J-9

Administrative Amendment Request (Commonwealth of Virginia Transfer)

L 25383 13037960 03320 (45-25383-02)

	45-25383-01 Charles Hilbert	Mail Control No. Docket No. President	143377 14337.8 030-34342	
Contact:	:Name	Title		
E-mail	l:	Telephone No.	571-437-0011	
Based on your response during our telephone conversation on 2/17/09, the option checked below applies to your request regarding use of licensed material under an NRC license:				
You have reviewed your current license and have determined that you need to maintain both an NRC license and a Commonwealth of Virginia license. You therefore request that your existing NRC license be amended to remove authorization for use of material in the Commonwealth of Virginia and authorize work activities only in non-Agreement States. In addition, you request that the NRC issue a new license for work activities only in the Commonwealth of Virginia. You understand that your new license will then be transferred to the Commonwealth of Virginia in conjunction with the effective date of the Agreement between the NRC and the Commonwealth of Virginia. You further understand that you will be assessed annual fees to maintain both the NRC and Commonwealth of Virginia licenses.				
to conduct existing National Coininon between upon the Virginia, temporary (reciprocion areas of	You have reviewed your current license and no longer find it necessary for authorization to conduct licensed activities in NRC-regulated states, and therefore request that your existing NRC license be amended to authorize the use of material only in the Coininonwealth of Virginia. You request that this be effective on the date the Agreement between the NRC and the Commonwealth of Virginia is signed. You understand that upon the effective date of the Agreement between the NRC and the Commonwealth of Virginia, you will be licensed by the Commonwealth of Virginia to conduct work at temporary job sites in the Commonwealth and as such, must file a NRC Form 241 (reciprocity) prior to performing any work in NRC jurisdictions (non-Agreement States) or in areas of Exclusive Federal Jurisdiction within an Agreement State.			
Additional comm	ments:			

Administrative Amendment Request (Commonwealth of Virginia Transfer)

Licensee Name: License No.	Pole Brothers Imaging Company, LLC 45-25383-01	Mail Control No. 143378 030-34342 Docket No.
SUNSI Revi	lity: x Public or No	on-Public (1)
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Immediate Release SUNSI Review Con		Delayed Release Date: Document Accession #:



201 Davis Drive. St te KK Sterling, Virginia 20164 Tel 703 430 1759 • Fax 703 43€ 1760

December **9,2008**

U.S. Nuclear Regulatory Commission, Region II 475 Allentown Road King Of Prussia, PA 19406-1415

License # 45-25383-01 Docket # 030-34342

Attention: License Assistance Team

Reference: Proposed agreement with the Commonwealth of Virginia

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(HS-25383-02)

In response to the letter dated November 25th 2008, we are hereby requesting per paragraph 2-B the ability to maintain an NRC license for temporary job sites in the District of Columbia. We will also require a license for permanent storage and activities in the Commonwealth of Virginia. Please note that this reply is being sent along with a Request for Ownership Transfer.

Charles Hilbert

Radiation Safety Officer

2008 DEC 16 MM ID: 1-2

REC'D IN LAT 12/4/08

CTI Core Drilling Services, Inc. (Trading & CDS)

• Core Drilling • Saw Cutting • X-Ray • Radiographic Testing •

Non-Destructive Testing • Investigative Drilling • Consulting •

Med Trace /43378,
12/31/2004 /43378,
19/307//148070 ROUNG



201 Davis Drive, Su te KK Sterling, Virginia 20164 Tel 703 430 1759 • Fax 703 430 1760

December 01,2008

U.S. Nuclear Regulatory Commission, Region II 475 Allentown Road King Of Prussia, PA 19406-1415

License # **45-25383-01** Docket # 030-34342

Attention: License Assistance Team

Reference: License Transfer

7008 DEC 16 MM IO: 1

We are herby presenting a "Request for Transfer of Control" Per NUREG 1556 volume 15 all items 5.1 through 5.6 have been addressed below.

After more than 10 years the current owner of CTI Core Drilling Services, Inc has decided to sell the company assets. The proposed owner has overseen the management of this license from day one and as current RSO has partnered with the current co-workers to form Pole Brothers Imaging Company, LLC all aspects will remain the same. The physical address will be forthcoming as our current lease has been terminated by the landlord and we must be vacated by years end.

5.1 DESCRIPTION OF TRANSACTION

Asset purchase of equipment, company logo, and the trade name "CDS"

The transferee will be Pole Brothers Imaging Company, LLC and will continue doing business as CDS. For information concerning business operations and details about the sale of this license the following parties will be available.

Transferor: Chris Stevenson-Owner CDS Inc.

Office # 804-622-8630

Email --- Cstevenson@cti-consultants.com

Transferee: Charles Hilbert – Current RSO

E-mail – cds@cti-consultants.com

PERSONAL INFORMATION WAS REMOVED BY NRC. NO COPY OF THIS INFORMATION WAS RETAINED BY THE NRC,

- Core Drilling Saw Cutting X-Ray Radiographic Testing •
- Non-Destructive Testing Investigative Drilling Consulting •



5.2 CHANGES OF PERSONNEL

The license will continue under the stewardship of Charles **A.** Hilbert aka Tad Pole. Charles will be the President of Pole Brothers Imaging, llc with minor partners Favio Gudiel and Elmer Medina both current assistant radiographers under this license. No other personnel will be added to this license at this time.

5.3 CHANGES OF LOCATION, EQUIPMENT & PROCEDURES

Other than name and ownership, the day to day operations will continue as current. The address of warehoused equipment is under current negotiations with hopes to stay as is. No changes in operation procedures or equipment are planned at this time.

5.4 SURVEILANCE RECORDS

All records pertaining to equipment calibrations, leak tests of sources and cameras are current and surveillance will continue under the same Radiation Safety Officer. Surveillance records pertaining to the day to day operations will continue to be stored at the same address.

Once approved by the NRC all security, training, and maintenance files will be transferred to the Residence / Office of Charles Hilbert at; 245 Nightingale Ave. Stevens City, VA 22655-2446

5.5 DECOMMISSIONING AND RELATED RECORDS TRANSFER

All radioactive sources used under this license are provided by Source Production & Equipment Company and are type G 60 for Iridium 192 cameras and type G 70 for Cobalt 60 these are sealed sources and records of leak tests are maintained on premises. No reports of source leakage have been reported under this license.

Due to the nature of our sources and work a decommissioning procedure is not warranted at this time.

5.6 COMMITMENTS

The Pole Brothers Imaging Company, LLC agrees to abide by all license constraints, license conditions, requirements, representations, and commitments identified in and attributed to the existing license



The signatures below represent an agreement between Chis Stevenson, and Charles Hilbert (aka Tad Role) that the transfer of all records pertaining to the maintenance of this license and rudiography equipment including all radioactive sources will transfer upon approval by the NRC of this amendment and the closing of the sales transaction. All items above have been addressed as fact. Furthermore upon approval and transfer of this license Chris Stevenson will be released of all future responsibility and obligations pertaining to the maintenance & this license.

Transferee -Christopher R. J. Stevenson

Date: 12-8-08

Rate: 12.8.08.

Charles Anthony Hilbert Transferor -