

June 29, 2020

Sent via email

Ms. Erin Kennedy
Health Physicist
Materials Licensing Branch
U.S. Nuclear Regulatory Commission
Region III
2443 Warrenville Rd., Suite 210
Lisle, IL 60532-4352

RE: Materials License No. 34—24957-02; Document 1000.300.0711

Dear Ms. Kennedy:

As a follow up to our telephone conversation on June 25, 2020, this letter is provided in regard to a potential change of control determination. Our firm, Hull & Associates, LLC (“Hull”), is in the final stages of negotiating and preparing for a transaction that will result in a change of majority control of Hull. Hull’s company name, Federal Tax ID number, equipment, facilities, and personnel related to the licensed program will not change.

Please note that Hull is currently storing and operating our licensed gauges within the State of Ohio, which, as an Agreement State, has jurisdiction of our operations in Ohio. We have been in contact with the Ohio Department of Health Bureau of Environmental Health and Radiation Protection and are adhering to their requirements for this transaction.

Please find below responses to the nine questions provided in NUREG 1556 Vol. 15 Appendix E – Change of Control Application. Upon review hereof and after completion of comment periods, Hull requests that the Commission grant consent for the change of control described herein or otherwise convey to Hull a determination that no adverse action will be taken by the Commission due to such change of control. Please also confirm that Hull remains in good standing and can continue operating with no interruptions while this change of control request is under review. All of Hull’s gauges are now in Ohio only and, therefore, are governed by Ohio Department of Health.

- 1. Describe any planned changes in the organization, including but not limited to, transfer of stocks or assets and mergers, change in members on Board of Directors, etc. Provide the new licensee name, mailing address, and contact information, including phone numbers. Clearly identify when the amendment is due to a name change only.**

RTC Environmental Services, LLC, is acquiring all of the equity interests of Hull & Associates, LLC fka Hull & Associates, Inc. (“Hull”). All but three current Hull beneficial owners will remain partly invested, indirectly, in Hull. Hull will continue to operate under the same name with the same tax identification number and the organization will not change except for a new CEO as described in the response to question 2 below.

Under the new arrangement, RTC Environmental Services, LLC will own National EC Services, Inc., which will own 99.5% of Hull. The remaining 0.5% will be owned by all but three of the current Hull beneficial owners. The board for National EC Services, Inc. will govern the entities.

The license name, mailing address, and contact information, including phone numbers will not change.

- 2. Describe any changes in personnel or duties that relate to the licensed program. Include training and experience for new personnel and any changes in the training program.**

There will be one change in personnel or duties that relate to the licensed program. Hull will hire a new Chief Executive Officer, Gerald Salontai. Mark Zakrzewski will remain Hull's Radiation Safety Officer. His duties with respect to the program and the remainder of our current program, training, facilities, and equipment will not change.

- 3. Describe any changes in the location, facilities, equipment, radiation safety program, use, possession, waste management, or other procedures that relate to the licensed program.**

There will be no change in the location, facilities, equipment, radiation safety program, use, possession, waste management, or other procedures that relate to the licensed program.

- 4. Describe the status of the licensee's facilities, equipment, and radiation safety program, including any known contamination and whether decontamination will occur prior to transfer. Include status of calibrations, leak tests, area surveys, wipe tests, training, quality control, and related records.**

There is no change in status of any facilities, equipment, or radiation safety programs. All required surveillance has been performed, documented, and reviewed. Attached please find copies of the most recent leak tests for each of our nine portable soil density/moisture gauges.

- 5. If current decommissioning funding plans (DFP) will be changed as a result of the transfer, the revised DFP should be submitted. If other financial assurance documents will be changed as a result of the transfer, confirm that all financial assurance instrument associated with the license will be held in the transferee's name before the license is transferred, and as required by 10CFR30.35(f), the licensee must, within 30 days, submit financial instruments reflecting such changes.**

Not applicable, the license will remain with Hull & Associates, LLC.

- 6. Confirm that all records concerning the safe and effective decommissioning of the facility will be transferred to the transferee or to NRC, as appropriate. These records include documentation of surveys of ambient radiation levels and fixed and/or removable contamination, including methods and sensitivity.**

No decommissioning of any facility will occur as part of the business transaction.

- 7. Confirm that by the transferor and transferee agree to transferring control of the licensed material and activity and the conditions of transfer, and that the transferee has been made aware of any inspection items and its responsibility for possible resulting enforcement actions.**

The transferor and transferee agree as indicated on the letter provided.

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- 8. Confirm that the transferee will abide by all constraints, conditions, requirements, representations, and commitments of the transferor or that the transferee will submit a complete description of the proposed licensed program.**

The transferee will abide by all constraints, conditions, requirements, representations, and commitments of the transferor.

- 9. The transferee, in the case of fuel cycle facilities, shall provide documentation showing that it is financially qualified to conduct normal operation. The information can be in the form of income statements and balance sheet forecasts.**

Not applicable.

If you have any questions, please feel free to contact me via email at mzakrzewski@hullinc.com or at 216-505-7746.

Sincerely,



Mark F. Zakrzewski, CSP
Health & Safety Officer / RSO

Attachment: Leak Test Documentation

Cline's Technical Services, Inc.

10883 Cincinnati Zanesville Road - Amanda, Ohio 43102 - Ph 740.969.2720 Fax 740.969.2122

Leak Test Report

HULL & ASSOCIATES, INC.
4 Hemisphere Way
Bedford, OH 44146

Model Number: CPN MC 3

Serial Number: M37067683

Isotope: Cs-137 10 mCi
Am-241/Be 50 mCi

Date of test: 02-20-2020

The sample and information above was submitted for leak test analysis.

Analysis date: 02-25-2020

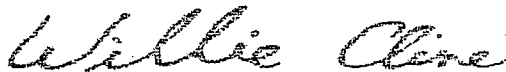
Analysis Number: 6322

Results: Removable Contamination < 1 Becquerel "Bq" or < 2.7027027027027E-05 Ci
(note: < = less than)

Note:

The US Nuclear Regulatory Commission and Agreement States require that the analysis of the wipe from a sealed source be capable of detecting the presence of 185 Becquerel (or 0.005 micro curie) on the sample. { The count on this wipe is below 185 Bq. } The Source is not considered leaking. This report should be retained for viewing by regulatory agencies.

Signed



Office of Radiation Safety
Ohio Materials License No. 03225230000

Cline's Technical Services, Inc.

10883 Cincinnati Zanesville Road - Amanda, Ohio 43102 - Ph 740.969.2720 Fax 740.969.2122

Leak Test Report

HULL & ASSOCIATES, INC.
4 Hemisphere Way
Bedford, OH 44146

Model Number: CPN MC 3

Serial Number: M38048170, # 2

Isotope: Cs-137 10 mCi
Am-241/Be 50 mCi

Date of test: 04-08-2020

The sample and information above was submitted for leak test analysis.

Analysis date: 04-10-2020

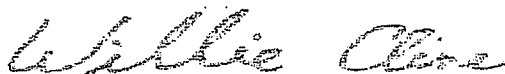
Analysis Number: 6427

Results: Removable Contamination < 1 Becquerel "Bq" or < 2.7027027027027E-05 Ci
(note: <= less than)

Note:

The US Nuclear Regulatory Commission and Agreement States require that the analysis of the wipe from a sealed source be capable of detecting the presence of 185 Becquerel (or 0.005 micro curie) on the sample. { The count on this wipe is below 185 Bq. } The Source is not considered leaking.
This report should be retained for viewing by regulatory agencies.

Signed



Office of Radiation Safety
Ohio Materials License No. 03225230000

Cline's Technical Services, Inc.

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Leak Test Report

HULL & ASSOCIATES, INC.

4 Hemisphere Way
Bedford, OH 44146

Model Number: CPN MC 3

Serial Number: M38118605, (# 3)

Isotope: Cs-137 10 mCi
Am-241/Be 50 mCi

Date of test: 02-20-2020

The sample and information above was submitted for leak test analysis.

Analysis date: 02-25-2020

Analysis Number: 6320

Results: Removable Contamination < 1 Becquerel "Bq" or < 2.7027027027027E-05 Ci
(note: <= less than)

Note:

The US Nuclear Regulatory Commission and Agreement States require that the analysis of the wipe from a sealed source be capable of detecting the presence of 185 Becquerel (or 0.005 micro curie) on the sample. { The count on this wipe is below 185 Bq. } The Source is not considered leaking.
This report should be retained for viewing by regulatory agencies.

Signed



Office of Radiation Safety
Ohio Materials License No. 03225230000

Cline's Technical Services, Inc.

10883 Cincinnati Zanesville Road - Amanda, Ohio 43102 - Ph 740.969.2720 Fax 740.969.2122

Leak Test Report

HULL & ASSOCIATES, INC.
4 Hemisphere Way
Bedford, OH 44146

Model Number: CPN MC 3

Serial Number: M39079002

Isotope: Cs-137 10 mCi
Am-241/Be 50 mCi

Date of test: 06-26-2020

The sample and information above was submitted for leak test analysis.

Analysis date: 06-26-2020

Analysis Number: 6516

Results: Removable Contamination < 1 Becquerel "Bq" or < 2.7027027027027E-05 Ci
(note: <= less than)

Note:

The US Nuclear Regulatory Commission and Agreement States require that the analysis of the wipe from a sealed source be capable of detecting the presence of 185 Becquerel (or 0.005 micro curie) on the sample. { The count on this wipe is below 185 Bq. } The Source is not considered leaking.
This report should be retained for viewing by regulatory agencies.

Signed



Office of Radiation Safety
Ohio Materials License No. 03225230000

Cline's Technical Services, Inc.

10883 Cincinnati Zanesville Road - Amanda, Ohio 43102 - Ph 740.969.2720 Fax 740.969.2122

Leak Test Report

HULL & ASSOCIATES, INC.

4 Hemisphere Way
Bedford, OH 44146

Model Number: CPN MC 3

Serial Number: M30047478, (# 6)

Isotope: Cs-137 10 mCi
Am-241/Be 50 mCi

Date of test: 06-10-2020

The sample and information above was submitted for leak test analysis.

Analysis date: 06-26-2020

Analysis Number: 6515

Results: Removable Contamination < 1 Becquerel "Bq" or < 2.7027027027027E-05 Ci
(note: < = less than)

Note:

The US Nuclear Regulatory Commission and Agreement States require that the analysis of the wipe from a sealed source be capable of detecting the presence of 185 Becquerel (or 0.005 micro curie) on the sample. { The count on this wipe is below 185 Bq. } The Source is not considered leaking.
This report should be retained for viewing by regulatory agencies.

Signed _____

Willie Cline

Office of Radiation Safety

Ohio Materials License No. 03225230000

Cline's Technical Services, Inc.

10883 Cincinnati Zanesville Road - Amanda, Ohio 43102 - Ph 740.969.2720 Fax 740.969.2122

Leak Test Report

HULL & ASSOCIATES, INC.

4 Hemisphere Way
Bedford, OH 44146

Model Number: CPN MC 3

Serial Number: M320400835

11

Isotope: Cs-137 10 mCi
Am-241/Be 50 mCi

Date of test: 04-08-2020

The sample and information above was submitted for leak test analysis.

Analysis date: 04-10-2020

Analysis Number: 6428

Results: Removable Contamination < 1 Becquerel "Bq" or < 2.7027027027027E-05 Ci
(note: < = less than)

Note:

The US Nuclear Regulatory Commission and Agreement States require that the analysis of the wipe from a sealed source be capable of detecting the presence of 185 Becquerel (or 0.005 micro curie) on the sample. { The count on this wipe is below 185 Bq. } The Source is not considered leaking.
This report should be retained for viewing by regulatory agencies.

Signed



Office of Radiation Safety

Ohio Materials License No. 03225230000

Cline's Technical Services, Inc.

10883 Cincinnati Zanesville Road - Amanda, Ohio 43102 - Ph 740.969.2720 Fax 740.969.2122

Leak Test Report

HULL & ASSOCIATES, INC.

4 Hemisphere Way

Bedford, OH 44146

Model Number: CPN MC 3

Serial Number: M37097908 #12

Isotope: Cs-137 10 mCi
Am-241/Be 50 mCi

Date of test: 06-17-2020

The sample and information above was submitted for leak test analysis.

Analysis date: 06-26-2020

Analysis Number: 6498

Results: Removable Contamination < 1 Becquerel "Bq" or < 2.7027027027027E-05 Ci
(note: < = less than)

Note:

The US Nuclear Regulatory Commission and Agreement States require that the analysis of the wipe from a sealed source be capable of detecting the presence of 185 Becquerel (or 0.005 micro curie) on the sample. { The count on this wipe is below 185 Bq. } The Source is not considered leaking.
This report should be retained for viewing by regulatory agencies.

Signed _____

Willie Cline

Office of Radiation Safety

Ohio Materials License No. 03225230000

Cline's Technical Services, Inc.

10883 Cincinnati Zanesville Road - Amanda, Ohio 43102 - Ph 740.969.2720 Fax 740.969.2122

Leak Test Report

HULL & ASSOCIATES, INC.
4 Hemisphere Way
Bedford, OH 44146

Model Number: CPN MC 3

Serial Number: M350302544, (#13)

Isotope: Cs-137 10 mCi
Am-241/Be 50 mCi

Date of test: 02-19-2020

The sample and information above was submitted for leak test analysis.

Analysis date: 02-25-2020

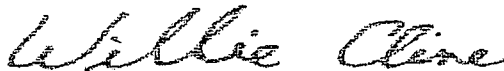
Analysis Number: 6319

Results: Removable Contamination < 1 Becquerel "Bq" or < 2.7027027027027E-05 Ci
(note: < = less than)

Note:

The US Nuclear Regulatory Commission and Agreement States require that the analysis of the wipe from a sealed source be capable of detecting the presence of 185 Becquerel (or 0.005 micro curie) on the sample. { The count on this wipe is below 185 Bq. } The Source is not considered leaking.
This report should be retained for viewing by regulatory agencies.

Signed



Office of Radiation Safety
Ohio Materials License No. 03225230000

Cline's Technical Services, Inc.

10883 Cincinnati Zanesville Road - Amanda, Ohio 43102 - Ph 740.969.2720 Fax 740.969.2122

Leak Test Report

HULL & ASSOCIATES, INC.
4 Hemisphere Way
Bedford, OH 44146

Model Number: CPN MC 3

Serial Number: M30602693

#14

Isotope: Cs-137 10 mCi
Am-241/Be 50 mCi

Date of test: 04-08-2020

The sample and information above was submitted for leak test analysis.

Analysis date: 04-10-2020

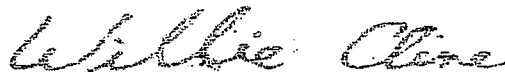
Analysis Number: 6418

Results: Removable Contamination < 1 Becquerel "Bq" or < 2.7027027027027E-05 Ci
(note: < = less than)

Note:

The US Nuclear Regulatory Commission and Agreement States require that the analysis of the wipe from a sealed source be capable of detecting the presence of 185 Becquerel (or 0.005 micro curie) on the sample. { The count on this wipe is below 185 Bq. } The Source is not considered leaking.
This report should be retained for viewing by regulatory agencies.

Signed



Office of Radiation Safety
Ohio Materials License No. 03225230000

HULL

Environment / Energy / Infrastructure

July 6, 2020

Sent via email

Ms. Erin Kennedy
Health Physicist
Materials Licensing Branch
U.S. Nuclear Regulatory Commission
Region III
2443 Warrenville Rd., Suite 210
Lisle, IL 60532-4352

RE: Materials License No. 34—24957-02; Document 1000.300.0712

Dear Ms. Kennedy:

Attached, please find documentation of a potential change of control determination with detail regarding the transaction between Hull & Associates, LLC (Hull) and RTC Environmental Services, LLC (RTC).

As requested, both Hull and RTC agree to transferring control of the licensed material and activity and the conditions of transfer, and that the RTC has been made aware of any inspection items and its responsibility for possible resulting enforcement actions. Additionally, RTC will abide by all constraints, conditions, requirements, representations, and commitments of Hull licensed program.

If you have any questions, please feel free to contact our Radiation Safety Officer, Mark Zakrzewski via email at mzakrzewski@hullinc.com or at 216-505-7746 or either of the undersigned at ckasper@hullinc.com or chris@rtcpartners.com.

Sincerely,



Craig A. Kasper
President, Hull & Associates, LLC



Christopher Lee
Managing Partner, RTC Environmental Services, LLC

Attachment: June 29 letter regarding change of control determination

Song, Taehoon

From: Kennedy, Erin
Sent: Monday, July 06, 2020 3:03 PM
To: Pavon, Sandy; Song, Taehoon
Cc: Tomczak, Tammy
Subject: New Change of Control Request
Attachments: NRC Cover Letter- 7-6-2020.docx; NRC Letter- 6-29-20.pdf

Good Afternoon Tae,

Please add the attached documents to ADAMS and control the action in as a new change of control request.

Thank you,

Erin

From: Mark Zakrzewski <mzakrzewski@hullinc.com>
Sent: Monday, July 06, 2020 2:57 PM
To: Kennedy, Erin <Erin.Kennedy@nrc.gov>
Subject: [External_Sender] RE: Question about potential license amendment requirement

Erin,
As requested, please find attached a letter signed by senior management of both companies involved in the transaction which occurred on July 1, 2020. Also attached is a letter from me containing responses to the nine change of control items. Please contact me with any questions or if you need additional information.
Thank you,

Mark F. Zakrzewski, CSP
Corporate Health & Safety Officer

One goal... no one gets hurt

HULL | Bedford, Ohio
Environment / Energy / Infrastructure

o: 216-505-7746 | c: 216-905-9087
Follow Hull on [Facebook](#) & [LinkedIn](#)
[Web](#) | [Directions to offices](#)

From: Kennedy, Erin <Erin.Kennedy@nrc.gov>
Sent: Thursday, June 25, 2020 10:00 AM
To: Mark Zakrzewski <mzakrzewski@hullinc.com>
Cc: Tomczak, Tammy <Tammy.Tomczak@nrc.gov>; Orlikowski, Robert <Robert.Orlikowski@nrc.gov>
Subject: RE: Question about potential license amendment requirement

Good morning Mark,

Thank you for discussing your potential change of control with me this morning. As we discussed, licensees need to obtain NRC's prior written consent for a transfer control and the request has to be publicly posted for 30 days to allow time for public comment. For your convenience, I have included a link to the guidance documents that you will need for submitting a transfer of control to the U.S. Nuclear Regulatory Commission. NUREG-1556 Volume 15, Rev. 1 "Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses"
(<https://www.nrc.gov/docs/ML1618/ML16181A003.pdf>) walks you through the steps needed for the NRC to

consider a change of control. I have attached Appendix E of this document which outlines the nine specific areas that we review. Please submit a letter signed by senior management from **both** companies and either incorporate your responses as outlined in Appendix E into the letter or include the items as an attachment. Please feel free to give me a call if you have any additional questions.

Thanks,

Erin Kennedy
U.S. Nuclear Regulatory Commission, Region III
Health Physicist- Materials Licensing
Email: erin.kennedy@nrc.gov
Office: 630-829-9876
Cell: 505-699-3675

From: Mark Zakrzewski <mzakrzewski@hullinc.com>
Sent: Wednesday, June 24, 2020 7:42 AM
To: Kennedy, Erin <Erin.Kennedy@nrc.gov>
Subject: [External_Sender] Question about potential license amendment requirement

Good morning Ms. Kennedy,
A couple months ago, we spoke about my company name change from “Hull & Associates, Inc.” to “Hull & Associates, LLC.” We are currently in discussions with a potential equity investor in our company. If the business deal proceeds, the company name and tax id number would not change and current owners of the company would remain, in addition to the equity investor. You had mentioned needing additional information for a license amendment if there is a “change of control.” My question is: If the name “Hull & Associates, LLC” and tax ID number remain the same, whether the addition of the equity investor would require another license amendment or if you would need more information. Finally, what is the required timing of notification if the business deal proceeds.

Feel free to call me to discuss. I will be on the road much of today, so if I can’t take your call immediately because I’m driving, I’ll return your call as soon as I can find a safe place to stop call you back.

Thank you,
Mark

Mark F. Zakrzewski, CSP
Corporate Health & Safety Officer

One goal... no one gets hurt

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o: 216-505-7746 | c: 216-905-9087
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