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Engineering and Surveying Inc.

1091 Stoneridge Drive • Bozeman, Montana • Phone (406) 587-1115 • Fax (406) 587-9768  
www.chengineers.com • E-Mail: info@chengineers.com

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July 27, 2022

U.S. Nuclear Regulatory Commission Region IV  
Attn: Carol L. Hill  
1600 E Lamar Blvd.  
Arlington, TX 76011-4511

**RE: Amendment Request for NRC License Number 25-35009-01**

Dear Carol,

The additional information requested in your email sent on July 26, 2022 has been addressed and is included with this submittal for your review.

The additional information has been formatted and addressed as outline in Appendix E of NUREG-1556, Volume 15, Revision 1.

Respectfully,

Michael J. Welch, P.E.  
Project Executive/ Principle / Radiation Safety Officer

# NUREG1556V 15 Rev 1 – Appendix E

## NRC License Number: 25-35009-01 Amendment Request

NRC Region: IV (Arlington Texas)  
Telephone: (406) 587-1115

Contact: Michael J. Welch  
Fax: (406) 587-9768 -

- 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 request is due to a name change only.**

C&H Engineering and Surveying, Inc. is in the process of merging with IMEG Corp. We would like to Amend our NRC License (25-35009-01) to allow for a licensee name change to IMEG Corp, and Licensee address change to 623 26<sup>th</sup> Ave., Rock Island, IL, 61201. The license material will still be used and stored at our current facility located at 1091 Stoneridge Drive, Bozeman MT 59718. Our day-to-day operations will stay the same, as will the intended use of the licensed material to aid in engineering design and inspection.

New Licensee Name: IMEG Corp.  
New Licensee Address: 623 26<sup>th</sup> Avenue  
Rock Island, IL, 61201  
Contact Information: Michael J. Welch (License RSO) 406-587-1115

Licensed Material storage/use location: IMEG Corp  
1091 Stoneridge Drive  
Bozeman, MT 59718

- 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.**

The Amendment request is only for the Licensee Name Change and Address Change. The licensed material will still be used and stored at our current facility located at 1091 Stoneridge Drive, Bozeman, MT 59718 as listed on the current NRC License Number: (25-35009-01). Michael J. Welch will maintain his position as our onsite facility RSO as listed on the current license.

Our current training program will remain the same, where all authorized users are required to take and pass a Nuclear Gauge Safety Course including USDOT Hazmat meeting the requirements of 49 CFR 172 subpart H. Copies of training certificates will be and will continue to be kept on file for each authorized user.

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 changes for the use and storage of the licensed material and equipment. the licensed material will be used and stored at our current facility located at 1091 Stoneridge Drive, Bozeman, MT 59718 as listed on the current NRC License (25-35009-01).

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

Our current facility is currently and will continue to operate as an engineer consulting firm. We currently own 3 Seaman C-300 nuclear density gauges and 1 Seaman C-200 nuclear density gauge. All gauges are stored in a manner that is consistent with the two physical barrier rule and in a manner to keep the public dose below 100 mrem per year.

The licensed material will be used and stored at our current facility as it has been in the past and as listed on the current NRC license and will continue in this manner.

We current operate with our radiation safety plan that is associated with the NRC License 25-35009-01. There will be no changes in the current radiation safety plan other than the licensee name and will continue to operate under this safety plan.

At this time there are no known contaminations, the licensed material will be used and stored at our current facility as listed on the NRC License and will not be physically transferred. This amendment request is only to allow the licensee name and address change.

Our current gauges are calibrated as needed, with the most recent calibration performed by Seaman Nuclear in August of 2021.

All gauges are physically inventoried at 6-month intervals or earlier. A record of each gauge inventory including which gauge, serial number of the gauge, person conducting the inventory, and the date of the inventory is kept on file at our storage facility.

All gauges are leak tested at 6-month intervals or earlier. The leak tests are conducted by Qal-Tek Associates and meet the NRC Requirements. All leak tests are kept on file at our storage facility. None of the gauges have been found to be leaking. The most recent leaks tests were done on June 28, 2022 and no leaks were found.

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

Decommissioning funding plans are not affiliated with NRC License # 25-35009-01.

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.**

The licensed material will be used and stored at our current facility as they have been in the past and as stated on the current NRC License. This amendment request is to allow the licensee name and address change only.

7. **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.**

IMEG Corp has been provided copies of all documents associated with NRC License number : 25-35009-01. There are no know open inspections associated with the NRC License at this time. IMEG Corp is aware of everything covered within the current NRC License and the responsibilities associated with it.

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.**

IMEG Corp has been provided copies of all documents associated with NRC License Number 25-35009-01 and will abide by all constraints, conditions, requirements, representations, and commitments of the transferor and/or that the IMEG Corp will submit a complete description of the proposed licensed program.

9. **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.**

No Fuel Cycle Facilities are affiliated with NRC License Number 25-35009-01.

**From:** [N Schaible](#)  
**To:** [Hill, Carol](#)  
**Cc:** [R4 Licensing Action Submittals](#); [Michael Welch](#)  
**Subject:** [External\_Sender] NRC License Number: 25-35009-01 Additional Information  
**Date:** Thursday, July 28, 2022 1:58:04 PM  
**Attachments:** [image.png](#)  
[NUREG15556V 15 Rev1 Appendix E - NRC License # 25-35009-01 Amendment Request.pdf](#)

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Good Afternoon Carol,

The attached PDF contains the addition information requested in your email sent on July 26, 2022 for NRC License Number 25-35009-01 Amendment Request.

Please let me know if you have any questions or if additiaon information is required.

Noah J. Schaible, E.I  
Project Manager

[www.chengineers.com](http://www.chengineers.com)



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**Uncommon Dedication • Est. 1994**

- |                          |                                  |
|--------------------------|----------------------------------|
| ○ Civil Engineering      | ○ Geotechnical Engineering       |
| ○ Structural Engineering | ○ Floodplain Delineation         |
| ○ Land Surveying         | ○ Soil & Concrete Testing        |
| ○ Subdivision Design     | ○ Environmental Site Assessments |
| ○ Water System Design    | ○ Site Grading & Drainage Plans  |
| ○ Septic System Design   | ○ Storm Water Plans (SWPPP)      |

"This message and/or attachment contains confidential information. Distribution of this information must be only to those of C&H Engineering and Surveying, Inc employees or individuals contractually approved to receive this information. If you are not the addressee and/or are not authorized to receive this for the addressee, you must not use, copy, disclose, forward, print or take any action based on this message or any information herein. If you have received this message in error, please advise the sender immediately by reply e-mail and delete this message."



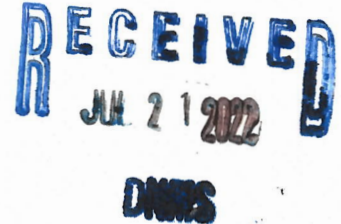


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July 12, 2022

U.S. Nuclear Regulatory Commission Region IV  
Attn: Licensing Assistant  
1600 E Lamar Blvd.  
Arlington, TX 76011-4511



**RE: Amendment Request for NRC License Number 25-35009-01**

Dear Sir or Madam,

C&H Engineering and Surveying, Inc. requests an amendment to NRC License Number 25-35009-01. The amendment request is to change Licensee Name to IMEG Corp and to change the Licensee Address to 623 26<sup>th</sup> Avenue, Rock Island, IL, 61201. The licensed material will still be used and stored at our facility located at 1091 Stoneridge Drive, Bozeman, Montana as listed on our NRC License 25-35009-01. The reason for the amendment request is because C&H Engineering and Surveying, Inc. is in the process of merging with IMEG Corp. Upon completion of the merger C&H Engineering and Surveying, Inc. will then operate under the name IMEG Corp at our current facility located at 1091 Stoneridge Drive, Bozeman, Montana 59718.

Respectfully,

A handwritten signature in blue ink that reads 'M.J. Welch'.

Michael J. Welch, P.E.  
Project Executive/ Principle / Radiation Safety Officer



Engineering and Surveying, Inc.  
1091 Stoneridge Drive  
Bozeman, MT 59718

BILLINGS MT 591

15 JUL 2022 PM

FIRST-CLASS



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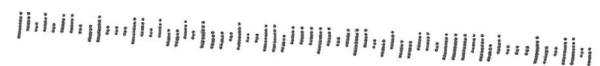
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JUL 13 2022

RECEIVED JUL 20 2022

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JUL 21 2022

DNRS

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**From:** [Hill, Carol](#)  
**To:** [mwelch@chengineers.com](mailto:mwelch@chengineers.com)  
**Cc:** [Torres, Roberto](#); [O'Keefe, Neil](#)  
**Subject:** Incomplete Application for Change of Control Authorization for Nuclear materials License 25-35009-01  
**Date:** Tuesday, July 26, 2022 9:50:00 AM  
**Attachments:** [NUREG1556v15 Rev 1.pdf](#)

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Good Morning,

I am in receipt of your letter dated July 12, 2022, requesting amendment to your Nuclear Materials License 25-35009-01, to reflect a change of control. After a cursory review of your request it was determined that the request was incomplete and did not provide the necessary information to complete a full review of your request.

Please refer to Appendix E of NUREG -1556, Volume 15, Revision 1, (attached for your convenience) and submit the information as outlined in Appendix E. Once we receive that information we can complete our review of your amendment request.

If you have any questions or need additional information, please feel free to contact me.

Thank you,  
Carol Hill

**\*\*\*IN THE FUTURE, PLEASE SEND ALL LICENSE-RELATED EMAIL TO OUR NEW LICENSING RESOURCE MAILBOX:  
[r4licensingactionsubmittals.resource@nrc.gov](mailto:r4licensingactionsubmittals.resource@nrc.gov) \*\*\*\***

Carol L. Hill, Licensing Assistant

Direct: 817-200-1140  
Toll Free: 1-800-952-9677  
Fax: 817-200-1083  
Direct E-mail: [Carol.Hill@nrc.gov](mailto:Carol.Hill@nrc.gov)

US Nuclear Regulatory Commission  
1600 E. Lamar Blvd.  
Arlington, TX 76011-4511



**From:** [Torres, Roberto](#)  
**To:** [Hill, Carol](#)  
**Subject:** RE: C&H Engineering  
**Date:** Tuesday, July 26, 2022 9:53:27 AM

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Lets discuss with Neil in today's licensing status meeting.

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**From:** Hill, Carol <Carol.Hill@nrc.gov>  
**Sent:** Tuesday, July 26, 2022 9:38 AM  
**To:** Torres, Roberto <RobertoJ.Torres@nrc.gov>  
**Subject:** RE: C&H Engineering

Did we ever decide what we were going to do with submissions like this that were submitted incomplete and not logged in to WBL? I can't remember if we did or not. How are we going to track them? Or are we not going to track them at all? When we had paper, I could just sit the copy on my desk and check up on them occasionally. Do we not care about tracking it because it was incomplete?

Should we talk about this again in the Branch meeting?

**\*\*\*IN THE FUTURE, PLEASE SEND ALL LICENSE-RELATED EMAIL TO OUR NEW LICENSING RESOURCE MAILBOX:  
[r4licensingactionsubmittals.resource@nrc.gov](mailto:r4licensingactionsubmittals.resource@nrc.gov) \*\*\*\***

Carol L. Hill, Licensing Assistant

Direct: 817-200-1140  
Toll Free: 1-800-952-9677  
Fax: 817-200-1083  
Direct E-mail: [Carol.Hill@nrc.gov](mailto:Carol.Hill@nrc.gov)

US Nuclear Regulatory Commission  
1600 E. Lamar Blvd.  
Arlington, TX 76011-4511

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**From:** Torres, Roberto <[RobertoJ.Torres@nrc.gov](mailto:RobertoJ.Torres@nrc.gov)>  
**Sent:** Thursday, July 21, 2022 1:12 PM  
**To:** Hill, Carol <[Carol.Hill@nrc.gov](mailto:Carol.Hill@nrc.gov)>  
**Subject:** RE: C&H Engineering

Don't log it in. It is incomplete. Ask the licensee to submit the information requested in Appendix E of NUREG-1556, Volume 15, revision 1. Once the information is received then we can merge the letter with the response and set it up.

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**From:** Hill, Carol <[Carol.Hill@nrc.gov](mailto:Carol.Hill@nrc.gov)>  
**Sent:** Thursday, July 21, 2022 1:01 PM  
**To:** Torres, Roberto <[RobertoJ.Torres@nrc.gov](mailto:RobertoJ.Torres@nrc.gov)>

**Subject:** C&H Engineering

Roberto,

This is a change of control, right? If so, I KNOW he hasn't provided enough information. Do you want me to log it in or not? I don't know what we decided on the to log or not to log discussions.



**ACKNOWLEDGEMENT - RECEIPT OF CORRESPONDENCE**

**Name and Address of Applicant and/or Licensee**

Mr. Michael J. Welch, P.E.  
Radiation Safety Officer  
C&H Engineering and Surveying, Inc.  
1091 Stoneridge Drive  
Bozeman, MT 59715

**Date**

08/09/2022

**License Number(s)**

25-35009-01

**Mail Control Number(s)**

632048

**Licensing and/or Technical Reviewer or Branch**

C. Hill

This is to acknowledge receipt of your: ☒ Letter and/or ☐ Application Dated: 07/27/2022

The initial processing, which included an administrative review, has been performed.

☒ Amendment ☐ Termination ☐ New License ☐ Renewal

☐ There were no administrative omissions identified during our initial review.

☐ This is to acknowledge receipt of your application for renewal of the material(s) license identified above. Your application is deemed timely filed, and accordingly, the license will not expire until final action has been taken by this office.

☐ Your application for a new NRC license did not include your taxpayer identification number. Please complete and submit NRC Form 531, Request for Taxpayer Identification Number, located at the following link: <http://www.nrc.gov/reading-rm/doc-collections/forms/nrc531.pdf>  
Follow the instructions on the form for submission.

☐ The following administrative omissions have been identified:

Your application has been assigned the above listed MAIL CONTROL NUMBER. When calling to inquire about this action, please refer to this control number. Your application has been forwarded to a technical reviewer. Please note that the technical review, which is normally completed within 180 days for a renewal application (90 days for all other requests), may identify additional omissions or require additional information. If you have any questions concerning the processing of your application, our contact information is listed below:

**Region IV**  
**U. S. Nuclear Regulatory Commission**  
**DNMS/NMSB - B**  
**1600 E. Lamar Boulevard**  
**Arlington, TX 76011-4511**  
**(817) 200-1103 or (817) 200-1140**

BETWEEN:

Accounts Receivable/Payable  
and  
Regional Licensing Branches

[ FOR ARPB USE ]  
INFORMATION FROM WBL

Program Code: 03121  
Status Code: Pending Amendment  
Fee Category: 3P  
Exp. Date: 12/31/2022  
Fee Comments:  
Decom Fin Assur Req: N

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## License Fee Worksheet - License Fee Transmittal

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### A. REGION

#### 1. APPLICATION ATTACHED

Applicant/Licensee: C&H Engineering and Surveying, Inc.  
Received Date: 07/28/2022  
Docket Number: 3038578  
Mail Control Number: 632048  
License Number: 25-35009-01  
Action Type: Change of Control

#### 2. FEE ATTACHED

Amount: N/A  
Check No.: N/A

#### 3. COMMENTS

Signed: Carol L. Hill  
Date: 08/09/2022

### B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered / / )

1. Fee Category and Amount: \_\_\_\_\_

#### 2. Correct Fee Paid. Application may be processed for:

Amendment: \_\_\_\_\_  
Renewal: \_\_\_\_\_  
License: \_\_\_\_\_

3. OTHER \_\_\_\_\_  
\_\_\_\_\_

Signed: \_\_\_\_\_  
Date: \_\_\_\_\_

Agency: NRC

## WBL WORKSHEET

DOCKET NUMBER: 3038578	LICENSE NUMBER: 25-35009-01	STATUS: Pending Amendment
MAIL CONTROL NUMBER: 632048	RECEIPT DATE: 07/28/2022	ACTION TYPE: Change of Control
DUE DATE: 01/24/2023	INST. CODE: 35009	LICENSE REGION: Region 4
LICENSE TYPE: 30	ENTITY TYPE: C	LICENSE GROUP: Industrial
ISSUE DATE:	ORIGINAL DATE: 12/14/2012	EXPIRATION DATE: 12/31/2022
DECOMMISSIONING CATEGORY: Group 1	LAST ISSUE DATE:	
LICENSEE NAME: C&H Engineering and Surveying, Inc.	DECOM FIN ASSUR REQD: N SUBM: N	
MAILING ADDRESS LINE1: 1091 Stoneridge Drive	CONT PLAN REQD: N      APPRV: N	
MAILING ADDRESS LINE 2:		
CITY: Bozeman	STATE: MT	ZIP: 59715
CONTACT PERSON: PREFIX:	FIRST NAME: Michael	MIDDLE INITIAL: J.
LAST NAME: Welch	SUFFIX: P.E.	
JOB TITLE: Radiation Safety Officer	PHONE: 406-587-1115    FAX: 406-587-9768	EMAIL: mwelch@chengineers.com
BILLING ADDRESS LINE 1:		
BILLING ADDRESS LINE 2:		
CITY:	STATE: Montana	ZIP:
BILLING CONTACT PERSON: FIRST NAME:	MIDDLE INITIAL:	LAST NAME:
PHONE:	EMAIL:	FAX:
PRIMARY PGM CODE: 03121	SECONDARY PGM CODE:	
INSPECTION REGION: Region 4	PRIORITY: 5	
RSO: PREFIX:	FIRST NAME: Michael	MIDDLE INITIAL: J.    LAST NAME Welch
SUFFIX: P.E.	RSO JOB TITLE: Radiation Safety Officer	
RSO PHONE: 406-539-1046	RSO FAX: 406-587-9768	RSO EMAIL: mwelch@chengineers.com
STATES WHERE USE IS AUTHORIZED:	0- ALL LISTED STATES 1- SAME AS STATE IN ADDRESS 2- ALL STATES 3- NON-AGREEMENT-STATES	
AUTHORIZED STATES (USE ONLY IF ABOVE IS ZERO):		