

October 2, 1996

Dr. Susan Butts
The Dow Chemical Company
Chair, Reactor Operations Committee
1602 Building
Midland, Michigan 48667

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (TAC NO. M96111)

Dear Dr. Butts:

We are continuing our review of your request to make changes to the Dow TRIGA Research Reactor Emergency Plan which you submitted on July 8, 1996. During our review of your request, questions have arisen for which we require additional information and clarification. Please provide responses to the enclosed request for additional information within 30 days of the date of this letter. In accordance with 10 CFR 50.30(b), your response must be executed in a signed original under oath or affirmation. Following receipt of the additional information, we will continue our evaluation of your request.

This requirement affects nine or fewer respondents and, therefore, is not subject to Office of Management and Budget review under P. L. 96-511.

If you have any questions regarding this review, please contact me at (301) 415-1127.

Sincerely,

Original signed by:

Alexander Adams, Jr., Senior Project Manager
Non-Power Reactors and Decommissioning
Project Directorate
Division of Reactor Program Management
Office of Nuclear Reactor Regulation

Docket No. 50-264

Enclosure:
As stated

cc w/enclosure:
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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

October 2, 1996

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The Dow Chemical Company
Chair, Reactor Operations Committee
1602 Building
Midland, Michigan 48667

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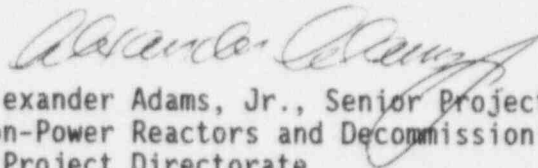
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Dow Chemical Company

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cc:

Office of the Mayor
333 West Ellsworth
Midland, Michigan 48640

Office of the Governor
Room 1 - Capitol Building
Lansing, Michigan 48913

Stan Dombrowski
Chair, Radiation Safety Committee
Dow North America
1803 Building
Midland, Michigan 48667

REQUEST FOR ADDITIONAL INFORMATION

DOW TRIGA RESEARCH REACTOR EMERGENCY PLAN

DOCKET NO. 50-264

1. It was noted during the review that the proposed emergency plan did not include some certain basic information. This information includes, a map showing the location of the facility, the EPZ, a floor plan showing the facility layout, and a diagram showing the overall emergency organization. Please either amend the emergency plan to address the above mentioned items or explain why these items were not included. Additional guidance and information on the content of emergency plans for non-power reactors can be found in NUREG-0849, "Standard Review Plan for the Review and Evaluation of Emergency Plans for Research and Test Reactors."
2. Siren switches are discussed in the plan but are not defined. Please provide a definition of siren switches and discuss the effect of an increased number of switches on emergency preparedness.
3. In your submittal, the phrase, "and will have portable equipment for taking air samples" was removed because the Michigan Division Industrial Hygiene Group does not have equipment for taking air samples. Please provide information regarding how this function will be handled. If this capability is removed, please explain why its removal does not reduce the effectiveness of the plan.
4. The EALs for a NOUE were changed to eliminate events such as tornados, fires, security events, etc. Please provide the basis for removing these EALs and explain why removing the wording does not reduce the effectiveness of the plan.
5. Letters of Agreement with the offsite support organizations did not appear to be included in the emergency plan. Please provide the section(s) of the emergency plan which includes the current Letters of Agreement. Alternatively, if such letters exist, but are not part of the plan, please provide copies of them and explain why they are not part of the plan.