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**Peter H. Kesser**  
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October 4, 2016

**By FedEx Express**

Bryan Parker, Health Physicist  
Division of Nuclear Materials Safety  
U.S. Nuclear Regulatory Commission, Region III  
2443 Warrenville Road, Suite 210  
Lisle, Illinois 60532-4352

Re: NRC License No. 21-17630-01 (Docket No. 030-13087)  
Requested Supplement to License Amendment to Update Corporate Name and Form

Dear Mr. Parker:

On August 16, 2016, Verso Corporation ("Verso"), on behalf of its subsidiary Escanaba Paper Company (the "Licensee"), submitted a request to amend NRC License No. 21-17630-01 ("the License") to reflect a planned change in the Licensee's corporate name, form, and state of incorporation. As reflected in that request, the planned change is the result of an internal corporate reorganization and will not impact licensed activities or the License, nor will it result in a change of control over the License.

During a September 28, 2016 phone conversation between yourself and Verso outside counsel, you asked us to supplement the license amendment request with a completed questionnaire listed in NUREG-1556, Consolidated Guidance About Materials Licenses, Vol. 15, Rev. 1, App. E. **Attachment 1** provides the completed questionnaire.

Please contact our outside counsel, Amy Roma, at Hogan Lovells US LLP (amy.roma@hoganlovells.com; 202-637-6831) if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Peter H. Kesser".

Peter H. Kesser

Attachment: Completed NUREG-1556, Vol. 15, Rev. 1, Appendix E Questionnaire

cc: Amy Roma, Hogan Lovells US LLP  
Radiation Safety Officer, Escanaba Paper Company

## ATTACHMENT 1

### Completed NUREG-1556, Vol. 15, Rev. 1, Appendix E Questionnaire

- 1. Describe any planned changes in the organization, including but not limited to, transfer of stocks or assets and mergers, change in members on Board of Directors, etc. Provide the new licensee name, mailing address, and contact information, including phone numbers. Clearly identify when the amendment request is due to a name change only.**

Verso Corporation ("Verso") is undergoing an internal corporate reorganization, under which its subsidiary Escanaba Paper Company (the "Licensee"), holder of NRC License No. 21-17630-01 (the "License"), will be changing its corporate name and form from "Escanaba Paper Company" to "Verso Escanaba LLC." Also as part of this change, the Licensee's state of incorporation will move from Michigan to Delaware. No other changes to the Licensee's ownership structure, Board of Directors, or management are envisioned under the planned reorganization.

The new Licensee name will be "Verso Escanaba LLC." The Licensee mailing address and contact information will remain the same. This license amendment request is due to a change in corporate name, form, and state of incorporation. None of these reflect a change in control of the License, as explained in NUREG-1556, Vol. 15, Rev. 1, App. C, at C-5 (2016).

- 2. Describe any changes in personnel or duties that relate to the licensed program. Include training and experience for new personnel and any changes in the training program.**

No such changes are planned.

- 3. Describe any changes in the location, facilities, equipment, radiation safety program, use, possession, waste management, or other procedures that relate to the licensed program.**

No such changes are planned.

- 4. Describe the status of the licensee's facilities, equipment, and radiation safety program, including any known contamination and whether decontamination will occur prior to transfer. Include the status of calibrations, leak tests, area surveys, wipe tests, training, quality control, and related records.**

The status of the Licensee's facility, equipment, and radiation safety program will remain unchanged as a result of the administrative change to the License. The liability for any decommissioning or decontamination will remain with the Licensee.

- 5. If current decommissioning funding plans (DFP) will be changed as a result of the transfer, the revised DFP should be submitted. If other financial assurance documents will be changed as a result of the transfer, confirm that all financial assurance instruments associated with the license will be held in the transferee's name before the license is transferred, and as required by 10 CFR 30.35(f), the licensee must, within 30 days, submit financial instruments reflecting such changes.**

The License does not require a DFP or financial assurance.

6. **Confirm that all records concerning the safe and effective decommissioning of the facility will be transferred to the transferee or to NRC, as appropriate. These records include documentation of surveys of ambient radiation levels and fixed and/or removable contamination, including methods and sensitivity.**

Such records will remain with the Licensee.

7. **Confirm that both transferor and transferee agree to transferring control of the licensed material and activity, and the conditions of transfer, and that the transferee has been made aware of any open inspection items and its responsibility for possible resulting enforcement actions.**

No transfer of control is occurring as a result of the administrative amendment to the License. There are no known inspection items or enforcement actions under the License.

8. **Confirm that the transferee will abide by all constraints, conditions, requirements, representations, and commitments of the transferor or that the transferee will submit a complete description of the proposed licensed program.**

No transfer of control is occurring as a result of the administrative amendment to the License. The Licensee will continue to abide by all constraints, conditions, requirements, representations, and commitments identified in the existing License.

9. **The transferee, in the case of fuel cycle facilities, shall provide documentation showing that it is financially qualified to conduct normal operations. The information can be in the form of income statements and balance sheet forecasts**

Not applicable.

## Taylor, Tiresha

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**From:** Parker, Bryan  
**Sent:** Wednesday, October 19, 2016 11:24 AM  
**To:** Taylor, Tiresha  
**Cc:** Tomczak, Tammy  
**Subject:** FW: NRC License 21-17630-01 - Requested Supplement to License Amendment Submission  
**Attachments:** Supplement to NRC License Amendment Submission - Escanaba Paper Co.pdf; Escanaba 665.pdf

Hey Tiresha,

I understand Tammy is out today. I need the attached document put into ADAMs – a 665 is also attached.

Note that the email below indicates they were sending a hard copy, so I thought that would get into ADAMs; however, I don't see that it is already in ADAMs, so that is why I am forwarding this to you.

If you have questions, please let me know.

Thanks.  
Bryan

**From:** Desai, Sachin [mailto:sachin.desai@hoganlovells.com]  
**Sent:** Tuesday, October 04, 2016 10:01 PM  
**To:** Parker, Bryan <Bryan.Parker@nrc.gov>  
**Cc:** Roma, Amy C. <amy.roma@hoganlovells.com>  
**Subject:** [External\_Sender] NRC License 21-17630-01 - Requested Supplement to License Amendment Submission

Bryan,

I am writing in regards to Escanaba Paper Company, holder of NRC License No. 21-17630-01. In response to our phone discussion on September 28, we are providing the completed nine-point questionnaire from NUREG-1556 to help with the processing of the August 16 license amendment submission. The signed original has been mailed to you and should arrive tomorrow (Wednesday). Please let me know if there is anything else we can do to help.

Sachin

**Sachin Desai\***  
Associate

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