



Teledyne e2v US, a business unit
of Teledyne Digital Imaging US,
Inc.
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U.S. Nuclear Regulatory Commission,
ATTN: Document Control Desk,
Washington, D.C. 20555

6 March 2020

Dear Sirs,

Reply to a Notice of Violation

This letter by Teledyne e2v US, a business unit of Teledyne Digital Imaging US, Inc. ("Teledyne") responds to the United States Nuclear Regulatory Commission's ("NRC") notice of violation dated February 7, 2020, following an inspection conducted on December 20, 2019 through January 28, 2020 in relation to license no. 31-23630-02E ("License"). The notice of violation related to the transfer of control of the License.

(1) The reason for the violation, or, if contested, the basis for disputing the violation:

Teledyne Technologies Incorporated was not made aware of the License and its requirements prior to its subsidiary, Rhombi Holdings Limited, completing the purchase of stock of e2v technologies plc of which e2v technologies Inc. (later called Teledyne e2v US, Inc.) was an indirect wholly owned subsidiary ("the Transaction").

(2) The corrective steps that have been taken and the results achieved:

Following completion of the Transaction on March 28, 2017, the Transaction was notified to the NRC on July 2, 2018. The notification on July 2, 2018 also requested a change of name from e2v technologies, Inc. to Teledyne e2v US, Inc. The notification incorrectly referred to an acquisition date of 28 October 2017 rather than 28 March 2017.

On July 3, 2018, the NRC acknowledged the notification letter dated July 2, 2018 confirming the amendment to the License and that there were no administrative omissions identified during its initial review.

On 21 August, 2018, the NRC issued amendment No.9 to the License in the name of Teledyne e2v US, Inc.

Therefore, the corrective steps have been taken in relation to this violation notice and the results achieved.

(3) The corrective steps that will be taken to avoid further violations:

This NRC requirements outlined under 10 CFR 30.34(b)(1) are now known to Teledyne's local and corporate management teams.



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As a result of this visibility, Teledyne would also like to notify the NRC of the following changes of control within the Teledyne corporate group that occurred after 28 March 2017, but related to and were made in connection with the Transaction:

On March 31, 2017, Teledyne e2v Limited transferred to Rhombi Holdings Limited all of the outstanding stock of e2v holdings, inc. (later called Teledyne e2v Holdings, Inc.) of which e2v technologies inc. was a direct wholly owned subsidiary.

On March 31, 2017, Rhombi Holdings Limited transferred to Teledyne Technologies Incorporated all of the outstanding stock of e2v holdings, Inc.

On September 30, 2018, Teledyne e2v Holdings, Inc. transferred all of the outstanding stock of Teledyne e2v US, Inc. to Teledyne Technologies Incorporated.

On September 30, 2018, Teledyne Technologies Incorporated transferred all of the outstanding stock of Teledyne e2v US, Inc. to Teledyne Instruments, Inc.

On December 31, 2018, Teledyne e2v US, Inc. merged with and into Teledyne Digital Imaging US, Inc.

Notwithstanding the foregoing, Teledyne Technologies Incorporated remained the ultimate parent company of the holder of the License during this period.

(4) The date when full compliance will be achieved:

On February 4, 2020, the NRC issued amendment no.10 to the License to Teledyne e2v US, a business unit of Teledyne Digital Imaging US, Inc. on February 4, 2020.

Therefore, the License is now issued in the correct name of Teledyne e2v US, a business unit of Teledyne Digital Imaging US, Inc.

As noted above, the requirements set forth 10 CFR 30.34(b)(1) are now known to the local and corporate management teams of Teledyne Technologies Incorporated, and Teledyne will comply with these requirements in the event of future changes in control of the holder of the License.

If you have any further questions regarding this matter, please contact Vijay Patel (Vijay.Patel@teledyne.com).

Yours faithfully,

Vijay Patel
Head of Business Development – Americas

cc. Regional Administrator, Region I