

From: [Ullrich, Betsy](#)
To: [Battista, Grace \(GE\)](#); [Hypolite, Curvel \(C\)](#)
Subject: your request to amend due to "name change"
Date: Thursday, August 19, 2021 2:20:00 PM

Ms. Battista and Mr. Curvel

The information provided in your amendment request is not sufficient for me to determine if this is just a change of name, or if this is a change of control. Based on the new name (Dow Chemical Company) and the statement that Dow is consolidating smaller legal entities (in this case, Performance Materials is an LLC), it is not clear if this is, or is not, a change of control. It may be that this is similar to the "No Change of Control " example (2) in Appendix C, but there is not sufficient information to make a decision. In accordance with Section 5.1 of NUREG 1556, volume 15, please provide a pre- and post- organizations chart showing the corporate structure of the license holder and its parent company(ies). In accordance with Appendix E of NUREG 1556, volume 15, describe any planned changes in the organization, including but not limited to, transfer of stocks or assets and mergers, change in members on Board of Directors, etc..

Thank you very much,
Betsy

Betsy Ullrich, Senior Health Physicist
USNRC Region I
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406
610-337-5040 (office)
240-704-4575 (cell)
Elizabeth.ullrich@nrc.gov