



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PA 19406-2713

August 6, 2015

Docket No. 03038529

License No. 12-31469-01

Preston Hopson
Senior Corporate Counsel
AECOM
1999 Avenue of the Stars, Suite 2600
Los Angeles, CA 90067

**SUBJECT: URS ENERGY & CONSTRUCTION, INC., CONSENT TO TRANSFER NRC
LICENSE, MAIL CONTROL NO. 586570 (CORRECTED COPY)**

Dear Mr. Hopson:

By letter dated April 8, 2015 (ML15111A115), AECOM submitted to the U.S. Nuclear Regulatory Commission (NRC) a request for consent to direct license transfer of NRC Materials License No. 12-31469-01. Based on the information you provided, we understand that as a result of a proposed sale between URS Energy & Construction, Inc. (URSE&C), and System One Holdings, LLC (System One), ownership and control of License No. 12-31469-01 will be directly transferred from URS E&C to System One. We further understand that this transfer will not result in any change to the licensed materials, persons using the license material, location of use of licensed material, or persons responsible for the licensee's radiation safety program.

Based on the above understandings and as more fully detailed in the enclosed NRC staff's Safety Evaluation Report, which documents the NRC staff's review of the request, we have no objection to the proposed transfer. Please note that you will need to notify us promptly, in writing, after the transaction has been finalized and include a signed copy of the sale agreement confirming completion of the transaction. With this information, we can issue an administrative amendment to your NRC license to reflect the transaction. If this planned sale has not been consummated within 30 days of the date of this letter please notify us in writing. Please contact me at 610-337-5216, or by e-mail at craig.gordon@nrc.gov if you have any questions regarding this letter.

Future changes in the licensee's name, licensed use, licensed materials, licensed location, or persons responsible for licensed material require submission of a request to amend the license. NRC approval must be received prior to implementation of the proposed change.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC website at <http://www.nrc.gov/reading-rm/adams.html>.

P. Hopson

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Thank you for your cooperation.

Sincerely,

Original signed by Craig Gordon

Craig Gordon, Senior Health Physicist
Commercial, Industrial, R&D
and Academic Branch
Division of Nuclear Materials Safety

cc: David Revelt

Docket No. 030-38529
License No. 12-31469-01
Control No. 586570

Enclosure: As stated

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SAFETY EVALUATION REPORT
PROPOSED TRANSFER OF CONTROL FOR BYPRODUCT MATERIALS NRC LICENSE
NUMBER 12-31469-01, URS ENERGY & CONSTRUCTION, INC.

DATE: July 7, 2015

DOCKET NO.: 030-38529

LICENSE NO.: 12-31469-01

CONTROL NO.: 586570

LICENSEE: URS Energy & Construction, Inc.
1437 South Bell School Road, Inc.
Rockford, IL 61108

TECHNICAL REVIEWER: Craig Gordon, Sr. Health Physicist
DNMS, Region I

SUMMARY AND CONCLUSIONS

URS Energy & Construction, Inc. (URS E&C), is authorized by NRC Materials License No. 12-31469-01 for the use of byproduct material in industrial radiography at temporary job sites of the licensee anywhere in the United States where U.S. Nuclear Regulatory Commission (NRC) maintains jurisdiction for regulating the use of licensed material, including areas of exclusive Federal jurisdiction within agreement states.

By letter dated April 8, 2015 (ML15111A115),¹AECOM, corporate counsel for URS E&C, requested NRC consent to a direct transfers of ownership and control from URS E&C to System One Holdings LLC (System One), a Delaware limited liability company. URS E&C intends to sell the assets related to the License No. 12-31469-01 to System One. Transfer of the license will not affect daily operations of the business with regard to this materials license, and the licensee will continue to operate under the conditions of License No. 12-31469-01.

The request for consent was reviewed by NRC staff and is understood to be a direct transfer of a 10 CFR Part 30 license using the guidance in NUREG-1556, Volume 15, "Consolidated Guidance about Materials Licenses: Program-Specific Guidance about Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Material Licenses," dated November 2000. The NRC staff finds that the information submitted by AECOM (on behalf of URS E&C) sufficiently describes and documents the transaction and commitments made by URS E&C and System One to support maintaining the license.

As required by 10 CFR 30.34 and section 184 of the Atomic Energy Act of 1954, as amended (the Act), NRC staff has reviewed the April 8, 2015 letter and finds that the proposed transfer of control is in accordance with the Act. The staff finds that System One is qualified to use byproduct material for the purpose requested and, after the transfer of control, will have the equipment, facilities, and procedures needed to protect public health and safety and promote the common defense and security.

¹ ML numbers are accession numbers used in the NRC's Agencywide Documents Access and Management System (ADAMS). Accession numbers can be used to access publicly available documents online at <http://adams.nrc.gov/wba/>.

SAFETY AND SECURITY REVIEW

NRC License No. 12-31469-01 was last amended on December 2, 2014, as amendment 01, with an expiration date of December 31, 2024. The NRC conducted a field office inspection (Aiken, SC) and temporary job site inspection (Palisades Nuclear Plant, Covert, Michigan) of URS E&C during the period February 12- June 9, 2015. The NRC did not identify any violations and there were no violations identified during the previous inspection.

The commitments made by URS E&C and System One state that URS E&C License No. 12-31469-01:

- A. will not change the radiation safety officer listed in the NRC license;
- B. will not change the personnel involved in licensed activities;
- C. will not change the locations, facilities, and equipment authorized in the NRC license;
- D. will not change the radiation safety program authorized in the NRC license;
- E. will change the organization's name listed in the NRC license from URS Energy & Construction, Inc. to System One Holdings LLC; and
- F. will keep regulatory required surveillance records and decommissioning records.

Based on the information in the preceding paragraphs and the guidance provided by the NRC's Office of Nuclear Material Safety and Safeguards (NMSS),² "Checklist to provide a basis for confidence that radioactive materials will be used as specified on the license," September 3, 2008 revision, for security purposes, System One is considered a known entity. The purpose of this checklist is for the NRC to obtain reasonable assurance from new license applicants or NRC licensees transferring control of licensed activities that the licensed material will be used for its intended purpose and not for malevolent use. System One currently holds NRC License No. 37-27891-02. There were no violations identified during NRC safety and security inspections of System One conducted in 2013 and 2014.

Pursuant to 10 CFR 30.35, "Financial Assurance and Recordkeeping for Decommissioning", a decommissioning funding plan or financial assurances are not required for NRC License No. 12-31469-01 due to the types and quantities of licensed materials authorized for use and possession under the license.

² Previously the Office of Federal and State Materials and Environment Management Programs (FSME)

REGULATORY FRAMEWORK

URS E&C's NRC License No. 12-31469-01 was issued under 10 CFR Part 30, Rules of General Applicability to Domestic Licensing of Byproduct Material. The Commission is required by 10 CFR 30.34 to determine if the transfer of control is in accordance with the provisions of the Act and give its consent in writing.

10 CFR 30.34(b) states: "No license issued or granted pursuant to the regulations in this part and parts 31 through 36, and 39 nor any right under a license shall be transferred, assigned or in any manner disposed of, either voluntarily or involuntarily, directly or indirectly, through transfer of control of any license to any person, unless the Commission shall, after securing full information, find that the transfer is in accordance with the provisions of the Act and shall give its consent in writing."

As previously indicated, the staff evaluation is based on guidance in NUREG-1556, Volume 15. The central issue is whether the authority over the license has changed. URS E&C's request for consent describes a direct transfer of control resulting from a planned sale between URS E&C and System One. Following completion of the transfer, URS E&C's nondestructive testing and quality inspection services business authorized under License No. 12-31469-01 will be sold to System One. As such, the transfer requires NRC consent.

DESCRIPTION OF TRANSACTION

The transaction is described in detail in documents available on the NRC Agencywide Document and Access Management System (ADAMS). After completion of the change System One will be the licensee and be in control of all licensed activities under NRC License 12-31469-01. The NRC staff finds that the request for consent adequately provides a complete and clear description of the transaction, and is consistent with the guidance provided in Appendix F of NUREG-1556, Volume 15.

TRANSFeree'S COMMITMENT TO ABIDE BY THE TRANSFEROR'S COMMITMENTS

The NRC staff finds that the information submitted in documents by AECOM sufficiently describes and documents the understandings and commitments made by URS E&C and System One, and is consistent with the guidance in NUREG-1556, Volume 15.

ENVIRONMENTAL REVIEW

An environmental assessment for this action is not required since this action is categorically excluded under 10 CFR 51.22(c)(14)(vi).

CONCLUSION

The staff has reviewed the request for consent submitted by URS E&C and the future commitments by both parties with regard to direct transfer of control of byproduct materials under NRC License 12-31469-01 and approves the application pursuant to 10 CFR 30.34(b).

The submitted information sufficiently describes the transaction; documents the understanding of the license and commitments of the transferee; and demonstrates that personnel have the experience and training to properly implement and maintain the license in that they will maintain the existing records and abide by all existing commitments to the license. This information is consistent with the guidance in NUREG-1556, Volume 15.

Therefore, the staff concludes that the proposed transfer of control would not alter the previous findings, made under 10 CFR Part 30, that licensed operations will not be inimical to the common defense and security, or to the health and safety of the public.