

April 5, 2024

United States Nuclear Regulatory Commission Region III
2443 Warrenville Rd., Suite 210
Lisle, IL 60532-4352

Re: Information for Transfer of Control
NRC Material License No. 21-32669-01

Dear United States Nuclear Regulatory Commission,

We are in the process of an acquisition where we will be transitioning ownership to Clark Dietz, Inc. The closing is scheduled for April 26, 2024. We would like to transfer the NRC license to Clark Dietz. Below are the responses to the Transfer of Control questions as outlined in Appendix E in the Consolidated Guidance About Materials Licenses.

1. Describe any planned changes in the organization, including but not limited to, transfer of stocks or assets and mergers, change in the Board of Directors, etc. Provide the new licensee name, mailing address, and contract information, including phone numbers. Clearly identify when the amendment request is due to a name changed only. **Effective April 26, 2024, RS Engineering, LLC will become a wholly owned subsidiary of Clark Dietz, Inc., thereby we are requesting the transfer of the license. All staff utilizing and storing the equipment will remain the same. Updated firm/licensee contact information will be:**

**Clark Dietz, Inc.
125 W Church Street
Champaign, IL 61820
217.373.8900**

The Clark Dietz, Inc. Board of Directors currently includes the following: Emily Basalla, Wesley Christmas, Mustafa Emir, Joh Howaniec, Nirav Patel, Jerald Payonk, Seth Swartz, Tonia Westphal, and Sean Widener. At the June 2024 shareholder meeting, Bob Rayl is anticipated to be added to the board.

2. Describe any changes in personnel or duties related to the licensed program. Include training and experience for new personnel and any changes in the training program. **There will be no changes in the personnel or duties related to the licensed program. Shawn L. Kraus will continue to be the Radiation Safety Officer.**
3. Describe any changes in the location, facilities, equipment, and radiation safety program, use, possession, waste management, or other procedures that relate to the licensed program. **The**

Troxler 3440 nuclear density gauge will continue to be located at 6709 Centurion, Suite 300, Lansing MI 48917 when not in use. There are no changes to the location, facilities, or equipment. The radiation safety program, use, possession, waste management, or other procedures that relate to the licensed program will remain in place.

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. **The facility, equipment and radiation safety program meet all current requirements and will remain the same after the sale. There is no known contamination prior to transfer. Dosimetry badges are provided for users of the gauge, as well as people who work closest to the gauge storage room. The gauge was calibrated over the winter for use during the 2024 construction season. At this time a leak test was performed (passed) and the survey meter received its annual calibration. All current records regarding calibrations, leak tests, area surveys, wipe tests, training, quality control, and related records are in the office of Shawn L. Kraus, Radiation Safety Officer at 6709 Centurion, Suite 300, Lansing MI 48917 (where the gauge is located).**
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 license is transferred, as is required by 10 CFR 30.35(f), the licensee must, within 30 days, submit financial instruments reflecting such changes. **The are no current DFP plans or other financial assurance documents in place.**
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. **All records will be transferred to the transferee upon completion of the sale. Records will remain at their existing location at 6709 Centurion, Suite 300, Lansing MI 48917.**
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 actions. **Both the transferor, RS Engineering, LLC, and the transferee, Clark Dietz, Inc. agree to transferring control of the licensed material and activity, and the conditions of the transfer. The transferee has been made aware of any inspection items and its responsibility for possible resulting actions.**
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. **Clark Dietz, Inc. will abide by all constraints, conditions, requirement, representations, and commitments of the transferor, RS Engineering, LLC.**

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 found in the form of income statements and balance sheet forecasts. **This does not apply.**

Please let me know if you need anything additional to transfer the license to Clark Dietz.

Thank you,



Digitally signed by
Shawn L Kraus, P.E.
Date: 2024.04.05
12:50:12 -04'00'

Shawn L. Kraus
Radiation Safety Officer
RS Engineering, LLC
(517) 253-0521
skraus@rs-eng.com

Martha Pavon

From: Tammy Tomczak
Sent: Monday, April 8, 2024 7:08 AM
To: Martha Pavon
Cc: Sandy Pavon
Subject: FW: Transfer of NRC Material License No. 21-32669-01
Attachments: RS Engineering Transfer of Control Letter 4_5_2024.pdf

Importance: High

Good morning, Martha 😊

Can you please add the attached to ADAMS?

Thank you!!
Tammy

From: Shawn Kraus <skraus@rs-eng.com>
Sent: Friday, April 5, 2024 11:56 AM
To: Tammy Tomczak <Tammy.Tomczak@nrc.gov>
Cc: Sarah Gustafson <sgustafson@rs-eng.com>; Robert Rayl <r-rayl@rs-eng.com>
Subject: [External_Sender] Transfer of NRC Material License No. 21-32669-01
Importance: High

Hi Tammy,

Attached please find the responses to the Transfer of Control questions found in Appendix E of the Consolidated Guidance About Materials Licenses.

In short RS Engineering, LLC is being acquired by Clark Dietz, Inc. The storage location, radiation safety officer, users, records, policies, and safety plans will remain the same as prior to the acquisition.

If you have any questions, please do not hesitate to contact me.

Thank you,

Shawn L. Kraus, PE | Project Manager | Principal
RS Engineering, LLC

D: 517-253-0521 | O: 517-908-0877 | C: 517-614-1696
E: skraus@rs-eng.com | W: www.rs-eng.com