



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION IV  
1600 E. LAMAR BLVD  
ARLINGTON TX 76011-4511

November 9, 2022

Mark J. Senette  
Radiation Safety Officer  
Versa Integrity Group, Inc.  
111 Nova Drive  
Broussard, LA 70518

SUBJECT: VERSA INTEGRITY GROUP, INC., REQUEST FOR WRITTEN CONSENT TO AN INDIRECT LICENSE TRANSFER

By letter dated October 19, 2022 (Agencywide Documents Access and Management System (ADAMS) Accession Number ML22299A080), Versa Integrity Group, Inc., (licensee) submitted to the Nuclear Regulatory Commission (NRC) a request for written consent to a proposed indirect transfer of control of NRC license number 17-35243-01. In accordance with Section 184 of the Atomic Energy Act of 1954, as amended (AEA), and Title 10 of the Code of Federal Regulations (10 CFR) 30.34, the NRC consents to the transfer.

NRC license number 17-35243-01 authorizes the storage and use of byproduct material in industrial devices at temporary job sites in NRC jurisdiction in accordance with 10 CFR Part 30. By letter dated October 19, 2022, Versa Integrity Group, Inc., requested written consent to the indirect transfer of control of its license from the NRC. Because the license was issued under 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material," the NRC must find that the transfer is in accordance with the provisions of the AEA and, if so, must give its consent in writing prior to the transfer, in accordance with Section 184 of the AEA and 10 CFR 30.34(b). Additionally, the NRC staff reviewed the indirect transfer of control request using the guidance in NUREG-1556, Volume 15, Revision 1, "Consolidated Guidance About Materials Licenses - Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses," dated June 2016.

10 CFR 30.34(b) states:

- (1) No license issued or granted pursuant to the regulations in [parts 30] through 36, and 39 nor any right under a license shall be transferred, assigned or in any manner disposed of, either voluntarily or involuntarily, directly or indirectly, through transfer of control of any license to any person, unless the Commission shall, after securing full information, find that the transfer is in accordance with the provisions of the Act and shall give its consent in writing.
- (2) An application for transfer of license must include:
  - (i) The identity, technical and financial qualifications of the proposed transferee; and
  - (ii) Financial assurance for decommissioning information required by [10 CFR] 30.35.

As required by 10 CFR 30.34 and section 184 of the Atomic Energy Act of 1954, as amended (the Act), NRC staff has reviewed the application and finds that the indirect transfer of control is in accordance with the Act. As described in ADAMS accession number ML22299A080, the proposed transaction is a transfer of the equity ownership of the licensee's parent company, GBOG Holding Corporation from its current shareholder, MU Series PTO of MU, LLC, to Rockwood Services Corporation. Following the closing, the licensee will become an indirect, wholly-owned subsidiary of Rockwood Services Corporation. This transaction is expected to close on November 14, 2022.

The NRC staff finds that the licensee's request adequately provides a complete and clear description of the proposed transaction, consistent with 10 CFR 30.34(b) and Chapter 5 and Appendix E of NUREG-1556, Volume 15, Revision 1. The sufficiency of the description is evaluated below.

The request for an indirect transfer of control was posted for public comment on the NRC website on October 20, 2022, in accordance with 10 CFR Part 2, Subpart M and as described in NRC's Regulatory Issue Summary 2014-08, Revision 1. To date, no comments have been received from members of the public. In accordance with 10 CFR 2.1301 and 2.1305, an application for a transfer of control is posted for a 30-day public comment period and the NRC does not, absent extenuating circumstances, grant consent to the transfer until the 30-day posting period has elapsed. Here, the requestors have demonstrated extenuating circumstances justifying expedited review and consent to the transfer. Specifically, the requestors explained that due to the late stage of the acquisition process, the licensee's personnel are leaving the company at a faster rate than expected, creating potential near-term difficulties in the licensee's ability to ensure safe operations and assure continuity of the radiation safety program. Based on the above, the NRC finds that extenuating circumstances are present, and it is in the interest of public health and safety to issue its decision on the request on an expedited basis.

In reviewing the request for an indirect transfer of control, the NRC staff determined that the licensee is not required to have financial assurance for decommissioning based on the types and amounts of material authorized in NRC license number 17-35243-01. The NRC staff finds that the licensee's request adequately provided information for financial assurance for decommissioning, consistent with 10 CFR 30.34(b) and Chapter 5 and Appendix E of NUREG-1556, Vol. 15, Rev. 1.

Additionally, as described in its request, the transferee, Rockwood Services Corporation:

- A. commits that it will not change the radiation safety officer listed in the NRC license;
- B. commits that it will not change the personnel involved in licensed activities;
- C. commits that it will not change the locations, facilities, and equipment authorized in the NRC license;
- D. commits that it will not change the radiation safety program authorized in the NRC license;
- E. commits that it will not change the company name listed in the NRC license; and
- F. commits that it will keep regulatory required surveillance records and decommissioning records.

Based on these commitments, the NRC staff finds that the licensee's request adequately documents the constraints, license conditions, requirements, representations, and commitments made by the transferee, consistent with 10 CFR 30.34(b) and Chapter 5 and Appendix E of NUREG-1556, Volume 15, Rev. 1.

The NRC staff used the guidance provided by the NRC's Office of Nuclear Material Safety and Safeguards' "Checklist to provide a basis for confidence that radioactive materials will be used as specified on the application," January 29, 2019 revision. The purpose of this checklist is for the NRC to obtain reasonable assurance from new license applicants or NRC licensees transferring control of licensed activities that the licensed material will be used for its intended purpose and not for malevolent use. Therefore, for security purposes, the licensee has provided sufficient information for the NRC to reach a basis for confidence that licensed material will be used as intended.

An environmental assessment for this action is not required because this action is categorically excluded under 10 CFR 51.22(c)(21).

The staff has reviewed the request for an indirect transfer of control of NRC license number 17-35243-01. The NRC staff finds that the indirect transfer of control is in accordance with Section 184 of the AEA and 10 CFR 30.34(b) and consents to the transfer.

Enclosed is amendment number 6 to NRC license number 17-35243-01 documenting the commitments made as a result of the transfer of control. Future changes in the licensee's name, licensed use, licensed materials, licensed location, persons responsible for licensed material, or other changes to the corporate organizational structure require submission of a request to amend the license or a request to transfer the license. NRC approval must be received prior to implementation of any such proposed change.

In accordance with 10 CFR 2.390, a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC website at <https://www.nrc.gov/reading-rm/adams.html>. You can contact me at 817-200-1189 if you have any questions regarding this letter.

Thank you for your cooperation.

Sincerely,

Roberto J. Torres, M.S., Senior Health Physicist  
Materials Licensing Branch

Docket: 030-38837  
License: 17-35243-01  
Control: 633284

Enclosure: As stated