

From: [Jones, Andrea](#)
To: [Savoy, Joanne](#)
Subject: FW: RE: ?RE: Re: ?Follow-up Questions
Date: Monday, May 04, 2020 2:01:15 PM

From: Jones, Andrea
Sent: Monday, April 13, 2020 4:00 PM
To: csimmons@csimmonslaw.com
Cc: Habighorst, Peter <Peter.Habighorst@nrc.gov>
Subject: FW: RE: ?RE: Re: ?Follow-up Questions

Mr. Simmons:

As per our conversation, please find the questions that I sent Southern Ionics regarding the apparent transfer of control. We look forward to seeing your response.

From: Jones, Andrea
Sent: Wednesday, March 25, 2020 12:41 PM
To: Renner, James <james.renner@chemours.com>
Subject: RE: RE: ?RE: Re: ?Follow-up Questions

I understand.

From: Renner, James <james.renner@chemours.com>
Sent: Wednesday, March 25, 2020 12:40 PM
To: Jones, Andrea <Andrea.Jones2@nrc.gov>
Subject: [External_Sender] RE: ?RE: Re: ?Follow-up Questions

Hey Andrea – It will take me a couple days to respond. I need additional info from colleagues. Jim



James F. Renner, P.G.
Manager of Environmental Stewardship
2649 Zero Bay Road Patterson, GA 31557
☎ (912) 215-9318 | Email: james.renner@chemours.com

From: Jones, Andrea [<mailto:Andrea.Jones2@nrc.gov>]

Sent: Wednesday, March 25, 2020 12:03 PM

To: Renner, James <james.renner@chemours.com>

Cc: Savoy, Joanne <Joanne.Savoy@nrc.gov>; Chimood, Jane <Jane.Chimood@nrc.gov>; Baker, Stephen <Stephen.Baker@nrc.gov>; Habighorst, Peter <Peter.Habighorst@nrc.gov>

Subject: ?RE: Re: ?Follow-up Questions

External email. Confirm links and attachments before opening.

Look forward to your response.

From: Renner, James <james.renner@chemours.com>

Sent: Tuesday, March 24, 2020 5:38 PM

To: Jones, Andrea <Andrea.Jones2@nrc.gov>

Cc: Savoy, Joanne <Joanne.Savoy@nrc.gov>; Chimood, Jane <Jane.Chimood@nrc.gov>; Baker, Stephen <Stephen.Baker@nrc.gov>

Subject: [External_Sender] Re: ?Follow-up Questions

Thanks Andrea. I received this email and will respond tomorrow.

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From: Jones, Andrea <Andrea.Jones2@nrc.gov>

Sent: Tuesday, March 24, 2020 5:30:43 PM

To: Renner, James <james.renner@chemours.com>

Cc: Savoy, Joanne <Joanne.Savoy@nrc.gov>; Chimood, Jane <Jane.Chimood@nrc.gov>; Baker, Stephen <Stephen.Baker@nrc.gov>

Subject: ?Follow-up Questions

External email. Confirm links and attachments before opening.

This question of transfer of control is determined on whether authority over the license has transferred.

Prior to August 2019, was Southern Ionics the parent company, with Southern Ionic Minerals as its subsidiary? Reporting to Southern Ionics?

After the sale, who owned Southern Ionics? What entity controlled Southern Ionics? Did Southern Ionics continue to exist?

Does Chemours Company report to Southern Ionics? The parent company?

Does Chemours Company have any authority?

Can you explain the state... "In 2020 we intend to change the name of the Licensee (exporter) from "Southern Ionics Minerals LLC" to "The Chemours Company FC, LLC" when SIM is retired as a wholly-owned subsidiary of Chemours and becomes a business unit in the Titanium Technologies business group." What business transactions will result

from those transactions?

From my review, it appears that Chemours is the Parent Company.

The guidance we have received from our Office of General Counsel is:

- Direct transfer of control—results from a change to the licensee itself.
- Indirect transfer of control—results from a change to a parent company or establishment of a new company with control over the licensee (where the licensee is left unchanged).

Does the transaction fall under any of the aforementioned transfers of controls? I have my thoughts, but I believe an illustrative, org chart and answers to the questions will help to shed light on whether this is a simple name change or transfer of control.

It is also possible that they were both a direct and indirect transfer of control, i.e. change in Southern Ionics to SIMS then change in Parent Company. I'm hoping your supplemental information can shed some light.

Applicable regulation: 10 C.F.R. § 110.50(d) provides that a specific license may be transferred to another person "only with the approval of the Commission by license amendment." We are trying to figure out if a transfer occurred.

Andrea R. Jones
Sr. Licensing Officer/Office of International Programs
Location: US NRC/Region II/Office 1469
404-997-4443