

May 28, 2021

*Via email*

Elizabeth Ullrich  
Senior Health Physicist  
Commercial, Industrial, R&D and Academic Branch  
Division of Nuclear Materials Safety  
Region 1  
2100 Renaissance Blvd.  
King Of Prussia, PA 19406-2713

RE: Amendment Request to  
NRC License No. 07-17431-01  
(Mail Control No. 624514)  
Duffield Associates, LLC  
Wilmington, DE

Dear Ms. Ullrich,

Thank you for your ongoing assistance with our license amendment request. Hopefully the following information that you requested in correspondence dated May 26, 2021, will help answer your remaining questions regarding our ownership transition.

There has been no change in the status of Duffield Associates, LLC's (Duffield) nuclear gauge surveillance system, facilities, leak testing, inventory, training and record keeping associated with the ownership transition. There has been no instances of contamination and/or leaking of radioactive sources. Hull & Associates, LLC has agreed to accept Duffield's facilities and equipment "as is."

As part of the ownership transfer, the transferee (Hull & Associates, LLC) will abide by all constraints, conditions, requirements and commitments of the transferor's (Duffield Associates, LLC) previously established radioactive materials licenses including, but not limited to, Duffield's nuclear gauge health and safety program including gauge use, transportation and storage procedures, as well as decommissioning requirements as applicable.

Duffield has no open inspection items. Should enforcement action occur, Hull & Associates, LLC is aware of their responsibility for possible enforcement actions.

Decommissioning information for facilities where Duffield has previously stored gauges (in the States of Delaware, New Jersey, Maryland and Pennsylvania) continues to be filed and stored with Duffield at our office in Wilmington, Delaware. Decommissioning and other nuclear gauge program related records will be made available to Hull & Associates, LLC upon request.

Hull & Associates, LLC maintains two radioactive materials licenses:

- Ohio Department of Health License For Radioactive Material, License No. 31210490005, expiration date February 1, 2026; and
- U.S. NRC Materials License, No. 34-24957-02, expires August 31, 2034.

Hull maintains the NRC License to facilitate nuclear gauge use in non-Agreement States and on Federal properties within Agreement States.

We appreciate your attention to this matter. Please contact us if you have any questions or require additional information.

Very truly yours,

DUFFIELD ASSOCIATES, LLC



Michael S. Johnson  
Radiation Safety Officer



W. Hank Stack, P.E.  
Vice President of Operations



Christopher Lee  
Sole Manager  
Hull & Associates, LLC

# Request for Taxpayer Identification Number and Certification

**Give Form to the  
requester. Do not  
send to the IRS.**

▶ Go to [www.irs.gov/FormW9](http://www.irs.gov/FormW9) for instructions and the latest information.

Print or type. See Specific Instructions on page 3.	1 Name (as shown on your income tax return). Name is required on this line; do not leave this line blank. <b>Hull &amp; Associates, LLC</b>		
	2 Business name/disregarded entity name, if different from above <b>Duffield Associates, LLC</b>		
	3 Check appropriate box for federal tax classification of the person whose name is entered on line 1. Check only <b>one</b> of the following seven boxes.		
	<input type="checkbox"/> Individual/sole proprietor or single-member LLC <input type="checkbox"/> C Corporation <input type="checkbox"/> S Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> Trust/estate		
	<input checked="" type="checkbox"/> Limited liability company. Enter the tax classification (C=C corporation, S=S corporation, P=Partnership) ▶ <u>  P  </u> <b>Note:</b> Check the appropriate box in the line above for the tax classification of the single-member owner. Do not check LLC if the LLC is classified as a single-member LLC that is disregarded from the owner unless the owner of the LLC is another LLC that is <b>not</b> disregarded from the owner for U.S. federal tax purposes. Otherwise, a single-member LLC that is disregarded from the owner should check the appropriate box for the tax classification of its owner.		
	<input type="checkbox"/> Other (see instructions) ▶		
	5 Address (number, street, and apt. or suite no.) See instructions. <b>5400 Limestone Road</b>		Requester's name and address (optional)
6 City, state, and ZIP code <b>Wilmington Delaware</b>		<b>for Nuclear registration</b>	
7 List account number(s) here (optional)			

## Part I Taxpayer Identification Number (TIN)

Enter your TIN in the appropriate box. The TIN provided must match the name given on line 1 to avoid backup withholding. For individuals, this is generally your social security number (SSN). However, for a resident alien, sole proprietor, or disregarded entity, see the instructions for Part I, later. For other entities, it is your employer identification number (EIN). If you do not have a number, see *How to get a TIN*, later.

**Note:** If the account is in more than one name, see the instructions for line 1. Also see *What Name and Number To Give the Requester* for guidelines on whose number to enter.

<b>Social security number</b>									
				-			-		
<b>or</b>									
<b>Employer identification number</b>									
3	4	-	1	5	4	9	8	2	9

## Part II Certification

Under penalties of perjury, I certify that:

1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me); and
2. I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding; and
3. I am a U.S. citizen or other U.S. person (defined below); and
4. The FATCA code(s) entered on this form (if any) indicating that I am exempt from FATCA reporting is correct.

**Certification instructions.** You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return. For real estate transactions, item 2 does not apply. For mortgage interest paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an individual retirement arrangement (IRA), and generally, payments other than interest and dividends, you are not required to sign the certification, but you must provide your correct TIN. See the instructions for Part II, later.

<b>Sign Here</b>	Signature of U.S. person ▶	Date ▶ <b>27 May 2021</b>
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## General Instructions

Section references are to the Internal Revenue Code unless otherwise noted.

**Future developments.** For the latest information about developments related to Form W-9 and its instructions, such as legislation enacted after they were published, go to [www.irs.gov/FormW9](http://www.irs.gov/FormW9).

## Purpose of Form

An individual or entity (Form W-9 requester) who is required to file an information return with the IRS must obtain your correct taxpayer identification number (TIN) which may be your social security number (SSN), individual taxpayer identification number (ITIN), adoption taxpayer identification number (ATIN), or employer identification number (EIN), to report on an information return the amount paid to you, or other amount reportable on an information return. Examples of information returns include, but are not limited to, the following.

- Form 1099-INT (interest earned or paid)

- Form 1099-DIV (dividends, including those from stocks or mutual funds)
- Form 1099-MISC (various types of income, prizes, awards, or gross proceeds)
- Form 1099-B (stock or mutual fund sales and certain other transactions by brokers)
- Form 1099-S (proceeds from real estate transactions)
- Form 1099-K (merchant card and third party network transactions)
- Form 1098 (home mortgage interest), 1098-E (student loan interest), 1098-T (tuition)
- Form 1099-C (canceled debt)
- Form 1099-A (acquisition or abandonment of secured property)

Use Form W-9 only if you are a U.S. person (including a resident alien), to provide your correct TIN.

*If you do not return Form W-9 to the requester with a TIN, you might be subject to backup withholding. See What is backup withholding, later.*