

DED/DCB



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November 27, 1990

Mr. Roy J. Caniano  
Chief  
Nuclear Materials Safety  
Section 2  
United States Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Dear Mr. Caniano:

Re: Licence No. 24-08918-01  
Docket No. 030-05106

In accordance with the requirements of 10 CFR 2.201, Pea Ridge Iron Ore Company, Inc. ("Pea Ridge") submits the following written statement concerning the above captioned citation:

1. Pea Ridge has submitted a request for the consent of the United States Nuclear Regulatory Commission ("Commission") to the indirect transfer of control of the above captioned license which occurred on June 29, 1990, when St. Joe Minerals Corporation sold all the outstanding capital stock of Pea Ridge to Big River Minerals Corporation. A copy of the request is attached hereto as Exhibit A. Pea Ridge has not received a response from the Commission because of the time involved; a copy of the response will, however, be forwarded to you when it is received.
2. Because the circumstance which resulted in the citation (the sale of Pea Ridge's stock) is unlikely to occur in the near future, if ever, further corrective steps are not necessary. However, to assure there is no violation if the circumstances should occur again, a copy of pertinent portions of the Commission's regulations will be placed in the file where the permit is maintained along with a copy of this letter. A copy of pertinent portions of the regulations is attached hereto as Exhibit B. Since a lack of understanding of the requirement of consent under the narrow circumstances caused the citation, this action should prevent any future similar occurrence.
3. Pea Ridge's commitment in paragraph 2 hereof occurred today. Full compliance will be achieved on the date of the determination of

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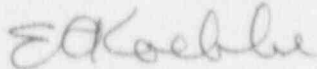
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United States Nuclear Regulatory Commission  
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Commission on Pea Ridge's request for the consent to the transfer. A copy thereof will be furnished to you after Pea Ridge receives a copy of the Commission's determination.

Very truly yours,



E. R. Koebbe  
General Manager