



May 30, 2018

Ms. Laura Cender
U.S. Nuclear Regulatory Commission
Materials Licensing Branch
Laura.Cender@nrc.gov

VIA E-MAIL

**Re: Alliant Techsystems Operations LLC Transfer of Control Application
Response to Request for Additional Information**

Dear Ms. Cender:

I write in response to your request for additional information regarding the Transfer of Control Application for Alliant Techsystems Operations LLC. Please see our responses below.

- 1. 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. Provide the new licensee name, mailing address, and contact information, including phone numbers. Clearly identify when the amendment request is due to a name change only.*

On September 17, 2017, Orbital ATK entered into an Agreement and Plan of Merger (the "Merger Agreement") with Northrop Grumman Corporation (Northrop Grumman). Upon the terms and subject to the conditions set forth in the Merger Agreement, after the transaction closes, Orbital ATK will continue as a surviving corporation and a wholly-owned subsidiary of Northrop Grumman but will change its name to Northrop Grumman Innovation Systems, Inc. The transaction is expected to close in the first half of calendar year 2018.

The NRC licensee at issue in this application is Alliant Techsystems Operations LLC, which is a wholly owned subsidiary of Orbital ATK. After the merger transaction closes, Alliant Techsystems Operations LLC will continue to exist as a wholly owned subsidiary of Orbital ATK, which will be renamed Northrop Grumman Innovation Systems, Inc. Alliant Techsystems Operations LLC will not change its name as a result of the transaction.

The licensee will remain Alliant Techsystems Operations LLC, which will continue to operate at the Lake City Army Ammunition Plant, PO Box 1000, Independence, MO 64051-1000. The Radiation Safety Officer (RSO) will continue to be Rick Thompson and his contact information is unchanged.

- 2. 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 personnel and duties aligned with the NRC License # 24-24576-1 Amendment 28 will remain the same. Rick Thompson will continue as the Radiation Safety Officer and Dale Wilson or Rick Thompson are listed as the Users.



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

The location of the fixed gauge equipment containing radiation sources will remain at the current locations. Also, all equipment registered as General Licensed devices will remain at the Lake City Army Ammunition Plant.

4. *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.*

The 15 fixed gauges with radiative sources are used for quality control measurements during the manufacturing process of ammunition at a Government owned facility at Lake City Army Ammunition Plant. The General License devices with small amounts of radiation are stored in a controlled location at the same Lake City Army Ammunition Plant. The site performs leak testing on the fixed gauges and General licensed devices semi-annually. The leak testing results does not reveal the presence of .005 microcuries of radioactive materials as required to notify the NRC. Monthly radioactive surveys are conducted on the fixed gauges and the General License device storage areas. Production employees and Maintenance employees working near equipment with radioactive sources are trained as new hires and annually. All records are stored in a controlled area of the Safety and Environmental Dept.

5. *If current decommissioning funding plans (DFP) will be changed as a result of the transfer, the revised DFP should be submitted. If other financial assurance documents will be changed as a result of the transfer, confirm that all financial assurance instruments associated with the license will be held in the transferee's name before the license is transferred, and as required by 10 CFR 30.35(f), the licensee must, within 30 days, submit financial instruments reflecting such changes.*

Not Applicable.

6. *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.*

All equipment currently in use containing radioactive sources and associated processes will continue to be in use after the merger. No equipment will be decommissioned after the merger. The retention of records for leak testing, radioactive surveys, employee dosimeter records and past equipment disposal records will be maintained at the Lake City Army Ammunition Plant per NRC requirements.

7. *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.*



Control of the license will remain with the licensee, Alliant Techsystems Operations LLC. There are no open inspection items. Alliant Techsystems Operations LLC and its parent Orbital ATK are aware of their continued responsibility for any possible enforcement actions on this license after consummation of the transaction.

8. *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.*

The license will not be transferred. Control of the license will remain with the licensee, Alliant Techsystems Operations LLC. Alliant Techsystems Operations LLC will continue to follow its program, which is already in place. After consummation of the transaction, as described above, Alliant Techsystems Operations LLC will continue to abide by all constraints, conditions, requirements, representations, and commitments that apply to it as an NRC license holder.

9. *The transferee, in the case of fuel cycle facilities, shall provide documentation showing that it is financially qualified to conduct normal operations. The information can be in the form of income statements and balance sheet forecasts.*

Not Applicable.

If you have additional questions or would like to set up a time to discuss this matter further, please contact Kristin Boetticher, VP & Assistant General Counsel, Orbital ATK, Inc. at 612-418-5303 or Kristin.Boetticher@OrbitalATK.com. Thank you.

Very truly yours,

ALLIANT TECHSYSTEMS OPERATIONS LLC

Michael A. Kahn
President, Defense Systems Group
Officer, Alliant Techsystems Operations LLC

ORBITAL ATK, INC.

James S. Black, II
VP & Deputy General Counsel
Assistant Secretary, Orbital ATK, Inc.