

From: [Lawyer, Dennis](#)
To: Justin.douthat@cardno.com
Subject: Marshal Miller & Associates, Inc., Request for Additional Information Concerning Application for a License Amendment, Control 585375
Date: Tuesday, December 02, 2014 8:51:00 AM

Dear Mr. Justin S. Douthat,

This is in reference to your letter dated November 13, 2014, requesting for amendment to Nuclear Regulatory Commission License No. 45-17195-01, Docket No. 03012341. In order to continue our review, we need the following additional information:

1. In your letter, you state that substantially all assets and liabilities will be transferred to Cardno, Inc. From this we understand that the licensee name should be changed to Cardno, Inc. once the transfer has taken place and that they possess all the assets and facilities associated with licensed operations. Please confirm our understanding.
2. In your letter, you state that there are no changes in personnel. Please confirm who will be the management contact, title, phone and electronic mail address when the transfer to Cardno, Inc. is completed.
3. Your letter did not describe the changes in organization that exercises control over licensed program as stated in NUREG-1556, Volume 15, "Consolidated Guidance About Materials Licenses Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses," section 5.3. Please describe the changes in organization that exercises control over the licensed program.
4. You provided that the surveillance program is in place and will continue to remain in effect. NUREG-1556, Volume 15, section 5.4, states to submit that all required surveillances have been performed, documented, and reviewed. Provide this statement or if they will not be performed, the reasons, and any corrective actions and the date these corrective actions will be completed.
5. NUREG-1556, Volume 15, section 5.5 discusses decommissioning and related records transfer. Although you may not be required to have a decommissioning fund, you are still required to maintain records important to decommissioning. The requirements for maintaining records important to decommissioning, including the type of information required, are stated in 10 CFR 30.35(g). All licensees are required to maintain these records in an identified location until the site is released for unrestricted use. In the event that the licensed activities are transferred to another person or entity, these records shall be transferred to the new licensee before transferring the licensed activities. Please commit to transferring records important to decommissioning and when they will be transferred. Provide a description of any contaminated areas. Please have Cardno, Inc. commit to maintain the records received from Marshall Miller & Associates.

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office (Address below) and refer to Mail Control No. 585375. If you have technical questions regarding this letter, please call me at (610) 337-5366.

Please note that you may not reply to this letter by return e-mail. Your reply must be in writing by letter or facsimile (610-337-5269). If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application.

Region 1 Office Mailing Address: Licensing Assistance Team, US Nuclear Regulatory Commission Region I, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406-2713.

Dennis Lawyer
Health Physicist
U.S. Nuclear Regulatory Commission
Division of Nuclear Material Safety
610-337-5366
610-337-5269 (F)