

March 13, 2017

Mr. Scott Wilson, Health Physicist  
**United States Nuclear Regulatory Commission**  
NRC Region I  
2100 Renaissance Boulevard, Suite 100  
King of Prussia, PA 19406-2713

Reference: Change of Control GeoConsult, Inc.  
Docket No. 03031133  
Control No. 592879

Dear Mr. Wilson:

I am writing to provide you with the additional information you requested via email on March 9, 2017. I have listed your questions and my answers below. This letter is also signed by me (transferee) and my father, who was previously the owner of GeoConsult, Inc. (transferor). Although my father is no longer the owner of the company, he continues to work with us and is always available to us for consulting in any manner we should need.

1. State whether or not you, as the new owner and license applicant, have a current State or Federal government license, registration or authorization for other operations within the scope of the proposed licensed activities. For example, state if you have a license for radioactive materials or have held one in the past either with the NRC or any other governmental body. If not, provide evidence of any registration, business license, professional engineering license, etc. so that we may establish that you are a known entity and that the materials will be used as described in the license. If you were listed on an NRC or other license as an authorized user or radiation safety officer, please provide that information.

I am registered as a Professional Engineer in Puerto Rico and Virginia. Please refer to attached files. I have worked at GeoConsult since 2007 (except for a leave of absence from 2009-2012 while working with our Governor at the time).

2. Provide the date the transfer of control occurred.

On April 7, 2015 ownership of GeoConsult, Inc. changed, and it is now wholly owned by me. My father still comes on a daily basis, although he now works part time.

3. 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. It is most important that NRC make a determination regarding the "control" of the program and materials. This can only be done if we have a full description of the transfer that occurred.

100% of the stocks are owned by me since April 7, 2015. Board of Directors appointments since August 2015 are attached, although I have for quite some time been a Board Member. To use your word, the program is being "controlled" in exactly the same manner as previously. We have the same Radiation Safety Officer (my father), the same Laboratory Chief, the same Radiation safety Consultant (David Rhoe) that we have used over the last 20 years.

4. Provide a description of the organization pre-transfer and post-transfer. Pre and Post organizational charts are most helpful in describing the organization and the changes that occurred as a result of the transfer.

The company is exactly the same as it was before transfer occurred, except that daily management and decision making is done by me. My father is still the Radiation Safety Office. There are no changes I can report, except that we have far fewer personnel due to the current extremely poor economic situation on the island. We have gone from 65 employees in 2008 to 9 in 2017. You can also refer to the attached document (History of GeoConsult).

5. Provide the new licensee name, mailing address, and contact information, including phone numbers, email addresses, and fax numbers.

All contact information stays the same. GeoConsult, Inc. Mailing Address: PO Box 362040, San Juan, PR 00936. Phone numbers: 787-783-3585. Email: pcrumley@geoconsult.us. Fax number: 787-793-0410.

6. 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.

The only change that has occurred has been the change in ownership. The information requested is thus as follows: GeoConsult, Inc. Owner: Patricia A. Crumley, PE. Mailing Address: PO Box 362040, San Juan, PR 00936. Phone numbers: 787-783-3585. Email: pcrumley@geoconsult.us. Fax number: 787-793-0410.

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

There are no changes in our existing program.

8. 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.

Equipment will not be transferred. Regarding the status of the facilities, they are the same as previous. Storage and protection of the equipment is in place, at the same locations.

9. 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.

I confirm that all pertinent records are in my possession. At this time, we have no plans to decommission any of our equipment.

10. 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.

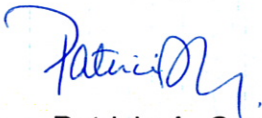
I confirm that both parties have agreed to this transfer. Please advise if a signed statement from transferor is necessary.

11. 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.

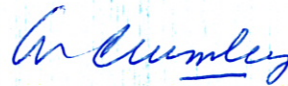
I confirm my understanding that I, as transferee, must abide by the terms of the license and pledge to continue all aspects of our existing safety program.

Please feel free to contact me with any further clarifications that may be needed.

Sincerely,



Patricia A. Crumley, PE  
President and Owner  
GeoConsult, Inc.



Alan R. Crumley, PE  
Previous President and Owner  
GeoConsult, Inc.