



4345 Independence Dr.  
Schnecksville, PA 18078

Phone: 610-262-1100  
Fax: 610-262-1516  
[www.PrimeNDT.com](http://www.PrimeNDT.com)

J6

01/15/2019

97-29370-01  
03030982

U.S. Nuclear Regulatory Commission  
Attn: Dennis Lawyer  
475 Allendale Road  
King of Prussia, PA 19406

RE: Transfer of Control

Mr. Lawyer,

This letter is to supply the information required in 10 CFR 30.34 (b); 10 CFR 31.2; 10 CFR 40.46; and 10 CFR 70.36 for the Approval of Changes in Control.

**1. Description of Transaction**

RAE Group Holdings Inc. have purchased the shares of Prime NDT Services, Inc. Our tax I.D. number 23-2865040 and name will remain unchanged. The license contact will remain the same.

**2. Changes of Personnel**

All personnel pertaining to the current license will remain unchanged. I (Don B. Shumway, Jr.) will remain the RSO and key contact.

**3. Changes of Location, Equipment, and Procedures**

All locations, equipment, and procedures will remain unchanged.

**4. Surveillance Records**

All the surveillance records for Prime NDT have been performed, documented, and reviewed.

611090

Rec'd. in LAT-1/22/2019

**5. Decommissioning and Related Records Transfer**

The new owners of Prime NDT (RAE Group Holdings Inc.) have taken responsibility for the transfer and maintenance of records important to the safe and effective decommissioning of facilities involved in licensed activities. All aspects and locations listed on the license will remain unchanged. There are no ambient radiation levels or contamination. All of our sources are sealed form.


**6. Transferee's Commitment to Abide by the Transferor's Commitments**

The new owner of Prime NDT (RAE Group Holdings Inc.) agree to abide by all constraints, license conditions, requirements, representations, and commitments identified in and attributed to the existing license and regulations.

Thank you,



Don B. Shumway, Jr.  
RSO  
Prime NDT Services, Inc.



Jairo Perez  
Chief Financial Officer  
RAE Group Holdings Inc.



**ACKNOWLEDGEMENT - RECEIPT OF CORRESPONDENCE**

<b>Name and Address of Applicant and/or Licensee</b>  Prime NDT Services, Inc. ATTN: Don B. Shumway, Jr., President 4345 Independence Drive Schnecksville, PA 18078	<b>Date</b> January 22, 2019
	<b>License Number(s)</b> 37-23370-01
	<b>Mail Control Number(s)</b> 611090
	<b>Licensing and/or Technical Reviewer or Branch</b> Dennis Lawyer <input checked="" type="checkbox"/> Notification

This is to acknowledge receipt of your:  Letter and/or  Application Dated: 01/15/2019

The initial processing, which included an administrative review, has been performed.  
 Amendment  Termination  New License  Renewal

There were no administrative omissions identified during our initial review.

This is to acknowledge receipt of your application for renewal of the material(s) license identified above. Your application is deemed timely filed, and accordingly, the license will not expire until final action has been taken by this office.

Your application for a new NRC license did not include your taxpayer identification number. Please complete and submit NRC Form 531, Request for Taxpayer Identification Number, located at the following link: <http://www.nrc.gov/reading-rm/doc-collections/forms/nrc531.pdf>  
 Follow the instructions on the form for submission.

The following administrative omissions have been identified:

Your application has been assigned the above listed MAIL CONTROL NUMBER. When calling to inquire about this action, please refer to this control number. Your application has been forwarded to a technical reviewer. Please note that the technical review, which is normally completed within 180 days for a renewal application (90 days for all other requests), may identify additional omissions or require additional information. If you have any questions concerning the processing of your application, our contact information is listed below:

**Region I**  
**U. S. Nuclear Regulatory Commission**  
**Division of Nuclear Materials Safety**  
**2100 Renaissance Boulevard, Suite 100**  
**King of Prussia, PA 19406-2713**  
**(610) 337-5260, (610) 337-5313,**  
**(610) 337-5398, or (610) 337-5239**