

From: [Ullrich, Betsy](#)
To: larry.adams@boothenergy.com; TPotter@archcoal.com
Subject: your letter dated March 8, 2021 for transfer of your NRC license
Date: Wednesday, June 09, 2021 9:56:00 AM

Mr. Adams and Mr. Potter,

I am reviewing the letter dated March 8, 2021, notifying us of a change of control for licensed materials from Southeastern Land, LLC to Coal-Mac LLC. In order to complete the review, I will need additional information.

1. Please provide the information requested in Appendix E of NUREG-1556, Volume 15, Guidance about changes of Control and About Bankruptcy involving byproduct, source or Special Nuclear Materials Licenses, Revision 1" (NUREG-1556 vol 15, Rev 1). A link to that guidance is <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v15/index.html> . In particular, I need the information requested on page E-1 Items 1, 2, and 3.
2. Confirm if this is applicable only to License No. 16-35383-02, or if License No. 16-35383-01 also is involved.
3. Provide a license number for the Coal-Mac entity that is taking control of the Southeastern -01 license. I am aware of the NRC License No. 47-25599-01, but it is possible that Coal-Mac holds a license in an Agreement State.
4. The gauges that are possessed under a general license require a separate notification. Allowed transfers are described in 10 CFR 31.5(c)(8). It appears to me that this transfer is allowed under 31.5(c)(8)(i), and meets the description in 31.5(c)(9)(i) which requires the transfer to be reported as described there. You should review the regulation to be sure that you report the transfer that actually occurred. A link to the regulation is <https://www.nrc.gov/reading-rm/doc-collections/cfr/part031/part031-0005.html> . Confirm that you will provide the notification of the transfer of the gauges possessed under a general license as directed in Part 31.

Please contact me if you have any additional questions. Thank you for your time.

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