

APR 19 1991

The Dow Chemical Company
ATTN: Scott W. Maxey
1803 Building
Midland, MI 48674

Gentlemen:

We have received guidance from the NRC Division of Industrial and Medical Nuclear Safety (NMSS) regarding your recent request to allow Decay-In-Storage of radioactive material with half-life less than 90 days. The guidance states that this practice may be approved providing the following conditions are met.

1. Policy and Guidance Directive 90-3 "Licensing of Low-Level Radioactive Waste Storage By Materials and Fuel Cycle Licensees" is followed.
2. The specific isotopes approved with half-life greater than 65 days are listed on the license; and
3. That Region III specifically review and approve the monitoring equipment and survey procedures to be used by Dow Chemical Co., in determining that radiation levels of waste material are at background levels.

Item 1. has been committed to in previous material submitted by Dow Chemical, however, you will need to provide additional information for items 2. and 3.

Please provide a list of each of the isotopes with half-life greater than 65 days and less than 90 days for which you desire to decay-in-storage. These will be listed separately on your license.


Provide detailed procedures which will be followed and specific information on the instrumentation which you will use to determine that radiation levels are at background levels prior to incineration. Your procedures and instrumentation must take into account the differences in the type of radiation emitted by each of the isotopes you wish to decay-in-storage.

If you have any questions or require clarification of any of the above stated information, contact us at (708)790-5625.

We will continue our review of your application upon receipt of this information. Please reply in duplicate, within 30 days, stating that this is ADDITIONAL INFORMATION and refer to Control Number 91351.

Sincerely,

Original Signed By
John D. Jones
Materials Licensing Section

RLL

jddjones
04/17/91