

August 26, 2024

Mr. John Scott
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: Notification of Future Change of Control – Radioactive Material License 37-17717-02

Dear Mr. Scott,

As you may recall, on July 30, 2024, we spoke about a potential change of control with respect to Radioactive Material License 37-17717-02 which is held by TranSystems Corporation d/b/a TranSystems Corporation (the “Licensee”). Licensee is a wholly owned subsidiary of TranSystems Parent, Inc., which in turn is owned by TranSystems Holdings, Inc. (“Holdings”).

During our call, I explained that Licensee and Gannett Fleming, Inc. (“GF”) entered into a transaction agreement pursuant to which Licensee will ultimately be merged into GF. Following our conversation, I sent the attached letter to the NRC Licensing Assistance Team to provide notice of a potential change of control in connection with this transaction. We recently received NRC Form 532 acknowledging receipt of my letter.

Unfortunately, it has now come to my attention that I misunderstood the details of the transaction between the TranSystems corporate family and GF. While it is true that a consolidation is planned, to accomplish this, GF first acquired Holdings (the indirect parent of Licensee) through a merger of Holdings into a subsidiary of GF, with Holdings being the surviving corporation. This merger occurred on August 5, 2024, and as a result, Holdings is now a subsidiary of GF. The Licensee is still owned by TranSystems Parent, Inc., which continues to be owned by Holdings. The only change is that Holdings is now owned by GF. For your convenience, I have attached an organization chart showing the company structure before and after this transaction. GF and Holdings anticipate transitioning to operate through a single entity in the coming months.

I sincerely apologize for my misunderstanding of the details of the transaction. Please be assured that there have been no changes with respect to the Radioactive Material License following GF’s acquisition of Holdings. As mentioned above, the transaction merely had the effect of changing the ownership of the holding company that sits two levels above the Licensee in the corporate organizational chart; that is, Licensee continues to be 100% owned

indirectly by Holdings, but Holdings is now owned by GF. The materials are still used and handled in the same manner, the same safety procedures are in place, the same individuals remain responsible for compliance with the license, and GF acknowledges that the Licensee must continue to comply with the license in all respects. We also note that GF currently holds its own Radioactive Materials License, NRC License No. 37-20647-01, but is considering whether that license can, in the near future, be terminated in connection with that anticipated consolidation of GF and the TranSystems corporate family. We will notify the NRC in advance of any planned changes of control in connection with that consolidation and any termination of the licenses.

Sincerely,



William Stenger
Asst. Vice President,
Manager of Operations - Geosciences