



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION I
2100 RENAISSANCE BLVD., SUITE 100
KING OF PRUSSIA, PA 19406-2713

February 17, 2015

Docket No.: 03036563
Mail Control: 585243

License No.: 44-30912-01

John J. Judge
President
R.O.V. Technologies, Inc.
49 Bennett Drive
Brattleboro, VT 05301

John A. Stringer
President
R. Brooks Associates, Inc., d/b/a Rolls-Royce
6546 Pound Road
Williamson, NY 14589

SUBJECT: R.O.V. TECHNOLOGIES INC., REQUEST FOR ADDITIONAL INFORMATION
CONCERNING CHANGE OF CONTROL AND OWNERSHIP, CONTROL NO. 585243

Dear Mr. Judge and Mr. Stringer:

This letter is in reference to letter, dated October 29, 2014 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14323A202), in which, you requested NRC's consent for a change of control and ownership to Nuclear Regulatory Commission License No. 44-30912-01. On Tuesday, February 17, 2015, Mr. Glenn Roberts, your consultant, and I discussed additional information that will be needed to complete our review.

In order to continue our review, we need the following additional information:

1. Since NRC License No. 44-30912-01 authorizes the use of special nuclear material, you must comply with 10 CFR 70.36(b) before there is a change of control. 10 CFR 70.36(b) requires that an application for transfer of license must include: (1) the identity, technical, and financial qualification of the proposed transferee and (2) financial assurance for decommissioning information required by 10 CFR 70.25. Please submit information demonstrating the transferee's (R. Brooks Associates, Inc.) financial qualifications and financial assurance.

2. In your letter dated October 29, 2014, you stated that the transaction will involve the direct sale of the business including the name, licensed property, facilities, and equipment, including all radiological and other equipment necessary for the administration of the radiation safety program. However, the letter did not describe a transfer of stocks. Please provide a detailed description of the direct sale including any purchase, sale or transfer of stocks.
3. Please provide a description of any provisions or conditions of the sale that would shield directors or board members of Rolls-Royce, and R. Brooks Associates, Inc., d/b/a Rolls-Royce from decisions involving classified or secret information, and/or from the management or control of special nuclear material.

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 585243. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5323. Your reply must be in writing by letter or facsimile (610-337-5269). You may submit a signed PDF via email. If we do not receive a reply from you within 30 calendar days from the date of this email, we will assume that you do not wish to pursue your application.

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Nuclear Materials; Med, Ind, & Academic Uses**; then **Licensee Toolkits**, see our **toolkit index page**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

Your submittal should not contain personally identifiable information (PII), such as date of birth, social security number, home addresses, and home telephone numbers. For additional information, refer to Regulatory Information Summary 2007-04, Personally Identifiable Information Submitted to the U.S. Nuclear Regulatory Commission, dated March 9, 2007, (<http://www.nrc.gov/reading-rm/doc-collections/gen-comm/reg-issues/2007/ri200704.pdf>).

The NRC's Safety Culture Policy Statement became effective in June 2011. While a policy statement and not a regulation, it sets forth the agency's *expectations* for individuals and organizations to establish and maintain a positive safety culture. You can access the policy statement and supporting material that may benefit your organization on NRC's safety culture Web site at <http://www.nrc.gov/about-nrc/safety-culture.html>. We strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

Sincerely,



Laurie A. Kauffman
Health Physicist
Decommissioning and Technical Support Branch
Division of Nuclear Materials Safety