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License No. R-98
September 3, 2010

Director,
Division of Policy and Rulemakings
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

**Aerotest Radiography and Research Reactor
Docket No. 50-228
Request for Extension To Transfer Order**

Ladies and Gentlemen:

By notice published in the Federal Register letter dated July 13, 2010 (75 Fed. Reg. 39,985 (July 13, 2010) (the "Transfer Order")), the U.S. Nuclear Regulatory Commission ("NRC") approved the transfer of the license for the Aerotest Radiography and Research Reactor ("ARRR") held by Aerotest Operations, Inc. ("Aerotest") with certain specified conditions. The Transfer Order also required that Aerotest inform the NRC when all regulatory approvals for the transfer have been met no less than seven (7) business days prior to the transfer. If such approvals are not obtained by September 13, 2010, the Transfer Order is "null and void" unless the Transfer Order is extended. 75 Fed. Reg. at 39,986.

Aerotest, along with the Buyer and Seller (the "Parties") have diligently pursued necessary agreements from the U.S. Department of Energy ("DOE") and U.S. Department of Defense ("DoD") with regard to used nuclear fuel at the ARRR. However, such agreements have proved difficult to secure for reasons beyond the control of Aerotest and the other Parties.

Aerotest expects to be able to inform the NRC by September 17, 2010, of the date by which an agreement with the DOE and DoD on used nuclear fuel will be able to be completed. At that time, Aerotest expects to be able to identify a date by which all U.S. Government agreements will be in hand appropriate for the transfer to be consummated. Therefore, Aerotest requests an extension until seven (7) business days

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after September 17, 2010 or until September 28, 2010. An extension of the Transfer Order until September 28, 2010 is expected to give Aerotest adequate time to identify how long an extension is needed to complete agreements on used nuclear fuel with DOE and DoD.

Sincerely,

//signed electronically//

Robert. B. Haemer
Counsel for Aerotest Operations, Inc.

cc: U.S. NRC Office of Nuclear Reactor Regulation/NRLPO
U.S. NRC Region IV, Regional Administrator
NRC, NRR (C. Montgomery)
NRC, OGC (S. Uttal)