

TestAmerica

THE LEADER IN ENVIRONMENTAL TESTING

Jenny L. Stewart
Corporate Counsel and VP of Human Resources
jenny.stewart@testamericainc.com

April 12, 2017

VIA EMAIL to sara.forster@nrc.gov

Sara A. Forster, M.S.
Health Physicist
Materials Licensing Branch
United States Nuclear Regulatory Commission
Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

Re: NRC Consent to Indirect License Transfer

Dear Ms. Forster:

I am writing in response to your letter to Michael Ridenhower dated January 3, 2017 regarding NRC's consent to the indirect license transfer. I understand that NRC is requesting documentation sufficient to show that the acquisition transaction actually occurred. I submit herewith copies of the following document:

Certificate of Merger from the Secretary of State of Delaware dated Sept. 23, 2016, showing that the JSTI subsidiary "SJK Environmental Testing LLC" was merged with TestAmerica Environmental Services LLC" with the resulting entity being TestAmerica Environmental Services LLC, wholly owned by JSTI Group

Furthermore, I hereby withdraw the letter dated January 13, 2017 that I sent to you in this matter enclosing certain documents, and request that you return or permanently destroy such documents and not make them part of any public disclosures.

Please feel free to contact me with any questions or follow-up requests.

Sincerely,



Jenny L. Stewart
Corporate Counsel and Vice President of Human Resources

Encl.

Cc: Kristen Ely (via email)

Delaware

The First State

Page 1

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF MERGER, WHICH MERGES:

"SJK ENVIRONMENTAL TESTING LLC", A DELAWARE LIMITED LIABILITY COMPANY,

WITH AND INTO "TESTAMERICA ENVIRONMENTAL SERVICES LLC" UNDER THE NAME OF "TESTAMERICA ENVIRONMENTAL SERVICES LLC", A LIMITED LIABILITY COMPANY ORGANIZED AND EXISTING UNDER THE LAWS OF THE STATE OF DELAWARE, AS RECEIVED AND FILED IN THIS OFFICE ON THE TWENTY-THIRD DAY OF SEPTEMBER, A.D. 2016, AT 11:10 O'CLOCK A.M.



3600786 8100M
SR# 20165915403

You may verify this certificate online at corp.delaware.gov/authver.shtml

A handwritten signature in black ink, appearing to read "JBULLOCK", is written over a horizontal line. Below the line, the text "Jeffrey W. Bullock, Secretary of State" is printed in a small font.

Authentication: 203046815
Date: 09-23-16

STATE OF DELAWARE
CERTIFICATE OF MERGER
OF
SJK ENVIRONMENTAL TESTING LLC,
a Delaware limited liability company
WITH AND INTO
TESTAMERICA ENVIRONMENTAL SERVICES LLC,
a Delaware limited liability company

Pursuant to Title 6, Section 18-209 of the Delaware Limited Liability Company Act (the "DLLCA"), the undersigned limited liability company executes the following Certificate of Merger and does hereby certify that:

FIRST: The constituent entities in the merger are TestAmerica Environmental Services LLC, a Delaware limited liability company, and SJK Environmental Testing LLC, a Delaware limited liability company (the "Merging Entity").

SECOND: The Agreement and Plan of Merger has been approved, adopted, certified, executed and acknowledged by each of the constituent entities in accordance with the DLLCA.

THIRD: The name of the surviving entity is TestAmerica Environmental Services LLC, a Delaware limited liability company (the "Surviving Entity").

FOURTH: The certificate of formation of the Surviving Entity, as in effect immediately prior to the effective date of the merger of the Merging Entity with and into the Surviving Entity, shall remain the certificate of formation of the Surviving Entity.

FIFTH: The executed Agreement and Plan of Merger is on file at 4101 Shuffel Drive NW, North Canton, Ohio 44720, an office of the Surviving Entity.

SIXTH: The merger is to become effective on the date that this Certificate of Merger is filed with the Secretary of State of the State of Delaware.

SEVENTH: A copy of the Agreement and Plan of Merger will be furnished by the Surviving Entity, on request and without cost, to any constituent entity or any stockholder or member of any constituent entity.

[Signature on the next page]

IN WITNESS WHEREOF, the Surviving Entity has caused this Certificate of Merger to be signed by a duly authorized person this 23 day of September, 2016.

**TESTAMERICA ENVIRONMENTAL SERVICES
LLC, a Delaware limited liability company**

By: Rachel Brydon Jannetta

Name: Rachel Brydon Jannetta

Title: Chief Executive Officer

Forster, Sara

From: Stewart, Jenny <Jenny.Stewart@testamericainc.com>
Sent: Wednesday, April 12, 2017 12:22 PM
To: Forster, Sara
Cc: Ely, Kristen
Subject: [External_Sender] Letter from TestAmerica Laboratories regarding St. Louis licensure
Attachments: Letter to NRC re St Louis rad license transfer 12Apr2017.pdf; Certificate of Merger of Merger Sub with and into the Company Filed with....pdf

Dear Ms. Forster,
Please see the attached letter.

JENNY L. STEWART, ESQ.
Corporate Counsel and Vice President of Human Resources

Admitted in New York and Connecticut

TestAmerica
THE LEADER IN ENVIRONMENTAL TESTING

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