



April 20, 1995

International Services 27-03  
27335 West Eleven Mile Road  
P.O. Box 5036  
Southfield, MI 48037-5036  
Phone: (810) 746-2424  
Fax: (810) 746-2444  
Telex ITT 4320029  
MICHUS33

04000017

U.S. NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555

RE: Our Letter of Credit Number [REDACTED]  
Date of Issue: 07/27/1990  
Account of: THE DOW CHEMICAL COMPANY  
2020 WILLARD H. DOW CENTER  
MIDLAND, MI 48674  
Prior Expiration Date: 07/25/1995

Amount: USD6,625,000.00

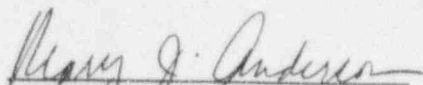
Gentlemen:

According to the original terms of this letter of credit, it has been automatically renewed for an additional period.

The new expiration date is: 07/25/1996

This letter is a notification only and is not an amendment to the credit.

Very truly yours,

  
AUTHORIZED SIGNATURE

cc: THE DOW CHEMICAL COMPANY  
2020 WILLARD H. DOW CENTER  
MIDLAND, MI  
48674

RICHARD MCKENZIE 06-16  
Bank: 001 Branch: 001

Letter of Credit File [REDACTED]

NON NEGOTIABLE

C/1

## SURVEY PLAN

Standard  
EA Form  
to be  
generic

Licensee: Dow Chemical Company  
Midland and Bay City, MI

License No.: STB-527 (active license)

Docket No.: 040-00017

Inspection Dates: August 5-9, 1996

Inspector(s): Ed Kulzer, Mike McCann, and Jack Parrot

Purpose of Inspection: Routine health physics safety inspection. The licensee is remediating two thorium contaminated sites. Inspectors will ~~the~~ evaluate the licensee's health physics safety practices (submitted as part of their decontamination plan). x

### Areas to be inspected:

#### I. Management Control

- ☐ A. as described in application
  - ☐ 1. verify competence of RSO and HP supervisors, and verify duties & responsibilities being done as committed to in license application and DP
  - ☐ 2. verify that the Radiation Safety Committee (RSC) is performing duties & responsibilities as committed to in application & DP (includes ALARA oversight)
- ☐ B. audits - type & frequency
- ☐ C. records
- ☐ D. adequate staff to oversee safety & perform safety related tasks?

#### II. Radiation Work Permits (RWP)

- ☐ A. issued according to license commitments
- ☐ B. signed by appropriate management personnel
- ☐ C. revised as necessary
- ☐ D. inspectors observations of RWP work in progress
- ☐ E. records

#### III. ALARA

- ☐ A. as described in application
- ☐ B. records

IV. Radiation instrumentation (field & analytical)

- ☐ A. quantity and type
- ☐ B. calibration
  - ☐ 1. frequency & method
  - ☐ 2. QA
  - ☐ 3. Records
- ☐ C. cross comparison between NRC & Licensee instrumentation

V. Personnel Monitoring

- ☐ A. whole body (DDE)
  - ☐ 1. type & frequency
  - ☐ 2. occupational & nonoccupational
  - ☐ 3. records
- ☐ B. internal (CDE)
  - ☐ 1. types & frequency
  - ☐ 2. procedure adequate
  - ☐ 3. analyses/instrumentation
  - ☐ 4. records

VI. Air sampling

- ☐ A. occupational
  - ☐ 1. type & frequency
  - ☐ 2. appropriate air samplers
  - ☐ 3. records
- ☐ B. nonoccupational (environmental)
  - ☐ 1. type & frequency
  - ☐ 2. appropriate air samplers
  - ☐ 3. records

VII. Contamination control

- ☐ A. types & frequency
- ☐ B. appropriate instrumentation used
- ☐ C. records
- ☐ D. PPE
  - ☐ 1. type & quantity
  - ☐ 2. worn properly

VIII. Posting & Security

- ☐ A. posting
  - ☐ 1. NRC-3
  - ☐ 2. caution radiation signs (Part 20)
  - ☐ 3. transportation
  - ☐ 4. Waste
- ☐ B. security
  - ☐ 1. Midland (burial area)
  - ☐ 2. trucks
  - ☐ 3. Bay City (storage piles, loading areas, truck cleaning area, etc.)
  - ☐ 4. other areas where licensed materials are used or stored.

VII. Personnel Safety Training

- \_\_\_ A. type & frequency  
\_\_\_ 1. trainers qualified  
\_\_\_ 2. testing for competency  
\_\_\_ 3. records

\_\_\_ B. ALARA

**NOTE:** NRC INSPECTORS WILL ASCERTAIN WHAT INFORMATION REGARDING THE IMPACT OF THE RADIOLOGICAL MATERIAL MAY HAVE ON EMPLOYEES AND WHAT WARNING INSTRUCTIONS HAVE BEEN PROVIDED TO EMPLOYEES. INSPECTORS WILL ASCERTAIN FORM OF INSTRUCTION AND FREQUENCY OF RE-INSTRUCTION AND ASSESS ADEQUACY OF INSTRUCTION.

- \_\_\_ C. Part 19  
\_\_\_ D. records

} Not  
all  
CAPS

VIII. Waste storage & disposal

- \_\_\_ adequate

IX. Emergency procedures

- \_\_\_ adequate

X. DOT

- \_\_\_ A. Rail  
\_\_\_ B. Truck

XI. OSHA Consideration

- \_\_\_ A. electrical safety  
\_\_\_ B. working surfaces (slip/trip hazards, barrier sufficient to prevent falls and unauthorized entry to restricted areas)  
\_\_\_ C. confine space entry (restricted access (permit controlled), atmosphere testing)  
\_\_\_ D. heavy equipment use (access control)  
\_\_\_ E. shoring trenches/pits (any present/engineer plan and oversight?)  
\_\_\_ F. lighting (sufficient to read warning instruction and signs/meters)  
\_\_\_ G. ~~hat~~ hats, glasses, shoes, respirators  
hard

X

XII. NRC Independent Measurements

- \_\_\_ A. restricted areas (according license commitments)

**NOTE:** Samples, e.g., smears, water (surface or ground), soil, or sediments, will not be collected from contaminated restricted areas which have been characterized. Samples may be collected if unexpected or unusual radiological measurements are detected during the course of the inspection.

X

\_\_\_ B. unrestricted areas, environmental samples will be collected, if unusual or unexpected radiological levels are detected, as follows:

- \_\_\_ 1. surface water
- \_\_\_ 2. ground water
- \_\_\_ 3. soil
- \_\_\_ 4. sediment

- \_\_\_ C. step-off pads and personnel survey points
- \_\_\_ D. truck/construction equipment/train cars
- \_\_\_ E. highway routes
- \_\_\_ F. truck/train loading and cleaning areas

via  
surface scans

Inspector E. L. Kulzer Parrott phone 7/30/96  
G.M. McCann  
E. L. Kulzer/G.M. McCann  
J. Parrott

Date 08/01/96

APPROVED BY: J. W. McCormick-Barger  
J. W. McCormick-Barger, Chief  
Decommissioning Branch

Date 8/2/96

### INSPECTION EQUIPMENT & SUPPLIES

- |     |   |         |
|-----|---|---------|
| 1.  | Survey kits<br>1-model 2241-1 meter<br>1-pancake probe 15 mg/cm <sup>2</sup><br>1-alpha scintillation probe<br>1-2x2 NaI scintillation probe<br>1-energy compensated GM 30 mg/cm <sup>2</sup><br>1-wooden handle for pancake probe<br>1-earphone<br>1-V' rope for 2x2 sling | (__2__) |
| 2.  | MicroR meters   | (__2__) |
| 3.  | model 3s Gms (or equivalent)<br>with pancake probes   | (__3__) |
| 4.  | floor gas proportional (GP) monitor   | (__)    |
| 5.  | 100 cm <sup>2</sup> GP probes   | (__)    |
| 6.  | HIPIs   | (__)    |
| 7.  | ionization meters (Eberline Pic6<br>or equivalent)  | (__)    |
| 8.  | soil cups & lids  | (_15_)  |
| 9.  | plastic bags  | (_40__) |
| 10. | filter paper for smears   | (_200)  |
| 11. | Envelops for smears   | (_200)  |
| 12. | 100' tape measure   | (__1)   |
| 13. | duct tape   | (__2)   |
| 14. | trowels   | (__2)   |
| 15. | paper towels for cleaning   | (_200)  |
| 16. | 5 gallon bucket   | (__2)   |
| 17. | marker (Sharpie or equivalent)  | (__2)   |
| 18. | caulk   | (1box)  |
| 19. | plastic flags   | (__)    |

20.	lights	
	hand-held	(__2)
	area lights	(__)
	hard hat lights	(__2)
21.	gloves	
	work type	( 3pr)
	plastic (surgeon type)	(20pr)
	playtex gloves	(_6pr)
22.	batteries	
	Ds	(__20)
	AA	(__)
23.	NRC hardhats	(__2)
24.	NRC issue ear protectors	(_1pk_)
25.	safety shields or glasses	(__3)
26.	safety shoes	(__)
27.	forms	
	• chain of custody	(__25)
	• smear data	(__20)
	• soil/sediment/water	(__20)
	• instrument (efficiency & daily checks	(__)
28.	Instrument checks sources	
	beta	(__1)
	gamma	(__3)
	alpha	(__1)
29.	soil sampler/drill	(__)
30.	sediment sampler	(__)
31.	air samplers	
	high volume	(__)
	low volume	(__)
32.	velometer	(__)