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February 15, 1984

Mr. James G. Keppler
Regional Administrator
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Re: License No. STB-433
Terminated License No. STB-136

Dear Mr. Keppler:

The writer as counsel for what is now known as Wellman Liquidating Corporation has been favored with a copy of your December 8, 1983 communication with Mr. S. J. Simmons, Director Industrial Relations and Program for Wellman Dynamics Corporation at Creston, Iowa. Your communication and the reports attached thereto have been noted, and it would appear that the Commission is operating under a misunderstanding with regard to certain factual matters. The purpose of this letter is to make certain that these facts are corrected and clarified.

The Wellman Dynamics Corporation located in Bay City, Michigan, and to which reference is made with regard to the Hartley and Hartley dumping site, was a corporation wholly or partially owned by the Dow Chemical Company at the time of the asserted dumping occurrence. Our best information is that Dow Chemical subsequently disposed of the assets of the Wellman Dynamics Corporation located in Bay City to the Pennwalt corporation. During the ownership by Pennwalt, the company moved its situs of operations from Bay City, Michigan to Creston, Iowa.

In January of 1976, certain principals of the Wellman operating division in turn purchased the assets of the

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corporation from the Pennwalt Corporation and continued operations in Creston, Iowa.

On November 4, 1982, the assets of Wellman Dynamics Corporation were again sold this time to a subsidiary of Esmark Corporation, and those assets are presently operating under the name Wellman Dynamics Corporation at Creston, Iowa.

This letter is intended to make clear the fact that although the name Wellman Dynamics Corporation persists to the present time, it is not the same organization as the Wellman Dynamics Corporation in existence at the time asserted thorium dispositions took place.

Yours very truly,

Philip S. Kappes
Philip S. Kappes

PSK/sd
cc: Edward E. Johnson
Ben Laughter
S. J. Simmons