



50-264

June 16, 1997

The Dow Chemical Company
Midland, Michigan 48667

Mr. Alexander Adams, Jr., Senior Project Manager
Non-Power Reactor and Decommissioning Project Directorate
Division of Project Support
Office of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission

Dear Mr. Adams

Enclosed is the response to your request for additional information regarding our amendment request for Facility Operating License R-108; letter dated April 17, 1997. The enclosure includes the changes proposed for amendment No. 7 and an explanation for the question raised in your letter. If you have any questions regarding this review, please contact me at (517) 636-6584.

Regards

Ward L Rigot

Ward L. Rigot
Reactor Supervisor
Dow TRIGA Research Reactor
The Dow Chemical Company

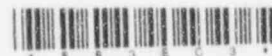
SUBSCRIBED TO AND SWORN BEFORE ME

THIS ^{16th} DAY OF June 19 97

Connie M. March

CONNIE M. MARCH
NOTARY PUBLIC, MIDLAND COUNTY, MICHIGAN
MY COMMISSION EXPIRES DECEMBER 23, 2000

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1. Figure 6.1 has been modified to show the separation of the operations and safety arms of the reactor's administration. The license is held by the radiation safety committee (RSC) which is chaired by The manager of Industrial Hygiene Research and Technology. This person serves as a Level 1 manager as described in ANSI/ANS 15.1-1990. In addition, Operations report to a Senior Research Manager within Analytical Sciences Laboratories. The Radiation Safety Committee is responsible for all aspects of radiation safety including issues related to the TRIGA reactor. For issues related to radiation safety the operations arm of the organization reports through the Senior Research Manager within Analytical Sciences Laboratories to the Radiation Safety Committee. The person responsible for reactor facility operations is the Facility Director and the person responsible for day-to-day operation of the reactor is the reactor supervisor. The role of Facility Director and Reactor Supervisor may be filled by the same person.
2. The Reactor Operations Committee reports to The Senior Research Manager within Analytical Sciences Laboratory. Members of the committee not required by the Technical Specifications (i.e. Radiation Safety Officer and Reactor Supervisor) are appointed by This Level 1 manager.
3. The Radiation Safety Officer communicates with the Level 3 management (Reactor Supervisor) and this reporting line has been added. The radiation safety function reports through The Manager, Industrial Hygiene Research and Technology, a level 1 manager.
4. Section 6.1.1. has been modified to show consistency with the change noted in 1. Above. This change designates the Level 1 management representative as the member of the R.O.C.
5. Section 6.1.2. has been modified to acknowledge the fact the Reactor Supervisor and Facility Director may be the same person and that in this case the Level 1 management representative appoints the Reactor Supervisor and has line management responsibilities for this individual.
6. Section 6.2.1. has been modified to acknowledge the fact the Reactor Supervisor and Facility Director may be the same person and that in this case the Level 1 management representative will serve as the chairperson of the R.O.C.

6. ADMINISTRATIVE CONTROLS

6.1. Organization

The Dow TRIGA Research Reactor is owned and operated by The Dow Chemical Company. The reactor is administered and operated through the Analytical Sciences Laboratory of the Michigan Division of Dow Chemical USA and is located in 1602 Building of the Analytical Sciences Laboratory at the Midland, Michigan location of the Michigan Division.

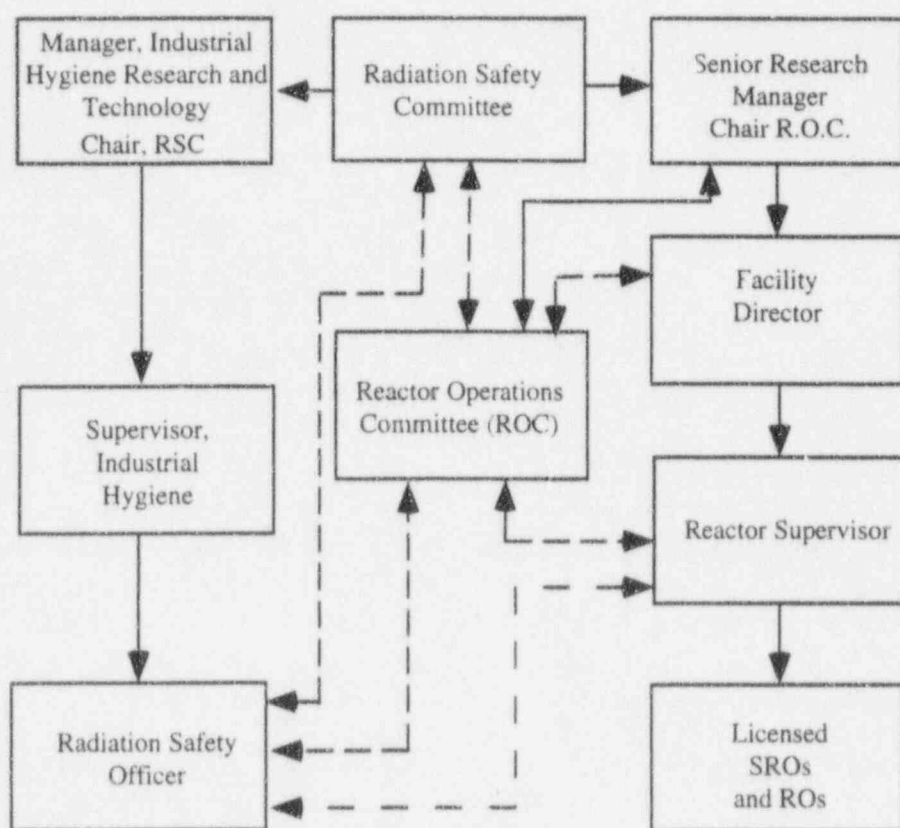
6.1.1. Structure

The structure of the administration of the reactor is shown in figure 6.1. This structure cuts across the lines of management of The Dow Chemical Company. The individual responsible for radiation safety is the Radiation Safety Officer for the reactor who reports on matters of radiation safety to the Radiation Safety Committee and to the Reactor Operations Committee. The Radiation Safety committee oversees the radiation safety program and is responsible for its implementation. The review and audit functions are performed by the Reactor Operations Committee which is composed of at least four persons including a manager within Analytical Sciences Laboratory, the Radiation Safety Officer, and the Reactor Supervisor.

6.1.2. Responsibility

The day-to-day responsibility for the safe operation of the reactor rests with the Reactor Supervisor who is a licensed Senior Reactor Operator appointed by the Facility Director or manager within Analytical Sciences Laboratory. The Reactor Supervisor may appoint equally-qualified individuals, upon notification of the Facility Director and the Reactor Operations Committee, to assume the responsibilities of the Reactor Supervisor. The Reactor Supervisor reports in a management sense to the Facility Director and within the reactor organization to the Reactor Operations Committee.

Figure 6.1. Administration



Line management responsibilities

———— Line Management Reporting
 - - - - - Communication Reporting