

February 15, 2024

Licensing Assistance Team  
Division of Radiological Safety and Security  
U.S. Nuclear Regulatory Commission, Region I  
475 Allendale Road, Suite 102  
King of Prussia, PA 19406-1415

Re: Possible Change of Control Request/Determination Notification Information  
License 47-35695-01

To Whom It May Concern:

We have reviewed the requirements in NUREG-1556 Volume 15, Rev.1, Section 5 pertaining to change of control and provide the following information for your review and determination if a possible change of control is warranted or, in the alternative, if you conclude that a change of control will occur in relation to the transaction described below, we wish to request the U.S. Nuclear Regulatory Commission's consent in relation to same (effective as of the date of completion of the proposed transaction). The following information below addresses the items outlined in NUREG-1556 Volume 15, Rev 1, Appendix E:

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.*
- **Infrastructure Consulting & Engineering, PLLC (the “Company”) will undergo a merger with and into an affiliate, which affiliate is owned by the same owners as those of the Company and in the same proportions, with the Company surviving such merger. Thereafter the owners of the Company will sell 100% of the outstanding equity interests of the Company to ICE USA Infrastructure, Inc., an affiliate of Godspeed Capital Management LP. The executive team of the Company will remain unchanged and continue to manage the business in cooperation with the new owner. The licensee will remain the Company (i.e., Infrastructure Consulting & Engineering, PLLC).**
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.*
- **There will be no personnel changes.**
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 to the location, facilities, equipment, radiation safety program, use, possession, waste management, or other procedures that relate to the license program.**

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.*
  - **All required surveillance has been performed, documented and reviewed. A copy of the current leak tests, physical inventories and monthly utilization log are included in Attachment A.**
  
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 E-2 license is transferred, and as required by 10 CFR 30.35(f), the licensee must, within 30 days, submit financial instruments reflecting such changes.*
  - **Not applicable. We only own nuclear density gauges that have sealed sources.**
  
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.*
  - **Not applicable.**
  
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.*
  - **The transferor and transferee agree to transferring control of the licensed material and activity, and the conditions of transfer. There are no open inspection items open at this time.**
  
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.*
  - **The transferee will abide by all constraints, conditions, requirements, representations, and commitments of the transferor.**
  
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.*
  - **Not applicable.**

If you have any questions or need additional information, please feel free to contact me at (803) 609-8500. Thank you for your attention to this matter.

Sincerely,



G. Tim Antley, Corporate RSO  
VP/CE&I Manager



Elham Farzam, PE  
President/CEO

Enclosures

## Attachment A

1. Bi-Annual Nuclear Gauge Inventory
2. Leak Tests (2023-2024)
3. Monthly Utilization Log – January 2024





**Troxler Electronic Laboratories, Inc.**  
3008 Cornwallis Rd., P.O. Box 12057  
Research Triangle Park, NC 27709  
Tel: (877) 876-9537 Fax: (866) 391-2759  
License: NC 032-0182-1

Cust Id: 7365

TROXLER  
3008 E. CORNWALLIS RD,  
RTP, NC 27709

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### LEAK TEST CERTIFICATE

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**DEVICE:**

Model: 3440P                      Serial No: 87217

**SEALED SOURCES:**

Serial No.	Measure Date	Nuclide	GBq	mCi
77-20661	02/27/2023	Cs-137	0.296	8
78-15457	06/06/2023	Am-241:Be	1.480	40

**LEAK TEST ANALYSIS:**

Sample collected on: 07/17/2023  
Sample analyzed on: 07/17/2023                      **Position:** 82  
Analyzed by: TH

	ALPHA	BETA-GAMMA
Conversion factor (cpm/Bq)	1.69E+001	2.19E+001
Background measurement (cpm)	0	6
Sample measurement (cpm)	0	12
Activity (Bq)	< MDA	< MDA
Min. Detectable Activity (Bq)	2.1E-001	7.1E+000

**This certifies that the leak test results are:**

**Less than 185 Bq (0.005 uCi)**                       **Greater than 185 Bq (0.005 uCi)**

