

## Weaver, Deborah

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**From:** Byers, Brett <Brett.Byers@drs.com>  
**Sent:** Friday, October 27, 2017 1:53 PM  
**To:** Struckmeyer, Richard  
**Cc:** Labermeyer, Joe  
**Subject:** [External\_Sender] RE: RE: Distribution License 09-23977-01E Amendment  
**Attachments:** FW Company Name for Nuclear Regulatory Commission

Mr. Struckmeyer,

After speaking with our Director of Contracts, our company remains DRS Training and Control Systems, LLC as stated on our License. When/if the novation to our company legal name is complete – we will be sure to address that through a Name Change Amendment.

Please see the attached email thread which states the legal name of our company from Todd Zielinski, Director of Contracts.

Please let me know if this information is suffice in regards to the RAI.

Thank you,

Brett  
850-217-9144

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**From:** Struckmeyer, Richard [mailto:Richard.Struckmeyer@nrc.gov]  
**Sent:** Thursday, October 26, 2017 12:57 PM  
**To:** Byers, Brett <Brett.Byers@drs.com>  
**Cc:** Labermeyer, Joe <jlabermeyer@drs.com>  
**Subject:** RE: RE: Distribution License 09-23977-01E Amendment

Mr. Byers,

The information you provided is inconclusive as to whether a transfer of control occurred. When I send you a Request for Additional Information (RAI) regarding your amendment application, I will have to ask you for a formal response on this matter. In the meantime, you (or perhaps your legal staff) could review the document that I previously referenced on the NRC public web site: <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v15/> You should look at Chapter 5, and Appendices B, C, D, and E.

After reviewing this information, you should request the appropriate amendment (name change only, transfer of control, or a combination of both). This can be done in your response to the RAI. If this request raises further questions, we would send you another RAI.

Thank you,

Richard K. Struckmeyer  
Materials Safety Licensing Branch  
Division of Material Safety, State, Tribal, and Rulemaking Programs  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission

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**From:** Byers, Brett [<mailto:Brett.Byers@drs.com>]  
**Sent:** Wednesday, October 25, 2017 12:37 PM  
**To:** Struckmeyer, Richard <[Richard.Struckmeyer@nrc.gov](mailto:Richard.Struckmeyer@nrc.gov)>  
**Cc:** Labermeyer, Joe <[jlabermeyer@drs.com](mailto:jlabermeyer@drs.com)>  
**Subject:** [External\_Sender] RE: Distribution License 09-23977-01E Amendment

Mr. Struckmeyer,

In regards to the letterhead – the Corporate level of our organization and the company that owns DRS merged to form LEONARDO DRS.

This change has been used on our internal documentation, however the legal name of our Fort Walton Beach site remains DRS Training and Control Systems, LLC. In the future, our Corporate Legal Team may mandate we change our name, but at this time, it remains the same as what is listed on the license.

I apologize for the confusion.

Brett  
850-217-9144

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**From:** Struckmeyer, Richard [<mailto:Richard.Struckmeyer@nrc.gov>]  
**Sent:** Wednesday, October 25, 2017 9:54 AM  
**To:** Byers, Brett <[Brett.Byers@drs.com](mailto:Brett.Byers@drs.com)>  
**Cc:** Labermeyer, Joe <[jlabermeyer@drs.com](mailto:jlabermeyer@drs.com)>  
**Subject:** RE: Distribution License 09-23977-01E Amendment

Mr. Byers,

We received your letter requesting amendment of your license, and it has been assigned to me.

I note a possible discrepancy between the name on your license and the name in the header of your letter; i.e., “DRS Training & Control Systems, LLC” does not match “Leonardo DRS.” On the other hand, I note that you show “DRS Training & Control Systems, LLC” following your letter closure.

In the letter that transmitted your license, you were advised that you must “Request and obtain appropriate amendments if you plan to change control or ownership of your organization, change locations of distribution of products containing radioactive material, or make any other changes in your program which are contrary to the license conditions or representations made in your license application and any supplemental correspondence with NRC.”

As a general rule, you must request and obtain an amendment to the license and registration certificate before you make changes or modifications to the information submitted to obtain them.

Please provide an explanation for this apparent discrepancy. If the name of the company has changed, and/or if there has been a transfer of control, you should apply for an amendment to make that change on your license. Information about transfer of control is available in the document referenced on this NRC public web site:

<https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v15/>

Thank you,

Richard K. Struckmeyer  
Materials Safety Licensing Branch  
Division of Material Safety, State, Tribal, and Rulemaking Programs  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
301-415-5477

## Weaver, Deborah

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**From:** Labermeyer, Joe <jlabermeyer@drs.com>  
**Sent:** Friday, October 27, 2017 1:34 PM  
**To:** Byers, Brett  
**Cc:** Bowen, Lee; Mack, Michael  
**Subject:** FW: Company Name for Nuclear Regulatory Commission

Brett

Per Todd Zielinski, Director of Contracts we are still at this time DRS Training & Control Systems, LLC.

See his email below. So at this time we still need to move forward with no name change. Once the name change has been legally through the novation process we will then have to once again amend the license.

Thanks

Josef Labermeyer  
Senior Project Engineer  
Airborne and Intelligence Systems  
654 Anchors St., Ft. Walton Beach, FL 32548  
Tel +1-850-302-3927  
Email jlabermeyer@drs.com <mailto:jlabermeyer@drs.com>  
drs.com

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**From:** Zielinski, Todd  
**Sent:** Friday, October 27, 2017 9:45 AM  
**To:** Labermeyer, Joe <jlabermeyer@drs.com>  
**Subject:** RE: Company Name for Nuclear Regulatory Commission

Joe,

Our legal name is still DRS Training & Control Systems, LLC.

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**From:** Labermeyer, Joe  
**Sent:** Friday, October 27, 2017 8:31 AM  
**To:** Zielinski, Todd <tzielinski@drs.com <mailto:tzielinski@drs.com> >  
**Subject:** Company Name for Nuclear Regulatory Commission

Todd

We are trying to amend our Nuclear Regulatory Commission (NRC) License. Is our legal name still "DRS Training & Control Systems LLC" or is it still "Leonardo DRS Training & Control Systems LLC"? Reason it is

important is that any name change or ownership change requires a Amendment to our Exempt Distribution License. We need this license to ship ADACS TIDs.

Thanks

<< OLE Object: Picture (Device Independent Bitmap) >>

Josef Labermeyer  
Senior Project Engineer  
Airborne and Intelligence Systems  
654 Anchors St., Ft. Walton Beach, FL 32548  
Tel +1-850-302-3927  
Email [jlabermeyer@drs.com](mailto:jlabermeyer@drs.com) <<mailto:jlabermeyer@drs.com>>  
drs.com