

From: [Ullrich, Elizabeth](#)
To: [Barry Roziewski](#); [Reichard, Michael](#)
Cc: [Randall L. Bagwell](#)
Subject: RE: RE: RE: Notification for License No. 10-31353-01
Date: Thursday, August 22, 2019 2:31:00 PM

Mr. Roziewski,

I will add your new letter to the licensing action with the first letter. Reviewing the examples of "indirect change of control" in Appendix C of NUREG 1556, Volume 15, I believe your situation very likely is an indirect change of control. However, both the letters and other information that we typically gather through internet searches or in requests for additional information from the licensee, will be reviewed by our legal counsel to determine if the NRC believes the transaction constitutes a change of control under our regulations.

Thank you for the additional information. I assume that, as this transaction already occurred on August 12, there is no longer a need to expedite the review of this action.

Betsy

Betsy Ullrich, Senior Health Physicist
USNRC Region I
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406
610-337-5040 (office)
240-704-4575 (cell)
Elizabeth.ullrich@nrc.gov

-----Original Message-----

From: Barry Roziewski [<mailto:broziewski@usanova.com>]
Sent: Thursday, August 22, 2019 11:17 AM
To: Ullrich, Elizabeth <Elizabeth.Ullrich@nrc.gov>; Reichard, Michael <Michael.Reichard@nrc.gov>
Cc: Randall L. Bagwell <rlbagwell@usanova.com>
Subject: [External_Sender] RE: RE: Notification for License No. 10-31353-01

Mr. Reichard and Ms. Ullrich,

Attached please find responses to the information requested. The notification being provided explains the notification previously provided pertained to a financial transaction only. There is no change of control of NRC license No. 10-31353-01; Control No. 613901.

Please review the attached at your convenience and let us know if there are any questions or if additional information is required.

Thanks in advance for your response.

BARRY ROZIEWSKI
Radiation Safety Officer

678.631.2903 (direct) 678.898.9181 (mobile)

"When we all work together to address hazards, we can do the best job possible to ensure employees go home safely each day."

-----Original Message-----

From: Ullrich, Elizabeth <Elizabeth.Ullrich@nrc.gov>

Sent: Monday, August 19, 2019 2:01 PM

To: Reichard, Michael <Michael.Reichard@nrc.gov>; Barry Roziewski <broziewski@usanova.com>

Cc: Randall L. Bagwell <rlbagwell@usanova.com>

Subject: RE: RE: Notification for License No. 10-31353-01

Sender is External. Please be careful opening links and attachments.

Mr. Roziewski,

I can give you a better idea of timing after I read through your letter. At the moment, I have several other urgent activities that need work today.

If this is a change of control as described in NUREG 1556 Vol 15, then it will be 40-50 days to complete the action as a minimum. Our internal metric is that all change of control actions should be done within 180 days. The action is being processed in now; it will be assigned to a reviewer as soon as someone is ready for new work. This could be 2 days to 2 weeks, depending on other activities. We have a requirement that a public version of the letter be placed on our website for 30 days. We cannot issue the approval of the transfer until that public review period is up. In the meantime, the reviewer has to write up a basis for approving (or not) the director or indirect transfer of control, make sure all regulatory requirements are met, and have that basis reviewed by our legal counsel.

The guidance document concerning change of control for licensees is NUREG 1556, Volume 15, Revision 1, "Consolidated Guidance About Materials Licenses: Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses". The document can be found at the following location: <https://www.nrc.gov/docs/ML1618/ML16181A003.pdf> or at <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v15/>

If you answered the pertinent questions found in Appendix E, we should be able to complete this more quickly. Additionally, Appendices B - D contain additional background information on the legal basis for changes of control, examples of changes of control, and recommended actions for various types of transactions.

I am working away from my desk at the moment, so if you have questions, please email me. Tomorrow, I will also be available by telephone to 610-337-5040.

Betsy Ullrich, Senior Health Physicist

-----Original Message-----

From: Reichard, Michael

Sent: Monday, August 19, 2019 1:36 PM

To: Barry Roziewski <broziewski@usanova.com>

Cc: Randall L. Bagwell <rlbagwell@usanova.com>; Ullrich, Elizabeth <Elizabeth.Ullrich@nrc.gov>

Subject: RE: RE: Notification for License No. 10-31353-01

Mr. Roziewski,

Your request is being processed by our Licensing Assistance Team. It hasn't been assigned to anyone yet. I've CCed Betsy Ullrich, because she's tracks licensing assignments and statuses. These types of actions typically take 90 days, which I understand isn't what you desired. She'll be able to discuss this with you.

Michael Reichard

Health Physicist

Division of Nuclear Materials Safety

United States Nuclear Regulatory Commission Michael.reichard@nrc.gov

610-337-6945 (o)

610-420-5338 (c)

-----Original Message-----

From: Barry Roziewski [<mailto:broziewski@usanova.com>]
Sent: Monday, August 19, 2019 10:11 AM
To: Reichard, Michael <Michael.Reichard@nrc.gov>
Cc: Randall L. Bagwell <rlbagwell@usanova.com>
Subject: [External_Sender] RE: Notification for License No. 10-31353-01

Mr. Reichard,

Would it be possible to obtain an approximate time line for receiving a response to the notification provided by the attached letter?

Thanks in advance for your response.

BARRY ROZIEWSKI
Radiation Safety Officer

678.631.2903 (direct) 678.898.9181 (mobile)

"When we all work together to address hazards, we can do the best job possible to ensure employees go home safely each day."

-----Original Message-----

From: Reichard, Michael <Michael.Reichard@nrc.gov>
Sent: Thursday, August 08, 2019 7:23 AM
To: Barry Roziewski <broziewski@usanova.com>
Subject: Read: Notification for License No. 10-31353-01

Sender is External. Please be careful opening links and attachments.
