



The Dow Chemical Company
Midland, Michigan 48667

October 8, 1996

Mr. Alexander Adams, Jr., Senior Project Manager
Non-Power Reactor and Decommissioning Project Directorate
Division of Project Support
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission

Dear Mr. Adams

Enclosed is the response to your request for additional information regarding our amendment request for Facility Operating License R-108; letter dated September 12, 1996. The enclosure includes the changes proposed for amendment No. 7 and an explanation for the question raised in your letter. If you have any questions regarding this review, please contact me at (517) 636-6584.

Regards

Ward L. Rigot

Ward L. Rigot
Reactor Supervisor
Dow TRIGA Research Reactor
The Dow Chemical Company

Tammy A. Eckerd 10/14/96

TAMMY A. ECKERD
NOTARY PUBLIC, BAY COUNTY, MICHIGAN
ACTING IN MIDLAND COUNTY, MICHIGAN
MY COMMISSION EXPIRES APRIL 17, 2000

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1. 5. Figure 6.1 is currently divided into 2 charts; the first is that of the line (reporting) organization. The second chart shows lines of communications between the various members within the organization. Although this scheme is accurate, it may also be represented by a single block diagram which is more closely aligned with that described in ANSI/ANS-15.1-1990, 'the development of technical specifications for research reactors'. The proposed organizational chart merges the information in the second chart showing communication lines into the first chart with the reporting lines. Additional changes in the titles of individuals who fill the roles within the organization have been made. These changes in title do not reflect a change in management responsibilities.

Unlike the figure in ANSI/ANS-15.1-1990, the reporting lines for the reactor operating staff and radiation protection organization do not merge until the Chief Executive Officer of the company. This requires that the two 'ladders' be incorporated into the organization chart showing the separation of responsibilities between two functions.

The Reactor Operations Committee, which has responsibility for the review and audit functions for the facility do not report to management; but the facility director, who serves as chair of the R.O.C. reports to the Director Analytical Sciences Laboratories.

The Radiation Safety Committee (RSC) has overall responsibility for the safe handling of all radioactive material, including the reactor. The Radiation Safety Officer and Reactor Supervisor report regularly to the RSC.