



Region I Office  
 Division of Nuclear Materials Safety  
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## Telephone Conversation Record

Date: January 17, 2024  
 License No. 47-01876-01  
 Docket No.(no hyphens): 03006660  
 Mail Control/Report No. 637691  
 Licensee Name: DuPont Specialty Group USA, LLC  
 Now known as Delrin USA, LLC  
 Participant(s) Name/Title: Bryan Monroe, Radiation Safety Officer; Josh Ankrom, Manager EH&S; Gregory Westbrook, Plant Manager; Lou Parvis, Counsel  
 Work Telephone No. Teams Meeting  
 Business Cellphone No. N/A  
 NRC Representative Name/Title: Steven Courtemanche / Health Physicist  
 Brett Klukan, Regional Counsel

Subject: Information Required for an Indirect Transfer of Control

Discussion: After introductions, Brett Klukan explained why the NRC believed that the issue to be resolved was an indirect transfer of control and not just a name change. Representatives of the licensee stated that was not how other state and federal agencies had handled the change. Brett explained that due to the nature of the devices and the radioactive material within them, the NRC had to go a step further to ensure they were properly transferred and used. The information that the NRC requires could be found in NUREG-1556, Vol. 15, App. C. The representatives asked to what extent TJC (the new indirect owner) had to go to fulfill the request. Steven Courtemanche replied that the NRC was trying to determine if TJC was a known entity which meant that they were already a direct or indirect owner of another company that was an NRC or Agreement State licensee. If it is determined that none of the companies under the direct or indirect control of TJC are NRC or Agreement State licensees, then the NRC would conduct a licensing visit with TJC representatives to vet them. The discussion continued in more detail regarding the above topics.

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