



June 28, 2016

Reference No. 11034001

Ms. Sara Forster
License Reviewer
Materials Licensing Branch
2443 Warrenville Road
Suite 210
Lisle, Illinois 60532

Dear Ms. Forster:

**Re: NRC License No. 21-32548-01 issued to Inspecsol Engineering Inc.
Information Needed for Change of Name Application - Resubmission**

GHD Services Inc. (GHD) received an email from the United States Nuclear Regulatory Commission (NRC) dated June 14, 2016 requesting information as required by NUREG-1156, Volume 1, Appendix C in order to change the name on the Inspecsol Engineering License No, 21-32548-01 to GHD Services Inc. This letter contains our responses to the NRC request for information in the same order as outlined in the specified regulation.

Licensees must provide full information and obtain NRC's prior written consent before transferring ownership or control of the license; some licensees refer to this as "transferring the license."

Licensees must provide the following information concerning changes of ownership or control by the applicant (transferor and/or transferee, as appropriate). If any items are not applicable, licensees must so state.

1. The new name of the licensed organization. If there is no change, the licensee should so state.

Response: GHD Services Inc.

2. The new licensee contact and telephone number(s) to facilitate communications.

Response: GHD Services Inc.

14496 Sheldon Road, Suite 200

Plymouth, Michigan 48170

RSO Rebecca Bentley

Office: (734) 453-5123

3. Any change in personnel having control over licensed activities (e.g., officers of a corporation) and any change in personnel named in the license such as RSO, authorized users, or any other persons identified in previous license applications as responsible for radiation safety or use of licensed material. The licensee should include information concerning the qualifications, training, and responsibilities of new individuals.

Response: There has been no change in corporate officers for the GHD location identified.

Rebecca Bentley is the new RSO (applicable training records and Delegation of Authority included in Attachment A). Ms. Bentley has been an authorized user under NRC license 21-32548-01 for 10 years, and is taking over the RSO role. The Delegation of Authority to RSO is attached, signed by GHD Vice President, Scott Adamowski and Ms. Bentley.

Emergency Procedure response persons are as follows:

Rebecca Bentley (RSO) – Office (734)453-5123

Matt Lamb – Associate – Office (734)453-5123

Scott Adamowski – Vice President – Office (734)453-5123

Before using licensed materials, authorized users will have successfully completed one of the training courses described in Criteria in the sections entitled "Training for Individuals Working In or Frequenting Restricted Areas" in NUREG-1556, Vol. 1, Rev. 1, dated September 2001. Training records for currently authorized users Rebecca Bentley, Austin Sash and David Canfield are included in Attachment A.

4. An indication of whether the transferor will remain in non-licensed business without the license.

Response: Inspecsol Engineering, Inc. merged with GHD Services Inc. and no longer exists as a business.

5. A complete, clear description of the transaction, including any transfer of stocks or assets, mergers, etc., so that legal counsel is able, when necessary, to differentiate between name changes and changes of ownership.

Response: In July 2014, GHD and Conestoga-Rovers & Associates merged through a stock purchase transaction at the holding company level; specifically, GHD Holdings (Canada) Inc. acquired 100% of the shares of Conestoga-Rovers & Associates, Inc.'s ultimate parent company (CRA Holdings Inc.). Notably, Conestoga-Rovers & Associates, Inc.'s parent company, CRA Holdings U.S., LLC, remains constant. In July 2015, GHD and Conestoga-Rovers & Associates, Inc. completed the business combination through a series of transactions including a rebranding/re-naming of the operating entities. Conestoga-Rovers & Associates, Inc. underwent a name change to "GHD Services Inc.". A name change document evidencing this name change was filed with its state of domicile, Delaware, and each state it held a certificate of authority in to complete its rebranding to GHD. Inspec-Sol Engineering Inc. remains

wholly owned by GHD Consultants Ltée (formerly known as Inspec-Sol Inc.) and ultimately owned by the holding company, GHD Holdings (Canada) Inc.

6. A complete description of any planned changes in organization, location, facility equipment, or procedures (i.e., changes in operating or emergency procedures).

Response: Emergency Procedures response persons will be changed to the following:

Rebecca Bentley (RSO) – Office (734)453-5123

Matt Lamb – Associate – Office (734)453-5123

Scott Adamowski – Vice President – Office (734)453-5123

7. A detailed description of any changes in the use, possession, location, or storage of the licensed materials.

Response: There is no change in the use, possession, location, or storage of the licensed materials.

8. Any changes in organization, locations, facilities, equipment, procedures, or personnel that would require a license amendment even without the change of ownership.

Response: The new RSO is Rebecca Bentley with Delegation of Authority included in Attachment A. There are no changes in organization, locations, facilities, equipment or procedures that would require a license amendment with the change in licensed name from Inspecsol Engineering, Inc. to GHD Services Inc.

9. An indication of whether all surveillance items and records (e.g., calibrations, leak tests, surveys, inventories, and accountability requirements) will be current at the time of transfer. Provide a description of the status of all surveillance requirements and records.

Response: Troxler Soil Density Gauge Model 3440 – Gauges 31097 and 30968 current on calibration and leak tests with most recent records included in Attachment B.

"Area Monitor" dosimetry badge monitors public dose closest to stored gauges with most recent dosimetry record included in Attachment B.

Annual Portable Gauge Audit performed May, 2016 with record included in Attachment B.

10. Confirmation that all records concerning the safe and effective decommissioning of the facility, pursuant to 10 CFR 30.35(g), 40.36(f), 70.25(g) and 72.30(d); public dose; and waste disposal by release to sewers, incineration, radioactive material spills, and on-site burials, have been transferred to the new licensee, if licensed activities will continue at the same location, or to NRC for license terminations.

Response: All records concerning the safe and effective decommissioning of the facility, pursuant to 10 CFR 30.35(g), 40.36(f), 70.25(g) and 72.30(d); public dose; and waste disposal

by release to sewers, incineration, radioactive material spills, and on-site burials, have remained in possession of licensee with company name change.

11. A description of the status of the facility. Specifically, the presence or absence of contamination should be documented. If contamination is present, will decontamination occur before transfer? If not, does the successor company agree to assume full liability for the decontamination of the facility or site?

Response: There have been no changes in location, facilities, equipment or procedures with the change in licensed name from Inspecsol Engineering, Inc. to GHD Services Inc. There is no contamination present in the facility.

12. A description of any decontamination plans, including financial assurance arrangement of the transferee, as specified in 10 CFR 30.35, 40.36, and 70.25. Include information about how the transferee and transferor propose to divide the transferor's assets, and responsibility for any cleanup needed at the time of transfer.

Response: There have been no changes in organization, location, facilities, equipment or procedures with the change in licensed name from Inspecsol Engineering, Inc. to GHD Services Inc. There are no plans necessary because owners have not changed.

13. Confirmation that the transferee agrees to abide by all commitments and representations previously made to NRC by the transferor. These include, but are not limited to: maintaining decommissioning records required by 10 CFR 30.35(g), implementing decontamination activities and decommissioning of the site, and completing corrective actions for open inspection items and enforcement actions.

With regard to contamination of facilities and equipment, the transferee should confirm, in writing, that it accepts full liability for the site, and it should provide evidence of adequate resources to fund decommissioning; or the transferor should provide a commitment to decontaminate the facility before change of control or ownership.

With regard to open inspection items, etc., the transferee should confirm, in writing, that it accepts full responsibility for open inspection items and/or any resulting enforcement actions; or the transferee proposes alternative measures to meeting the requirements; or the transferor provides a commitment to close out all such actions with NRC before license transfer.

Response: GHD agrees to abide by all commitments and representations previously made to NRC by Inspecsol Engineering, Inc. These include, but are not limited to: maintaining decommissioning records required by 10 CFR 30.35(g), implementing decontamination activities and decommissioning of the site, and completing corrective actions for open inspection items and enforcement actions, as necessary.

GHD confirms that it accepts full liability for the site. There have been no changes in, location, facilities, equipment or procedures with the change in licensed name from Inspecsol Engineering, Inc. to GHD Services Inc. There are no plans necessary because owners have not changed.

GHD accepts full responsibility for open inspection items under the Inspecsol Engineering, Inc. license, and/or any resulting enforcement actions with the NRC.

14. Documentation that the transferor and transferee agree to the change in ownership or control of the licensed material and activity, and the conditions of transfer; and the transferee is made aware of all open inspection items and its responsibility for possible resulting enforcement actions.

Response: There have been no changes in, organization, location, facilities, equipment or procedures with the change in licensed name from Inspecsol Engineering, Inc. to GHD Services Inc. GHD agrees the name on NRC License 21-32548-01 should be changed from Inspecsol Engineering, Inc. to GHD Services Inc. GHD is aware of all open NRC inspection items, and takes responsibility for possible resulting enforcement actions.

15. A commitment by the transferee to abide by all constraints, conditions, requirements, representations, and commitments identified in the existing license. If not, the transferee must provide a description of its program, to ensure compliance with the license and regulations.

Response: GHD will abide by all constraints, conditions, requirements, representations, and commitments identified in the existing NRC License 21-32548-01.

GHD believes the information provided herein satisfies the requirements of NUREG-1156, Volume 1, Appendix C in order to change the name on the Inspecsol Engineering License No. 21-32548-01 to GHD Services Inc. If you have any questions, please do not hesitate to contact us.

Sincerely,

GHD



June 28, 2016

Signature of Management Representative

Date

Vice President on behalf of Inspecsol Engineering, Inc. and
GHD Services Inc.

Scott J. Adamowski

Name

Title

TAYLOR, TIRESHA S

From: FORSTER, SARA A
Sent: Tuesday, June 28, 2016 6:57 AM
To: TAYLOR, TIRESHA S
Subject: FW: FW: NRC License Amendment for License Name Change to GHD
Attachments: 11034001Letter-Resubmit 6-28-16.pdf

Please scan into ADAMS and return hard copy to me. Thanks, Tiresha!

Sara x9892

From: Bentley, Rebecca [mailto:Rebecca.Bentley@ghd.com]
Sent: Tuesday, June 28, 2016 6:55 AM
To: FORSTER, SARA A <Sara.Forster@nrc.gov>
Subject: [External_Sender] FW: NRC License Amendment for License Name Change to GHD

Sara –

As discussed yesterday, here is the resubmittal of the letter portion of our amendment request (first 5 pages). If you have any questions, please let me know. Also, if you can confirm by email that everything is in order, and we are starting the approval waiting period, I would appreciate it.

Thanks for your help on this,

Rebecca Bentley

GHD

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