



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

June 19, 1996

MEMORANDUM TO: Jack Parrott
Reactor Decommissioning Section
Low-Level Waste and Decommissioning
Projects Branch

FROM: Louis M. Bykoski *Louis M. Bykoski*
Materials Decommissioning Section
Low-Level Waste and Decommissioning
Projects Branch
Division of Waste Management, NMSS

SUBJECT: THE OFFICE OF THE GENERAL COUNSEL AND CONTRACTOR COMMENTS ON
NON-STANDARD FINANCIAL ASSURANCE SUBMITTAL

Our contractor, ICF Incorporated, and the Office of the General Counsel (OGC) have reviewed and provided comments on the Dow Chemical nonstandard financial assurance submittals sent to us for review.

The ICF comments are presented in two parts. The first part deals with specific recommendations to current deficiencies. The second part (Other Issues) provides a discussion of changes to the standard wording that are acceptable and are not considered to be deficiencies. The OGC comments may include additional deficiencies that need to be corrected by the licensee and comments for our internal use.

You should carefully review all the comments before preparing the deficiency letter. We have enclosed both the ICF and OGC comments to assist you in your review.

Attachments: As stated

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LIST OF INSTRUCTIONS

Dow Chemical

In reviewing the comments the reviewer will note that there will be some overlap between ICF and OGC comments. The following comments should be included in the basis for the deficiency letter:

1. ICF comments 1 through 8 plus last paragraph.
2. All OGC comments.

All other comments and discussions are for reviewer information.