NRC FORM 313 **U.S. NUCLEAR REGULATORY COMMISSION**
(01-2020)
10 CFR 30, 32, 33, 34, 35, 36, 37, 39, and 40

APPLICATION FOR MATERIALS LICENSE

APPROVED BY OMB: NO. 3150-0120 **EXPIRES: 01/31/2023**

Estimated burden per response to comply with this mandatory collection request: 4.3 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the Information Services Branch (T-6 A10M), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

INSTRUCTIONS: SEE THE CURRENT VOLUMES OF THE NUREG-1556 TECHNICAL REPORT SERIES ("CONSOLIDATED GUIDANCE ABOUT MATERIALS LICENSES") FOR DETAILED INSTRUCTIONS FOR COMPLETING THIS FORM: http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/. SEND TWO COPIES OF THE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

MATERIALS SAFETY LICENSING BRANCH
DIVISION OF MATERIAL SAFETY, STATE, TRIBAL AND RULEMAKING PROGRAMS
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS
U.S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555-0001

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

IF YOU ARE LOCATED IN:

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA,

SEND APPLICATIONS TO:

LICENSING ASSISTANCE TEAM
DIVISION OF NUCLEAR MATERIALS SAFETY
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PA 19406-2713

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

IF YOU ARE LOCATED IN:

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING,

SEND APPLICATIONS TO:

NUCLEAR MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
1600 E. LAMAR BOULEVARD
ARLINGTON, TX 76011-4511

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

1. THIS IS AN APPLICATION FOR *(Check appropriate item)*

- ☐ A. NEW LICENSE
- ☑ B. AMENDMENT TO LICENSE NUMBER 37-17717-02
- ☐ C. RENEWAL OF LICENSE NUMBER

2. NAME AND MAILING ADDRESS OF APPLICANT *(Include zip code)*

Transystems
615 West Highland Avenue
Ebensburg, PA 15931

3. ADDRESS WHERE LICENSED MATERIALS WILL BE USED OR POSSESSED

Transystems - Geotechnical Services Building
725 West Triumph Street
Ebensburg, PA 15931
Please see Attachment A

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

William Stenger

BUSINESS TELEPHONE NUMBER	BUSINESS CELLULAR TELEPHONE NUMBER
814-419-7896	814-243-2971

BUSINESS E-MAIL ADDRESS
westenger@transystems.com

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

5. RADIOACTIVE MATERIAL
   a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.
6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.
7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE.
8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.
9. FACILITIES AND EQUIPMENT.
10. RADIATION SAFETY PROGRAM.
11. WASTE MANAGEMENT.

12. LICENSE FEES (Fees required only for new applications, with few exceptions*)
(See 10 CFR 170 and Section 170.31)
***Amendments/Renewals that increase the scope of the existing license to a new or higher fee category will require a fee.**

FEE CATEGORY: N/A AMOUNT ENCLOSED: $

PER THE DEBT COLLECTION IMPROVEMENT ACT OF 1996 (PUBLIC LAW 104-134), YOU ARE REQUIRED TO PROVIDE YOUR TAXPAYER IDENTIFICATION NUMBER. PROVIDE THIS INFORMATION BY COMPLETING NRC FORM 531: https://www.nrc.gov/reading-rm/doc-collections/forms/nrc531info.html.

13. CERTIFICATION. *(Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.*

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 37, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.
WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

CERTIFYING OFFICER -- TYPED/PRINTED NAME AND TITLE	SIGNATURE	DATE
William Stenger, Director - Geosciences, Asst. VP, RSO		05-17-2023

FOR NRC USE ONLY

TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
			$		
APPROVED BY				DATE	

TranSystems
Formerly L.R. Kimball

615 West Highland Avenue
Ebensburg, PA 15931
814.472.7700
www.transystems.com

May 17, 2023

Jonathan Pfingsten – Senior Health Physicist
U.S. NRC Region 1
475 Allendale Road, Suite 102
King of Prussia, PA 19406-1415

RE: Name Change/Change of Control

Dear Mr. Pfingsten:

With our new branding nearing completion, Transystems is transitioning out of using the "CDI – Infrastructure, LLC d/b/a L.R. Kimball" name for all business endeavors, with the intent of using the name "**Transystems Corporation d/b/a Transystems Corporation Consultants**" going forward. Hence, we are requesting a name change amendment to our license #37-17717-02.

The following is information pertinent to the name change:

• New licensee name

TranSystems Corporation d/b/a TranSystems Corporation Consultants

• An original Corporate structure

See attached Exhibit 1

• Any newly proposed Corporate Structure

See Attached Exhibit 2 – Current
See Attached Exhibit 3 – Organizational chart of parent company

• Mailing address; and

615 West Highland Avenue, Ebensburg, PA 15931

• Contact information (Including phone numbers and/or e-mail address).

William Stenger (RSO) (814) 243-2971 Cell, (814) 491-7896 Office; Email: estenger@transystems.com

EIN Number and W-9.

EIN - 430839725 See attached W-9 Form.

Changes in personnel or duties that relate to the license program.

No Changes in personnel or duties that relate to license program are being made.

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

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

Status of the licensee's facilities, equipment, and radiation safety program.

There have been no changes to the licensee's facilities, equipment and radiation safety program, including any known contamination. All required calibrations, leak tests, area surveys, wipe tests, training, quality control, surveillance records, and related records are up to date and available for inspection at our Ebensburg, Pa Office.

Decommissioning funding plans (DFP) or other financial assurance (FA) documents

No changes are anticipated.

Records concerning the safe and effective decommissioning of the facility

Not Applicable

If deemed required, we have included Form 313 and the following information needed for Change of Control:

5.1 Description of Transaction

Regulation: 10 CFR 30.34(b); 10 CFR 40.46; 10 CFR 70.36.
Criteria: Prior to approval of a change of control, NRC requires a complete, clear description of the transaction.

Discussion: The required description includes, but is not limited to, any transfer of stocks or assets, or mergers. This description will enable legal counsel to differentiate between name changes and changes of control, when necessary.

The licensee needs to include the new name of the licensed organization or state that there has been no name change. If appropriate, the licensee should include the new licensee contact and telephone number(s) to facilitate communications.

Response from the Licensee:

- Description of transaction;
- New name, if applicable;
- New licensee contact(s). including names and phone numbers

The new name of the new licensed organization is "TranSystems Corporation d/b/a TranSystems Corporation Consultants" (TranSystems). "CDI Corporation" sold "CDI-Infrastructure, LLC d/b/a L.R. Kimball" (L.R. Kimball) to TranSystems Corporation, who also hired substantially all of the employees of L.R. Kimball and intends to continue to operate the business formerly owned by L.R. Kimball in the same general manner as before. TranSystems also owns the name "CDI-Infrastructure, LLC d/b/a L.R. Kimball", and we continue to operate under that name. However, we are transitioning to the TranSystems name so we are seeking a name change. No entity named L.R. Kimball will remain in non-licensed business without the license. The licensee contact will remain Radiation Safety Officer – William E. Stenger. Contact info: Phone – 814-419-7896; Fax – 814-427-7712; email – westenger@ltransystems.com.

5.2 Changes of Personnel

Regulation: 10 CFR 30.34(b); 10 CFR 40.46; 10 CFR 70.36.
Criteria: Prior to approval of a change of control, NRC requires that changes in personnel be documented, reviewed, and approved.

Discussion: Changes in personnel that need to be documented include individuals having control over licensed activities. This may include, in some cases, officers of a corporation or other management individuals who are listed on the license or referred to in the supporting documentation. This would also include any changes in personnel such as the Radiation Safety Officer, authorized users, or any other persons identified on the license or in the license application as having responsibility for radiation safety or authorized to use licensed material. Changes of personnel, as used in this report, does not include notifications regarding new authorized users made in accordance with 10 CFR 35.14.

As with any change in personnel listed on a license, pertinent information with regard to training, experience and qualifications applicable to the type of use will be required. The licensee should include applicable information concerning the qualifications, training, and responsibilities of any new individuals not previously listed on the current license or referred to in the supporting documentation. The specific information required will be found in the respective
program-specific guidance for the type of operation in which a particular licensee is engaged, or it may be obtained by contacting the appropriate Headquarters or Regional license reviewer.

Response from the Licensee:

- Training and experience of *new* individuals to be listed on the NRC license.

There will be no changes in personnel

5.3 Changes of Location, Equipment, and Procedures

Regulation: 10 CFR 30.34(b); 10 CFR 40.46; 10 CFR 70.36.
Criteria: Prior to the approval of a change of control, the licensee needs to submit a complete description of any planned changes in location, facilities, equipment, or procedures.

Discussion: Provide a detailed description of any changes in the licensees'location(s) of use, facility description, equipment or procedures (i.e., changes in operating or emergency procedures) that would normally require a license amendment. Include any changes in organization that may not be identified in Section 5.2, Changes in Personnel.

The location must be described if the licensee is adding a place of use. A description of the contaminated condition of the facility, if any, is required if the licensee is removing a place of use. Refer to Section 5.6 for a more detailed description of the information needed. Any changes in the facilities where licensed material will be used or stored must be described. If equipment
used in licensed activities is required to be described by license condition or regulation, or if information regarding this equipment is requested by appropriate licensing guidance, a description of all equipment changes should be provided. Changes in procedures, including routine operating and emergency procedures, must be reviewed to ensure that they are adequate for the types and uses described on the license. Changes in personnel that would require a license amendment, even without the change of ownership, must be submitted as requested by appropriate licensing guidance.

Response from the Licensee:

- Describe changes in the organization that exercises control over the licensed program.
- Describe changes in place of use, including potentially affected adjacent areas, as required.
- Describe changes in facilities where licensed material is to be used or stored.
- Describe changes in equipment to be used in the licensed program.
- Submit relevant procedural changes.
- Describe changes in personnel, particularly those requiring a license amendment or notification regardless of the change of control.

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There will be no changes in the organization that exercises control over the licensed program. There will be no changes in place of use, including potentially affected adjacent areas, as required. There will be no changes in facilities where licensed material is to be used or stored. There will be no changes in equipment to be used in the licensed program. There will be no relevant procedural changes. The only change is the parent company.

5.4 Surveillance Records

Regulation: 10 CFR 30.34(b); 10 CFR 40.46; 10 CFR 70.36.

Criteria: Prior to the approval of a change of control, licensees or applicants must submit a review of the status of all applicable surveillance requirements and records. This should include an indication of whether the surveillance program is current and if it will be current at the time of transfer.

Discussion: Typical surveillance requirements include leak tests, physical inventories, ventilation measurements, and conductivity tests. Surveillance requirements specific to the types of use may be found in the license, the regulations, the appropriate NUREG-1556 or any other pertinent guidance published by NRC. The licensee must review any and all pertinent surveillance records to determine if they are current and ensure that they will be current at the time of transfer or include an explanation if this is not to be the case. The licensee may perform the surveillance as authorized by its license. The licensee may also choose to have surveillance items performed by another party such as a contractor or the transferee, as authorized by the license, and if agreeable to both parties. It should be noted that the requirement for surveillance items in the regulations or the license is not waived due to a change of control.

Response from the Licensee: Submit a statement that all required surveillance has been performed, documented and reviewed, including the results, if appropriate.

- If surveillance items are not or will not be completed, the reasons, any corrective actions, and/or the date these corrective actions will be completed, should be submitted to NRC.

All required surveillance has been performed, documented, and reviewed, including the results, if appropriate.

5.5 Decommissioning and Related Records Transfers

Regulations: 10 CFR 30.34(b); 30.35(g); 10 CFR 40.46; 40.36(f); 10 CFR 70.36; and 70.25(g).

Criteria: Prior to the approval of a change of control, NRC regulations require that licensees arrange for the transfer and maintenance of records important to the safe and effective decommissioning of facilities involved in licensed activities. NRC also requires a description of the status of the licensed facility with regard to ambient radiation levels and fixed and/or removable contamination as a result of NRC licensed activities. The parties must confirm, in writing, that they accept full responsibility for the decommissioning of the site, including any contaminated facilities and equipment.

Discussion: Licensees are required to maintain certain records important to safe and effective decommissioning, including: evaluations concerning waste disposal by release as effluents (either air or water); release to sewers; incineration; disposal of liquid scintillation medium and animal tissue as if it were not radioactive; and disposal by methods specifically allowed through the license.

Subsequent to the transfer, the new licensee will become responsible for maintaining these records until the license is terminated. If licensed activities will continue at the same location, NRC requires confirmation that all the records of the aforementioned evaluations have been transferred to the new licensee. If the license will be terminated, these records must be forwarded to the appropriate NRC Regional Office.

No change of control or ownership or license termination will be authorized until all required records have been transferred to the new licensee or to NRC, as appropriate.

These regulations require that before licenses are transferred or assigned, all records be transferred to the new licensee. The regulations require that all records of measurements and calculations used to evaluate the release of radioactive effluents to the environment and records of certain disposals be transferred to the new licensee prior to the license being transferred or assigned, unless the existing licensee was only authorized to possess and use unsealed material
with a half life of less than 65 days or material in a sealed source form.

The current licensee must document ambient radiation levels and the presence or absence of contamination. The documentation must include, as appropriate, the method and sensitivity of the evaluation. If contamination is present, the documentation should describe how and when decontamination will occur or indicate that the timing and means of decontamination and/or decommissioning have not yet been determined.

The current licensee must also discuss how the parties agree to assume responsibility for the decontamination and decommissioning of licensed facilities. Those licensees required under 10 CFR 30.35, 40.36, and/or 70.25 to provide evidence of adequate resources to fund any required decommissioning must describe the effect that the change of control will have on financial assurance for decommissioning. As necessary, documents describing financial assurance must be amended to reflect the change in control. This documentation may refer to
decontamination plans, including any required financial assurance arrangements of the transferor, that were previously submitted in support of a decommissioning funding plan.

Response from the Licensee:

- Describe the method and proposed timetable for the transfer of required records.
- Provide a commitment by the transferee to maintain the records received from the transferor.
- Provide a description of the facility with regard to contamination and ambient radiation levels.
- Describe any decontamination to prepare the facility for decommissioning prior to the change of control.
- If decommissioning will not occur until after the change of control, describe any contamination and confirm that the transferee is knowledgeable of the extent and levels of contamination and applicable decommissioning requirements.

Not Applicable. No decommissioning is proposed. No termination of license is sought. All current records will be maintained and continued under the existing approved program, which will not be modified by transfer of control. No changes to the facility or personnel are proposed. The transferee agrees to accept the facility “as is” on the date of transfer.

5.6 Transferee's Commitment to Abide by the Transferor's Commitments

Regulation: 10 CFR 30.34(b); 10 CFR 40.46; 10 CFR 70.36.
Criteria: The new licensee (transferee) must either: (1) submit a commitment to abide by all constraints, license conditions, requirements, representations, and commitments identified in and attributed to the existing license; or (2) provide a description of its own program to comply with the license and all applicable regulations.

Discussion: The transferee may agree to abide by all constraints, conditions, requirements, representations, and commitments previously made to NRC by the transferor. This would include, but not be limited to, information submitted in support of license amendments (including documents itemized in the tie-down condition of the license) and the maintenance of decommissioning records required by 10 CFR 30.35. Alternatively, the transferee may submit a description of its own program to ensure compliance with the license and regulations.

This would also include completion of corrective actions for open inspection items and enforcement actions and, if required, implementation of site decontamination and decommissioning activities.

With regard to open inspection items and/or enforcement actions, the transferee should confirm, in writing, that it is knowledgeable of and accepts full responsibility for open inspection items and/or any resulting enforcement actions. Alternatively, the transferee may propose other measures for meeting these requirements, or the transferor may provide a commitment to close out all such actions with NRC before license transfer.

Information Required of the Licensee:

- An agreement to abide by all constraints, license conditions, requirements, representations, and commitments identified in and attributed to the existing license (or) a description of the transferees' program to ensure compliance with the license and regulations;
- A description of action to be taken to resolve open inspection and enforcement issues.

We agree to abide by all constraints, license conditions, requirements, representations, and commitments identified in and attributed to the existing license. There are no open inspection and enforcement issues to resolve.

6.0 Bankruptcy

Regulations: 10 CFR 30.34(h); 10 CFR 40.41(f); 10 CFR 70.32(a)(9).

Criteria: The licensee must notify the appropriate NRC Regional Administrator, in writing, immediately following the filing of a voluntary or involuntary petition for bankruptcy by or against:

- A licensee;
- An entity controlling the licensee; or
- An affiliate of the licensee.

This notification must identify the bankruptcy court in which the petition was filed and the date of filing. Specific legal definitions of the terms "entity" and "affiliate" as used in this regulation may be found in 11 U.S.C. 101(14) and in 11 U.S.C. 101(2), respectively.

Discussion: A licensee's financial condition could affect its ability to control licensed material. Therefore, NRC must be notified so it can assure that appropriate measures to protect the public health and safety have been or will be taken. These measures include:

- Maintaining security of licensed material and contaminated facilities;
- Assuring that licensed material is transferred only to properly authorized NRC or Agreement State licensees;

- Assuring that properly trained and experienced personnel are retained to implement appropriate radiation safety measures.

Note: **Licensees who have filed for bankruptcy remain responsible for all regulatory requirements.**

NRC may share pertinent information with other involved entities (e.g., trustees) so that health and safety issues can be resolved before bankruptcy actions are completed.
There are different types of bankruptcies described in Title 11 of the United States Code. The following discussion outlines the bankruptcy types that may involve NRC.

- Chapter 7 is used primarily by individuals and by businesses who wish to free themselves from debt simply and inexpensively. The debtor may enter Chapter 7 bankruptcy voluntarily or be forced to enter it involuntarily by creditors. The creditors of a debtor, as well as the debtor, have the right under Chapter 11 to convert to a case under Chapter 7.
- Chapter 9 addresses the adjustments of debts of a municipality.
- Chapter 11 is generally used to reorganize a business and allows the debtor to continue its business operations by a plan of reorganization in the hopes it can be returned to a viable state. As under Chapter 7, the debtor may enter Chapter 11 bankruptcy either voluntarily or involuntarily.
- Chapter 12 is designed to give special relief to a family farmer with regular income.
- Chapter 13 is used as a rehabilitation vehicle for an individual with regular income whose debts do not exceed specified amounts, and is typically used to budget some of the debtor's future earnings under a plan through which creditors are paid in whole or in part.
  The filing of a petition in bankruptcy court triggers the automatic stay provision in Section 362(a) of the United States Bankruptcy Code. This provision stays legal actions against the debtor or against the property of the bankruptcy estate, except in certain limited circumstances that include public health, safety, and environmental obligations. See *Midlantic National Bank v New Jersey Department of Environmental Protection*, 474 U.S. 494 (1986) and *In re Chateaugay Corporation*, 944 F.2d 997 (2d Cir 1991).

NRC will establish a Bankruptcy Review Team (BRT) to review and act on bankruptcy notifications when they occur. The BRT brings together the various NRC offices and is typically composed of members of the relevant licensing office staff, the Office of the General Counsel (OGC), the Office of the Controller (OC), the Office of Enforcement (OE), the Division of Industrial and Medical Nuclear Safety (IMNS), and the Division of Waste Management (DWM).
NRC procedures for reviewing bankruptcy actions are described in detail in Appendix H. These procedures ensure that bankruptcy cases are managed in a fully-coordinated manner with all involved NRC staff. Key provisions of these procedures may be summarized as follows:

- NRC will promptly verify any bankruptcy information obtained and ensure that the required written notification is submitted by the licensee.
- NRC will promptly verify the adequacy of control of all licensed material possessed by the licensee and, if appropriate, conduct a special inspection and/or request emergency assistance from other Federal agencies.
- NRC staff should, upon receipt of a bankruptcy notification, promptly alert NRC management and initiate formation of a BRT for the case.
- The BRT will develop a list of NRC recipients to receive additional information as it becomes available.
- NRC management will assign an individual as the lead for the bankruptcy action.
- The BRT will promptly, by telephone or fax, inform: the licensee or trustee, if appointed, that the bankruptcy filing does not relieve the licensee of its obligation to comply with all NRC requirements. Inspections and other NRC regulatory actions will continue after the bankruptcy filing.
- the Bankruptcy Court that any trustee or receiver in bankruptcy retains the debtor licensee's legal obligations, including public health, safety, and environmental

obligations, and must comply with NRC regulations and license conditions.

Note: **Any person possessing property contaminated with NRC licensed materials, transferred by the licensee before completion of decommissioning, must comply with all applicable NRC requirements, including obtaining or maintaining an NRC license and completing decommissioning.**

Note: **A reorganized entity emerging from Chapter 11 bankruptcy must receive written NRC approval prior to its assumption of control over licensed activities.**

Following the informal contact, NRC staff will provide written notification to the Bankruptcy Court, any trustee or receiver in bankruptcy, or owner of property contaminated by the licensee's activities, regarding the licensee's obligations to control the site, to decontaminate and decommission the site, and to comply with applicable NRC requirements and the conditions of the license.

Note: **NRC licenses remain in full effect, even beyond their stated expiration date, until terminated in writing by NRC.**

- The OGC representative to the BRT will ensure representation by the Department of Justice (DOJ) of NRC's interests in any bankruptcy proceedings.
- The BRT will assess the current public health and safety situation at the licensee's facility and any impacts that bankruptcy could have on licensed operations. NRC will make an in-house hazard assessment of the extent of contamination and health risks posed by any contamination present. This assessment will be used to:
  --support any NRC discussions with the Environmental Protection Agency (EPA), the Department of Energy (DOE), DOJ, and OGC;
  --support any petition to the bankruptcy court for priority disbursements of the bankruptcy estate; and
  --determine if prompt action is necessary to secure the site or to take any other action required under the Atomic Energy Act (AEA).
- The OGC representative will provide the BRT with copies of all pertinent filings in the bankruptcy proceeding. The bankruptcy lead will maintain copies of these filings. The licensee might, as a courtesy, provide some copies of filings, but there is no obligation to do so.
- The BRT will decide if additional information is needed from the licensee; make recommendations about the need to issue orders to the licensee or other persons; and prepare a list of issues to be addressed. The OGC and OE representatives to the BRT should help prepare any Demands for Information, Orders, Notices of Violation, or other enforcement actions regarding the licensee, the Trustee, or the Receiver in bankruptcy.
- _ The BRT, in coordination with the Office of State and Tribal Programs or the Regional State Liaison Officer, will inform the appropriate EPA Regional Office of the bankruptcy, if appropriate, and will provide the EPA staff with the results of NRC's in-house hazard assessment. If the BRT considers that a "removal" action under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) may be appropriate, the bankruptcy lead will discuss with the EPA staff whether a "removal" action should be pursued.
- The BRT will recommend whether the support of a technical contractor is needed to analyze the licensee's financial condition and coordinate the technical support through DWM.
- The BRT will ensure that Suggestions of Interest or Proofs of Claim are filed with the Bankruptcy Court for matters such as: actions to maintain control of radioactive materials, site decommissioning, or licensing fees or civil penalties that may be due NRC.
- The BRT will make recommendations as to the need to draw on financial assurance

instruments that may have been submitted by the licensee. Appendix I contains detailed procedures for drawing on financial assurance instruments.

- The BRT will consider the need for additional legal action by NRC that would require the debtor to decontaminate and decommission the site. The BRT should also determine whether there are NRC administrative proceedings or other litigation pending or anticipated (i.e., civil penalties, fee collection) that may affect NRC staff actions in the bankruptcy proceeding.

Response from Licensee or Applicant: A licensee (or an entity controlling the licensee, or an affiliate of the licensee) must immediately notify the appropriate NRC Regional Administrator, in writing, of the following information:

- Bankruptcy court in which the petition was filed.
- Date that the petition was filed.

Not Applicable-.None Filed

I trust these responses will be adequate for the proposed transfer. If you need additional information, please feel free to contact me at your convenience. Thank you!

Sincerely,

William Stenger, RES
Radiation Safety Officer
Asst. Vice President

WES/wes

K:EBG_SHARED/CE_U_DRIVE/RSO/DOCS/NRC/23Lt0517

ATTACHMENT A

Item 3

Transystems confirms that nuclear gauge use and storage in Ebensburg, PA is not in NRC jurisdiction and thus is not to be authorized on our NRC License.

Transystems further confirms that we are requesting authorization to use licensed materials at jobsites anywhere in the United States where the NRC maintains jurisdiction for regulating the use of licensed material, including areas of exclusive Federal jurisdiction within Agreement States.

Suggested Format for Providing Information Requested in Items 5 through 11 of U.S. Nuclear Regulatory Commission Form 313

Items 5 and 6: Materials To Be Possessed and Proposed Uses

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
✓		Cesium-137	Gauge manufacturer (or distributor) and model number: Troxler - model 3430	Specify activity per source and number of gauges requested. 9 millicuries 2 gauges	Yes ☑ Specific description of the gauge use: Measure physical properties of materials	☑ Not applicable ❒ Uses are: (Submit safety analysis supporting safe use.)
✓		Americium-241	Gauge manufacturer (or distributor) and model number: Troxler - model 3430	Specify activity per source and number of gauges requested. 44 millicuries 2 gauges	Yes ☑ Specific description of the gauge use: Measure physical properties of materials	☑ Not applicable ❒ Uses are: (Submit safety analysis supporting safe use.)

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
	✓	Californium-252	Gauge manufacturer (or distributor) and model number: _____	Specify activity per source and number of gauges requested. _____ _____	Yes ❒ Specific description of the gauge use: _____ _____ _____ _____ _____ _____ _____	❒ Not applicable _____ ❒ Uses are: _____ (Submit safety analysis supporting safe use.)
	✓	Radium-226	Gauge manufacturer (or distributor) and model number: _____	Specify activity per source and number of gauges requested. _____ _____	Yes ❒ Specific description of the gauge use: _____	❒ Not applicable _____ ❒ Uses are: _____ (Submit safety analysis supporting safe use.)
	✓	Other Isotope (Specify):	Gauge manufacturer (or distributor) and model number: _____	Specify activity per source and number of gauges requested. _____ _____	Yes ❒ Specific description of the gauge use: _____	❒ Not applicable _____ ❒ Uses are: _____ (Submit safety analysis supporting safe use.)
	✓	Is financial assurance required? If yes, submit evidence of financial assurance.				

Suggested Format for Providing Information Requested in Items 5 through 11 of U.S. Nuclear Regulatory Commission Form 313

Items 5 and 6: Materials To Be Possessed and Proposed Uses

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
✓		Cesium-137	Gauge manufacturer (or distributor) and model number: Troxler - model 3440	Specify activity per source and number of gauges requested. 9 millicuries 2 gauges	Yes ☑ Specific description of the gauge use: Mearsure physical properties of materials	☑ Not applicable ❒ Uses are: (Submit safety analysis supporting safe use.)
✓		Americium-241	Gauge manufacturer (or distributor) and model number: Troxler - model 3440	Specify activity per source and number of gauges requested. 44 millicuries 2 gauges	Yes ☑ Specific description of the gauge use: Measure physical properties of mateials	☑ Not applicable ❒ Uses are: (Submit safety analysis supporting safe use.)

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
	✓	Californium-252	Gauge manufacturer (or distributor) and model number: _____	Specify activity per source and number of gauges requested. _____ _____	Yes ❒ Specific description of the gauge use: _____ _____ _____ _____ _____ _____ _____	❒ Not applicable _____ ❒ Uses are: _____ (Submit safety analysis supporting safe use.)
	✓	Radium-226	Gauge manufacturer (or distributor) and model number: _____	Specify activity per source and number of gauges requested. _____ _____	Yes ❒ Specific description of the gauge use: _____	❒ Not applicable _____ ❒ Uses are: _____ (Submit safety analysis supporting safe use.)
	✓	Other Isotope (Specify):	Gauge manufacturer (or distributor) and model number: _____	Specify activity per source and number of gauges requested. _____ _____	Yes ❒ Specific description of the gauge use: _____	❒ Not applicable _____ ❒ Uses are: _____ (Submit safety analysis supporting safe use.)
	✓	Is financial assurance required? If yes, submit evidence of financial assurance.				

Suggested Format for Providing Information Requested in Items 5 through 11 of U.S. Nuclear Regulatory Commission Form 313

Items 5 and 6: Materials To Be Possessed and Proposed Uses

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
✓		Cesium-137	Gauge manufacturer (or distributor) and model number: Humbolt model 5001C	Specify activity per source and number of gauges requested. 11 millicuries 1 gauge	Yes ☑ Specific description of the gauge use: Measure physical properties of materials	☑ Not applicable ❒ Uses are: (Submit safety analysis supporting safe use.)
✓		Americium-241	Gauge manufacturer (or distributor) and model number: Humbolt model 5001C	Specify activity per source and number of gauges requested. 44 millicuries 1 gauge	Yes ☑ Specific description of the gauge use: Measure physical properties of materials	☑ Not applicable ❒ Uses are: (Submit safety analysis supporting safe use.)

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
	✓	Californium-252	Gauge manufacturer (or distributor) and model number: _____	Specify activity per source and number of gauges requested. _____ _____	Yes ❒ Specific description of the gauge use: _____ _____ _____ _____ _____ _____ _____	❒ Not applicable _____ ❒ Uses are: _____ (Submit safety analysis supporting safe use.)
	✓	Radium-226	Gauge manufacturer (or distributor) and model number: _____	Specify activity per source and number of gauges requested. _____ _____	Yes ❒ Specific description of the gauge use: _____	❒ Not applicable _____ ❒ Uses are: _____ (Submit safety analysis supporting safe use.)
	✓	Other Isotope (Specify):	Gauge manufacturer (or distributor) and model number: _____	Specify activity per source and number of gauges requested. _____ _____	Yes ❒ Specific description of the gauge use: _____	❒ Not applicable _____ ❒ Uses are: _____ (Submit safety analysis supporting safe use.)
	✓	Is financial assurance required? If yes, submit evidence of financial assurance.				

Suggested Format for Providing Information Requested in Items 5 through 11 of U.S. Nuclear Regulatory Commission Form 313

Items 5 and 6: Materials To Be Possessed and Proposed Uses

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
✓		Cesium-137	Gauge manufacturer (or distributor) and model number: Instrotek model 501DR	Specify activity per source and number of gauges requested. 10 millicuries 2 gauges	Yes ☑ Specific description of the gauge use: Measure physical properties of materials	☑ Not applicable ❒ Uses are: (Submit safety analysis supporting safe use.)
✓		Americium-241	Gauge manufacturer (or distributor) and model number: Instrotek model 501DR	Specify activity per source and number of gauges requested. 50 millicuries 2 gauges	Yes ☑ Specific description of the gauge use: Measure physical properties of materials	☑ Not applicable ❒ Uses are: (Submit safety analysis supporting safe use.)

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
	✓	Californium-252	Gauge manufacturer (or distributor) and model number: _____	Specify activity per source and number of gauges requested. _____ _____	Yes ❒ Specific description of the gauge use: _____ _____ _____ _____ _____ _____ _____	❒ Not applicable _____ ❒ Uses are: _____ (Submit safety analysis supporting safe use.)
	✓	Radium-226	Gauge manufacturer (or distributor) and model number: _____	Specify activity per source and number of gauges requested. _____ _____	Yes ❒ Specific description of the gauge use: _____	❒ Not applicable _____ ❒ Uses are: _____ (Submit safety analysis supporting safe use.)
	✓	Other Isotope (Specify):	Gauge manufacturer (or distributor) and model number: _____	Specify activity per source and number of gauges requested. _____ _____	Yes ❒ Specific description of the gauge use: _____	❒ Not applicable _____ ❒ Uses are: _____ (Submit safety analysis supporting safe use.)
	✓	Is financial assurance required? If yes, submit evidence of financial assurance.				

Suggested Format for Providing Information Requested in Items 5 through 11 of U.S. Nuclear Regulatory Commission Form 313

Items 5 and 6: Materials To Be Possessed and Proposed Uses

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
✓		Cesium-137	Gauge manufacturer (or distributor) and model number: Troxler - model 1351	Specify activity per source and number of gauges requested. 8 millicuries 10 gauges	Yes ☑ Specific description of the gauge use: Measure physical properties of materials	☑ Not applicable ❒ Uses are: (Submit safety analysis supporting safe use.)
	✓	Americium-241	Gauge manufacturer (or distributor) and model number:	Specify activity per source and number of gauges requested.	Yes ❒ Specific description of the gauge use:	❒ Not applicable ❒ Uses are: (Submit safety analysis supporting safe use.)

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
	✓	Californium-252	Gauge manufacturer (or distributor) and model number: _____	Specify activity per source and number of gauges requested. _____ _____	Yes ❒ Specific description of the gauge use: _____ _____ _____ _____ _____ _____ _____	❒ Not applicable _____ ❒ Uses are: _____ (Submit safety analysis supporting safe use.)
	✓	Radium-226	Gauge manufacturer (or distributor) and model number: _____	Specify activity per source and number of gauges requested. _____ _____	Yes ❒ Specific description of the gauge use: _____	❒ Not applicable _____ ❒ Uses are: _____ (Submit safety analysis supporting safe use.)
	✓	Other Isotope (Specify):	Gauge manufacturer (or distributor) and model number: _____	Specify activity per source and number of gauges requested. _____ _____	Yes ❒ Specific description of the gauge use: _____	❒ Not applicable _____ ❒ Uses are: _____ (Submit safety analysis supporting safe use.)
	✓	Is financial assurance required? If yes, submit evidence of financial assurance.				

Suggested Format for Providing Information Requested in Items 5 through 11 of U.S. Nuclear Regulatory Commission Form 313

Items 5 and 6: Materials To Be Possessed and Proposed Uses

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
	✓	Cesium-137	Gauge manufacturer (or distributor) and model number:	Specify activity per source and number of gauges requested.	Yes ❒ Specific description of the gauge use:	❒ Not applicable ❒ Uses are: (Submit safety analysis supporting safe use.)
✓		Americium-241	Gauge manufacturer (or distributor) and model number: Troxler model 3322	Specify activity per source and number of gauges requested. 10 millicuries 1 Gauge	Yes ☑ Specific description of the gauge use: measure physical properties of materials	☑ Not applicable ❒ Uses are: (Submit safety analysis supporting safe use.)

Yes	No	Radionuclide	Manufacturer or Distributor Model No.	Quantity	Use as Listed on SSD Registration Certificate	Specify Other Uses Not Listed on SSD Registration Certificate
	✓	Californium-252	Gauge manufacturer (or distributor) and model number: _____	Specify activity per source and number of gauges requested. _____ _____	Yes ❒ Specific description of the gauge use: _____ _____ _____ _____ _____ _____ _____	❒ Not applicable _____ ❒ Uses are: _____ (Submit safety analysis supporting safe use.)
	✓	Radium-226	Gauge manufacturer (or distributor) and model number: _____	Specify activity per source and number of gauges requested. _____ _____	Yes ❒ Specific description of the gauge use: _____	❒ Not applicable _____ ❒ Uses are: _____ (Submit safety analysis supporting safe use.)
	✓	Other Isotope (Specify):	Gauge manufacturer (or distributor) and model number: _____	Specify activity per source and number of gauges requested. _____ _____	Yes ❒ Specific description of the gauge use: _____	❒ Not applicable _____ ❒ Uses are: _____ (Submit safety analysis supporting safe use.)
	✓	Is financial assurance required? If yes, submit evidence of financial assurance.				

Supplement A
2021 Application for Renewal Material License No. 37-17717-02

Radioactive Material

Byproduct Source and/or Special Nuclear Material	Chemical and/or Physical Form	Maximum amount that Licensee may possess at any one time under this license
A. Cesium 137	A. Sealed Sources (Troxler Dwg. A-102112)	A. 9 Millicuries per source not to exceed 36 Millicuries Total
B. Americium 241:Be	B. Sealed Neutron Source (Troxler Dwg. A-102451 and C-106580)	B. 44 Millicuries per source not to exceed 176 Millicuries Total
C. Cesium 137	C. Sealed Sources (CPN Model CPN-131)	C. 10 Millicuries per source not to exceed 20 Millicuries Total
D. Americium 241:Be	D. Sealed Neutron Sources (CPN Model CPN-131)	D. 50 Millicuries per source not to exceed 100 Millicuries Total
E. Cesium 137	E. Sealed Source (Humbolt Dwg. 2200064-1)	E. 11 Millicuries per source not to exceed 11 Millicuries Total
F. Americium 241:Be	F. Sealed Neutron Source (Humbolt Dwg. 2200067-1)	F. 44 Millicuries per source not to exceed 44 Millicuries Total
G. Cesium 137	G. Sealed Sources (Troxler Dwg. A-102112)	G. 8 Millicuries per source not to exceed 80 Millicuries Total
H. Americium 241:Be	H. Sealed Sources (Troxler Dwg. A-102700)	H. 10 Millicuries per source not to exceed 10 Millicuries Total
A. and B. For use in Troxler Electronic Laboratories, Inc. Model 3430 and 3440 portable gauging devices to measure the physical properties of materials		
C. and D. For use in CPN International, Inc. (Instrotek) Model 501DR portable gauging devices to measure the physical properties of materials		
E. and F. For use in Humbolt Scientific, Inc. Model 5001C portable gauging devices to measure the physical properties of materials		
G. For use in Troxler Electronic Laboratories, Inc. Model 1351 portable gauging devices to measure the physical properties of materials		
H. Possession and Storage only pending source disposition of Troxler Electronics Laboratories, Inc. Model 3322 portable gauging device		

Purpose(s) for which licensed material will be used

Troxler Electronic Laboratories Model Nos. 1351, 3322, 3430 and 3440; Humbolt Scientific Inc. Model 5001C; and InstroTek (formerly CPN) Model 501DR portable gauging devices purpose is measuring physical properties of materials.

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Items 7 through 11: Training and Experience, Facilities and Equipment, Radiation Safety Program, and Waste Disposal

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE— RADIATION SAFETY OFFICER Name: William Stenger	Documentation demonstrating the proposed radiation safety officer's training and experience (e.g., certificate of completion of the RSO's course and/or the authorized user's course).	Submit applicable documentation.	
8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS	Before using licensed materials, authorized users will have successfully completed one of the training courses described in the "Criteria" part of the section titled, "Training for Individuals Working in or Frequenting Restricted Areas" in NUREG–1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses."	☑	❒
9. FACILITIES AND EQUIPMENT	Provide a facility diagram for each permanent portable gauge storage location. Include on the diagram the use of adjacent areas (including above and below), and information relevant to public dose and security as discussed in Sections 8.10.5, "Public Dose," and 8.10.6, "Operating, Emergency, and Security Procedures," respectively, in NUREG–1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses"	Submit applicable documentation. Not Applicable	

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.1 RADIATION SAFETY PROGRAM—AUDIT PROGRAM	The applicant should not submit its audit program to the NRC for review during the licensing phase. The audit program will be reviewed during NRC inspections.	Need Not Be Submitted with Application	
10.2 RADIATION SAFETY PROGRAM—RADIATION MONITORING INSTRUMENTS	We will either possess and use, or have access to and use, a radiation survey meter that meets the criteria in the section titled, "Radiation Safety Program—Radiation Monitoring Instruments" in NUREG–1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses," in the event of an incident.	☑	❒
10.3 RADIATION SAFETY PROGRAM—MATERIAL RECEIPT AND ACCOUNTABILITY	Physical inventories will be conducted every 6 months or at other intervals approved by the NRC to account for all sealed sources and devices received and possessed under the license. AND We will develop, implement, and maintain procedures for ensuring accountability of licensed materials at all times.	☑	❒
10.4 RADIATION SAFETY PROGRAM—OCCUPATIONAL DOSE	We will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of the limits in 10 CFR 20.1502(a). OR We will provide and require the use of individual monitoring devices (dosimetry). All personnel dosimeters that require processing to determine the radiation dose will be processed and evaluated by a NVLAP-approved processor.	❒ ☑	❒

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.5 RADIATION SAFETY PROGRAM—PUBLIC DOSE	The applicant is *not* required to submit a response to the public dose section in a license application. This matter will be examined during NRC inspections.	Need Not Be Submitted with Application	
10.6 RADIATION SAFETY PROGRAM—OPERATING, EMERGENCY, AND SECURITY PROCEDURES	We will implement and maintain the operating, emergency, and security procedures in Appendix G to NUREG–1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses." Copies of these procedures will be provided to all gauge users and will be available at each jobsite. OR Operating, emergency, and security procedures will be developed, implemented, and maintained and will meet the criteria in section 8.10.6, "Radiation Safety Program—Operating, Emergency, and Security Procedures," NUREG–1556, Vol. 1, Rev. 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses." Copies of these procedures will be provided to all gauge users and will be available at each jobsite.	☑ ❒	❒ For this item, checking this box indicates that alternative procedures will be provided as part of the application and that these procedures will be provided to all gauge users and will be available at each jobsite.

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.7 RADIATION SAFETY PROGRAM—LEAK TEST	Leak tests will be performed at intervals approved by the NRC or an Agreement State and specified in the SSD registration certificate. Leak tests will be performed by an organization licensed by the NRC or an Agreement State to provide leak testing services to other licensees; or by using a leak test sample collection kit supplied by an organization licensed by the NRC or an Agreement State to provide leak test kits and/or sample analysis services to other licensees and according to the kit supplier's instructions. Records of leak test results will be maintained. OR We will implement the model leak test program published in Appendix I of NUREG–1556, Volume 1, Revision 2, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses." Records of leak tests will be maintained.	☑ ❒	❒ For this item, checking this box indicates that alternative equipment and/or procedures will be provided as part of the application and that records of leak tests will be maintained.

Item No. and Title	Suggested Response	Yes	Alternative Procedures Attached
10.8 RADIATION SAFETY PROGRAM—MAINTENANCE	*Routine Cleaning and Lubrication* We will implement and maintain procedures for routine maintenance of our gauges according to each manufacturer's written recommendations and instructions.	☑	❒
	Nonroutine Maintenance The gauge manufacturer or other person licensed by the NRC or an Agreement State will perform nonroutine maintenance or repair operations that require detaching the source or source rod from the gauge.	☑	❒ The information listed in Appendix F of this NUREG supporting a request to perform nonroutine maintenance in house is attached.
10.9 RADIATION SAFETY PROGRAM—TRANSPORTATION	The applicant is *not* required to submit a response about transportation during the licensing process. The NRC will review this issue during inspection.	Need Not Be Submitted with Application	
11. WASTE MANAGEMENT—GAUGE DISPOSAL AND TRANSFER	The applicant is *not* required to submit a response about waste management during the licensing process; however, the licensee should establish and include gauge transfer and waste disposal procedures in its radiation safety program.	Need Not Be Submitted with Application	

NETS

North East Technical Services, Inc.

Certifies that

Bill Stenger

Has successfully completed North East Technical Services, Inc. Radiation Safety Officer Training Course for Nuclear Gauges, in accordance with Nuclear Regulatory Commission and current US DOT regulations.

Training materials are maintained at:

North East Technical Services, Inc.
75 Aileron Court, Suite 4
Westminster, MD 21157

Date of Completion: April 16, 2008

Douglas Sims

Instructor: Douglas C. Sims

Top Level Organization Chart

Effective Jan. 1, 2022

Richard J. Morsches
CEO

Paul J. Malir
President

Shari Frank
VP Human Resources

Jill Black
VP Communications & Marketing

Chuck Stenzel
SVP Officer Development Leader

Rich Markwith
EVP Strategy

Market Sector Leaders
Kevin Chafin | *SVP Federal*
Jeff Stiles | *EVP Transit & Aviation*
Greg Murphy | *SVP Government*
Kevin Hicks | *SVP Freight*

Practice Leaders
Tony Albert | *EVP Construction*
Larry Kirchner | *SVP Bridges*

Sarah Rahall-Lunsford
SVP Business Development

Julie Frigon
EVP | CFO

Scott Nash
VP Information Technology

Matt Clayton
VP Operations

Tina Lawrence
AVP Project Accounting

Tim Rock
EVP Operations

Nabil Farah
VP Quality

Scott Mladic
AVP Safety

Michael Cavanaugh
SVP Legal

SALES AND OPERATIONAL DELIVERY

CENTRAL REGION
Brian Fairwood
Regional SVP

TEXAS
(FW, HU)

Tim Rock
Managing Director (FW)

Office Directors
Chad Gartner (FW)
Bruce Anderson (HU)

Amanda Keith
Director of BD (KC)

Hannah White
Reg Bus Op Mgr (KC)

GREAT LAKES WEST
(CH, CD)

Brian Fairwood
Managing Director (CH)

Office Directors
Matt Smith (CH)
Lynn Otte (CD)

Amanda Keith
Director of BD (KC)

Hannah White
Reg Bus Op Mgr (KC)

MIDWEST
(KC, IN, SL, WI)

Jeff Lackey
Managing Director (WI)

Office Directors
Paul Hentschke (KC)
Brett Letkowski (WI)

Amanda Keith
Director of BD (KC)

Hannah White
Reg Bus Op Mgr (KC)

WEST REGION
Camilo Rocha
Regional SVP

(SD, SA, LA, OK)

Office Directors
Andrew Stanevicius (SD)
Joe Sawtelle (SA)
Kirsten Clayward (OK)

Amanda Keith
Director of BD (KC)

Jennifer Duran
Reg Bus Op Mgr (SA)

NORTHEAST REGION
Evan Lowell
Regional SVP

NEW ENGLAND
(BO, HT)

Evan Lowell
Managing Director (BO)

Office Directors
Scott Darling (BO)
Brian McGovern (HT)

Lisa Reeves
Director of BD (PA)

JoAnn Rizio
Reg Bus Op Mgr (HT)

PA/NJ
(PA, PT, MT)

Rick Genday
Managing Director (EB)

Office Directors
Meg Sherman (PA)
Brian Krul (PT)
Rick Genday (EB)

Lisa Reeves
Director of BD (PA)

JoAnn Rizio
Reg Bus Op Mgr (HT)

GREAT LAKES EAST
(CO, CL, YG)

Brent Downing
Managing Director (CO)

Office Directors
Nabil Farah (CL)
Aaron Grilliot (CO)

Lisa Reeves
Director of BD (PA)

John Hanson
Area Operations Manager (KC)

SOUTHEAST REGION
Bo Sanchez
Regional SVP

MID-ATLANTIC
(AT, DC, CR, GV)

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Peter Strub (GV)
Alex Stone (AT)

Office Directors
Alex Stone (AT)
John Bergman (Carolinas)

Lisa Reeves
Director of BD (PA)

Monique Mitchum
Reg Bus Op Mgr (CR)

FLORIDA
(OR, TA, FL)

Bo Sanchez
Managing Director (OR)

Office Directors
Gail Woods (OR)
Alan Klevens (FL)
Ken Kerr (TA)

Stacey Lopez
Reg Bus Dev Mgr (OR)

Monique Mitchum
Reg Bus Op Mgr (CR)

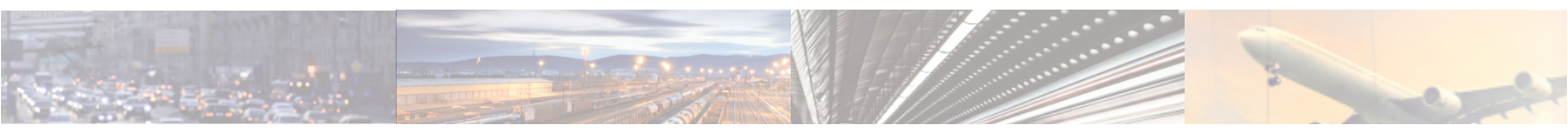

EXHIBIT 1

Infrastructure

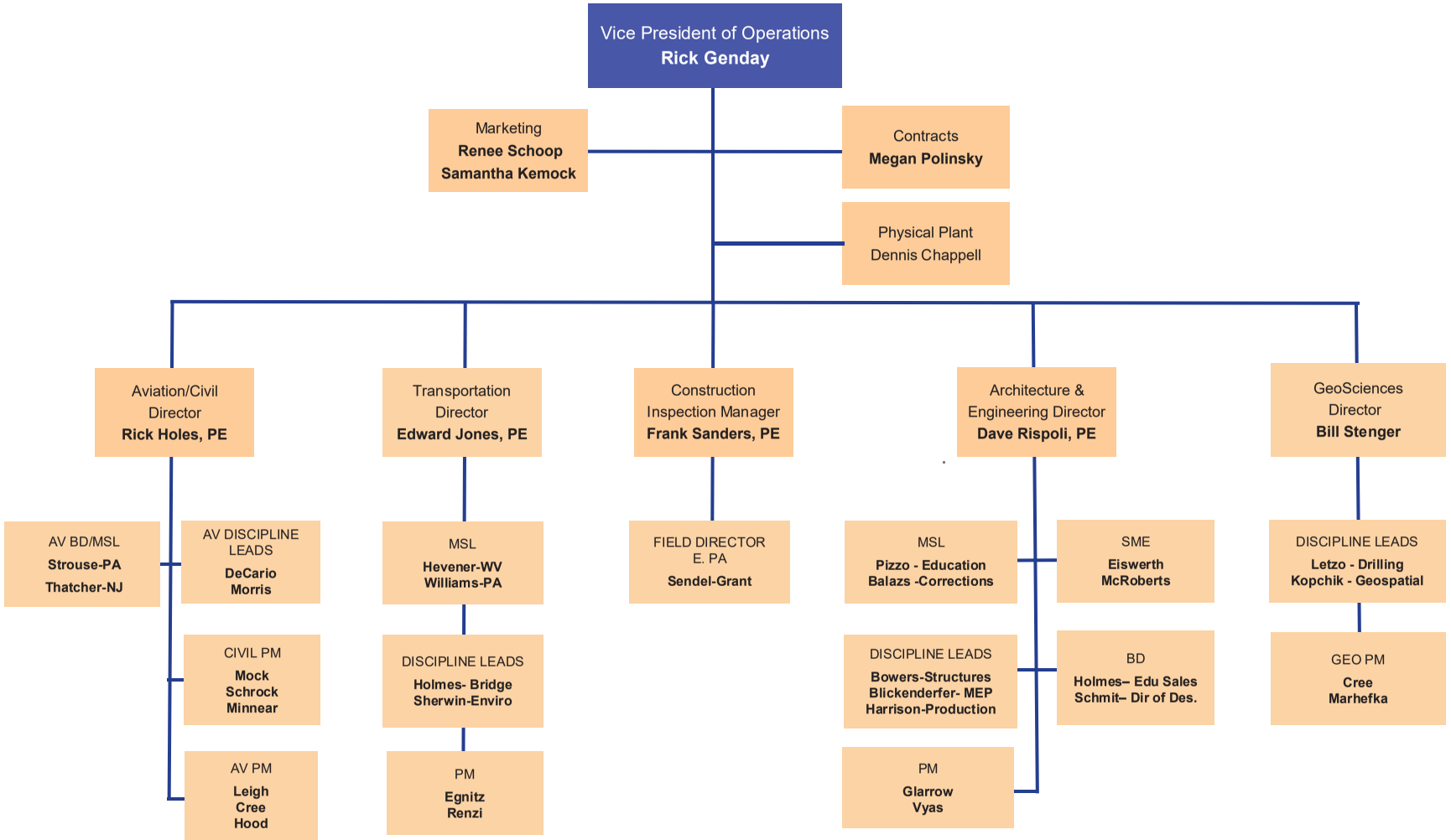

EXHIBIT 2

TranSystems Corp. d/b/a TranSystems Corp. Consultants