location of use.

To ensure timely review of your Decommissioning Plan, please review the appropriate NRC guidance associated with the above Request for Additional Information and provide as complete information as possible.

NRC is requesting that the information above be provided within 60 days of the date of this letter. If a response is not received within that time or the response is inadequate to initiate a Technical Review, the NRC shall consider whether additional actions are necessary.

If you have any questions concerning the decommissioning process or the requirements for the decommissioning of your facility, you may contact Michael LaFranzo of the Materials Control, ISFSI, and Decommissioning Branch at 1-630-829-9865.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC's Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC's website at <http://www.nrc.gov/reading-rm/adams.html>.

Any correspondence regarding the decommissioning of your facility should reference the control number specified below, and your license number.

Sincerely,

/RA by Michael A. Kunowski for/

Michael M. LaFranzo, Senior Health Physicist
Materials Control, ISFSI, and
Decommissioning Branch
Division of Nuclear Materials Safety

Docket No. 03004858
License No. 21-08362-08
Mail Control No. 609668

Letter to Kelly Wegener from Michael LaFranzo dated August 23, 2019.

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DATE	8/23/2019		8/23/2019					

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