

BURLE INDUSTRIES, INC. | 1000 New Holland Ave. | Lancaster, PA 17601-5688 USA  
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Carlton L. Rintz  
President & COO

16 May 2005

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37-30196-01  
03033750

Mr. Steve Courtemanche  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19496-1415

RECEIVED  
REGION 1

VIA FACSIMILE AND  
FIRST CLASS MAIL

RE: NRC License 3730196-01, Notification of Possible Change of Ownership

Dear Mr. Courtemanche:

The purpose of this letter is to inform you of the possible change of ownership of BURLE INDUSTRIES, INC. On the April 24, 2005, the sole shareholders of BURLE INDUSTRIES, Erich Burlefinger and Carlton Rintz entered a Share Purchase Agreement with HolFra Finances SA of France ("Buyer") pursuant to which the BURLE shareholders agreed to sell all of the outstanding stock of BURLE to the Buyer.

While the sale of stock, if closed, would result in a change in ownership of the company, we believe that this will not constitute a change in control of our Material License 37-30196-01. In support of our position, we are submitting for your review our response to the criteria listed in NUREG 1556, Volume 15, line item 5: Change of Control, Items 5.1 through 5.6.

### 5.1 Description of Transaction

Description of Transaction: Sale of stock by principal owners  
New Name: No Change – name remains BURLE INDUSTRIES, INC.  
New License Contacts – A license amendment request was submitted on 4/22/05, to change the named R.S.O. to Dr. Scott Moulzolf, (717) 295-6846, to be effective 7/1/05.

### 5.2 Changes in Personnel

Dr. Scott Moulzolf will become the new Radiation Safety Officer effective 7/1/05. Dr. Moulzolf holds both a B.S. and Ph.D in Physics. His course work included classes in Modern and Nuclear physics. He worked as a staff scientist at the Laboratory for Surface Science and Technology, University of Maine from 1999 to 2001. He has been employed at BURLE INDUSTRIES, INC. since 2001, where he holds the position of a Senior Member of the Technical Staff. Dr. Moulzolf is registered to attend a Radiation Safety Training course at Applied Health Physics, Inc., Bethel Park, PA on May 23, 2005 to become certified as an R.S.O.

### 5.3 Changes in Location, Equipment & Procedure:

We are undergoing a consolidation in floor space in our Conversion Tubes manufacturing area, effectively reducing our total space by 40%. The only impact on the sites described by our materials license Application is reduction of the Burn-in room size by approximately 75%, and to include the Tritium Storage Facility in this room. Within the Burn-in room is a locked ventilated cabinet where extra sources



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are stored when not in use. This cabinet will become the Tritium Storage Facility. This move will put all sources in one room and one locked cabinet. The Company plans to continue pilot and limited run production of PMTs at its Lancaster facility, and a limited number of radioactive sources will be required.

#### **5.4 Surveillance Records**

Records are kept on all sources, exempt and non-exempt, showing isotope, activity, quantity and location. An annual inventory is taken of all sources. It should be noted that all sources are sealed sources, and the non-exempt sources are further encased in Lucite to reduce the risk of damage due to repeated handling by hourly operators. Over the past year, we have replaced many sealed sources with LEDs. As a result, we are in the process of reducing our inventory by approximately 50% by returning these excess sources to SRB Technologies, the vendor from whom we purchased them.

#### **5.5 Decommissioning and Related Records Transfer**

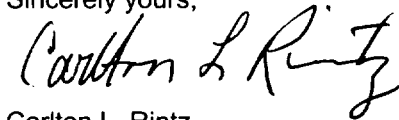
Not applicable; current/amended License will remain in force.

#### **5.6 Transferee's Commitment to Abide by the Transferor's Commitments**

BURLE INDUSTRIES agrees to abide by all commitments, terms and conditions appearing made on its license and application. While there will be a change of stock ownership, there will be no change in BURLE INDUSTRIES' commitment to meeting the license requirements.

There are no unresolved open inspection or enforcement issues.

Sincerely yours,



Carlton L. Rintz

cc: Don Cammerata  
Kirk Jenne, EVP & General Counsel – BURLE