

UNC RESOURCES

UNC Crescent Plaza Falls Church, Virginia 22043
7700 Leesburg Pike Telephone 703/821-7900

June 16, 1981

Mr. R. G. Page, Chief
Uranium Fuel Licensing Branch
Division of Fuel Cycle and Material Safety
U S Nuclear Regulatory Commission
7915 Eastern Avenue
Silver Springs, Maryland 20910

Subject: Amendment of Licenses

Reference: 1) SNM License 368 -1A

2) By-Product License 06-96884-01 -3L (amend #17 issued 2/24/81).
no action necessary.

Dear Mr. Page:

Pursuant to 10 C.F.R. §§ 30.34(b), 40.46, and 70.36, United Nuclear Corporation, a Delaware corporation ("United") and UNC Resources, Inc. ("Resources"), a Virginia corporation, which owns all of the outstanding capital stock of United hereby request the United States Nuclear Regulatory Commission (the "Commission") to give its written consent to amendment of the above-referenced licenses to change the name of the licensee to UNC Naval Products, Division of UNC Resources, Inc.

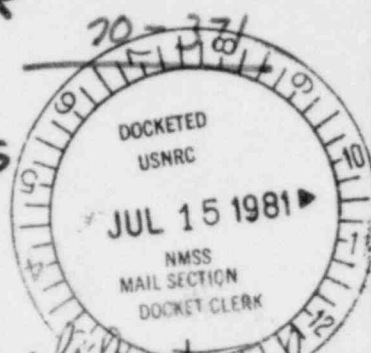
The licensed activities have been conducted by United through its division named UNC Naval Products (the "Division"). It is proposed that such activities shall hereafter be conducted through a division of Resources, also named UNC Naval Products.

Management of United and Resources is of the opinion that restructuring the Division as a division of Resources will be advantageous in better maintaining the overall separateness of such business from other businesses conducted by United (presently, its most significant other business is the mining and milling of uranium). Because most of the business of the Division has consisted of work under contracts with the U. S. Naval Reactors Program, this business has special needs and responsibilities relating to such matters as security and accounting not generally applicable to United's other businesses.

The proposed restructuring of the Division will not effect any substantive change in the present obligations and responsibilities of the Division with respect to the licenses proposed to be transferred. All of the business and properties of the Division will be transferred to Resources, which will assume the agreement, obligations, and responsibilities of United relating to such business and properties. It is anticipated that all

PDR

RETURN TO
D. CRAMER
39655



JUN 19 PM 12 15

Applicant...
Check No. 133261 (1990)
Amount/Fee Category...
Type of Fee...
Date Check Rec'd. 7/13/81
Received By...
Child Peterson

FEE EXEMPT
add'l info to 11/19/81 request
adv fee paid
19271

Mr. R. G. Page, Chief
Uranium Fuel Licensing Bureau
page two

Division employees will become employees of Resources with no change in management positions or relationships. All statements, representations, agreements, and procedures contained in the applications and correspondence filed by United and identified in the licenses listed in Exhibit A and amendments thereto will be applicable and binding upon Resources. All insurance policies of United applicable to the Division that are presently in effect pursuant to the provisions of the Price-Anderson Act will remain unchanged, with appropriate endorsements to reflect the restructuring of the Division.

The proposed transfers of licenses are in accordance with the Atomic Energy Act of 1954, as amended (the "Atomic Energy Act"). They would not affect any of the substantive findings previously made in connection with the issuance of the licenses, as amended, specifically:

1. The activities conducted under each license, as amended, will not be changed as a result of the restructuring of the Division. Therefore, based upon prior findings by the Commission, the activities will be conducted for purposes authorized by the Atomic Energy Act and will not be inimical to the common defense and security or to the health and safety of the public.
(10 C.F.R. §§ 30.33(a)(1), 40.32(a) and (d), and 70.23(a)(1).

2. The equipment, facilities and procedures at the Division's Montville, Connecticut plant will not be changed as a result of the restructuring of the Division. Therefore, based upon prior findings by the Commission, the equipment, facilities and procedures will remain adequate to protect health and minimize damage to life and property.
(10 C.F.R. §§ 30.33(a)(2), 40.32(c) and 70.23(a)(3) and (4).

3. The Division's personnel and their technical qualifications will not be changed as a result of the restructuring. Therefore, based upon prior findings by the Commission, Resources will be qualified by training and experience to use the materials under the licenses, as amended, in a manner as to protect health and minimize danger to life and property.
(10 C.F.R. §§ 30.33(a)(3), 40.32(b), and 70.23(a)(2)).

Mr. R. G. Page, Chief
Uranium Fuel Licensing Bureau
page three

4. All of the operating assets of the Division will become assets of Resources. It is submitted that, with respect to licenses issued pursuant to Part 70, Resources will be financially qualified to engage in the activities authorized by those licenses, including any decommissioning costs.
(10 C.F.R. § 70.23(a)(5)).

5. The directors and principal officers of United and Resources will all be United States citizens, and neither United nor Resources is dominated by an alien, a foreign corporation, or a foreign government.

Since none of the licenses were issued pursuant to Section 103 of the Atomic Energy Act (42 U.S.C. § 2133), no antitrust review is required in connection with the issuance of the requested amendments (42 U.S.C. § 2135).

Since the issuance of the requested consents is not an action described in 10 C.F.R. § 51.5(a) or (b), it does not require the preparation of an environmental impact statement, negative declaration or environmental impact appraisal. (10 C.F.R. § 51.5(d)(4)). Since the requested consents relate only to a change in corporate ownership and not to any substantive change in the terms of the licenses, as amended, the requested consents would not authorize any change in the types, or any increase in the amounts, of effluents or any increase in the potential for accidental releases under the licenses.

No prior notice is required under the Atomic Energy Act or the regulations thereunder in order for the Commission to issue the requested consents.

United and Resources further request that all applications of the UNC Naval Products Division of United pending before the Commission at the time the restructuring becomes effective be deemed to be applications of UNC Naval Products Division of Resources, and that the statements contained herein be incorporated in such applications.

Your early attention to our request for consents to transfers of the subject licenses would be greatly appreciated.

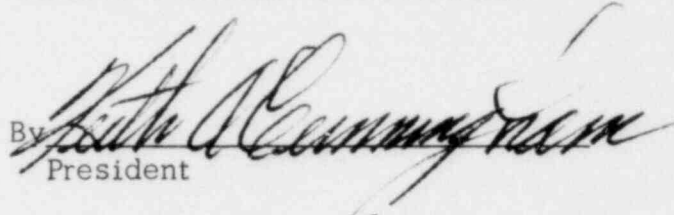
This request modifies and supersedes the request made in letter dated January 19, 1981, addressed to you by United Nuclear Corporation and UNC Naval Products, Inc.

Mr. R. G. Page, Chief
Uranium Fuel Licensing Bureau
page four

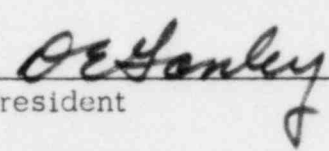
If you have any questions or require any additional information,
please contact Glenn O. Amy at UNC Naval Products, 67 Sandy Desert
Road, Uncasville, Connecticut 06382, telephone 203-848-1511.

Very truly yours,

UNITED NUCLEAR CORPORATION

By 
President

UNC NAVAL PRODUCTS, Division of
UNC RESOURCES, INC.

By 
President

CC: W. T. Crowe
NRC, Washington