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April 5, 2018
Revised May 4, 2018
Revised June 28, 2018

NRC Region: Region III
Contact: Ted Shear RSO
Telephone: (314) 739-0906 office, (618) 779-9577 cell
Fax: (314) 739-0910

Information Needed for Transfer of Control

1. Describe any planned changes in the organization, including but not limited to, transfer of stocks, or assets and mergers, change of members on Board of Directors, etc. Provide the new licensee name, mailing address, and contact information, including phone numbers.

Response

Genesis Solid Waste Group, Inc. was purchased by IngenAE, LLC in February 2016. IngenAE does not have a Board of Directors. IngenAE, LLC is an Indiana LLC, is wholly owned by BoosRT, LLC, an Illinois LLC. Timothy Boos is appointed as Manager of IngenAE by BoosRT, LLC. Edward A Shepard Jr., was the owner of Genesis Solid Waste Group, Inc. he is a vice president of IngenAE, LLC.

*IngenAE, LLC.
502 Earth City Expressway
St. Louis, Missouri 63045*

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.

Response

The RSO has remained the same, Ted Shear. All personnel using a nuclear gauge have completed a Nuclear Gauge Safety Training Class, they have Nuclear Gauge Safety and Hazmat Certifications. They are on file. Any new personnel will complete the Nuclear Gauge Safety and Hazmat Certification training. They will work with one of our senior staff to ensure all procedures are followed, this will include hands on training in accordance with the guidance in NUREG 1556 Appendix C.

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.

Response

The location has changed, we are in the same office complex, we are now located on the first floor. The new address is listed above. Our Radiation Safety Program and Procedures have not changed. The gauges when not in use are stored in a locked storeroom. We currently are allowed to have 3 gauges, we currently own 3 gauges. We would like to increase our license to 6 gauges. A map showing the new storage location is attached.

4. Describe the status of the license'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.

Response

The current license expires on 1-31-2025. All gauges are inspected and calibrated annually. Leak test are conducted semi-annually, all tests are up to date and current. The records are on file in the RSO's office. All records related to calibrations, leak tests, training and other related records have been transferred to IngenAE, LLC.

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 license must, within 30 days, submit financial instruments reflecting such changes.

Response

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.

Response

All records have been transferred to IngenAE, LLC.

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 aware of any open inspection items and its responsibility for possible resulting enforcement actions.

Response

Edward Shepard-President of Genesis Solid Waste Group, Inc. is aware of the transfer and there are no open inspection items. Edward Shepard is now Vice President of IngenAE, LLC., he is in charge of the engineering department. His duties remain the same as when he was owner of Genesis Solid Waste Group, Inc.

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.*

Response

IngenAE, LLC is aware of their requirements. IngenAE will abide by all constraints, conditions, requirements, representations and comments of Genesis Solid Waste Group, Inc. with respect to NRC License No. 24-32539-01..

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.

Response

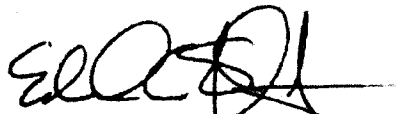
Not Applicable

Also, attached is a copy of IngenAE, LLC, Missouri Professional Engineering License #2016022864.


Should you have any questions regarding this response to comments, please contact me at (314)739-0906.

Sincerely,

IngenAE, LLC.



Edward A. Shepard, Jr., P.E.
Vice President



Ted Shear
Radiation Safety Officer

State of Missouri

**Department of Insurance, Financial Institutions and Professional Registration
Division of Professional Registration
Board for Architects, Engineers, Land Surveyors & Landscape Architects
Professional Engineering Corporation**

VALID THROUGH DECEMBER 31, 2018
ORIGINAL CERTIFICATE/LICENSE NO. 2016022864

INGENAE LLC
514 EARTH CITY EXPRESSWAY SUITE 314
ST. LOUIS MO 63045
USA

Judy Kemper

EXECUTIVE DIRECTOR

John A. Davis

DIVISION DIRECTOR

Cender, Laura

From: Ted Shear <TShear@ingenae.com>
Sent: Thursday, June 28, 2018 2:42 PM
To: Cender, Laura
Subject: [External_Sender] RE: NRC License No. 24-32539-01 Pending Amendment
Attachments: 2018.06.28 IngenAE-Revised Nuclear License Transfer-signed.pdf

Per our conversation and email, attached is a signed revised copy of our Transfer of Control Application for NRC License 24-32539-01.

Please contact me if you have any questions or need any additional information.

Thank You.

Ted Shear
IngenAE, LLC.
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St. Louis, MO. 63045
(314) 739-0906 Office
(314) 739-0910 Fax
(618) 779-9577 cell

From: Cender, Laura [mailto:Laura.Cender@nrc.gov]
Sent: Thursday, June 28, 2018 2:27 PM
To: Ted Shear
Subject: NRC License No. 24-32539-01 Pending Amendment

Hello Ted,

As we discussed this afternoon this email is to request that you provide additional information to support your change of control application. Specifically, in your response to Item 8 of your application dated April 5, 2018 Rev. May 4, 2018 with respect to continuing to abide by implement the commitments made previously by Genesis Solid Waste Group, Inc. Senior licensing staff reviewing this application identified that the statement provided is not a legally binding commitment to continue to implement the existing radiation safety program.

Specifically, the response provided to Item 8 was "IngenAE, LLC is aware of their requirements." We are requesting that a statement confirming that IngenAE, LLC will abide by all constraints, conditions, requirements, representations, and commitments of Genesis Solid Waste Group, Inc. with respect to NRC License No. 24-32539-01 be provided.

Additionally, in your response to Item 2 of the change of control application regarding training for gauge users we request that you clarify your response to confirm portable gauge users will also receive hands-on training in accordance with the guidance in NUREG 1556 Appendix C (attached).

Please ensure that your response is both signed and dated. Please feel free to contact me at 630-829-9712 if you have any questions.

Thank you,
Laura

Laura Cender

U.S. Nuclear Regulatory Commission
Materials Licensing Branch
E-mail: Laura.Cender@nrc.gov
Phone: (630) 829-9712