



September 2, 2021

Nuclear Materials Licensing Branch
US Nuclear Regulatory Commission Region 1
Attention: Elizabeth Ullrich

RE: Amendment No. 4 for License Number 07-13441-03

Dear Ms. Ullrich,

Thank you for your feedback on Amendment Request No. 4 for the Radioactive Materials License 07-13441-03 of Performance Materials NA Inc, located at the DuPont Experimental Station in Wilmington, Delaware. Additional information is provided to support a Licensee Name change to The Dow Chemical Company.

Performance Materials NA Inc., the current Licensee Name, is a subsidiary of The Dow Chemical Company. Effective 11/1/2021, Performance Materials NA Inc. will merge into The Dow Chemical Company, with The Dow Chemical Company surviving the merger. Please see Attachment 1 for organization charts.

Additionally, Dow's public [SEC Filings](#) can be viewed, which lists Performance Materials NA Inc. as a subsidiary of The Dow Chemical Company. This can be found under Exhibit 21 – Subsidiaries of Dow Inc, page 215.

Please review the additional information provided for the Amendment No. 4 request. In reviewing the guidance in NUREG 1556 Volume 15, Chapter 5, I do not believe this change triggers a Transfer of Control. Please advise if the additional information provided satisfies the Amendment Request.

Thank you for your assistance. If you have any questions, contact information is provided below.

Sincerely,

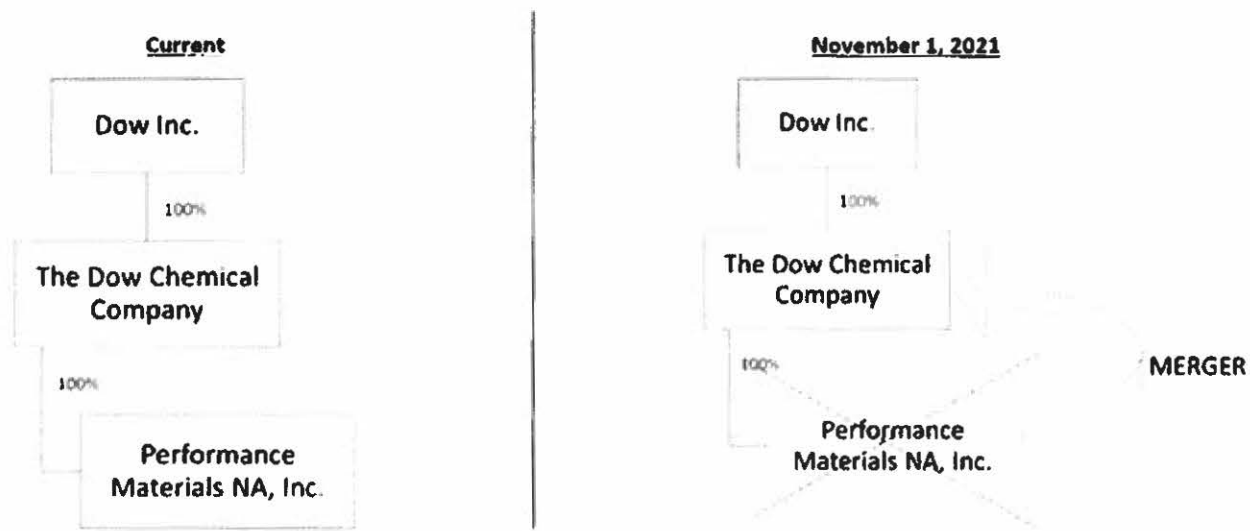
Grace E. Battista
Radiation Safety Officer
Performance Materials NA Inc
The Dow Chemical Company
(610) 244-6418
GBattista1@dow.com

Curvel Hypolite
R&D Site Leader
Performance Materials NA Inc
The Dow Chemical Company
(302) 485-6709
CHypolite@dow.com





Attachment 1



Dow Public SEC Hyperlink:

<https://www.sec.gov/Archives/edgar/data/1751788/000175178821000010/dowinc202010kex21.htm>



200 Powder Mill Rd
Wilmington, DE 19803