



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

April 10, 2024

SUBMITTED BY EMAIL

Betsy Ullrich
Mail Control No. 637691
USNRC, Region I
Division of Radiological Safety and Security
475 Allendale Road – Suite 102
King of Prussia, PA 19406
Elizabeth.Ullrich@nrc.gov

Subject: DUPONT SPECIALTY PRODUCTS USA, LLC, REQUEST FOR ADDITIONAL INFORMATION, MAIL CONTROL NO. 637691

Dear Ms. Ullrich:

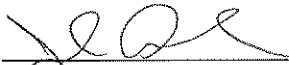
This letter responds to the NRC's Request for Additional Information, dated Apr. 2, 2024 (the "RAI"), pertaining to an indirect transfer of control and name change for DuPont Specialty Products USA, LLC (n/k/a Delrin USA, LLC) (the "Licensee"). The Licensee respectfully submits the following information:

1. TJC, L.P. ("TJC") has, after further review, identified one of its portfolio companies that holds two nuclear materials licenses, including one issued by NRC and one issued by an Agreement State. Specifically, Communications & Power Industries, LLC ("CPI") holds NRC License No. 20-02237-03E (available in ADAMS at ML22202A476) and Commonwealth of Massachusetts License No. 02-2374. Consequently, TJC respectfully submits that it should be treated as a "known entity" for materials licensing purposes, and no pre-licensing meeting should be required.
2. Licensee and TJC provide the following information in response to the RAI:
 - a. TJC has not changed, and will not change, the radiation safety officer identified on License No. 47-01876-01 (the "License"). Moreover, TJC intends that the Licensee will continue to directly manage activities under the License, including ensuring that any changes in radiation safety officers occur in compliance with NRC requirements.
 - b. TJC has not changed, and will not change, personnel involved in licensed activities. TJC intends that the Licensee will continue to directly manage activities under the License, including ensuring that any changes in personnel occur in compliance with NRC requirements.
 - c. TJC has not changed, and will not change, the locations, facilities, and equipment authorized in the License. TJC intends that the Licensee will continue to directly manage activities under the License, including ensuring that any future changes in locations, facilities, and equipment authorized in the License occur in compliance with NRC requirements.


- d. TJC has not changed, and will not change, the radiation safety program authorized in the License. TJC intends that the Licensee will continue to directly manage activities under the License, including ensuring that any future changes in radiation safety program authorized in the License occur in compliance with NRC requirements.
- e. The Licensee will keep regulatorily required surveillance records and decommissioning records. TJC recognizes these obligations and intends that the Licensee will continue to directly comply with them.
- f. TJC will abide by all constraints, conditions, requirements, representations, and commitments, to the extent that such obligations apply to TJC. The Licensee will remain directly responsible for compliance with License constraints, conditions, requirements, representations and commitments, and Licensee will continue to comply with those ongoing obligations.

Please contact Josh Ankrom, EHS Manager for Delrin USA, LLC, at josh.ankrom@delrin.com or 304-483-3375, if you or other members of the NRC staff require additional information with respect to this matter.

Sincerely,



Josh Ankrom
EHS Manager
Washington Works
Delrin USA, LLC



Ian Arons
Partner
TJC, L.P.

ATTACHMENT

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