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March 12, 1985

COUNSEL
CRAIG HOSMER
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Myron Karman, Esq.
Office of the Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: Facility Operating License No. R-81
Docket No. 50-54

Dear Myron:

Enclosed is the memorandum you requested regarding maintenance of the license pursuant to Section 104(b) of the Atomic Energy Act of 1954, as amended, for the research reactor at Sterling Forest, New York. We believe that the Section 104(b) license should be retained when an amendment is issued transferring Facility Operating License No. R-81 from Union Carbide Subsidiary "B" to Cintichem.

Please contact me if you have questions regarding the enclosed memorandum.

Sincerely,



Robert J. Ross

cc: Howard Hill, Esq.
Robert King
James J. McGovern
Lee Puccini, Esq.

RJR/jkb