



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**

REGION III  
2443 WARRENVILLE RD. SUITE 210  
LISLE, IL 60532-4352

Sharon L. Long  
Radiation Safety Officer  
National Physics Consultants  
5589 Cardinal Drive  
Mentor, OH 44060

**OCT 30 2018**

Dear Ms. Long:

This refers to your letters dated August 2, 2018, and August 8, 2018, regarding your request for consent to a change of ownership and control for NRC Material License No. 34-26653-02.

We find that we will need additional information to complete our review.

If you wish to pursue this matter, please provide only one complete, written response that is currently dated and signed. This will help ensure that your response is processed correctly in our offices.

Your written response should be addressed to my attention at the above address, as "additional information to control number 609523." Faxing your response to me at 630-515-1078 is the fastest way to transmit it. Please only send one response via one means of transmission only. We will then continue our review.

I am reviewing each of your licensing requests in order. I completed an amendment for old NPC removing several authorized users only, with the other requests made pending the outcome of the change of ownership and termination actions. You should be receiving that any day now.

I'm currently working on the change of ownership request and have some questions.

1. In your letter dated August 8, 2018, you stated that a copy of your Ohio license showing the transfer of ownership was attached. It was not. The transmittal letter from Ohio to you was attached but the license itself was not and is needed to reflect the change in ownership by Ohio.
2. Please send us an organization chart for the old company and one for the new company. Are you involved in both companies and do you appear on the organization chart for the new company? If so, in what capacity?
3. Item 4 in your letter dated August 8, 2018, states that "the asset purchase closed on August 1, 2018" but that "the current corporation will remain in business until all legal federal and state obligations are completed." Please explain it this as these statements appear to contradict each other.
4. In one of your emails to me dated August 17, 2018, sent at 9:28 a.m., you stated that Eli Global was buying NPC and then setting up the new company under the new name. But

none of the documents you have sent us officially say anything about Eli Global. Who or what is this entity? Your license and your company cannot transfer to Eli Global without our consent either and it appears that that is what has happened. Please explain.

5. Your letter dated August 2, 2018, says in Item 4 that the status of the radiation safety program is "active." But you've told me in telephone calls that you have no radioactive material in your possession under this license so how can your program be "active?" Please explain.
6. Your letter dated August 2, 2018, also says in Item 4 that "this licensee possesses no sealed sources in quantities that require leak testing." Whether you possess sealed sources that require leak testing is irrelevant. That is not a criterion of licensability.

For purposes of transferring the license, do you have in your possession any radioactive materials at all, including exempt, button, generally licensed or specifically licensed materials, but only under the NRC license 34-26653-02? We are not concerned with materials possessed under your Ohio license, only the NRC license. If you have anything under this license, please include a current inventory of all radioactive materials under the NRC license.

7. When you and I have talked on the phone, you've told me what your "licensed activities" consisted of. But none of the documents you've submitted have contained that explanation. In response, please explain simply and clearly exactly what your "licensed activities" have consisted of and whether you transported radioactive materials outside of Ohio at all under this NRC license.
8. In your letter dated August 2, 2018, Item 3 you stated "All radioactive materials are only used at temporary job sites within the jurisdiction of the NRC or agreement states." Item 1 in this letter also makes reference to this license appearing to have radioactive materials. This is included because it relates to my questions in Items 5, 6 and 7 above. Please explain this reference also.

Please contact me at (630) 829-9841 or (800) 522-3025, ext. 9841 if you have any questions. My fax number is (630) 515-1078 and my email address is [colleen.casey@nrc.gov](mailto:colleen.casey@nrc.gov).

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,

A handwritten signature in cursive script, reading "Colleen Carol Casey".

Colleen Carol Casey  
Materials Licensing Branch

License No. 34-26653-02  
Docket No. 030-35055

Enclosure:

Control No. 609523