

February 3, 2012

Sara A. B. Forster  
Materials Licensing Branch  
Nuclear Regulatory Commission  
Region III  
2443 Warrenville Road  
Lisle, Illinois 60532-4351

Subject: License No.: 13-32402-01 Control No.: 576541

Pursuant to your Telecon & Fax Transmittal dated 1/27/2012, I address the items listed in the Information Needed for Transfer of Control Application (reference NUREG 1556, Volume 7, APPENDIX E, pages E-1 through E-2) herein. For ease of reference I reiterated the citation in each item.

Item 1. The new name of the licensed organization. If there is no change, the licensee should so state.

**Answer: UL LLC**

Item 2. The new licensee contact and telephone number(s) to facilitate communications.

**Answer: No change.**

Item 3. Any changes in personnel having control over licensed activities (e.g., officers of a corporation) and any changes in personnel named in the license such as radiation safety officer, authorized users, or any other persons identified in the previous license applications as responsible for radiation safety or use of licensed material. The licensee should include information concerning the qualifications, training, and responsibilities of new individuals.

**Answer: No change.**

Item 4. An indication of the whether the transferor will remain in non-licensed business without the license.

**Answer: Not applicable.**

Item 5. A complete description of the transaction, including any transfer of stocks or assets, mergers, etc., so that legal counsel is able, when necessary, to differentiate between name changes and transferring control.

**Answer: On December 31, 2011, Underwriters Laboratories Inc. transferred a number of U.S. assets to one of its wholly owned subsidiaries, UL LLC. The assets transferred included physical assets, real property and employees. UL LLC is a Delaware limited liability company. Any assets that had been used to fulfill UL's obligations to NRC have been transferred to UL LLC.**

Item 6. A complete description of any planned changes in organization, location, facility, equipment, or procedures (i.e., changes in operating or emergency procedures)

**Answer: No changes.**

Item 7. A detailed description of any changes in the use, possession, location, or storage of the licensed materials

**Answer: Not applicable.**

Item 8. Any changes in organization, location, facilities, equipment, procedures, or personnel that would require a license amendment even without transferring control.

**Answer: Not applicable.**

Item 9. An indication of whether all surveillance items and records (e.g., calibrations, leak tests, surveys, inventories, and accountability requirements) will be current at the time of transfer. Provide a description of the status of all surveillance requirements and records.

**Answer: All will be current.**

Item 10. Confirmation that all records concerning the safe and effective decommissioning of the facility, pursuant to 10 CFR 30.35(g), 40.36(f), 70.25(g) and 72.30(d); public dose; and waste disposal by release to sewers, incineration, radioactive material spills, and on-site burials, have been transferred to the new licensee, if licensed activities will continue at the same location, or to NRC for license terminations.

**Answer: Licensed activities will continue at the same location.**

Item 11. A description of the status of the facility. Specifically, the presence or absence of contamination should be documented. If contamination is present, will decontamination occur before transfer? If not, does the successor company agree to assume full liability for decontamination of the facility or site?

**Answer: Contamination is absent.**

Item 12. A description of any decontamination plans, including financial assurance arrangements of the transferee, as specified in 10 CFR 30.35, 40.36, 70.25. Include information about how the transferee and transferor propose to divide the transferor's assets, and responsibility for any cleanup needed at the time of transfer.

**Answer: Not applicable.**

Item 13. Confirmation that the transferee agrees to abide by all commitments and representations previously made to NRC by the transferor. These include, but are not limited to: maintaining decommissioning records required by 10 CFR 30.35(g); implementing decontamination activities and decommissioning of the site; and completing corrective actions for open inspection items and enforcement actions.

With regard to contamination of facilities and equipment, the transferee should confirm, in writing, that it accepts full liability for the site, and should provide evidence of adequate resources to fund decommissioning; or the transferor should provide a commitment to decontaminate the facility before transferring control.

With regard to open inspection items, etc., the transferee should confirm, in writing, that it accepts full responsibility for open inspection items and/or any resulting enforcement actions; or the transferee proposes alternative measures for meeting the requirements; or the transferor provides a commitment to close out all such actions with the NRC before license transfer.

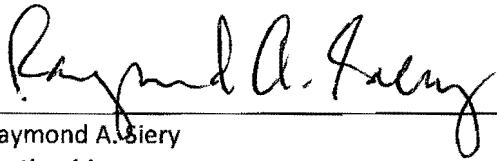
**Answer: Not applicable.**

Item 14. Documentation that the transferor and the transferee agree to transferring control of the licensed material and activity, and the conditions of the transfer; and the transferee is made aware of all open inspection items and its responsibility for possible resulting enforcement actions.

**Answer: Not applicable.**

Item 15. A commitment by the transferee to abide by all constraints, conditions, requirements, representations, and commitments identified by the existing license. If not, the transferee must provide a description of its program, to ensure compliance with the license and regulations.

**Answer: No change in commitment.**

 2/3/2012

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## **Forster, Sara**

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**From:** Siery, Raymond A [Raymond.A.Siery@ul.com]  
**Sent:** Friday, February 03, 2012 4:18 PM  
**To:** Forster, Sara  
**Subject:** Transfer of Control Application  
**Attachments:** RX.pdf - Adobe Acrobat Pro.pdf; 20120203161346.pdf

Hi Sara,

I've attached the responses to the items in the TCA application for NRC's written consent per your request in the original fax (also attached) to Dale Piechocki dated 1/27/2012. If you need anything further or have questions please call the number below.

Best Regards,

Ray Siery  
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