



Br. 2

May 20, 2019

U.S. NRC Region I  
2100 Renaissance Blvd., Suite 100  
King of Prussia, PA 19406-2713

Re: Notification of New Owner/Operator  
Ashland LLC  
Neal Plant  
100 Big Sandy River Road  
Kenova, West Virginia  
Materials License Number 47-31073-01 / 03036992  
Via Fed-Ex

REC RG 1 05 28 19 AM 09:25

To Whom It May Concern:

In November 2018, Ashland LLC (“Ashland”) announced a definitive agreement to sell its Composites business to INEOS Enterprises (“INEOS”)¹. The transaction is expected to close on June 30, 2019, when INEOS will become the owner/operator of the Neal Plant in Kenova, West Virginia. As part of this transaction, the Neal Plant will operate under the new legal entity name **INEOS Neal LLC** and Federal Employer Identification Number (FEIN) 83-3649194.

This letter serves as notification to the West Virginia Department of Environmental Protection (WVDEP) of the upcoming transaction causing the change in ownership and operational control of the facility from Ashland to INEOS Neal LLC (owner/operator) as of July 1, 2019. Please note there will be no changes to facilities, operations (including location, equipment, or procedures), or address. The sale to INEOS has no effect on the assets and liabilities in any way that would influence compliance with the license.

I will be transitioning to a Corporate Environmental Engineer role with INEOS upon the sale. The facility personnel, including the primary facility environmental contact, Matthew Murray, will remain the same. No new individuals will be involved with the NRC license or source materials.

¹ <https://investor.ashland.com/news-releases/news-release-details/ashland-signs-definitive-agreement-sell-composites-business-and>

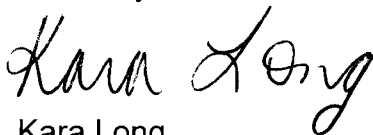
U.S. NRC Region I  
Notification of New Owner/Operator

Ashland currently operates under the Materials License Number 47-31073-01 (Materials License) for sealed sources at the Neal Plant. Ashland requests the WVDEP change the legal entity name to INEOS Neal LLC (owner/operator) on said Materials License. We have also enclosed a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between Ashland and INEOS.

The required surveillance has been performed, documented and reviewed. The records will remain with the facility upon transfer of ownership. The ambient radiation levels are documented, and no evidence of leakage or presence of contamination was identified. No decommissioning of the facility is planned for before or after the change of ownership. Ashland has not identified any open inspection and enforcement issues that need to be resolved.

If you have any questions or concerns, please do not hesitate to contact me at 614-790-9295 or [klong@ashland.com](mailto:klong@ashland.com).

Sincerely,



Kara Long  
Corporate Environmental Engineer  
Ashland LLC

cc: Matthew Murray, Ashland LLC

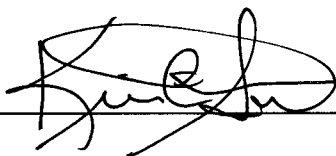
**TRANSFER OF OWNERSHIP AGREEMENT**


Ashland LLC ("Ashland") currently owns the regulated facility located at 100 Big Sandy River Road, Kenova, West Virginia ("the facility") operated under Materials License Number 47-31073-01 ("License"). Ashland will sell the facility associated with the License and transfer said License to INEOS Neal, LLC ("INEOS") effective June 30, 2019. Transfer of the License conveys to the INEOS all responsibility, coverage, and liability associated with the License. No change to equipment, operations, or programs are contemplated that would require any substantive modifications to the License terms, and INEOS will retain substantially all personnel currently employed at the facility.

INEOS agree to abide by all constraints, license conditions, requirements, representations, and commitments identified in and attributed to the existing License to ensure compliance with the License and regulations, and will maintain the records received from the Ashland.

**ASHLAND LLC**

**INEOS NEAL, LLC**

By: X  \_\_\_\_\_

By:  \_\_\_\_\_

Name: Keith C. Silverman

Name: RALSTON SKINNER

Title: Senior Vice President Global Operations,  
Quality & EHS

Title: DIRECTOR



**ACKNOWLEDGEMENT - RECEIPT OF CORRESPONDENCE**

<b>Name and Address of Applicant and/or Licensee</b>  Ashland, LLC ATTN: Steven D. Dunsmore, Plant Manager 100 Big Sandy River Road Kenova, WV 25530	<b>Date</b> June 3, 2019
	<b>License Number(s)</b> 47-31073-01
	<b>Mail Control Number(s)</b> 612347
	<b>Licensing and/or Technical Reviewer or Branch</b> Commercial, Industrial, R&D, & Academic Branch

This is to acknowledge receipt of your:  Letter and/or  Application Dated: 05/20/2019

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