

From: [Lawyer, Dennis](#)
To: [Don Shumway](#)
Subject: Prime NDT Services, Inc., Request for Additional Information Concerning Change of Control, Control 611090
Date: Monday, February 25, 2019 9:59:00 AM

Dear Mr. Shumway,

This is in reference to your letter dated January 15, 2019, notifying us that RAE Group Holdings Inc. has purchased the shares of Prime NDT Services, Inc. Reference Nuclear Regulatory Commission License No. 37-23370-01, Docket No. 03020982. Our questions specifically concern the transaction of the transfer of control. In order to continue our review, we need the following additional information:

1. What is the date that RAE Group Holding Inc. (RAE) purchases Prime NDT Services, Inc. (Prime NDT) shares?
2. What is the percent of control of stock in Prime NDT has RAE purchased?
3. Please provide a post-transaction organization chart showing the new corporate structure of Prime NDT and its relationship to RAE.
4. If Prime NDT is now a wholly owned subsidiary of RAE, or RAE is a majority owner of Prime NDT, please inform us what organizations owns or is controlling RAE.
5. Does RAE's purchase of Prime NDT stock give RAE the authority, if they desired to exercise it, to determine Prime NDT's activities under the license?

We will continue our review upon receipt of this information. Please reply to my attention at the Region 1 Office (Address below) and refer to Mail Control No. 611090. If you have technical questions regarding this letter, please call me at (610) 337-5366.

Your reply must be an originally signed and dated letter. The letter may be scanned and submitted as a pdf document attached to an email; or it may be transmitted by facsimile to (610) 337-5269; or it may be sent by regular mail. If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your application OR amendment request.

Region 1 Office Mailing Address: Licensing Assistance Team, US Nuclear Regulatory Commission Region I, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406-2713.

Dennis Lawyer
U.S. NRC Region 1
Health Physicist
610-337-5366