



DELIRIN® USA, LLC.
Delrin® Washington Works
8480 DuPont Road, Bldg. 200
P.O. Box 2800
Washington, WV 26181

March 22, 2024

SUBMITTED BY EMAIL

Betsy Ullrich
Mail Control No. 633415
USNRC, Region I
Division of Radiological Safety and Security
475 Allendale Road – Suite 102
King of Prussia, PA 19406

Subject: DUPONT SPECIALTY PRODUCTS, LLC, REQUEST FOR ADDITIONAL INFORMATION FOR CHANGE OF CONTROL, LICENSE NO. 47-01876-01, MAIL CONTROL NO. 637691

Dear Ms. Ullrich:

This response is in reference to the NRC letter dated December 28, 2023, requesting follow up information to a change in control of part of our licensed activities authorized by NRC License No. 47-01876-01. Please find below the following information in response to your questions:

1. Provide a letter from the management of DuPont Specialty Products USA, LLC (now known as Delrin USA, LLC) requesting the NRC's consent in writing of the indirect transfer of control of the license from E.I. DuPont de Nemours and Co., Inc. to TJC, L.P.

Response: At the time of the transfer, myself (Josh Ankrom) and Greg Westbrook, served as the management representative for DuPont Specialty Products, and did not have any objection to the license transfer. Furthermore, there is no other DuPont Specialty Product representative available to send such a document.

2. Describe the status and whether the licensee's surveillance program (surveys, wipe tests, posting, etc.) at the time prior to the transaction and at the present time is in compliance with the regulations and the license conditions.

Response: All required surveillance [leak tests and surveys] have been performed and documented in compliance with the regulations and license conditions.

3. Provide a letter under the header of the management of TJC, L.P. requesting the NRC's consent in writing of the indirect transfer of control of the license from E.I. DuPont de Nemours and Co., Inc. to TJC, L.P.

Response: See attached letter from TJC, L.P.

4. The management of TJC, L.P. should review their records to determine if the company has an interest (whole or in part) in other entities that may be NRC or Agreement State licensees. If TJC, L.P. does have an interest in companies that have NRC or Agreement State radioactive materials licenses, then a list containing the names of the companies and their license numbers should be provided as part of the response to this letter.

Response: TJC, L.P. has reviewed their records and determined they do not have any other entities that may be NRC or Agreement State Licensees.

We thank you for your attention to this matter. If you have any questions or need additional information, please do not hesitate to contact Josh Ankrom (304-483-3375).

Best Regards,



Josh Ankrom
EH&S Manager
Washington Works, Delrin USA, LLC.

ATTACHMENT

CC: Bryan S. Monroe, RSO for Delrin USA, LLC
Brian Connelly, Washington Works Plant Manager, Delrin USA, LLC

TJC

March 22, 2024

Betsy Ullrich, Senior Health Physicist
USNRC Region 1
475 Allendale Road, Suite 102
King of Prussia, PA 19406

RE: NRC License Amendment, NRC License No. 47-01876-01

Dear Sir or Madam,

On August 21, 2023 DuPont announced an agreement to sell an 80.1% ownership interest in the Delrin® business to an affiliate of The Resolute Fund VI, L.P., a Delaware limited partnership (“Resolute VI”) that is private equity fund managed by TJC, L.P., a Delaware limited partnership (“TJC”) that is registered as an investment adviser with the Securities and Exchange Commission. Resolute VI and TJC are ultimately controlled by a Partnership Board that consists of five (5) U.S. citizens. On November 1, 2023 TJC announced the successful close of the acquisition of Delrin®.

While DuPont Specialty Products USA, LLC was a retained DuPont company – DuPont Specialty Products USA, LLC transferred its DELRIN business to Delrin USA, LLC prior to the close on November 1, 2023 of the sale of Delrin® to Resolute VI. Delrin USA, LLC was acquired by Resolute VI, on November 1, 2023 along with several other legal entities around the world.

Delrin USA, LLC operates the Washington Works site, located at 8480 DuPont Road in Wood County, WV. Resolute VI (majority owner of Delrin USA, LLC) is requesting the NRC’s consent of the indirect transfer of control of License 47-01876-01 from DuPont Specialty Product USA, LLC to Delrin USA, LLC.

For inquiries concerning this notification, please contact Ian Arons at TJC, and/or Josh Ankrom at the Washington Works site.

Sincerely,



Ian Arons
Partner
TJC, L.P.