



Rolls-Royce

January 25, 2018

Rolls-Royce

6546 Pound Road Williamson, NY 14589

Tel: +1 315-589-4000

Fax: +1 315-589-4089

www.rolls-royce.com

Division of Nuclear Materials Safety
Licensing Assistance Section
U. S. Nuclear Regulatory Commission, Region I
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713

Br. J.

03036563

RE: License No. 44-30912-01 — License Amendment Request
Corporate Restructuring / Name Change to "Rolls-Royce Nuclear Field Services"

REC PG 1 01 25 18 PM 11 03

Dear Mr. Courtemanche,

The intent of this letter is to initiate a license amendment (to be amendment no. 10) to change the licensee name for License No. 44-30912-01 from R.O.V. Technologies, Inc. to Rolls-Royce Nuclear Field Services Inc. The NRC has agreed via its letter to Rolls-Royce Nuclear Field Services Inc. of April 4, 2017 (Mail Control No. 593004) that this corporate reorganization did not constitute a Transfer of Control as would be consistent with NUREG-1556, Volume 15.

We have secured the approval of a rider changing the name of the indemnitor for the surety bond that secures the nuclear liability amount required for the protection of the Radiation Controlled Area associated with NRC License no. 44-30912-01.

The standby trust requires an amendment to reflect the new name of the Grantor. Since the NRC signed the original agreement and since the terms at section 15 require the NRC's signature the bank is requesting that the NRC sign the amendment. I have included 4 copies of the amendment for your review and signature. If you could sign all 4 original copies, keep 2 for your records and send 2 back to me I would appreciate it.

Thank you for your consideration.

Best regards,

Sue Brooks
Legal Counsel
Rolls-Royce North America

602330/602331
NMSS/RGN1 MATERIALS-002

AMENDMENT NUMBER ONE TO STANDBY TRUST AGREEMENT

This Amendment Number One (this "Amendment") to Standby Trust Agreement dated August 11, 2015, (the "Agreement") by and between R.O.V. Technologies, Inc., a Vermont corporation, herein referred to as the "Former Grantor," and Sun Trust Bank, a Georgia banking corporation, as trustee (the "Trustee"), is entered into on this 19th day of January, 2018, by and among Rolls-Royce Nuclear Field Services Inc. ("RRNFS"), a New York corporation, as successor to the Former Grantor, the U.S. Nuclear Regulatory Commission ("NRC"), an independent agency of the United States government, and the Trustee.

WHEREAS, the Former Grantor and Trustee entered into the Agreement in conjunction with the Former Grantor providing financial assurance that funds will be available when needed for required decommissioning activities described in the Agreement; and

WHEREAS, the Former Grantor elected to use surety bond # [REDACTED] to provide all of such financial assurance for the facilities identified herein; and

WHEREAS, RRNFS provided notification to the NRC of a Potential Change of Control pursuant to NUREG-1566, Volume 15, Revision 1, "Consolidated Guidance About Materials Licenses: Guidance About Change of Control and About Bankruptcy Involving Byproduct, Source, or Special Materials Licenses", dated June 2016, which notice was accepted by the NRC on April 4, 2017, Mail Control No. 593004; and

WHEREAS, Former Grantor was effectively and legally merged into RRNFS, its parent company, on September 5, 2017 and has ceased to exist; and

WHEREAS, RRNFS will now undertake full responsibility for decontamination and decommissioning associated with NRC Special Materials License •44-30912-01 issued pursuant to 10 CFR Part 30 and Part 70 (the "License"); and

WHEREAS, RRNFS will assume and agree to perform all of the obligations of the Former Grantor under the Agreement; and

WHEREAS, the Agreement must be amended to reflect the assumption by RRNFS of all of the rights and obligations of the Former Grantor under the Agreement.

NOW, THEREFORE, RRNFS, NRC and the Trustee agree as follows:

1. RRNFS hereby assumes all of the obligations of the Former Grantor to fulfill all decommissioning responsibilities associated with the License in accordance with pursuant to NUREG-1566, Volume 15, Revision 1, "Consolidated Guidance About Materials Licenses: Guidance About Change of Control and About Bankruptcy Involving Byproduct, Source, or Special Materials Licenses", dated June 2016.
2. RRNFS hereby represents and warrants that it is the successor by merger to the Former Grantor, that the Former Grantor has ceased to exist and that such merger became

NONNEGOTIABLE

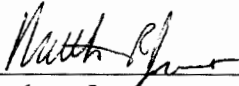
effective on September 5, 2017. Effective as of September 5, 2017, RRNFS did hereby assume and agree to perform all of the duties and obligations of the Former Grantor under the Agreement.

3. In accordance with Section 15 of the Agreement, for the purpose of reflecting the assumption by RRNFS of all of the duties and obligations of the Former Grantor under the Agreement, the Agreement is hereby amended so that the term "Grantor" as used therein shall mean RRNFS and any successors or assigns of RRNFS instead of the Former Grantor.
4. This Amendment shall not become effective until it has been executed and delivered by all of the parties hereto. The Agreement, as amended by this Amendment, shall remain in full force and effect.

IN WITNESS WHEREOF, the parties have caused this Amendment to be executed by the respective officers duly authorized as attested by the Notary Seals affixed hereto.

Rolls-Royce Nuclear Field Services Inc.

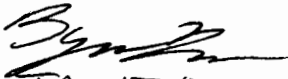
ATTEST:
[Title] MARY SUE BROOKS
[Seal] NOTARY PUBLIC-STATE OF NEW YORK
No. 02BR6245579
Qualified In Wayne County
My Commission Expires July 25, 2019



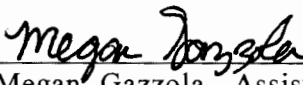
Matthew Jewett

SunTrust Bank.





TRUST OFFICER



Megan Gazzola, Assistant Vice President,
Escrow Services
Sun Trust Bank

U.S. Nuclear Regulatory Commission (NRC)

ATTEST:
[Title]
[Seal]



ACKNOWLEDGEMENT - RECEIPT OF CORRESPONDENCE

Name and Address of Applicant and/or Licensee Thomas J. Dente Radiation Safety Officer Rolls-Royce Nuclear Field Services Inc. 49 Bennett Drive Brattleboro, Vermont 05301	Date February 5, 2018
	License Number(s) 44-30912-01
	Mail Control Number(s) 602330 and 602331
	Licensing and/or Technical Reviewer or Branch Commercial, Industrial, R&D, and Academic Branch

This is to acknowledge receipt of your: Letter and/or Application Dated: January 25, 2018

The initial processing, which included an administrative review, has been performed. Financial Assurance
 Amendment Termination New License Renewal

There were no administrative omissions identified during our initial review.

This is to acknowledge receipt of your application for renewal of the material(s) license identified above. Your application is deemed timely filed, and accordingly, the license will not expire until final action has been taken by this office.

Your application for a new NRC license did not include your taxpayer identification number. Please complete and submit NRC Form 531, Request for Taxpayer Identification Number, located at the following link: <http://www.nrc.gov/reading-rm/doc-collections/forms/nrc531.pdf>
Follow the instructions on the form for submission.

The following administrative omissions have been identified:

Your application has been assigned the above listed MAIL CONTROL NUMBER. When calling to inquire about this action, please refer to this control number. Your application has been forwarded to a technical reviewer. Please note that the technical review, which is normally completed within 180 days for a renewal application (90 days for all other requests), may identify additional omissions or require additional information. If you have any questions concerning the processing of your application, our contact information is listed below:

Region I
 U. S. Nuclear Regulatory Commission
 Division of Nuclear Materials Safety
 2100 Renaissance Boulevard, Suite 100
 King of Prussia, PA 19406-2713
 (610) 337-5260, (610) 337-5313,
 (610) 337-5398, (610) 337-5239