From: Torres, RobertoJ
Sent: Monday, August 18, 2014 7:00 PM
To: Hill, Carol
Subject: FW: NRC Consent Request - Tulsa Gamma Ray, Inc.

Carol:

Here is the amendment request we talked about. Please work with FSME to post the publicly available version in NRC's website for 30 days. Please have a reviewer do a scrub of this case and assign to me. Thank you.

From: Peter Woodson [pwoodson@barberbartz.com]
Sent: Monday, August 18, 2014 1:55 PM
To: Torres, RobertoJ
Cc: Todd Holman
Subject: NRC Consent Request - Tulsa Gamma Ray, Inc.

Mr. Torres,

Thank you again for all of your assistance as we have gone through this process. I have attached a request for prior written consent of the NRC by licensee Tulsa Gamma Ray, Inc.

The first attached PDF document is not intended for public disclosure and contains a cover letter and signed and completed Appendix F intended for the internal review by the NRC. The second attached PDF is a completed Appendix F redacted for sensitive information per your discussions with Todd Holman. Our cover letter provides addition detail.

Let me know if you have any questions as you review these documents. My contact information is below and, along with that of Todd Holman, is in the cover letter attached.

Thank you,

Peter Woodson

FOR PUBLIC REVIEW AND COMMENT

Information Required for Change of Control and/or Change of Ownership
(Includes Change of Name)
Source: NUREG-1556, Volume 15

Please provide the following information concerning changes of control (transferor and/or transferee, as appropriate). If any items are not applicable, state so.

1. Provide a complete description of the transaction (i.e., transfer of stocks or assets, or merger). Indicate whether the name has changed and include the new name. Include the name and telephone number of a licensee contact who NRC may contact if more information is needed.

   A. Description of the transaction:

Currently, Owner, through his revocable trust, owns all of the shares of capital stock in Licensee, an Oklahoma corporation ("Licensee"). Licensee holds a NRC License. In the proposed transaction, Owner's revocable trust will sell a majority of its shares of capital stock in Licensee to Operating, a Delaware limited liability company ("Operating"). Operating is a wholly-owned subsidiary of Holdings, a Delaware limited liability company ("Holdings"). Holdings is an affiliate of Parent, a Delaware limited liability company ("Parent"). In connection with the proposed transaction, Owner's revocable trust will also contribute its remaining shares in Licensee to Holdings (which will then transfer such shares to Operating) in return for an equity interest in Holdings. The proposed transaction will result in the following structure: Licensee will become a wholly-owned subsidiary of Operating; Operating will continue to be a wholly-owned subsidiary of Holdings; and Holdings will be owned primarily by Parent, Owner's revocable trust, and New President (the post-transaction president and CEO of Licensee, who is further described below in Section 2A). Parent, which will hold a majority interest in Holdings, will be a passive investor and will not be involved with the day-to-day operations of Licensee nor will it have access to the NRC-licensed radioactive materials. Such radioactive materials will be handled exclusively by Licensee's authorized users.

   B. [X] No name change

      [ ] New name of licensed organization:_____

   C. [X] No change in contact: Licensee contact information is on record with the agency.

      [ ] New contact: _____

      [ ] New telephone number: _____

2. Describe any changes in personnel or duties that relate to the licensed program. Include training and experience for new personnel.

   A. [ ] No changes in personnel having control over licensed activities.

      [X] Changes is personnel having control over licensed activities (e.g. officers of a corporation):

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The only personnel change resulting from the proposed transaction will be that Owner will resign as President and CEO and incoming President ("New President") will become the new president and CEO. Owner will serve as a member of the board of managers of Holdings. The pre-transaction radiation safety officer for Licensee will continue to serve as its radiation safety officer after the proposed transaction.

New President has extensive professional experience and training in radiation safety. From 1991 through 1999, he served as a vice president at Quality Inspection Services, Inc. in Buffalo, New York. In that position, he was directly responsible for managing the radiation safety officers and implementing a radiation safety program. From 1999 through 2001, New President served as a regional manager at GE Inspection Services, Inc. in Decatur, Alabama, a division of GE Nuclear. In that position, New President also managed the radiation safety officers and implemented a radiation safety program. From 2001 through 2006, New President served as a vice president at Team Industrial Services in Houston, Texas. In that position, New President, again, managed the radiation safety officers and implemented a radiation safety program. In addition, New President is a Level II Radiographer and has received ALARA and Nuclear Employee Indoctrination Training while working on the West Valley Demonstration Project in West Valley, New York (a joint project between the U.S. Department of Energy and Westinghouse Electric Corporation) and received additional Nuclear Employee Indoctrination Training at the Ginna Nuclear Power Plant in Ontario, New York.

B. [X] No changes in personnel named in the license.

[ ] Changes in personnel named in the license (e.g. RSO, AUs) - include training, experience and responsibilities:

3. Describe, in detail, any changes in the organization, location, facilities, equipment or procedures that relate to the licensed program.

[ ] Organization:

[ ] Location:

[ ] Facility:

[ ] Equipment:

[ ] Procedures:

[X] Not applicable: There will be no changes in the organization, location, facilities, equipment and procedures.

4. Describe the status of the surveillance program (i.e., surveys, wipe tests, quality control) at the present time and the expected status at the time that control is to be transferred.

A. Description of the status of all surveillance program:

Licensee's current surveillance program status is acceptable per recent inspections and there are no expected changes to the surveillance program at the time of the proposed transaction.

B. Surveillance Items & Records: calibrations, leak tests, surveys, inventories, and accountability requirements will be current at the time of transfer

[X] Yes [ ] No (explain)

5. Confirm that all records concerning the safe and effective decommissioning of the facility will be transferred to the transferee or to NRC, as appropriate. These records include documentation of surveys of ambient radiation levels and fixed and/or removable contamination, including methods and sensitivity.

Records transferred to:
[ ] New licensee [ ] NRC for license termination [X]Not applicable

6. Confirm that the transferee will abide by all constraints, conditions, requirements and commitments of the transferor or that the transferee will submit a complete description of the proposed licensed program.

"On Record" (transferee company) will abide by all constraints, conditions, requirements and commitments of "On Record" (transferor company).

"On Record"	"On Record"
Signature/Title Transferee Official	Signature/Title Transferor Official
date	date

FOR PUBLIC REVIEW AND COMMENT

Information Required for Change of Control and/or Change of Ownership
(Includes Change of Name)
Source: NUREG-1556, Volume 15

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B. [X] No changes in personnel named in the license.

[ ] Changes in personnel named in the license (e.g. RSO, AUs) - include training, experience and responsibilities:

3. Describe, in detail, any changes in the organization, location, facilities, equipment or procedures that relate to the licensed program.

[ ] Organization:

[ ] Equipment:

[ ] Location:

[ ] Procedures:

[ ] Facility:

[X] Not applicable: There will be no changes in the organization, location, facilities, equipment and procedures.

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Records transferred to:
[ ] New licensee [ ] NRC for license termination [X]Not applicable

6. Confirm that the transferee will abide by all constraints, conditions, requirements and commitments of the transferor or that the transferee will submit a complete description of the proposed licensed program.

"On Record" will abide by all constraints, conditions,
(transferee company)
requirements and commitments of "On Record".
(transferor company)

"On Record"
Signature/Title
Transferee Official

date

"On Record"
Signature/Title
Transferor Official

date

584594

BETWEEN:

Accounts Receivable/Payable
and
Regional Licensing Branches

[FOR ARPB USE]
INFORMATION FROM WBL

Program Code: 03320
Status Code: Pending Amendment
Fee Category: 3O
Exp. Date: 02/28/2018
Fee Comments:
Decom Fin Assur Reqd: N

License Fee Worksheet - License Fee Transmittal

A. REGION

1. APPLICATION ATTACHED

Applicant/Licensee:	TULSA GAMMA RAY, INC.
Received Date:	08/19/2014
Docket Number:	3012319
Mail Control Number:	584594
License Number:	35-17178-01
Action Type:	Amendment

2. FEE ATTACHED

Amount: /

Check No.: /

3. COMMENTS

Signed: Colleen Murnahan

Date: 8-19-2014

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered / /)

1. Fee Category and Amount: _____

2. Correct Fee Paid. Application may be processed for:

Amendment: _____

Renewal: _____

License: _____

3. OTHER _____

_____

Signed: _____

Date: _____