



The Dow Chemical Company
Midland, Michigan 48667

Mr. Geoffrey Wertz, P.E.
Research and Test Reactors Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: The Dow TRIGA Research Reactor (DTRR) License No. R-108; Docket No. 50-264

Enclosed is a letter requesting consent for an Indirect License Transfer. Three attachments to this letter are:

Attachment I: The Dow Inc., Officers
Attachment II: The Dow Chemical Company, Officers and
Attachment III: The DTRR Surety Bond Renewal of March 2019

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.

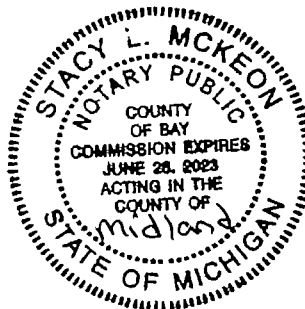
Executed on November 22nd, 2019

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

Subscribed and sworn to before me this 22nd day of November, 2019

Notary Public
Bay County, Michigan
My Commission Expires:

6/28/2023



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

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NRR



November 22nd, 2019

The Dow Chemical Company
Midland, Michigan 48667

Mr. Geoffrey Wertz, P.E.
Research and Test Reactors Branch
U.S. Nuclear Regulatory Commission
Washington, DC 20555

RE: THE DOW CHEMICAL COMPANY REQUEST AN APPROVAL OF AN INDIRECT TRANSFER OF CONTROL OF DOW TRIGA RESEARCH REACTOR LICENSE NO. R-108.

Dear Mr. Wertz,

In accordance with 10 C.F.R. § 50.80, The Dow Chemical Company ("TDCC") submits the below request for Nuclear Regulatory Commission ("NRC") consent to the indirect transfer of control of TDCC's interests in Dow TRIGA Research Reactor License No. R-108 ("License") to Dow, Inc. without amendment. As set forth below, NRC will see there are no changes in the criteria set forth in NUREG 1556, and thus, TDCC requests that the License remain in the name of The Dow Chemical Company.

INTRODUCTION

In August of 2017, TDCC merged with El du Pont De Nemours and Company and each entity became a wholly-owned subsidiary of DowDuPont, Inc. as part of a planned corporate reorganization. The next step of the reorganization occurred on April 1, 2019, when The Dow Chemical Company separated from DowDuPont, Inc. as a wholly-owned subsidiary of Dow, Inc. During the time between August of 2017, and the spin date of April 1, 2019, TDCC maintained, by agreement, operational control of the Dow TRIGA Research Reactor pursuant to the terms of the License. Upon spin, Dow Inc. was formed, and TDCC became a wholly-owned subsidiary of Dow, Inc., even though the organizational structure that controls the License has not changed. According to NUREG 1556, the following information is being submitted regarding this indirect transfer of control:

1. Dow, Inc.: Dow, Inc. is a sustainable materials science company which has a portfolio of performance materials, industrial intermediates and plastic businesses that deliver a broad range of differentiated science-based products. Dow, Inc. operates 113 manufacturing sites in 31 countries and employs approximately 37,000 people and delivered pro forma sales of approximately \$50 billion in 2018. Dow, Inc. is the market facing entity of TDCC and holds TDCC and all its wholly-owned subsidiaries. TDCC is the operating company that holds and operates assets in the United States including the Dow TRIGA Research Reactor. The officers of Dow, Inc. are essentially the same officers of TDCC. Please see Exhibit A (Attachment I, Board and Officers of Dow, Inc.) and Exhibit B (Attachment II, Officers of TDCC).
2. Change of Personnel: As it relates to the Dow TRIGA Research Reactor there was no change of personnel. Prior to merger and post spin, and pursuant to the License, TDCC's Senior Vice President over Research and Development, who is a U.S. Citizen, has exclusive authority of the TRIGA Research Reactor. As listed in Exhibit A, A.N. Sreeram is Dow, Inc.'s Chief Technology Officer. A.N. Sreeram is listed in Exhibit B as Senior Vice President of TDCC and has exclusive

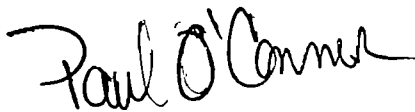
authority over the Dow TRIGA Research Reactor. When the License was renewed in June 18, 2014, A.N. Sreeram was the Vice President over Research and Development, nothing has changed. Additionally, the Level I Manager, Wayde Konze, and the Level II Manager, Paul O'Connor, for the DTRR have not changed. This was true when the License was renewed, at time of merger and now, post spin. Nothing has changed related to personnel who are responsible for the Dow TRIGA Research Reactor.

3. Changes of Location, Equipment, and Procedures: There has been no change to the place of use, including potentially affected adjacent areas; no change in facilities and equipment used in the License program, and no change in relevant procedures. Nothing has changed from pre-merger to post-spin.
4. Surveillance Records: All required surveillance work under the License will continue to be performed according to Technical Specifications contained in Appendix A of the License. Nothing has changed in the manner the surveillance records are maintained.
5. Decommissioning and Related Records: All drawings and records important to decommission of the License will continue to be maintained in the same location; nothing has changed.
6. Transferee's Commitment to abide by the Transferor's Commitments: There are no open inspection items or enforcement items associated with the License. All existing License commitments will continue to be followed by TDCC and Dow, Inc. as required.
7. Changes to Surety Bond: There are no changes to the surety bond conditions. The bond was renewed by TDCC naming US NRC as the Obligee on April 30, 2019. Attached hereto as Exhibit C (Attachment III)

We respectfully request the consent to the indirect transfer of control of TDCC's interests in Dow TRIGA Research Reactor License No. R-108 to Dow, Inc. without amendment. As stated above, TDCC established to the NRC that there are no changes in the criteria set forth in NUREG 1556, and thus, TDCC requests that the License remain in the name of The Dow Chemical Company.

Sincerely,

Paul O'Connor
The Facility Director
The Dow TRIGA Research Reactor
1897 Building
Midland, MI 48667








Attachment I: The Dow Inc., Officers

Current Officers & Directors (Default)










Dow Inc.




Date 11/05/2019

▼ Audit Committee




Name	Position	Start Date	Last Elected Date
 Bell, James A.	Chairman	03/20/2019	
 Bush, Wesley G.	Member	04/01/2019	
 Davis, Richard K.	Member	04/01/2019	
 Hinman, Jacqueline C.	Member	04/01/2019	
 Yohannes, Daniel W.	Member	04/01/2019	

▼ Board Positions






Name	Position	Start Date	Last Elected Date
 Fettig, Jeff M.	Chairman of the Board	04/01/2019	
 Allen, Samuel R.	Director	08/01/2019	
 Banga, Ajay	Director	04/01/2019	
 Barton, Jacqueline K.	Director	04/01/2019	
 Bell, James A.	Director	03/20/2019	
 Bush, Wesley G.	Director	04/01/2019	
 Davis, Richard K.	Director	04/01/2019	
 Fettig, Jeff M.	Director	04/01/2019	
 Fitterling, Jim	Director	08/30/2018	

 Hinman, Jacqueline C.	Director	04/01/2019
 Shaw, Ruth G.	Director	04/01/2019
 Yohannes, Daniel W.	Director	04/01/2019





▼ Compensation and Leadership Development Committee

Name	Position	Start Date	Last Elected Date
 Shaw, Ruth G.	Chairman	04/01/2019	
 Banga, Ajay	Member	04/01/2019	
 Fettig, Jeff M.	Member	04/01/2019	

▼ Environment, Health, Safety and Technology Committee







Name	Position	Start Date	Last Elected Date
 Barton, Jacqueline K.	Chairman	04/01/2019	
 Bush, Wesley G.	Member	04/01/2019	
 Hinman, Jacqueline C.	Member	04/01/2019	
 Shaw, Ruth G.	Member	04/01/2019	
 Yohannes, Daniel W.	Member	04/01/2019	

▼ Governance Committee

Name	Position	Start Date	Last Elected Date
 Fettig, Jeff M.	Chairman	04/01/2019	
 Banga, Ajay	Member	04/01/2019	
 Bell, James A.	Member	04/01/2019	
 Davis, Richard K.	Member	04/01/2019	

▼ Officers

Name	Position	Start Date	Last Elected Date
Wendt, Jonathan P.	Assistant Secretary	08/30/2018	04/01/2019
Fitterling, Jim	Chief Executive Officer	08/30/2018	04/01/2019
Ungerleider, Howard I.	Chief Financial Officer	08/30/2018	04/01/2019
Tessin, Brian B.	Chief Tax Officer	10/10/2019	
Sreeram, A. N.	Chief Technology Officer	04/01/2019	
Edmonds, Ronald C.	Controller	04/01/2019	
Kay, Colleen W.	Corporate Auditor	04/01/2019	
Wilson, Amy E.	Corporate Secretary	08/30/2018	
Kalmar, Melanie	Corporate Vice President	04/01/2019	
Wilson, Amy E.	General Counsel	04/01/2019	
Ungerleider, Howard I.	President	08/30/2018	04/01/2019
Holicki, Peter	Senior Vice President	04/01/2019	
Kraef, Torsten	Senior Vice President	04/01/2019	
Sreeram, A. N.	Senior Vice President	04/01/2019	
McGuire, Gary J.	Treasurer	08/30/2018	04/01/2019

 Draves, Mary F.	Vice President	04/01/2019
 Edmonds, Ronald C.	Vice President	04/01/2019
 McGuire, Gary J.	Vice President	04/01/2019
 Carter, Karen S.	Chief Human Resources Officer	04/01/2019
 Draves, Mary F.	Chief Sustainability Officer	04/01/2019
 Kalmar, Melanie	Chief Information and Digital Officer	04/01/2019



Attachment II: The Dow Chemical Company, Officers

Current Officers & Directors (Default)









The Dow Chemical Company

Date 11/05/2019

▼ Board Positions

Name	Position	Start Date	Last Elected Date
 Fitterling, Jim	Director	07/01/2018	
 Ungerleider, Howard I.	Director	08/31/2017	

▼ Officers

Name	Position	Start Date	Last Elected Date
 Trzcinski, Leah	Assistant Secretary	10/01/2018	
 Wendt, Jonathan P.	Assistant Secretary	05/11/2017	05/11/2017
 Fitterling, Jim	Chief Executive Officer	07/01/2018	
 Ungerleider, Howard I.	Chief Financial Officer	10/01/2014	05/11/2017
 Tessin, Brian B.	Chief Tax Officer	10/10/2019	
 Sreeram, A. N.	Chief Technology Officer	04/22/2019	
 Edmonds, Ronald C.	Controller	11/02/2009	05/11/2017
 Kay, Colleen W.		07/13/2017	

	Corporate Auditor		
Wilson, Amy E.	Corporate Secretary	02/01/2015	05/11/2017
Kalmar, Melanie	Corporate Vice President	04/22/2019	
Wilson, Amy E.	General Counsel	10/01/2018	
Ungerleider, Howard I.	President	07/01/2018	
Holicki, Peter	Senior Vice President	10/15/2015	05/11/2017
Kraef, Torsten	Senior Vice President	04/22/2019	
Sreeram, A. N.	Senior Vice President	10/15/2015	05/11/2017
McGuire, Gary J.	Treasurer	04/15/2016	05/11/2017
Draves, Mary F.	Vice President	04/22/2019	
Edmonds, Ronald C.	Vice President	11/02/2009	05/11/2017
McGuire, Gary J.	Vice President	04/15/2016	05/11/2017
Carter, Karen S.	Chief Human Resources Officer	10/15/2018	
Draves, Mary F.	Chief Sustainability Officer	04/22/2019	
Kalmar, Melanie	Chief Information and Digital Officer	04/22/2019	

Attachment III: The DTRR Surety Bond Renewal of March 2019



Commercial & Personal Insurance
Risk Management Consulting
Employee Benefits Services
Life Insurance Planning
Surety Bonding

March 21, 2019

The Dow Chemical Company
2211 H.H. Dow Way
Global Dow Center, Office 2243
Midland, MI 48674

Attn: Core Legal Practices

Re:	Name of Principal:	The Dow Chemical Company
	Name of Obligor:	US Nuclear Regulatory Commission
	Type of Bond:	Reclamation - Oil/Gas
	Bond Number:	6210359

Dear Rebecca:

In accordance with your request, enclosed please find the increase rider we issued in order to increase the above bond from \$6,108,881 to \$6,224,950. Please have an authorized individual sign the rider and have it filed prior to the renewal date of April 30, 2019.

Should you have any questions, please do not hesitate to contact us. Thank you.

Sincerely,

SIMKISS & BLOCK

A handwritten signature in dark ink, appearing to read "Theresa Bassett", is written over a horizontal line.

Theresa Bassett
Sr. Surety Representative

/tb

Enc.

original

INCREASE PENALTY RIDER

To be attached and form a part of Bond No. 6210359 dated the 30th day of April, 2003, executed by Safeco Insurance Company of America as surety, on behalf of The Dow Chemical Company as current principal of record, and in favor of US Nuclear Regulatory Commission, as Oblige, and in the amount of Six Million One Hundred Eight Thousand Eight Hundred Eighty One Dollars and 00/100 (\$6,108,881.00).

In consideration of the agreed premium charged for this bond, it is understood and agreed that Safeco Insurance Company of America hereby consents that effective from the 29th day of April, 2019, said bond shall be amended as follows:

THE BOND PENALTY SHALL BE Increased:

FROM: Six Million One Hundred Eight Thousand Eight Hundred Eighty One Dollars and 00/100 (\$6,108,881.00)

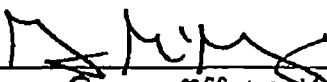
TO: Six Million Two Hundred Twenty Four Thousand Nine Hundred Fifty Dollars and 00/100 (\$6,224,950.00)

The Increase of said bond penalty shall be effective as of the 29th day of April, 2019, and does hereby agree that the continuity of protection under said bond subject to changes in penalty shall not be impaired hereby, provided that the aggregate liability of the above mentioned bond shall not exceed the amount of liability assumed by it at the time the act and/or acts of default were committed and in no event shall such liability be cumulative.

Signed, sealed and dated this 21st day of March, 2019.

The Dow Chemical Company
PRINCIPAL

BY:


Gary McGuire, Vice President and Treasurer

Safeco Insurance Company of America
SURETY

BY:


Daniel P. Duggan, ATTORNEY-IN-FACT

THIS POWER OF ATTORNEY IS NOT VALID UNLESS IT IS PRINTED ON RED BACKGROUND.

This Power of Attorney limits the acts of those named herein, and they have no authority to bind the Company except in the manner and to the extent herein stated.

Certificate No 7700672

American States Insurance Company
First National Insurance Company of America
General Insurance Company of America
Safeco Insurance Company of America

POWER OF ATTORNEY

KNOWN ALL PERSONS BY THESE PRESENTS: That American States Insurance Company is a corporation duly organized under the laws of the State of Indiana, that First National Insurance Company of America, General Insurance Company of America, and Safeco Insurance Company of America are corporations duly organized under the laws of the State of New Hampshire (herein collectively called the "Companies"), pursuant to and by authority herein set forth, does hereby name, constitute and appoint, Brian C. Block; Daniel P. Dunigan; James L. Hahn; Joseph W. Kolok, Jr.; Richard J. Decker; William F. Simkiss

all of the city of Paoli, state of PA, each individually if there be more than one named, its true and lawful attorney-in-fact to make, execute, seal, acknowledge and deliver, for and on its behalf as surety and as its act and deed, any and all undertakings, bonds, recognizances and other surety obligations, in pursuance of these presents and shall be as binding upon the Companies as if they have been duly signed by the president and attested by the secretary of the Companies in their own proper persons.

IN WITNESS WHEREOF, this Power of Attorney has been subscribed by an authorized officer or official of the Companies and the corporate seals of the Companies have been affixed thereto this 29th day of March, 2017



American States Insurance Company
First National Insurance Company of America
General Insurance Company of America
Safeco Insurance Company of America

By: David M. Carey
David M. Carey, Assistant Secretary

STATE OF PENNSYLVANIA
COUNTY OF MONTGOMERY

On this 29th day of March, 2017, before me personally appeared David M. Carey, who acknowledged himself to be the Assistant Secretary of American States Insurance Company, First National Insurance Company of America, General Insurance Company of America, and Safeco Insurance Company of America, and that he, as such, being authorized so to do, execute the foregoing instrument for the purposes therein contained by signing on behalf of the corporations by himself as a duly authorized officer.

IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed my notarial seal at King of Prussia, Pennsylvania, on the day and year first above written.



COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Teresa Pastella, Notary Public
Upper Merion Twp., Montgomery County
My Commission Expires March 28, 2021
Member, Pennsylvania Association of Notaries

By: Teresa Pastella
Teresa Pastella, Notary Public

This Power of Attorney is made and executed pursuant to and by authority of the following By-laws and Authorizations of The Ohio Casualty Insurance Company, Liberty Mutual Insurance Company, and West American Insurance Company which resolutions are now in full force and effect reading as follows:

ARTICLE IV - OFFICERS - Section 12. Power of Attorney. Any officer or other official of the Corporation authorized for that purpose in writing by the Chairman or the President, and subject to such limitation as the Chairman or the President may prescribe, shall appoint such attorneys-in-fact, as may be necessary to act in behalf of the Corporation to make, execute, seal, acknowledge and deliver as surety any and all undertakings, bonds, recognizances and other surety obligations. Such attorneys-in-fact, subject to the limitations set forth in their respective powers of attorney, shall have full power to bind the Corporation by their signature and executed, such instruments shall be as binding as if signed by the President and attested to by the Secretary. Any power or authority granted to any representative or attorney-in-fact under the provisions of this article may be revoked at any time by the Board, the Chairman, the President or by the officer or officers granting such power or authority.

Certificate of Designation - The President of the Company, acting pursuant to the Bylaws of the Company, authorizes David M. Carey, Assistant Secretary to appoint such attorneys-in-fact as may be necessary to act on behalf of the Company to make, execute, seal, acknowledge and deliver as surety any and all undertakings, bonds, recognizances and other surety obligations.

Authorization - By unanimous consent of the Company's Board of Directors, the Company consents that facsimile or mechanically reproduced signature of any assistant secretary of the Company, wherever appearing upon a certified copy of any power of attorney issued by the Company in connection with surety bonds, shall be valid and binding upon the Company with the same force and effect as though manually affixed.

I, Renee C. Llewellyn, the undersigned, Assistant Secretary, of American States Insurance Company, First National Insurance Company of America, General Insurance Company of America, and Safeco Insurance Company of America do hereby certify that the original power of attorney of which the foregoing is a full, true and correct copy of the Power of Attorney executed by said Companies, is in full force and effect and has not been revoked.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seals of said Companies this 21st day of March, 2019



By: Renee C. Llewellyn
Renee C. Llewellyn, Assistant Secretary

Not valid for mortgage, note, loan, letter of credit, currency rate, interest rate or residual value guarantees.

To confirm the validity of this Power of Attorney call 1-810-832-8240 between 9:00 am and 4:30 pm EST on any business day.