

From: [Ullrich, Elizabeth](#)
To: [Barry Roziewski](#)
Subject: Request for Additional Information for change of control for License No. 10-31353-01
Date: Tuesday, August 20, 2019 3:30:00 PM

License No. 10-31353-01
Docket No. 030-37885
Control No. 613901

Mr. Roziewski:

The NRC has a formal process for reviewing changes of control, as detailed in NUREG-1556, Volume 15, Revision 1, "Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses" (NUREG 1556 Vol. 15 Rev. 1). The document can be accessed via our public webpage at <https://www.nrc.gov/docs/ML1618/ML16181A003.pdf> or at <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v15/>.

Appendix E of the NUREG includes information required by the NRC to transfer control of the license to a separate entity. Please be aware that this information needs to be reviewed prior to the formal transfer of control of the license. Detailed discussion of the questions in Appendix E can be found in Section 5 of NUREG 1556, Vol. 15, Rev. 1.

Please address each of the following standard questions, and provide information that describes the current status of the license and its management:

- a. Describe any planned changes in the organization, including but not limited to, transfer of stocks or assets and mergers, change in members on Board of Directors, etc. Provide the new licensee name (if applicable), mailing address, and contact information, including phone numbers, if applicable. Clearly identify if the amendment request is due to a name change only. Please include pre- and post-organization charts.
- b. Describe any changes in personnel or duties that relate to the licensed program. Include training and experience for new personnel and any changes in the training program. If applicable, you may state that there are no changes in personnel.
- c. Describe any changes in the location, facilities, equipment, radiation safety program, use, possession, waste management, or other procedures that relate to the licensed program. If applicable, you may state that there are no changes in facilities, program and procedures.
- d. Describe the status of the licensee's facilities, equipment, and radiation safety program, including any known contamination and whether decontamination will occur prior to transfer. Include the status of calibrations, leak tests, area surveys, wipe tests, training, quality control, and related records.
- e. Confirm that all records concerning the safe and effective decommissioning of the facility will be transferred to the transferee or to NRC, as appropriate. These records include documentation of surveys of ambient radiation levels and fixed and/or removable contamination (such as leak test records), including methods and sensitivity.
- f. Confirm that both transferor and transferee agree to transferring control of the licensed material and activity, and the conditions of transfer, and that the transferee has been made aware of any open inspection items and its responsibility for possible resulting enforcement actions.
- g. Provide an agreement that the transferee will abide by all constraints, conditions, requirements, representations, and commitments of the transferor; or that the transferee will submit a complete description of the proposed new licensed program.

Please respond with a letter signed by management representative(s). The original signed letter may be submitted

by regular mail, OR you may submit a pdf of the signed hard copy letter by email, OR you may fax a copy of the signed hard copy letter to (610) 3378-5269. Please refer to your license number and the control number so the response is correctly handled.

If you have any questions, please contact me.

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