



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION I  
2100 RENAISSANCE BLVD.  
KING OF PRUSSIA, PA 19406-2713

April 3, 2019

Don B. Shumway, Jr., Radiation Safety Officer  
Prime NDT Services, Inc.  
4345 Independence Dr.  
Schnecksville, PA 18078

SUBJECT: PRIME NDT SERVICES, INC., CONSENT TO TRANSFER LICENSE, MAIL  
CONTROL NO 611090

Dear Mr. Shumway:

By letter dated January 15, 2019, Agencywide Documents Access and Management System (ADAMS) Accession Number ML19022A210, and as supplemented by letter dated March 20, 2019, ADAMS Accession Number ML19088A017, Prime NDT Services, Inc. (Prime) and RAE Group Holdings Inc. (RAE) requested the NRC's consent to an indirect transfer of control of NRC Materials License number 37-23370-01 from private investors to RAE. The indirect transfer of control occurred on May 3, 2018. Thus, this was a request for post-hoc approval to transfer control. Prime and RAE did not comply with NRC regulations as they did not receive the Commission's prior written approval for this transfer of control as required by 10 CFR 30.34(b) and Section 184 of the Atomic Energy Act of 1954, as amended.

From the above letters, we understand that this transfer did not result in a change associated with the materials, persons using licensed material, the locations, facilities, and equipment, nor the radiation safety program.

Based on the above understandings, as more fully detailed in the enclosed NRC staff's Safety Evaluation Report, which documents the NRC staff's safety review of the request, the NRC consents to the transfer.

Future changes in the licensee's name, licensed use, licensed materials, licensed location, or persons responsible for licensed material require submission of a request to amend the license. NRC approval must be received prior to implementation of the proposed change, as it was with the action at issue here. If you have any questions regarding this letter, please contact Dennis Lawyer at 610-337-5366 or via electronic mail at [dennis.lawyer@nrc.gov](mailto:dennis.lawyer@nrc.gov).

An environmental assessment for this action was not required because this action is categorically excluded under 10 CFR 51.22(c)(21).

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 document system (ADAMS). ADAMS is accessible from the NRC Web Site at: <http://www.nrc.gov/reading-rm/adams.html>.

D. Shumway

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Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "Dennis Lawyer", with a long, sweeping horizontal stroke extending to the right.

Dennis Lawyer, Health Physicist  
Commercial, Industrial, R&D  
and Academic Branch  
Division of Nuclear Materials Safety  
Region I

Docket No. 03020982  
License No. 37-23370-01  
Mail Control No. 611090

Enclosure: Safety Evaluation Report

D. Shumway

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PRIME NDT SERVICES, INC., CONSENT TO TRANSFER LICENSE, MAIL CONTROL NO  
611090 DATED April 3, 2019

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SUNSI Review Complete: DLawyer

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