

From: [Desai, Sachin](#)
To: [Simmons, Michelle](#)
Cc: [Roma, Amy C.](#)
Subject: [External_Sender] RE: RE: RE: License Transfer Filing for Atlas Companies (License No. 04-35210-01)
Date: Thursday, June 18, 2020 4:18:36 PM

Hi Michelle,

Thank you for reaching out. Since the NRC has concurred that no change of control approval is required for the transaction described in the application, then we can withdraw the license transfer application. We will submit the requisite form to process the name change promptly upon closing of the internal reorganization.

Sachin

From: Simmons, Michelle [<mailto:Michelle.Simmons@nrc.gov>]
Sent: Thursday, June 18, 2020 3:49 PM
To: Desai, Sachin
Cc: Roma, Amy C.
Subject: RE: RE: RE: License Transfer Filing for Atlas Companies (License No. 04-35210-01)

Would you like to withdraw your request for transfer of control since it is not needed? I have to close out the action.

Thanks

From: Desai, Sachin <sachin.desai@hoganlovells.com>
Sent: Wednesday, June 10, 2020 12:02 PM
To: Simmons, Michelle <Michelle.Simmons@nrc.gov>
Cc: Roma, Amy C. <amy.roma@hoganlovells.com>
Subject: [External_Sender] RE: RE: License Transfer Filing for Atlas Companies (License No. 04-35210-01)

Michelle,

Great to hear, thank you very much. That hopefully makes all our jobs easier. Per the filing, we will submit the requisite form to process the name change promptly upon closing of the internal reorganization. Have a great rest of the week.

Sachin

From: Simmons, Michelle [<mailto:Michelle.Simmons@nrc.gov>]
Sent: Wednesday, June 10, 2020 12:10 PM
To: Desai, Sachin
Cc: Roma, Amy C.
Subject: RE: RE: License Transfer Filing for Atlas Companies (License No. 04-35210-01)

Morning,

I heard back from our regional counsel. This is not a change of control, given that the transferor is a wholly-owned subsidiary of the transferee and the personnel, locations, equipment, etc. involved in licensed activities will remain unchanged.

Thank you

Michelle R. Simmons
Senior Health Physicist
Nuclear Regulatory Commission
Materials Licensing and Decommissioning Branch
Region IV
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Arlington, Texas 76011
817-200-1590

From: Desai, Sachin <sachin.desai@hoganlovells.com>
Sent: Friday, June 05, 2020 8:45 AM
To: Simmons, Michelle <Michelle.Simmons@nrc.gov>
Cc: Roma, Amy C. <amy.roma@hoganlovells.com>
Subject: [External_Sender] RE: License Transfer Filing for Atlas Companies (License No. 04-35210-01)

Hi Michelle,

Thank you very much for letting us know. We look forward to talking when you hear back, and have a great weekend if we do not talk before.

Sachin

From: Simmons, Michelle [<mailto:Michelle.Simmons@nrc.gov>]
Sent: Friday, June 5, 2020 8:40 AM
To: Desai, Sachin
Cc: Roma, Amy C.
Subject: RE: License Transfer Filing for Atlas Companies (License No. 04-35210-01)

Good morning,

Our general counsel is reviewing the documents. Once I received a message from him, I will pass it on to you.

Thanks

From: Desai, Sachin <sachin.desai@hoganlovells.com>
Sent: Thursday, June 04, 2020 6:34 PM
To: Simmons, Michelle <Michelle.Simmons@nrc.gov>

Cc: Roma, Amy C. <amy.roma@hoganlovells.com>

Subject: [External_Sender] License Transfer Filing for Atlas Companies (License No. 04-35210-01)

Dear Michelle,

I hope you are doing well. I called and left a message to discuss an application for approval for transfer of control of License No. 04-35210-01--or concurrence that there is no transfer of control. Amy (cc'ed) and I represent Atlas and its member companies in nuclear regulatory matters. Roberto informed me that you are the assigned reviewer.

I wanted to ask if you have a few minutes to discuss the filing, which describes an internal reorganization that is planned for 7/1. We took a conservative position and filed a license transfer application so all the information is before the NRC. But in the end what is happening is an internal reorganization without any change in ultimate ownership, so it appears likely the NRC would determine a license transfer approval is not necessary prior to the reorganization.

Given the request for expedited review, would it be beneficial to go over the transaction and see if you agree that there is no change of control? This could avoid the need for a full license transfer review and take the matter off your plate.

Happy to talk at your convenience, and thank you very much for your time.

Kind regards,
Sachin

Sachin Desai

Senior Associate

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If you would like to know more about how we are managing the impact of the COVID-19 pandemic on our firm then take a look at our brief [Q&A](#). If you would like to know more about how to handle the COVID-19 issues facing your business then take a look at our [information hub](#).

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