



July 24, 2018

Via E-Mail &
Via Overnight Delivery

Patricia Pelke
Materials Licensing Branch Chief
U.S. Nuclear Regulatory Commission – Region III
Nuclear Material Licensing Branch
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4351

SUBJECT: Request for approval of Direct Change of Control for U.S. Nuclear Regulatory Commission Materials License Number 21-11315-02

Dear Ms. Pelke:

Pursuant to 10 C.F.R. § 30.34(b), U.S. Nuclear Regulatory Commission (“NRC”) guidance found in NUREG-1556, Volume 15, Revision 1, “Consolidated Guidance About Materials Licenses, Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Material Licenses,” published June 2016, and NRC’s Regulatory Issue Summary 2014-08, Revision 1, “Regulatory Requirements for Transfer of Control (Change of Ownership) of Specific Material Licenses,” dated May 5, 2016, we hereby provide notice to, and respectfully request approval of, the planned change of control of a licensee, as addressed herein.

As you may recall, on March 12, 2018, MPI Research, Inc. (“MPI” or “Licensee”) and Charles River Laboratories International, Inc. requested written consent from the NRC for an *indirect* change of control for the above referenced license (the “License”) at the Mattawan facility (the “facility”). Approval of that request was received from NRC on June 4, 2018. At that time, MPI became a wholly owned, indirect subsidiary of Charles River Laboratories International, Inc.

This submittal now respectfully requests NRC approval for a *direct* change of control of the License to Charles River Laboratories, Inc., a wholly owned, direct subsidiary of Charles River Laboratories International, Inc., to be effective as of January 1, 2019. Specific information requested in Appendix E of NUREG-1556, and changes in the organization exercising control over the Licensed program because of the impending transactions, along with additional details, follow below. To the extent NRC requests as much, we promptly will submit a Form 313.

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Direct Change of Control of License 21-11315-02

On or about January 1, 2019, MPI will participate in a merger and corporate re-organization with its affiliates, the effect of which will be that Charles River Laboratories, Inc. will be the surviving legal entity that continues the business and operations of MPI, and that MPI will cease to exist as a legal entity.

Specifically, MPI and its upstream direct and indirect parent corporations, i.e., ACP Mountain Purchaser, Inc., ACP Intermediate Inc., and ACP Mountain Holdings, Inc., are expected to undergo a series of mergers. With these mergers, MPI will cease to exist as a legal entity, and Charles River Laboratories, Inc. will survive and continue the business and operations of the Licensee at the facility.

Consistent with this planned merger activity and pending your approval, the License would transfer, the Licensee's name would change by operation of law to Charles River Laboratories, Inc., and the Licensee would be under the direct control of Charles River Laboratories International, Inc. The surviving entity, Charles River Laboratories, Inc., is (as noted above) a direct, wholly owned subsidiary of Charles River Laboratories International, Inc., a publicly listed New York Stock Exchange (NYSE: CRL) corporation and leading U.S. biotechnology company. The Charles River Laboratories International, Inc. companies have an annual revenue in excess of \$1.9 billion (\$2017) and approximately 13,000 employees worldwide.

Charles River Laboratories, Inc. is and has been a known entity, with its direct and indirect subsidiary entities holding or having held nuclear materials licenses issued by Agreement States, e.g. Nevada (Charles River Laboratories, Inc.: License #11-16-0368, with an expiration date of May 31, 2021), Ohio (Charles River Laboratories Ashland, LLC: License #06320030003, with an authorized expiration date of March 1, 2020), and Pennsylvania (Charles River Laboratories, Inc.: License PA-1261, with an expiration date of March 31, 2025, but which has been terminated after decommissioning). Copies of these licenses are attached for your convenience.

MPI, Charles River Laboratories, Inc. and Charles River Laboratories International, Inc. understand that the planned organizational changes involving direct control of the License and Licensee's name may not become effective until and unless approval is requested, and subsequently received, from the NRC. The intent of this submittal is to request that approval and any applicable License amendment in a timely fashion, consistent with the goal that these planned changes may be completed no later than January 1, 2019.

Information Needed by NRC for Transfer of Control (from Appendix E of NUREG-1556)

- 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.*

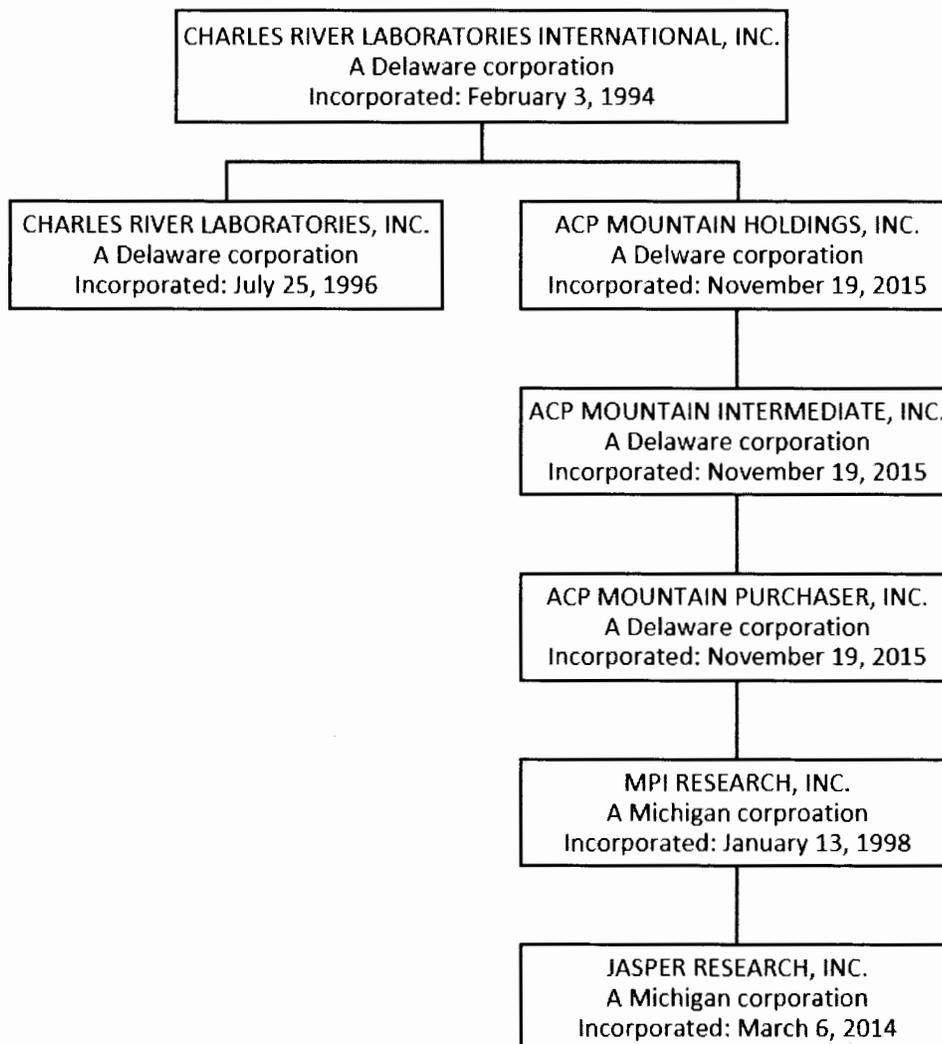
As described above, this is a direct change of control whereby, as a result of a series of upstream mergers, MPI will cease to exist as a legal entity, and Charles River Laboratories, Inc.

(again, the direct, wholly owned subsidiary of Charles River Laboratories International, Inc.) will survive and continue the business and operations at the facility, including pursuant to and with the benefit of the License.

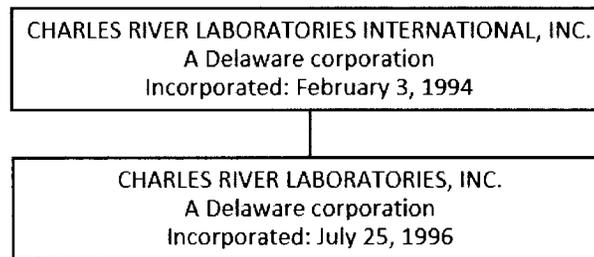
As a result, the Licensee's name will change. The reporting relationship between the Radiation Safety Officer ("RSO") and facility executive management, as well as between facility management and corporate management, will also change. Each of these changes is described below.

New licensee name: Charles River Laboratories, Inc.
Mailing address: 54943 North Main Street, Mattawan MI, 49071
Contact information: Richard Granberg (RSO), 269-668-3336 Ext. 2050

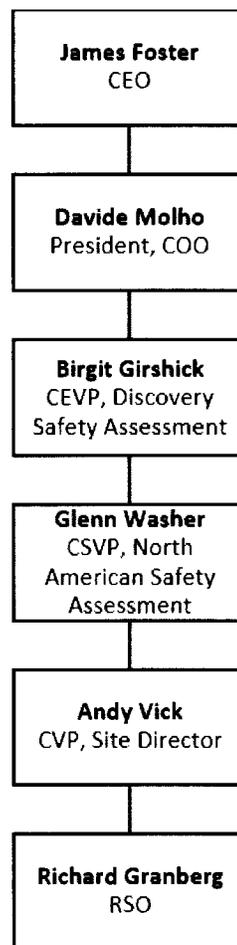
The pre-transition corporate structure was provided in our letter of March 12, 2018, and is reproduced below.



The post-transition organization chart for the merged entity, i.e., Charles River Laboratories, Inc., will be as shown below:



The RSO reporting relationship will change as shown below, with Richard Granberg, the current RSO, to report directly to the Mattawan facility Site Head, as discussed below, after these transactions.



- 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.*

No changes to personnel, including the RSO, or duties of the personnel engaged in Licensed operations or the radiation safety program, are currently planned because of this direct change of control. Likewise, no changes will take place to the License-related training programs.

The only significant planned change to personnel engaged in management of Licensed operations is the Mattawan facility Site Head, Andy Vick, PhD. Dr. Vick has substantial experience managing licensed operations comparable to those conducted at the Mattawan facility, in an Agreement State, and working with RSOs.

Specifically, Dr. Vick has approximately 20 years of experience in pharmaceutical, biotech, and contract research organizations supporting the use of radioisotopes to advance the discovery and development of innovative human health products. His scope of experience has ranged from hands-on application of radioisotopic methods in support of pharmaceutical development (e.g., bioanalytical chemistry, ADME/DMPK, etc.) to the management of testing facilities that utilize radiation and associated methods in basic research in support of medical advancement.

Dr. Vick is familiar with the scope of operations covered by the License and the management responsibilities associated with his position with respect to that License, including the management of potential hazards associated with the types, activity levels and quantities of radiological materials permitted by the License, and the corresponding importance of effective training, nuclear security and a nuclear-safety culture.

Dr. Vick and the RSO have reviewed the scope of the current MPI radiation safety program and the management oversight responsibilities associated with that program. A schedule of routine Licensed program status updates with executive management has been established and will be undertaken throughout the year. Dr. Vick will continue to work closely with the RSO to assure that all License requirements and NRC mandates are met.

- 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.*

No substantive changes to the location, facilities, equipment, radiation-safety program, use, possession, waste management, or other procedures authorized by the License will result from this direct change of control. Procedures are expected to be revised, if at all, only to incorporate the name, procedural layout and formatting changes that follow from the business entity name change accompanying these transactions. These minor revisions will not involve any modifications to current substantive program requirements.

- 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.*

Nothing regarding the facility's radiation-safety program, including its facilities and equipment, will change because of these transactions. There are no contaminated areas at the Licensed facility that require decontamination prior to transfer. Because current operations will remain unchanged and continue, no decommissioning is planned at this time.

All required surveillance items, including calibrations, leak tests, surveys, wipe tests, training, quality control and related records, are current. A review of these surveillance items was performed and documented in connection with the June 2018 acquisition of MPI. This review will be updated and documented in connection with these transactions, with that review expected to be completed no later than January 1, 2019.

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.*

The substantive aspects of the DFP will remain unchanged and unaffected by the direct change of control. The License is currently backed by a fully funded, written Trust Agreement between MPI ("Grantor") and Comerica Bank and Trust, National Association ("Trustee"), as approved by the NRC on August 12, 2016. This fully funded Trust Agreement will remain in place, with no substitution of Trustee contemplated as a result of these transactions. The Trust Agreement and any associated financial instrument will be amended only to the extent necessary to reflect these transactions and the replacement of "MPI Research, Inc." with "Charles River Laboratories, Inc." as the Grantor, effective as of the merger date. The NRC will be copied on all material written communications, and to the extent necessary asked to provide its concurrence with respect to written amendment of the Trust Agreement.

The parties will submit documentation reflecting completion of any necessary amendment of the Trust Agreement at soon as reasonably practicable after the later of NRC's approval of this direct change of control and, if necessary, the form of amendment of the Trust Agreement.

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 records associated with the License will remain with the Licensee, with no changes to the location or manner in which such records are maintained. All records will transfer from MPI to the control of the Charles River Laboratories, Inc. without alteration when Charles River Laboratories, Inc. becomes the Licensee, and will be maintained by the Charles River Laboratories, Inc., consistent with the License and applicable NRC regulation.

Pursuant to 10 C.F.R. § 30.35(g), Charles River Laboratories, Inc. will maintain drawings and records important to decommissioning, and upon NRC request will transfer the records to the appropriate NRC regional office before the License is terminated.

Licensed operations will continue during and after the transfer of control. Charles River Laboratories, Inc. is aware of the extent and levels of contamination and applicable decommissioning requirements, and agrees to accept the facility "as is" on the date of transfer with its future decommissioning mandates.

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.*

MPI and Charles River Laboratories, Inc. agree to the direct transfer of control of the Licensed material and activities. There are no open inspection items associated with the 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.*

Charles River Laboratories, Inc. has been advised of and will abide by all constraints, conditions, requirements, representations, and commitments of MPI with respect to the License. This process is facilitated by the fact that Richard Granberg, the current MPI RSO, will remain at the facility in his current role after these transactions.

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.*

The subject License is not a fuel cycle facility license.

Changes in the Organization that Exercises Control over the Licensed Program

There will be no material substantive changes in the organization that exercises control over the Licensed program, other than the reporting relationship of the RSO and the management personnel changes discussed above.

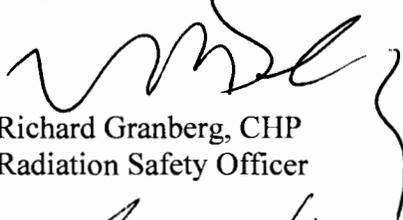
Specifically, Charles River Laboratories, Inc., vests the Mattawan facility Site Head as the management individual who is responsible for the conduct and control of Licensed operations and of the radiation safety program, and who has the authority to provide necessary resources to achieve and maintain regulatory compliance. The RSO will report directly to the Mattawan facility Site Head.

Patricia Pelke
July 24, 2018
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Charles River Laboratories, Inc.'s corporate management will support the Mattawan facility Site Head. The written program to implement the License will not change, and the RSO will not change.

Thank you for your prompt assistance with this request. If you have any questions or concerns after reviewing this request, please do not hesitate to contact Dick Granberg at (269) 668-3336, Ext. 2050.

Respectfully submitted,



Richard Granberg, CHP
Radiation Safety Officer



Andy Vick, PhD
Site Head, CR-Mattawan
CVP Safety Assessment



RADIOACTIVE MATERIALS LICENSE

Pursuant to the Radiation Protection Act, the Act of July 10, 1984 (No. 147, P.L. 888) (35 P.S. §§ 7110.101 - 7110.703) and Title 25, Rules and Regulations, Article V, Radiological Health of the Pennsylvania Department of Environmental Protection, and in reliance on statements and representations heretofore Licensee to receive, acquire, possess, transfer, and use radioactive material listed below for the purposes and at the places designated below. This license shall be deemed subject to all applicable rules, regulations, or orders of the Pennsylvania Department of Environmental Protection now or hereafter in effect and to any conditions specified below.

Licensee	In response to the renewal application dated March 7, 2015 and e-mail communication dated March 24, 2015
1. Charles Rivers Laboratories - Malvern	3. License No. PA-1261 is renewed in its entirety as follows:
2. 358 Technology Drive Malvern, Pennsylvania 19355	4. Expiration Date: March 31, 2025
	5. Client ID: 269508 Program: 3620 Priority: 5

6. Byproduct, source, and/or special nuclear material	7. Chemical and/or physical form	8. Maximum amount that licensee may possess at any one time under this license
A. Hydrogen 3	A. Any	A. 10 millicuries
B. Carbon 14	B. Any	B. 10 millicuries
C. Phosphorus 32	C. Any	C. 100 millicuries

9. Authorized use:

A. and B. Calibration of instruments

C. Research and development as defined in 10 CFR 36.4

CONDITIONS

10. Licensed material may be used or stored only at the licensee's facilities located at 358 Technology Drive, Malvern, Pennsylvania 19355.
11. A. Licensed material shall be used by, or under the supervision of, Michael J. Hartman, Ph.D., and Douglas B. Brown, Ph.D.
B. Licensed material in Items 6.B. and 6.C., may also be used by, or under the supervision of, Brian P Ruvolo, B.S.
C. Licensed material in Item 6.C. may also be used by, or under the supervision of, Melissa N. Pryce, M.S.
12. The Radiation Safety Officer for this license is: Douglas B. Brown, Ph.D.
13. Licensed material shall not be used in or on human beings.

Copy of Original RAM License located in Archive Room. *[Signature]*
16 APR 2015



14. The licensee shall not use licensed material in field applications where it is released except as provided otherwise by specific condition of this license.
15. The licensee is authorized to hold byproduct material with a physical half life of less than or equal to 120 days for decay-in-storage before disposal without regard to its radioactivity if the licensee:
 - A. Monitors byproduct material at the surface before disposal and determines that its radioactivity cannot be distinguished from the background radiation level with an appropriate radiation detection survey meter set on its most sensitive scale and with no interposed shielding; and
 - B. Removes or obliterates all radiation labels, except for radiation labels on materials that are within containers and that will be managed as biomedical waste after they have been released from the licensee; and
 - C. Maintains records of the disposal of licensed materials for 3 years. The record must include the date of the disposal, the survey instrument used, the background radiation level, the radiation level measured at the surface of each waste container, and the name of the individual who performed the disposal.
16. The licensee may transport licensed material, or deliver licensed material to a carrier for transport, in accordance with 25 Pa. Code Chapter 230, "Packaging and Transportation of Radioactive Material" and the provisions of 10 CFR Part 71 incorporated by reference.
17. Notwithstanding the requirements set forth in this license, the licensee shall comply with the regulations set forth in Title 25 of the Pennsylvania Code Article V "Radiological Health" and the U.S. Nuclear Regulatory Commission, Title 10 Code of Federal Regulations Parts 19-150 incorporated by reference.
18. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents including any enclosures, listed below. This license condition applies only to those procedures that are required to be submitted in accordance with the regulations. The Department of Environmental Protection's regulations shall govern unless the statements, representations and procedures in the licensee's application and correspondence are more restrictive than the regulations.
 - A. Application dated March 7, 2015
 - B. E-mail communication dated March 24, 2015

For the Pennsylvania Department of Environmental Protection


John S. Chippo
Bureau of Radiation Protection
P. O. Box 8469
Harrisburg, PA 17105-8469

Date: April 6, 2015

**OHIO DEPARTMENT OF HEALTH
LICENSE FOR RADIOACTIVE MATERIAL**

Pursuant to Chapter 3748 of the Ohio Revised Code, and in reliance on statements and representations made by the licensee, a license is hereby issued authorizing the licensee named herein to receive, acquire, possess, and transfer radioactive material as designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the applications of Chapter 3748 of the Ohio Revised Code and all applicable rules promulgated thereunder. This license is subject to all applicable rules, regulations and orders of the Ohio Department of Health now or hereinafter in effect and to any conditions specified below.

1. Charles River Laboratories Ashland, LLC 2. 1407 George Road Ashland, Ohio 44805	LICENSE NUMBER
	3. 03620030003
	EXPIRATION DATE
	4. March 1, 2020
	FILE NUMBER - ID NUMBER
	5. 501196 - 13458

6. RADIOACTIVE MATERIAL	7. CHEMICAL AND/OR PHYSICAL FORM	8. MAXIMUM QUANTITY THAT LICENSEE MAY POSSESS AT ANY ONE TIME UNDER THIS LICENSE
A. Hydrogen-3	A. Any	A. 18.5 GBq (500 mCi)
B. Carbon-14	B. Any	B. 74 GBq (2.0 Ci)
C. Phosphorus-32	C. Any	C. 1.85 GBq (50 mCi)
D. Sulphur-35	D. Any	D. 3.7 GBq (100 mCi)
E. Chromium-51	E. Any	E. 3.7 GBq (100 mCi)
F. Manganese-54	F. Any	F. 370 MBq (10 mCi)
G. Arsenic-73	G. Any	G. 185 MBq (5.0 mCi)
H. Arsenic-74	H. Any	H. 37 MBq (1.0 mCi)
I. Yttrium-90	I. Any	I. 9.25 GBq (250 mCi)
J. Technetium-99m	J. Any	J. 18.5 GBq (500 mCi)
K. Indium-111	K. Any	K. 18.5 GBq (500 mCi)
L. Iodine-125	L. Any non-volatile form	L. 8.51 GBq (230 mCi)
M. Iodine-125	M. Any volatile form	M. 740 MBq (20 mCi)
N. Gadolinium-153	N. Any	N. 370 MBq (10 mCi)
O. Lutetium-177	O. Any	O. 18.5 GBq (500 mCi)
P. Rhenium-188	P. Any	P. 37 GBq (1.0 Ci)
Q. Tungsten-188	Q. Any	Q. 18.5 GBq (500 mCi)
R. Iodine-131	R. Any	R. 1.85 GBq (50 mCi)
S. Copper-64	S. Dissolved in solution	S. 18.5 GBq (500 mCi)
T. Phosphorus-33	T. Any	T. 740 MBq (20 mCi)
U. Actinium-225	U. Any	U. 185 MBq (5 mCi)

9. Authorized Use

A., B., C., D., F., G., H., I., K., L.,
M., P., R.

Laboratory research as described in license application dated November 20, 2009 and correspondence dated July 17, 2012, August 14, 2012 and August 21, 2014.

E., J., M., N., O., Q., R., B., T., U.

Animal studies.

S.

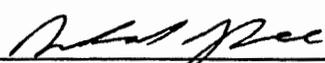
Chemical research.

OHIO DEPARTMENT OF HEALTH LICENSE FOR RADIOACTIVE MATERIALS SUPPLEMENTARY SHEET	Page 2 of 2
	License Number: 03620030003
	File Number - ID Number : 501196 - 13458
	Amendment No. 26

CONDITIONS

10. Licensed material may only be used at the licensee's facilities located at: 1407 George Road, Ashland, Ohio 44805.
11. The Radiation Safety Officer for this license is: Justin Godsey.
12. Licensed material shall be used by, or under the supervision of the Radiation Safety Officer.
13. Experimental animals or the products from experimental animals that have been administered licensed materials shall not be used for human consumption.
14. The licensee is authorized to hold radioactive material for decay-in-storage in accordance with OAC 3701:1-38-19(E).
15. In addition to the possession limits in item 8, the licensee shall further restrict the possession of licensed materials to quantities below the minimum limit specified in OAC 3701:1-40-17 for establishing a decommissioning funding plan.
16. The licensee is authorized to treat biological material by tissue digestion for release into the sanitary sewer provided:
 - A. The residual debris is surveyed for radioactive contamination prior to disposal; and
 - B. Records are maintained demonstrating compliance with sewer effluent discharge limits.
17. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below. The Ohio Department of Health's statutes, rules, and orders shall govern unless statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.
 - A. Renewal application dated January 5, 2015; Amendment 22 renews license 03620030003 in its entirety.
 - B. Correspondence dated February 3, 2015 (Amendment 23).
 - C. Email Correspondence dated June 27, 2016 (Amendment 24).
 - D. Email correspondence dated August 2, 2016 (Amendment 25).
 - E. Email correspondence dated October 27, 2016 (Amendment 26).

For the Ohio Department of Health

DATE: 11/28/16 BY: 
 Michael J. Snee
 Bureau of Environmental Health and Radiation Protection
 on behalf of the Director of Health



Nevada Radiation Control Program
Radioactive Material License

16-11-0368-01

LICENSE NUMBER

13

AMENDMENT NUMBER
(AMENDED IN ITS ENTIRETY)

A license is hereby issued authorizing such licensee to transfer, receive, possess and use the radioactive material designated below and to use such radioactive material for the purpose(s) and at the location(s) designated below. This license is subject to all applicable rules, regulations, and orders now or hereafter in effect and to any conditions specified below. ¹

1. Charles River Laboratories	3. 16-11-0368-01
LICENSEE NAME	LICENSE NUMBER
2. 6995 Longley Lane	4. May 31, 2021
STREET ADDRESS	EXPIRATION DATE
Reno Nevada 89511	5. RESERVED
CITY STATE ZIP CODE	

6. RADIOACTIVE MATERIAL	7. CHEMICAL AND/OR PHYSICAL FORM	8. MAX QTY LICENSEE MAY POSSESS AT ANY ONE TIME
A. Phosphorus-33	A. Any	A. 10 millicuries (370 gigabecquerels)
B. Sulfur-35	B. Any	B. 10 millicuries (370 gigabecquerels)
C. Hydrogen-3	C. Any	C. 0.2 microcuries (7.4 kilobecquerels)
D. Carbon-14	D. Any	D. 0.1 microcuries (3.7 kilobecquerels)
E. Cesium-137	E. Any	E. 1 microcurie (37 kilobecquerels)

¹ NRS 459.030; NAC 459.196



Nevada Radiation Control Program
Radioactive Material License

16-11-0368-01

LICENSE NUMBER

13

AMENDMENT NUMBER
(AMENDED IN ITS ENTIRETY)

9. AUTHORIZED USE

<p>A & B</p> <hr/> <p>ITEM</p> <p>For In-situ hybridization of tissue sections.</p> <p>PURPOSE</p>
<p>C - E</p> <hr/> <p>ITEM</p> <p>For use as calibration, check and reference sources.</p> <p>PURPOSE</p>

Conditions

- 10. Radioactive material shall be stored and used only at the licensee's facilities located at 6995 Longley Lane, Reno, Nevada.
- 11. The Radiation Safety Officer for activities authorized by this license shall be Christina Satterwhite, Ph.D.
- 12. Radioactive material identified in Items 6, 7 and 8 shall be used only by, or under the supervision of the following individuals:

AUTHORIZED USERS	AUTHORIZED USES
Christina Satterwhite Ph. D	P-33, S-35, H-3, C-14, Cs-137
Curtis Chan, B.S	P-33, S-35, H-3, C-14, Cs-137

- 13. The licensee is not authorized to use radioactive material on or in human beings for research.
- 14. The licensee shall not use licensed material in field applications where activity is released except as provided otherwise by specific condition of this license.
- 15. Experimental animals, or the products of experimental animals, that have been administered licensed materials, shall not be used for human consumption.



Nevada Radiation Control Program
Radioactive Material License

Page 3 of 3

16-11-0368-01

LICENSE NUMBER

13

AMENDMENT NUMBER
(AMENDED IN ITS ENTIRETY)

Conditions, continued

16. The licensee is authorized to hold radioactive material with a physical half-life of less than 120 days for decay-in-storage before disposal in ordinary trash provided:
- A. Radioactive waste to be disposed of in this manner shall be held for decay a minimum of ten half-lives.
 - B. Before disposal as normal waste, radioactive waste shall be surveyed to determine that its radioactivity cannot be distinguished from background. All radiation labels shall be removed or obliterated.
17. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents including any enclosures, listed below. Nevada Administrative Code (NAC) 459 shall govern unless the statements, representations and procedures in the licensee's application and correspondence are more restrictive than the regulations.
- A. Application dated April 28, 2016, signed by Christina Satterwhite, Ph.D., RSO; and
 - B. Letter dated July 1, 2016, signed by Karen Beckley, Program Manager; and
 - C. **Letter dated July 6, 2017, signed by Christina Satterwhite, Ph.D., RSO.**



SIGNATURE

August 15, 2017

DATE

Karen K. Beckley, M.P.A., M.S.
Manager, Radioactive Materials Program

FedEx Express

earthsmart
FedEx carbon-neutral
envelope shipping

ORIGIN ID: HAIA (269) 668-3336
JAMES BRILEY
MPI RESEARCH/CHARLES RIVER
54843 NORTH MAIN STREET
MATTAPAN, MA 01907
UNITED STATES US

SHIP DATE: 24 JUL 18
ACTWT: 0.45 LB
CRD: 0471588/CFE3111
BILL SENDER

TO **MS. PATRICIA PELKE**
U.S. NUCLEAR REGULATORY COMMISSION
2443 WARRENVILL RD
SUITE 210
LISLE IL 60532 **RECEIVED JUL 25 2018**

REF: 0/NA/RG



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0201

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PRIORITY OVERNIGHT

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FZ 10:30 5886 01:25