



Corteva Agriscience  
9330 Zionsville Road  
Building 307 UL  
Indianapolis, IN 46268

December 9, 2019

Materials Licensing Branch  
U.S. Nuclear Regulatory Commission, Region III  
2443 Warrenville Road, Suite 210  
Lisle, IL 60532-4352

Dear Ms. Forster,

**Request for License Amendment for Transfer of Control of all Source Materials for the Dow AgroSciences, LLC Broad Scope Materials License No. 13-26398-01, CN612617**

On June 1, 2019 all Dow AgroSciences facilities began operating as Corteva Agriscience. Notification was sent electronically to the Region III Branch indicating this change. After reviewing and discussing with the NRC's License Review Office and the Office of General Counsel, I am requesting an amendment, as part of my License Renewal Application, transferring control of security, use, and disposal of all radioactive materials under License 13-26398-01 from Dow AgroSciences, LLC to Dow AgroSciences conducting business as Corteva Agriscience, under the corporate tax identification of Dow AgroSciences.

Other than operating under the company name of Corteva Agriscience, no other changes in apply. 1. The Corporate structure remains in place as is has been for License Amendment 29 granted on March 1, 2019 and is shown on Attachment I. 2. The Radiation Safety Committee and the RSO remain in place and continue to oversee all facilities and activities involving radioactive materials and sources under the license. 3. The facilities, personnel, and activities involving the use of radioactive materials and sources remain the same. 4. Financial Assurance in the amount of \$1,125,000 by means of a Standby Trust Agreement and Letter of Credit with Citibank has been updated to also reflect this change.

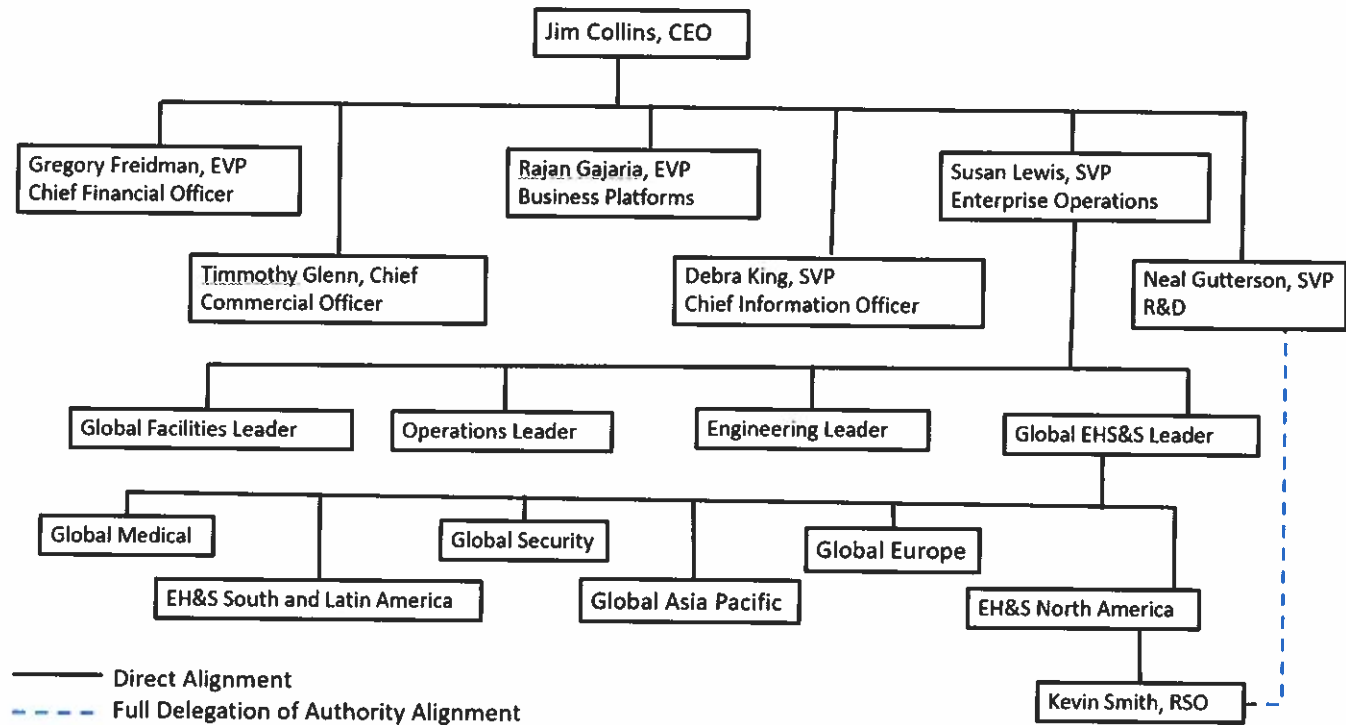
Thank you for your attention to this license amendment request. Please do not hesitate to contact me if you have any further question or need more information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kevin P. Smith".

Kevin Smith  
Radiation Safety Officer  
Corteva Agriscience  
Dow AgroSciences, LLC  
9330 Zionsville Road  
Indianapolis, IN 46268  
Work (317) 337-3466  
Work (302) 318-2449  
Email: [kevin.smith@corteva.com](mailto:kevin.smith@corteva.com)

Attachment I



**Pavon, Sandy**

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**From:** Forster, Sara  
**Sent:** Monday, December 09, 2019 7:58 AM  
**To:** Song, Taehoon; Pavon, Sandy  
**Cc:** Tomczak, Tammy  
**Subject:** FW: RE: RE: Additional Information Needed for Corteva Agriscience - Dow Agrosiences, NRC Lic. No. 13-26398-01, CN612617  
**Attachments:** Transfer\_of\_Control\_Amendment\_Request\_License\_13\_26398\_01.pdf

Good morning,

Could you please scan this in and provide to Tammy/Patty to be controlled in? It is a new TOC action which should be assigned to me, as I am also working on the renewal for this licensee.

Thank you!

Sara

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**From:** Smith, Kevin <kevin.smith@corteva.com>  
**Sent:** Monday, December 09, 2019 6:28 AM  
**To:** Forster, Sara <Sara.Forster@nrc.gov>  
**Subject:** [External\_Sender] RE: RE: Additional Information Needed for Corteva Agriscience - Dow Agrosiences, NRC Lic. No. 13-26398-01, CN612617

Dear Ms. Forster,  
Attached is my request for a license amendment for the Transfer of Control associated with the company name change.

Please don't hesitate to contact me if you have any questions or need additional information.  
Best Regards,

Kevin Smith  
EH&S Specialist, Radiation Safety Officer



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**From:** Forster, Sara <Sara.Forster@nrc.gov>  
**Sent:** Monday, December 2, 2019 8:14 AM  
**To:** Smith, Kevin <kevin.smith@corteva.com>  
**Subject:** [EXTERNAL] RE: RE: Additional Information Needed for Corteva Agriscience - Dow Agrosiences, NRC Lic. No. 13-26398-01, CN612617

Thank you for the update, Mr. Smith. I will be watching for this.

Sincerely,

**Sara A. Forster, Health Physicist Licensing Reviewer**  
U.S. Nuclear Regulatory Commission - Region III  
Division of Nuclear Materials Safety  
2443 Warrenville Rd. - Ste. 210  
Lisle, IL 60532-4352  
[sara.forster@nrc.gov](mailto:sara.forster@nrc.gov)  
Direct: (630) 829-9892  
Facsimile: (630) 515-1078



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**From:** Smith, Kevin <[kevin.smith@corteva.com](mailto:kevin.smith@corteva.com)>  
**Sent:** Sunday, December 01, 2019 10:35 PM  
**To:** Forster, Sara <[Sara.Forster@nrc.gov](mailto:Sara.Forster@nrc.gov)>  
**Subject:** [External\_Sender] RE: Additional Information Needed for Corteva Agriscience - Dow Agrosiences, NRC Lic. No. 13-26398-01, CN612617

Dear Ms. Forster,

My apologies for the delay. I have written the TOC as Dow AgroSciences doing business as Corteva agriscience. I was requested to have it reviewed prior to submitting and the individual was on vacation. I will have it to you as soon as possible but no later than the end of business on 12/06. I am traveling to the Delaware site this week but am available by my work phone at 317.413.4594 anytime on 12/4 and until noon on 12/5.

Thank you,

**Kevin Smith**  
EH&S Specialist, Radiation Safety Officer



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**From:** Forster, Sara <[Sara.Forster@nrc.gov](mailto:Sara.Forster@nrc.gov)>  
**Sent:** Friday, November 29, 2019 10:30 AM  
**To:** Smith, Kevin <[kevin.smith@corteva.com](mailto:kevin.smith@corteva.com)>  
**Subject:** [EXTERNAL] Additional Information Needed for Corteva Agriscience - Dow Agrosiences, NRC Lic. No. 13-26398-01, CN612617

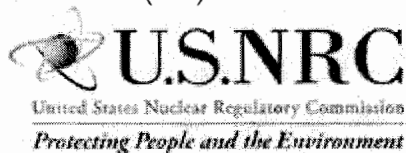
Dear Mr. Smith:

Has the transfer of control request been submitted? I have not seen it and am in the process of reviewing your license renewal application. Will the new name on the license be Corteva Agriscience, Dow Agrosiences, or both? Or is it a doing-business-as situation? I plan to reach out to you next week with a written request for

information regarding both the TOC and the renewal. Please let me know your availability to discuss between 12/4 and 12/6.

Thank you,

**Sara A. Forster, Health Physicist Licensing Reviewer**  
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Division of Nuclear Materials Safety  
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**From:** Forster, Sara  
**Sent:** Monday, November 18, 2019 11:30 AM  
**To:** Smith, Kevin <[kevin.smith@corteva.com](mailto:kevin.smith@corteva.com)>  
**Subject:** RE: FW: NRC Dow follow-up

Good morning, Mr. Smith:

Thank you for the inquiry. Regarding a transfer of control, there is no fee associated with that action. Fees are assessed at NRC on an annual basis, provided that the program scope has not been expanded. The only other fees for materials licensees would be for a new license, expansion of licensed activities to a new fee category, or certain decommissioning actions.

Hopefully this is helpful.

Sincerely,

**Sara A. Forster, Health Physicist Licensing Reviewer**  
U.S. Nuclear Regulatory Commission - Region III  
Division of Nuclear Materials Safety  
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Direct: (630) 829-9892  
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**From:** Smith, Kevin <[kevin.smith@corteva.com](mailto:kevin.smith@corteva.com)>  
**Sent:** Monday, November 18, 2019 9:01 AM  
**To:** Forster, Sara <[Sara.Forster@nrc.gov](mailto:Sara.Forster@nrc.gov)>  
**Subject:** [External\_Sender] FW: NRC Dow follow-up

Good Morning Ms. Forster,

Per the conversation with Ms. Ezell, I will be submitting a transfer of control request to be included in my license renewal application. My apologies for the delay on this but I should have it to you by the end of this week. However, I do have one question. Will submitting this request trigger a fee for the license renewal? The application I submitted in June did not originally have any changes warranting a fee.

Thank you for your assistance.

Best Regards,

Kevin Smith

EH&S Specialist, Radiation Safety Officer



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**From:** Ezell, Julie <[Julie.Ezell@nrc.gov](mailto:Julie.Ezell@nrc.gov)>

**Sent:** Friday, October 18, 2019 12:41 PM

**To:** McGee, Patricia <[patricia.mcgee@corteva.com](mailto:patricia.mcgee@corteva.com)>; Smith, Kevin <[kevin.smith@corteva.com](mailto:kevin.smith@corteva.com)>

**Cc:** Forster, Sara <[Sara.Forster@nrc.gov](mailto:Sara.Forster@nrc.gov)>; Harris, Brian <[Brian.Harris@nrc.gov](mailto:Brian.Harris@nrc.gov)>; Irvin, Ian <[Ian.Irvin@nrc.gov](mailto:Ian.Irvin@nrc.gov)>

**Subject:** [EXTERNAL] FW: NRC Dow follow-up

Good afternoon, Pat,

It was a pleasure to speak with you this morning. Thank you for taking the time to explain the Dow DuPont merger and subsequent spinoff transactions. As discussed, I am providing links to publicly available information E.I. du Pont submitted regarding their transfer of control request. To the extent you would like to withhold any information in your request from public disclosure, please see 10 CFR 2.390. Also, NUREG 1556, Volume 15, Appendix E contains information licensees need to provide for a transfer of control request for a materials license.

Original request: ML19035A729

Requests for Additional Information (RAIs): ML19046A056

E. I. du Pont response to RAIs: ML19065A146

Cover Letter for consent to transfer of control: ML19199A110

Safety Evaluation Report (SER): ML19199A109

Please let me know if you have any questions.

Best,

Julie Ezell

Attorney | Office of the General Counsel

U.S. Nuclear Regulatory Commission

301-287-9157

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