

**SAFETY EVALUATION REPORT  
PROPOSED CHANGE OF CONTROL FOR BYPRODUCT MATERIALS LICENSE  
NUMBER 29-28576-01, GOLDER ASSOCIATES USA INC.**

**DATE:** May 26, 2023

**DOCKET NO.:** 030-31907

**LICENSE NO.:** 29-28576-01

**LICENSEE:** Golder Associates USA Inc.  
200 Century Pkwy  
Ste. C  
Mount Laurel, NJ 08054

**TECHNICAL REVIEWER:** Laura B. Cender

**SUMMARY AND CONCLUSIONS**

Golder Associates USA Inc. is authorized by NRC License No. 29-28576-01 for the possession and use of byproduct material for purposes permitted by 10 CFR Part 30. The U.S. Nuclear Regulatory Commission (NRC) staff reviewed a request for consent to a direct license transfer submitted by Golder Associates USA Inc. that will result from a merger of Golder Associates USA Inc. into its affiliate WSP Global, Inc. following the 2021 acquisition of Golder Associates USA Inc.'s ultimate parent company Enterra Holdings Ltd. by WSP Global Inc.

The request for consent was reviewed by NRC staff as an direct change in control of a 10 CFR Part 30 license 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." The NRC staff finds that the information submitted by Golder Associates USA Inc. sufficiently describes and documents the transaction and commitments made by Golder Associates USA Inc. and WSP USA, Inc.

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 proposed change in control is in accordance with the Act. The staff finds that, after the change of control, the license holder will remain qualified to use byproduct material for the purpose requested, and will have the equipment, facilities, personnel, and procedures needed to protect public health and safety, and promotes the security of licensed material.

**SAFETY AND SECURITY REVIEW**

According to data obtained from the NRC's Web Based Licensing System (WBL), Golder Associates USA Inc. has been an NRC licensee since May 6, 1991. The NRC conducted a main office inspection of Golder Associates USA Inc. on November 12 and 23, 2021, and no violations were identified. The commitments made by Golder Associates USA Inc. and WSP Global, Inc. state that WSP Global, Inc.:

- A. will not change the radiation safety officer listed in the NRC license;

- B. will not change the personnel involved in licensed activities;
- C. will not change the locations, facilities, and equipment authorized in the NRC license;
- D. will not change the radiation safety program authorized in the NRC license;
- E. will change the organization's name listed on the NRC license to WSP Global, Inc.
- F. will keep regulatory required surveillance records and decommissioning records;

Following the transaction Golder Associates USA Inc. will become WSP Global, Inc. WSP Global, Inc. has not previously possessed an NRC or Agreement State license, and as such, for security purposes, is not considered as known entity following the guidance provided by the NRC's Office of Nuclear Material Safety and Safeguards (NMSS) 'Checklist to provide a basis for confidence that radioactive materials will be used as specified on the license', 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. The NRC has completed additional evaluation of WSP Global, Inc. and has determined that WSP Global, Inc. will use licensed material for its intended purpose and not for malevolent use.

Golder Associates USA Inc. is not required to have decommissioning financial assurance based on the types and amount of material authorized in License No. 29-28576-01.

## **REGULATORY FRAMEWORK**

Golder Associates USA Inc.'s License No. 29-28576-01, was issued under 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material." The Commission is required by 10 CFR 30.34 to determine if the change of control is in accordance with the provisions of the Act and give its consent in writing.

10 CFR 30.34(b) states: "No license issued or granted pursuant to the regulations in this part and parts 31 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."

As previously indicated, the staff evaluation is based on guidance in NUREG-1556, Volume 15, Revision 1. As discussed in NUREG-1556, Volume 15, Revision 1, NRC is generally using the term "change of control" rather than the statutory term "transfer" to describe the variety of events that could require prior notification and written consent of the NRC. The central issue is whether the authority over the license has changed. Golder Associates USA Inc. request for consent describes an direct change of control resulting from a sale between Enterra Holdings Ltd., the parent company of Golder Associates USA Inc., and WSP Global, Inc. and, as such, the transfer requires NRC consent.

## **DESCRIPTION OF TRANSACTION**

The transaction is described in ADAMS accession number ML23146A082. After completion of the sale, WSP Global, Inc. will become the licensee and will assume Materials License No. 29-28576-01. The NRC staff finds that the request for consent adequately provides a complete and clear description of the transaction, and is consistent with the guidance provided in Appendix E of NUREG-1556, Volume 15, Revision 1.

## **TRANSFeree'S COMMITMENT TO ABIDE BY THE TRANSFEROR'S COMMITMENTS**

The NRC staff finds that the information submitted by Golder Associates USA Inc. sufficiently describes and documents the commitments made by Golder Associates USA Inc. and WSP Global, Inc., and is consistent with the guidance in NUREG-1556, Volume 15, Revision 1.

## **ENVIRONMENTAL REVIEW**

An environmental assessment for this action is not required since this action is categorically excluded under 10 CFR 51.22(c)(14)(xi).

## **CONCLUSION**

The staff has reviewed the request for consent agreed to by both parties with regard to an indirect change of control of byproduct materials license No. 29-28576-01 and approves the application pursuant to 10 CFR 30.34(b).

The submitted information sufficiently describes the transaction; documents the understanding of the license and commitments; demonstrates that personnel have the experience and training to properly implement and maintain the license and that they will maintain the existing records; And, in the future, will abide by all existing commitments to the license, consistent with the guidance in NUREG-1556, Volume 15, Revision 1.

Therefore, the staff concludes that the proposed change in control would not alter the previous findings, made under 10 CFR Part 30, that licensed operations will not be inimical to the common defense and security, or to the health and safety of the public.