



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**

REGION III
2443 WARRENVILLE RD. SUITE 210
LISLE, IL 60532-4352

June 5, 2024

Madhukar Mahajan
Radiation Safety Officer
Haengel & Associates Engineering, Inc.
42040 Koppernick Road, Suite 407
Canton, MI 48187

Dear Mr. Mahajan:

This letter is regarding your request dated May 9, 2024, also signed by Gustavo N. Haengel, for consent to the proposed transfer of control of licensed operations under U.S. Nuclear Regulatory Commission (NRC) Materials License No. 21-32321-01.

The U.S. NRC's guidance document applicable to your request is NUREG-1556, Volume 15, Rev. 1, "Consolidated Guidance About Materials Licenses: Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses," dated June 2016. This guidance is available on the U.S. NRC's website at:
<https://www.nrc.gov/docs/ML1618/ML16181A003.pdf>

Upon review of the request, I identified the following areas requiring additional or clarifying information:

1. Section 5.1, "Description of Transaction," of the guidance specifies that a complete and clear description of the transaction must be provided, including the new legal name of the licensed organization.

The request did not include a complete description of the proposed change of control.

Therefore, please include a complete description of the change of control transaction, including a pre- and post-transaction organizational chart showing the corporate structure of the license holder and its parent companies, if any.

2. Section 5.5, "Decommissioning and Related Records Transfers," of the guidance identifies that prior to approval of a transfer of control, licensees must arrange for the transfer and maintenance of records important to the decommissioning of facilities involved in licensed activities (e.g., leak test results and transfer/disposal records). Further, the transferee must confirm, in writing, that they accept full responsibility for the decommissioning of the site, including any contaminated facilities and equipment.

As a minimum, the request should address the following:

- the statement, "Pursuant to 10 CFR §30.35(g), we shall maintain drawings and records important to decommissioning and will transfer these records to an NRC or Agreement State licensee before licensed activities are transferred; or we will transfer the records to the appropriate NRC regional office before the license is terminated;"

- description of the method and proposed timetable for the transfer of required records;
- a commitment by the transferee to maintain the records received from the transferor; and
- an agreement to perform a survey confirming that the facility is free of contamination or an agreement by the transferee to accept the facility “as is” on the date of transfer.

Please resubmit your request addressing all applicable items from Section 5.5 of the guidance, including those identified above. For additional information and guidance, please refer to Section 5.5 and Appendix E, “Information Needed for Transfer of Control Application,” of the guidance.

In accordance with Title 10 of the *Code of Federal Regulations* (10 CFR) §2.390 of the NRC’s “Rules of Practice,” a copy of this letter and its enclosure will be made available electronically for public inspection in the NRC Public Document Room or from the NRC’s Agencywide Documents Access and Management System (ADAMS), accessible from the NRC website at <https://www.nrc.gov/reading-rm/adams.html>.

To continue review of your request, please submit your response to this letter within 30 calendar days from the date of this letter. In your response, please refer to the license, docket, and control number specified below. I will assume that you do not wish to further pursue this licensing action if I do not receive a reply within the specified timeframe noted above.

If you have questions, require additional time to respond, or require clarification on any of the information stated above, I encourage you to contact me at (630) 829-9737 or via e-mail at Jason.Kelly@nrc.gov.

Sincerely,

Jason M. Kelly, MPH, CPH
Health Physicist
Materials Licensing Branch

Docket No.: 030-35736
License No.: 21-32321-01
Control No.: 640998