



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
2100 RENAISSANCE BLVD.
KING OF PRUSSIA, PA 19406-2713

May 26, 2021

W. Hank Stack, P. E.
Vice President of Operations
Duffield Associates, LLC
5400 Limestone Road
Wilmington, DE 19808

SUBJECT: DUFFIELD ASSOCIATES, LLC, REQUEST FOR ADDITIONAL INFORMATION,
MAIL CONTROL NO. 624514

Dear Mr. Stack:

This is in reference to your letters dated January 25 and April 8, 2021, requesting to amend your license due to a name change, and notifying us of an indirect change of control (company ownership) for NRC License No. 07-17431-01. In order to continue our review, we need the following additional information:

1. Describe the status of your facilities and licensed devices, including any known contamination or leakage of sources, leak test, inventory, training and recordkeeping. If there is known contamination or leakage, confirm the Hull & Associates, LLC has accepted the facilities and equipment "as is".
2. Confirm if Duffield Associates, LLC will maintain records important to decommissioning, or if such records will be transferred to Hull & Associates, LLC.
3. Confirm that both the Duffield Associates and Hull & Associates, LLC agree to the transfer of control of the licensed material and activity, and the conditions of transfer, and that the Hull & Associates, LLC has been made aware of any open inspection items and its responsibility for possible resulting enforcement actions.
4. Confirm that Hull & Associates, LLC will abide by all constraints, conditions, requirements, representations, and commitments of the license issued to Duffield Associates, Inc. Alternately, Hull & Associates must submit a complete description of the proposed licensed program.
5. Confirm if Hull & Associates, LLC possesses an NRC or Agreement State license for similar activities. If so, provide the license number and name of the licensee. If not, provide the name and contact information for an individual at Hull & Associates, LLC that we may contact prior to approval of the indirect transfer of control.

We will continue our review upon receipt of this information. Please reply to my attention at:

Betsy Ullrich
Mail Control No. 624514
USNRC, Region I
Division of Nuclear Materials Safety
2100 Renaissance Boulevard
King of Prussia, PA 19406

Or you may send a pdf copy of the signed letter by email to:

R1DRSSMail.Resource@nrc.gov
Reference – Betsy Ullrich
Mail Control No. 624515

In order to continue prompt review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter.

An electronic version of the NRC's regulations is available on the NRC Web Site at: www.nrc.gov. Additional information regarding use of radioactive materials may be obtained on the NRC Web Site at: <http://www.nrc.gov/materials/miau/mat-toolkits.html>. This site also provides the link to the toolbox for updated information on the revised regulations for naturally-occurring and accelerator-produced radioactive materials (NARM).

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS). ADAMS is accessible from the NRC Web Site at: <http://www.nrc.gov/reading-rm/adams.html>. Please be aware that you may request that certain portions of your submittal to NRC be withheld from public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390. You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.

If you have any questions regarding this request for additional information, please contact me at (610) 337-5040 or by electronic mail to Elizabeth.Ullrich@NRC.gov.

Thank you for your cooperation.

Sincerely,

Betsy Ullrich, Senior Health Physicist
Commercial, Industrial, R&D
and Academic Branch
Division of Nuclear Materials Safety
Region I

License No. 07-17431-01
Docket No. 030-12739
Mail Control No. 624514

cc: Michael S. Johnson, Radiation Safety Officer

DUFFIELD ASSOCIATES, LLC, REQUEST FOR ADDITIONAL INFORMATION, MAIL
CONTROL NO. 624514 DATED MAY 26, 2021

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SUNSI Review Complete: Betsy Ullrich

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