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03/20/2019

37-23370-01
03020982

U.S. Nuclear Regulatory Commission
Attn: Dennis Lawyer
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713

RE: Transfer of Control

Mr. Lawyer,

This letter is to reply to your email dated February 25, 2019.

- 1. What is the date that RAE Group Holding Inc. purchased Prime NDT Services, Inc. shares?**

RAE Group Holdings Inc. purchased 100% of Prime NDT Services, Inc. shares on May 3, 2018.

- 2. What is the percent of control of stock in Prime NDT has RAE purchased?**

100%

- 3. Provide a post-transaction organization chart showing the new corporate structure of Prime NDT and its relationship to RAE.**

Attached.

- 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.**

Please see the organization chart. There are no organizations the own or control RAE.

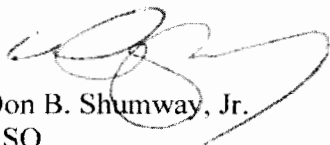
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5. Does RAE's purchase of Prime NDT stock give RAE the authority, if they desired to exercise it, to determine Prime NDT's activities under the license?

Yes.

Thank you,

A handwritten signature in black ink, appearing to read "Don B. Shumway, Jr.", written over the typed name.

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

