



20 October 2021

United States Nuclear Regulatory Commission

Materials Licensing and Decommissioning Branch Region IV 1600 E. Lamar Blvd. Arlington, TX 76011-4511

Attn.: Ms. Michelle R. Simmons, Senior Health Physicist

Subject: Response to Request for Additional Information

License: 42-35287-01 **Docket:** 030-38896 **Control:** 627250

Dear Ms. Simmons:

SIA Solutions, LLC (SIA) is pleased to provide our response to your request for additional information dated October 05, 2021, for the license referenced above. We appreciate the opportunity to provide our responses and look forward to working with you on this important matter. I also want to take the opportunity to thank you for reaching out to me regarding your communication.

For clarification, to ensure that we can continue to expand our services and geographic coverage and our sustainability after our graduation from the SBA 8(a) program, SIA entered into a "Merger" agreement as a wholly owned subsidiary of Salas O'Brien, Inc. This change was duly notified to NRC in our request for amendment dated June 30, 2021,

Following this Merger, SIA will continue to operate as a stand-alone, independent company, as a wholly owned subsidiary of Salas O'Brien and maintain its existing Name, Corporate Address, DUNS Number, Cage Code, and Taxpayer Identification Number. The subject license will continue to be in the name of SIA Solutions LLC. Dr. Srini Neralla will continue to lead SIA, including the Radiation Safety Committee, as the Managing Principal, and I, Henry Siegrist, will continue to be SIA's Corporate Radiation Safety Officer managing our Radiation Safety Program and reporting to Dr. Srini Neralla. The purpose of the amendment request was to notify the NRC of the change in ownership. No name change, mailing address change, and contact information change, is being requested.

Developing Solutions. Delivering Results.



Please find below our responses to your questions regarding our license amendment request:

1. Please provide an organizational chart.

Please see Attachments 1-5 for the organizational charts of Salas O'Brien and its Business Units (subsidiaries). The organizational charts reflect that SIA continues to operate as a stand-alone, independent company as a wholly owned subsidiary of Salas O'Brien.

2. Please provide documentation indicating that Global Engineering Solutions, Inc. has an Agreement State license or an NRC license.

Neither Global Engineering Solutions, Inc. nor Salas O'Brien have an Agreement State License or an NRC License.

3. Does Global Engineering Solutions, Inc currently hold a non-radioactive material State or federal government license/registration/authorization? Please provide a copy.

No. Neither Global Engineering Solutions, Inc. nor Salas O'Brien hold a non-radioactive material state or federal government license/registration/authorization.

4. 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's name, mailing address, and contact information, including phone numbers. Clearly identify when the amendment request is due to a name change only.

There are no planned changes in the organization since SIA Solutions will be operating as a wholly owned subsidiary of Salas O'Brien. As part of this merger, SIA retained its assets, while the stock was transferred to Salas O'Brien Holding, Inc. SIA has stock ownership in Salas O'Brien Holding, Inc. and as the Managing Principal of SIA, Dr. Srini Neralla is on the Board along with Managing Principals of other subsidiaries of Salas O'Brien, Inc.

5. 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.

As indicated in SIA's June 30, 2021 NRC notification license amendment request, no change in personnel or duties related to the NRC license program is anticipated.

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



No changes are planned or anticipated in the location, facilities, equipment, radiation safety program, use, possession, waste management, or other procedures that relate to the licensed program.

7. 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 the status of calibrations, leak tests, area surveys, wipe tests, training, quality control, and related records.

There are no changes to the licensee's facilities, equipment, or radiation safety program. Radioactive materials are limited to check and calibration sources all of which are NRC exempt except for low activity Th-230 sources specifically licensed. The specifically licensed total activity permitted for these sources is 0.5 microcuries. No leak tests are required. There is no known contamination. There will not be any transfers of radioactive material associated with this merger. The storage location for these sources when not in use is not altered with the change in ownership. Training, quality control and records associated with these sources do not change with the ownership merger.

8. 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 instruments associated with the license will be held in the transferee's name before the E–2 license is transferred, and as required by 10 CFR 30.35(f), the licensee must, within 30 days, submit financial instruments reflecting such changes.

Not Applicable

9. Confirm that all records concerning the safe and effective decommissioning of the facility will be transferred to the transferree 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.

Not Applicable. No change in records keeping or retention.

10. Confirm that both 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 open inspection items and its responsibility for possible resulting enforcement actions.

No transfer of specifically licensed calibration/check sources (Th-230) will occur. No other licensed radioactive material from SIA is maintained or involved with the merger. All other calibration/check sources are NRC exempt. NRC License activities at temporary job locations will remain under SIA control. There are no open NRC inspection items.



11. 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.

Not Applicable. There is no transfer of activities, actions, or licensed activities associated with temporary job sites. SIA Solutions will continue to abide by all constraints, conditions, requirements, representations, and commitments of the license.

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

Not Applicable

Again, SIA appreciates this opportunity to provide clarifications. We look forward to working with you and invite you to contact me at (860) 416-0196 or Dr. Srini Neralla at (832) 535-4626 whenever we can be of further assistance.

Sincerely,

SIA Solutions, LLC

Henry W. Siegrist, P.E., CHP Radiation Safety Officer hank.siegrist@gmail.com

CC: Dr. Srini Neralla, Managing Principal

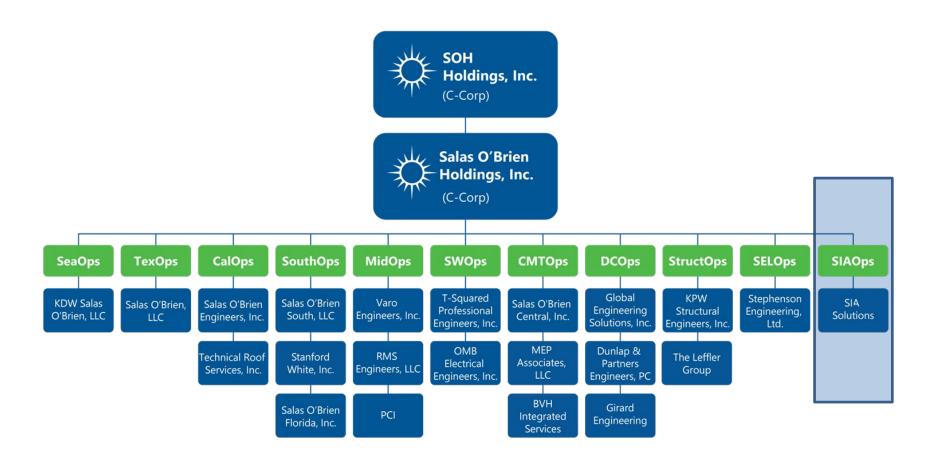
Attachments:

- Salas O'Brien Business Unit Structure
- 2. Salas O'Brien Managing Principals of Business Units
- 3. Salas O'Brien Corporate Organization
- 4. SIA Solutions Organization Chart
- 5. Radiation Safety Committee



Salas O'Brien Business Unit Structure

Salas O'Brien Business Unit Structure







Salas O'Brien Managing Principals of Business Units

Salas O'Brien Managing Principals of Business Units







Salas O'Brien Corporate Organization

Salas O'Brien Corporate Organization

Darin Anderson, Chairman & CEO

Paul Silva, President & COO

Services Leaders

- Grant Reindl, Corp. Dev., FP&A
- Mike Prusty, Controller
- Michael Rabieh, IT
- Eric Anest, Marketing
- Diane Walton Blevins, HR
- Gavin Chafin, Recruiting
- Farshad Arfaa, BD (Critical Environments)
- Amanda Barber, BD (Federal)
- Paul Barter, BD (Architects & Contractors)

Managing Principals

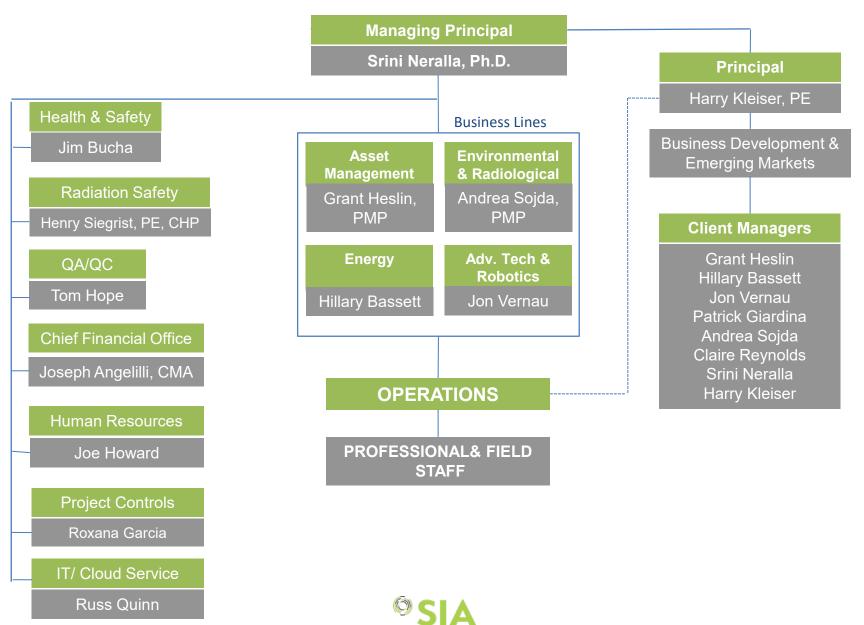
- Tim Burnham, MidOps
- Stan Everett, SouthOps
- Brad Kalmans, TexOps
- Arnold Kraakmo, SeaOps
- Aron McCallum, SELOps
- Deirdre McDaniel, CMTOps
- Essi Najafi, DCOps
- Srini Neralla, SIAOps
- John Salas, CalOps
- Farzad Tadayon, SWOps
- John Westphal, StructOps





SIA Organization Chart

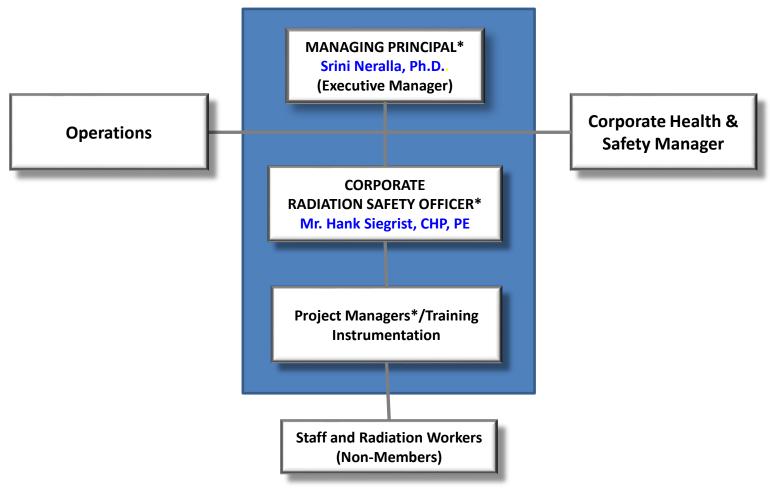
SIA Organization Chart





Radiation Safety Committee

Radiation Safety Committee



Note:

1. *=Indicates Members of the RSC



 From:
 hank.siegrist@gmail.com

 To:
 Simmons, Michelle

 Cc:
 "Srini Neralla"

Subject: [External_Sender] RE: SIA Change of Control Deficiency Letter: Additional Information required

Date: Wednesday, October 20, 2021 12:22:59 PM

Attachments: SIA Response to NRC Request for Information 10202021 Sent.pdf

Ms. Michelle R. Simmons,

Attached please find responses to the previous questions provided to SIA Solutions concerning SIA Change of Control Deficiency Letter: Additional Information Required.

Should you have any questions concerning the responses please feel free to contact me.

Sincerely,

Henry Siegrist

Hank Siegrist | Radiation Safety Officer SIA SOLUTIONS LLC | 8(a) | SDB 15115 Park Row | Suite 125 | Houston, TX 77084

C. (860) 416-0196 | hsiegrist@gmail.com | www.siasolutions.com

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From: Simmons, Michelle < Michelle. Simmons@nrc.gov>

Sent: Wednesday, October 13, 2021 4:01 PM

To: hank.siegrist@gmail.com

Subject: FW: SIA Change of Control Deficiency Letter: Additional Information required

From: Simmons, Michelle

Sent: Tuesday, October 05, 2021 10:16 AM

To: hsiegrist@siasolutions.com

Subject: SIA Change of Control Deficiency Letter: Additional Information required

Good morning,

Please the attached letter requesting some additional information in order to continue our review of your request for a change of control.

Thank you

Michelle R. Simmons

Senior Health Physicist
Nuclear Regulatory Commission
Materials Licensing and Decommissioning Branch
Region IV
1600 East Lamar Blvd.
Arlington, Texas 76011
817-200-1590



UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION IV 1600 E. LAMAR BLVD ARLINGTON TX 76011-4511

October 5, 2021

Henry W. Siegrist, P.E., CHP Radiation Safety Officer SIA Solutions LLC 15115 Park Row, Suite 125 Houston, Texas 77084

SUBJECT: REQUEST FOR ADDITONAL INFORMATION

Dear Mr. Siegrist:

We have reviewed your letter dated June 30, 2021 status change in its ownership. Before we can take further action, we will need the following additional information.

Please provide the following:

- 1. Please provide an organizational chart.
- 2. Please provide documentation indicating that Global Engineering Solutions, Inc. has an Agreement State license or an NRC license.
- 3. Does Global Engineering Solutions, Inc currently hold a non-radioactive material State or federal government license/registration/authorization? Please provide a copy.
- 4. 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's name, mailing address, and contact information, including phone numbers. Clearly identify when the amendment request is due to a name change only.
- 5. 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.
- Describe any changes in the location, facilities, equipment, radiation safety program, use, possession, waste management, or other procedures that relate to the licensed program.
- 7. 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 the status of calibrations, leak tests, area surveys, wipe tests, training, quality control, and related records.

- 8. 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 instruments associated with the license will be held in the transferee's name before the E–2 license is transferred, and as required by 10 CFR 30.35(f), the licensee must, within 30 days, submit financial instruments reflecting such changes.
- 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.
- 10. Confirm that both 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 open inspection items and its responsibility for possible resulting enforcement actions.
- 11. 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.
- 12. The transferee, in the case of fuel cycle facilities, shall provide documentation showing that it is financially qualified to conduct normal operations. The information can be in the form of income statements and balance sheet forecasts.

To continue review of your application, we request that you submit your response to this letter by <u>October 20, 2021.</u> In your response, please refer to the license, docket, and control number specified below. We will assume that you do not wish to further pursue this licensing action if we do not receive a reply within the specified timeframe noted above.

If you have questions, require additional time to respond, or require clarification on any of the information stated above, we encourage you to contact us at Michelle.Simmons@nrc.gov

Thank you for your cooperation.

Sincerely,

Michelle R.

Digitally signed by Michelle R.

Simmons

Simmons Date: 2021.10.05 10:15:39 -05'00'

Michelle R. Simmons, Senior Health Physicist Materials Licensing and Decommissioning Branch

Docket: 030-38896 License: 42-35287-01 Control: 627250