

June 20, 2018

Mr. Dennis Lawyer
U.S. Nuclear Regulatory Commission, Region I
Commercial, Industrial, R&D, and Academic Branch
Division of Nuclear Materials Safety
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713
Dennis.Lawyer@nrc.gov

VIA E-MAIL

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

Dear Mr. Lawyer:

I write in response to your request for additional information regarding the (indirect) 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 closed on June 6, 2018, Orbital ATK continued as a surviving corporation and a wholly-owned subsidiary of Northrop Grumman but changed its name to Northrop Grumman Innovation Systems, Inc. (NGIS).

The NRC licensee at issue in this application is Alliant Techsystems Operations LLC, which was a wholly owned subsidiary of Orbital ATK and continues to exist as a wholly owned subsidiary of NGIS. Alliant Techsystems Operations LLC did 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 Allegany Ballistics Laboratory (ABL) located at 210 State Route 956, Rocket Center, WV, 26726. The Radiation Safety Officer (RSO) will continue to be Joshua Walbert 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 Number: SUB-1440 will remain the same.

- 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 RAM, facilities, equipment, safety program, policies, and procedures detailed in the ABL Radiation Safety Program Policy and Manual remain unchanged.

- 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.*

No known contamination exists at the ABL facility. No decontamination efforts are planned or affected by the parent company name change. All GM Meters and Scintillation Counters remain part of the ABL Gage Recall and Calibration system. Shipping/Receiving and area radiation safety surveys and associated records will continue without change. All training, quality control, and procedures remain intact and unchanged.

- 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.*

Not Applicable.

- 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, NGIS, are aware of their continued responsibility for any possible enforcement actions on this license.

- 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. 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, NGIS, at 612-418-5303 or Kristin.Boetticher@ngc.com. Thank you.

Very truly yours,

NORTHROP GRUMMAN INNOVATION
SYSTEMS, INC.



James S. Black, II
Secretary, Northrop Grumman Innovation
Systems, Inc.

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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, NGIS, at 612-418-5303 or Kristin.Boetticher@ngc.com. Thank you.

Very truly yours,

ALLIANT TECHSYSTEMS OPERATIONS LLC



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