



June 22, 2018

MATERIALS SAFETY LICENSING BRANCH  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

VIA EMAIL: [SHIRLEY.XU@NRC.GOV](mailto:SHIRLEY.XU@NRC.GOV)  
[TOMAS.HERRERA@NRC.GOV](mailto:TOMAS.HERRERA@NRC.GOV)

Dear Licensing Assistance Team,

We are hereby providing notice of our intention to transfer the ownership of our assets to Ameriglo Holdings LLC, a Michigan limited liability corporation. In conjunction with this transaction, we request your written consent to transfer control of AmeriGlo Sealed Source Device Registration NR1420-D-101-E and AmeriGlo Exempt Distribution License 10-35311-01E to Ameriglo Holdings LLC.

Ameriglo Holdings LLC is a wholly owned subsidiary of Trijicon Inc., a Michigan corporation and a current licensee of the US Nuclear Regulatory Commission. Trijicon currently holds Sealed Source Device Registration NR-0418-D-101-E, Material Possession License 21-19874-01 and Exempt Distribution License 21-19874-02E.

Concurrent with this request, we are asking the State of Georgia to transfer our Georgia Possession License GA1654-1 to Ameriglo Holdings LLC.

To be clear, we request your consent to transfer our Sealed Source Device Registration NR1420-D-101-E and Exempt Distribution License 10-35311-01E. We do not want to amend or change Trijicon's existing SDDR, Material Possession License or Exempt Distribution License. Those licenses are to remain in place in their current form.

In compliance with NUREG-1556, Volume 3, Revision 2 and NUREG 1556, Volume 15, Revision 1, Sections 5-1 through 5-7, we provide the following:

1. As mentioned above, we have entered into an asset purchase agreement with Trijicon. The purchased assets will be owned by a new entity, Ameriglo Holdings LLC, a wholly owned subsidiary of Trijicon. Although owned by Trijicon, Ameriglo Holdings LLC will operate independently and remain in our current location at 645 Hembree Parkway, Suite K, Roswell, Georgia 30076 and with our current telephone number 470-223-4163.
2. There are no planned changes to personnel or duties related to our licensed program. Our Radiation Safety Officers, Richard Callihan and Keith Taylor, will remain in place and continue to

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oversee all licensed activities. All current employees will remain and there are no planned changes to our radiation safety, quality assurance and training programs.

3. Upon completion of the asset transfer, Ameriglo Holdings LLC will operate in a manner consistent with our current operations with no planned changes to our existing equipment, radiation safety program, use, possession, waste management or other procedures that relate to our licensed program.
4. As required by our Radiation Safety Program, our facilities and equipment are subject to regular radiological surveys to identify possible contamination. To facilitate our requested license transfer, a third party Certified Health Physicist performed a surface contamination survey of the facility on June 14, 2018. Their report is attached and confirms that the results are well within NRC guideline screening values.
5. A decommissioning funding plan is not applicable to the licenses to be transferred.
6. We will transfer all surveillance records including physical inventories, quality assurance records, and radiation safety records.

All historical company records will remain on site and archived for the transferee's reference.

Product service arrangements will remain in place and, if required, the transferee will service products previously distributed by the transferor.

The transferee is purchasing all existing inventory and product on the date of the SDDR and Exempt Distribution License transfer. An itemized inventory will be prepared for the asset transfer and the detail of this and all transfers will be provided to the USNRC on our Annual Distribution Report of devices to persons generally licensed under ss30.19.

7. The distributed product is not marked with serial numbers. The transferor will cease distribution on the day of the transfer of the SDDR and all inventory on that date will become the property of the transferee.
8. There will be no label or marking change on the products.
9. We confirm that no changes have been made to the product since our last amendment.
10. We confirm that Ameriglo LLC, the transferor, and Ameriglo Holdings LLC, the transferee, agree to the transfer of control of the licensed material and all conditions of the existing license. In addition, we confirm that there are no open inspection items for either the USNRC or the State of Georgia.
11. We confirm that the transferee will abide by all constraints, conditions, requirements, representations and commitments of the transferor.

We are hopeful that the NRC's knowledge of and history with Trijicon will make it possible to expedite the process to consent to our requested transfer of control of our above referenced SSDR and E-Distribution License. Please contact me with any questions.

Regards,

  
William E. Lynch Jr.  
President

Enclosure