

Wilson, Scott

From: Wilson, Scott
Sent: Wednesday, February 08, 2017 6:57 AM
To: 'GODWIN Craig TENOVA INC.'
Subject: Request for Additional Information; I2S, LLC License Amendment; Mail Control No. 592605; Docket No. 03038931

License No.: 06-21253-03
Docket No: 03038931
Control No: 592605

Craig Godwin
Radiation Safety Officer
I2S, LLC
1070 North Farms Road
Wallingford CT 06492

Please reply with a brief message acknowledging your receipt of this request.

Mr. Godwin:

This refers to your license amendment request letter received by our office on December 19, 2016, in which you requested a change to the company name on I2S, LLC's NRC license, number 06-21253-03. In order to continue our review of your request, the following additional information is needed:

1. It appears from your letter and the organizational charts you provided that a transfer of control of the license may have occurred. In order to fully review the corporate merger as it relates to control of the licensed materials, we will need organizational charts that show the entire corporate structure (including the parent company). The chart you provided for I2S, LLC, did not fully describe the relationship between I2S, LLC, Tenova, Inc. in PA and the parent company, before and after the merger/consolidation. Please provide organizational charts which describe the entire organization and relationship between the merged companies and the parent corporation before and after the merger.
2. Control of a license is in the hands of the person or persons who are empowered to decide when and how that license will be used. That control is to be found in the person or persons who, because of ownership or authority explicitly delegated by the owners, possess the power to determine corporate policy and, thus, the direction of the activities under the license. Your request for amendment is under review for potential "transfer of control" as defined in 10 CFR 30.34(b). It appears that the merger was a transfer of control as defined in 10 CFR 30.34(b); therefore, in order to amend the license, the following will be needed:
 - a. 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.

- b. Provide a letter, signed by both an officer of Tenova, Inc. and an officer of I2S, LLC, (the person or persons who, because of ownership or authority explicitly delegated by the owners, possess the power to determine corporate policy), confirming the following:
 - i. 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; and
 - ii. confirming that the transferee will abide by all constraints, conditions, requirements, representations, and commitments of the transferor or that the transferee will submit a description of the proposed licensed program.
3. Please note that prior to granting your request for a transfer of control, the request must be made publicly-available for comment. This public notice must be available for at least 30 days to allow for public comments. In order to ensure a timely response to your request, your letter requesting an amendment has been made publicly-available on our web site at <https://www.nrc.gov/about-nrc/regulatory/adjudicatory/hearing-license-applications.html>

Your reply must be an originally signed and dated letter. The letter may be scanned and submitted as a pdf document attached to an email; or it may be transmitted by facsimile to (610) 337-5269; or it may be sent by regular mail. If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your amendment request.

If you have any questions, you may contact me via email or telephone.

Thank you for your cooperation.

Scott Wilson
Health Physicist
NRC Region I
2100 Renaissance Blvd, Ste 100
King of Prussia, PA 19406
Phone: 610-337-5136
Fax: 610-337-5269