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08 May 2015

United States
Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Attn: Shirley S. Xu
Materials Safety Licensing Branch

Re: Robinson Technical Products T/A Inweld Corporation
Request for Additional Information

Dear Ms. Xu:

This letter provides the additional information you requested related to our request to transfer the ownership of Nuclear Regulatory Commission (NRC) Exempt-Distribution Materials License No. 37-35178-01E to Masterweld Products LLC.

1. There is no planned change in the organization. Robinson Technical Products (RTP) is wholly owned by Robinson Delaware Holdings Inc. (RDHI). RDHI owns a minority interest in Masterweld Products LLC (MWP). The two companies share facilities and also customers. Ownership flowcharts, shareholder agreements and business licenses for both companies are available upon request. The current ownership structure has been in place for RTP since 2004 and for MWP since 2007.
2. There are no planned changes in personnel or duties that relate to the licensed program. Both companies supplied the licensed products as part of their product offering prior to the NRC requirement for NRC licensing. The personnel in both companies have been trained in the products. Prior to last year when the import and sale of the products were moved solely to RTP to comply with the licensing requirements, MWP sold more of the licensed product as a percentage of their total corporate sales.
3. There are no planned changes in the location, facilities, etc. Both companies have been operating out of the same shared location since 2007. All safety programs, use, possession and waste management or other procedures will continue or be enhanced. Additionally, we feel MWP is better equipped to manage the programs associated with the licensed products.
4. The licensed product is not used in either facility. It is only purchased from a manufacturer and resold. As such the safety program is related to safe handling, control, shipment and disposal. Since the two companies share a facility, the facilities, equipment and safety program is already the same for both. There is no known contamination and currently no waste of the licensed products on-site.
5. Both Transferor and transferee agree to transferring control of the licensed material and activity. This letter is signed by an officer of each company to validate this agreement. There are currently no open inspection items and the transferee is aware of this.
6. With signature of this letter, the transferee's officer confirms that the transferor will submit a complete description of the proposed licensed program.

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I hope our answers will adequately support the request to transfer the license of RTP to MWP. We can be reached at 484-271-2161 for Mr. Reigner and 289-888-1901 for Mr. Widell or at the address above for either

Sincerely,

Jason Reigner
President
Masterweld Products LLC

A handwritten signature in cursive script, appearing to read "Gregory S. Widell".

Gregory S. Widell
President
Robinson Technical Products/Robinson Delaware Holdings Inc.