

Received 4/22/25

Mail Control Number: 646474  
Docket Number : 3038793  
License Number : 42-35196-01  
Licensee Name : Rock Engineering & Testing Laboratory, Inc.

**From:** [Alexus Willis](#)  
**To:** [Carol Hill](#)  
**Subject:** FW: Re: Re: NRC Change of Control - Rock Engineering & Testing Laboratory, Inc.  
**Date:** Tuesday, April 22, 2025 1:02:49 PM  
**Attachments:** image001.png  
Amendment No 22 Documents.zip  
NUREG 1556 responses.pdf  
UES Central and South Texas Org Chart.pdf

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For Rock Engineering and Testing:

I got an updated letter from the licensee with a new date and the organizational chart. He submitted the documentation that they sent to Texas, but that does not need to go into ADAMS.

Thank you.

Best Regards,

Alexus Willis  
Health Physicist | RIV/DRSS/MLB  
U.S. NRC | 817-200-1187

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**From:** Nathan Ruckstuhl <nathan.ruckstuhl@rocktesting.com>  
**Sent:** Tuesday, April 22, 2025 12:59 PM  
**To:** Alexis Willis <Alexus.Willis@nrc.gov>  
**Subject:** [External\_Sender] Re: Re: NRC Change of Control - Rock Engineering & Testing Laboratory, Inc.

Alexus,

See attached additional requested documents. For the response letter, I added the date to the top of page one and signed the last page.

Thanks,

**Nathan Ruckstuhl, P.E.**

CMT Department Manager – San Antonio



4770 Perrin Creek, Suite 480

San Antonio, Texas 78217

Office: 210-495-8000

Direct Dispatch: 210-457-3504

Cell: 361-658-5366

[nruckstuhl@teamues.com](mailto:nruckstuhl@teamues.com)

[www.TeamUES.com](http://www.TeamUES.com)

TBPELS #2101, #813, #17076

*Rock Engineering and Testing, Alpha Testing, and Riner Engineering are changing our name to UES. Same services, same people, more locations here in Texas.*

*Nationally, UES provides Environmental and Earth Sciences, Sustainable Infrastructure Solutions, and Geophysical Technologies.*

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**From:** Alexis Willis <[Alexus.Willis@nrc.gov](mailto:Alexus.Willis@nrc.gov)>

**Sent:** Monday, April 21, 2025 1:18 PM

**To:** Nathan Ruckstuhl <[nathan.ruckstuhl@rocktesting.com](mailto:nathan.ruckstuhl@rocktesting.com)>

**Subject:** RE: Re: NRC Change of Control - Rock Engineering & Testing Laboratory, Inc.

Hi Nathan,

Can you sign and date the responses? Also, the organizational chart along with the additional information provided to Texas is missing. Can you attach that as well?

Thank you.

Best Regards,

Alexus Willis

Health Physicist | RIV/DRSS/MLB

U.S. NRC | 817-200-1187

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**From:** Nathan Ruckstuhl <[nathan.ruckstuhl@rocktesting.com](mailto:nathan.ruckstuhl@rocktesting.com)>

**Sent:** Thursday, April 17, 2025 4:43 PM

**To:** Alexis Willis <[Alexus.Willis@nrc.gov](mailto:Alexus.Willis@nrc.gov)>

**Subject:** [External\_Sender] Re: NRC Change of Control - Rock Engineering & Testing Laboratory, Inc.

Good afternoon, Alexis,

I apologies for the delay in getting these to you. Please see attached requested documents.

Thanks,

**Nathan Ruckstuhl, P.E.**

CMT Department Manager – San Antonio



4770 Perrin Creek, Suite 480

San Antonio, Texas 78217

Office: 210-495-8000

Direct Dispatch: 210-457-3504

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*Rock Engineering and Testing, Alpha Testing, and Riner Engineering are changing our name to UES. Same services, same people, more locations here in Texas.*

*Nationally, UES provides Environmental and Earth Sciences, Sustainable Infrastructure Solutions, and Geophysical Technologies.*

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**From:** Alexis Willis <[Alexis.Willis@nrc.gov](mailto:Alexis.Willis@nrc.gov)>

**Sent:** Tuesday, March 18, 2025 9:30 AM

**To:** Nathan Ruckstuhl <[nathan.ruckstuhl@rocktesting.com](mailto:nathan.ruckstuhl@rocktesting.com)>

**Subject:** RE: NRC Change of Control - Rock Engineering & Testing Laboratory, Inc.

You don't often get email from [alexus.willis@nrc.gov](mailto:alexus.willis@nrc.gov). [Learn why this is important](#)

Hi Nathan,

I wanted to follow up on the below request. If you have any questions, please let me know.

Thank you.

Best Regards,

Alexis Willis

Health Physicist | Materials Licensing Branch (MLB)

Division of Radiological Safety & Security (DRSS)

U.S. NRC | Region IV | 817-200-1187

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**From:** Alexis Willis

**Sent:** Tuesday, February 25, 2025 12:37 PM

**To:** [nathan.ruckstuhl@rocktesting.com](mailto:nathan.ruckstuhl@rocktesting.com)

**Subject:** NRC Change of Control - Rock Engineering & Testing Laboratory, Inc.

Hi Nathan,

Per our conversation, please provide the additional information to move forward with processing the change of control. Please respond to the questions listed in Appendix E of NUREG 1556, Volume 15, "Consolidated Guidance About Materials Licenses: Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses." I have attached Appendix E for you. More information can be found at <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v15/index.html>. Since you all recently completed a change of control with the State of Texas, you can provide a copy of your approved Texas license and transmittal letter.

Please let me know if you have any additional questions. Thank you.

Best Regards,

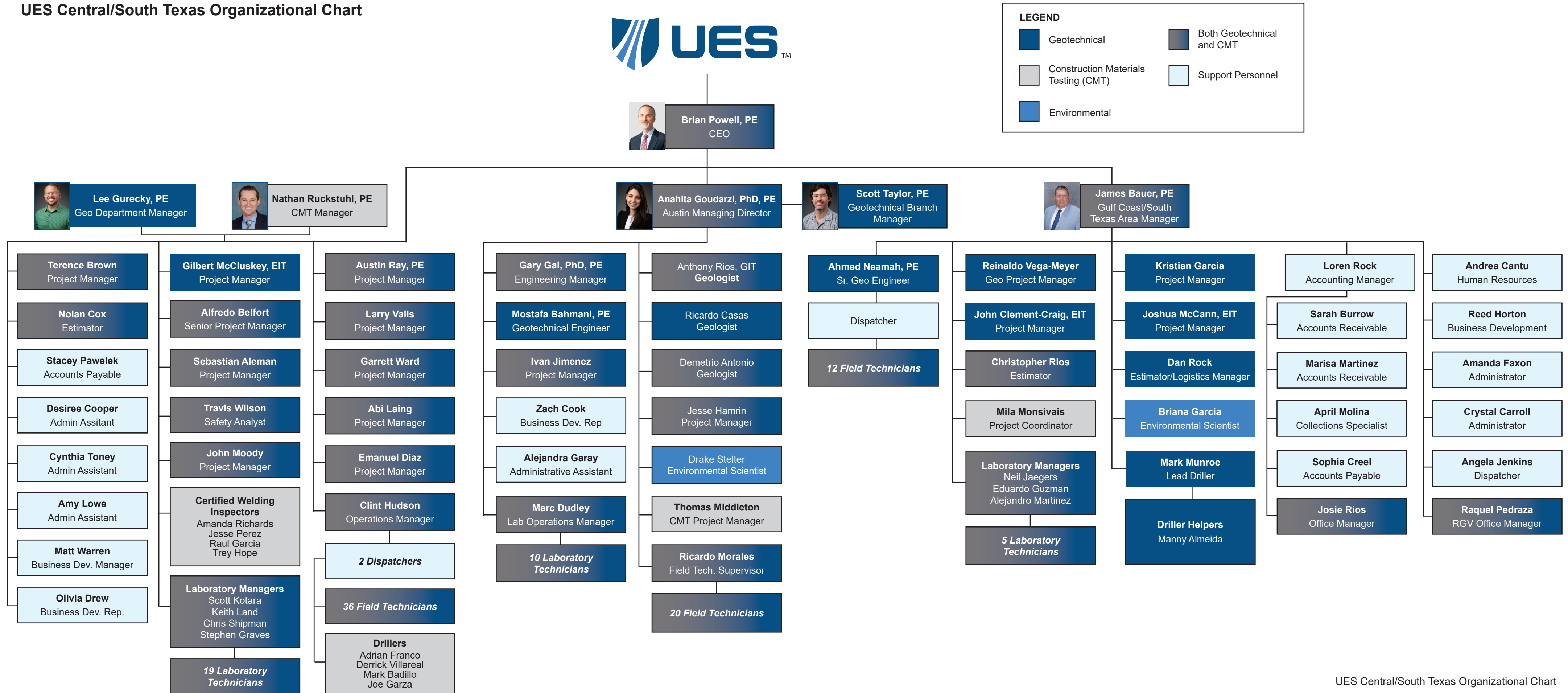
Alexis Willis

Health Physicist | Materials Licensing Branch (MLB)

Division of Radiological Safety & Security (DRSS)

U.S. NRC | Region IV | 817-200-1187

## UES Central/South Texas Organizational Chart



## **Attachment 2**

**NUREG-1556, Chapter 5 (Change of Control) and Appendix E  
(Information Needed for Transfer of Control Application)**



April 21, 2025

This information is submitted consistent with Chapter 5 (Change of Control) and Appendix E (Information Needed for Transfer of Control Application) of NUREG-1556, Vol. 15, Rev. 1, *Consolidated Guidance About Materials Licenses: Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses*.

- 1. Describe any planned changes in the organization, including but not limited to, transfer of stocks or assets and mergers, change in members on Board of Directors, etc. Provide the new licensee's name, mailing address, and contact information, including phone numbers. Clearly identify when the amendment request is due to a name change only.**

UES Professional Solutions 45, LLC currently holds NRC Radioactive Material License No. 42-35196-01 (the "License"). Licensee is currently wholly owned by Obsidian Group Acquisitions, Inc., a Delaware corporation ("Obsidian") (collectively with Licensee, the "Applicants").

Pursuant to an acquisition agreement signed on July 7, 2022, Licensee was acquired by Obsidian, resulting in an indirect ownership change over Licensee (the "Acquisition"). Subsequent to the Acquisition, Licensee continues to exist, continues as the holder of the License and continues its operations as before the Acquisition. Attachment 1 above presents a simplified organization chart illustrating the ownership of Licensee prior to and following the consummation of the Acquisition.

The only substantive change relevant to control of the License is the transfer of ownership of Licensee to Obsidian. Obsidian is a holding company doing business under the trade name "UES". Obsidian owns several engineering firms throughout the United States that currently hold U.S. Nuclear Regulatory Commission and Agreement State materials licenses.

The Acquisition has not impacted control over licensed activities, including licensed programs and trainings. The public health and safety are not compromised by the use of the materials covered by the License. Post-Acquisition, the day-to-day operations under the License remain unchanged, with operations taking place at the same location and using the same materials, facility, and procedures – all under the same Radiation Safety Officer.

- 2. Describe any changes in personnel or duties that relate to the licensed programs. Include training and experience for new personnel and any changes in the training program.**

There are no changes in personnel nor any of the licensed programs, including the training program.

- 3. Describe any changes in the location, facilities, equipment, radiation safety programs, use, possession, waste management, or other procedures that relate to the licensed program.**

There are no such changes planned in connection with the indirect transfer.

- 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.**

There are no changes in the status of facilities, equipment, or radiation safety program due to the transfer. Licensee is in compliance with respect to calibrations, leak tests, area surveys, wipe tests,





training, quality control, and related records. Also, there were no known contamination which required decontamination prior to the transfer.

- 5. If current 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, and as required by 10 CFR 30.35(f), the licensee must, within 30 days, submit financial instruments reflecting such changes.**

Licensee's operations are unchanged. To the extent that a decommissioning funding plan is required, it has not and will not, be changed as a result of the transfer.

- 6. Confirm that all records concerning the safe and effective decommissioning of the facility will be transferred to the transferee or to the regulator, as appropriate. These records include documentation of surveys of ambient radiation levels and fixed and/or removable contamination, including methods and sensitivity.**

The Applicants confirm that such records, which are current and were current at the time of the transfer, remain with Licensee, which continues to hold the License.

- 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 enforcement actions.**

The Applicants confirm that they have agreed to the indirect transfer. There are no open inspection items pertaining to licensed activities.

- 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.**

Licensee remains the holder of the License after the transfer and continues to abide by all constraints, conditions, requirements, representations, and commitments identified in and attributed to existing licensed activities after closing of the transaction. To the extent applicable, Obsidian agrees to and does abide by all constraints, conditions, requirements, representations, and commitments identified in and attributed to existing licensed activities after closing of the transaction.

- 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 in the form of income statements and balance sheet forecasts.**

This question is not applicable to the licensed activities.

Should you need further information, do not hesitate to contact our office.

A handwritten signature in black ink, appearing to read "Nathan Ruckstuhl".

Nathan Ruckstuhl, P.E.  
Radiation Safety Officer  
UES Professional Solutions 45, LLC



## ACKNOWLEDGEMENT - RECEIPT OF CORRESPONDENCE

## Name and Address of Applicant and/or Licensee

Rock Engineering & Testing Laboratory, Inc.  
Nathan Ruckstuhl, RSO  
10856 Vandale Street  
San Antonio, TX 78216

## Date

04/24/2025

## License Number(s)

42-35196-01

## Mail Control Number(s)

646474

## Licensing and/or Technical Reviewer or Branch

Giavanna Muffelletto

This is to acknowledge receipt of your: ☒ Letter and/or ☐ Application Dated: 04/21/2025

The initial processing, which included an administrative review, has been performed.

☒ Amendment ☐ Termination ☐ New License ☐ Renewal

☐ There were no administrative omissions identified during our initial review.

☐ This is to acknowledge receipt of your application for renewal of the material(s) license identified above. Your application is deemed timely filed, and accordingly, the license will not expire until final action has been taken by this office.

☐ Your application for a new NRC license did not include your taxpayer identification number. Please complete and submit NRC Form 531, Request for Taxpayer Identification Number, located at the following link: <http://www.nrc.gov/reading-rm/doc-collections/forms/nrc531.pdf>  
Follow the instructions on the form for submission.

☐ The following administrative omissions have been identified:

Your application has been assigned the above listed MAIL CONTROL NUMBER. When calling to inquire about this action, please refer to this control number. Your application has been forwarded to a technical reviewer. Please note that the technical review, which is normally completed within 180 days for a renewal application (90 days for all other requests), may identify additional omissions or require additional information. If you have any questions concerning the processing of your application, our contact information is listed below:

Region IV  
U. S. Nuclear Regulatory Commission  
DNMS/Materials Licensing Branch  
1600 E. Lamar Boulevard  
Arlington, TX 76011-4511  
(817) 200-1103 or (817) 200-1140

BETWEEN:

Accounts Receivable/Payable  
and  
Regional Licensing Branches

[ FOR ARPB USE ]  
INFORMATION FROM WBL

Program Code: 03121  
Status Code: Pending Amendment  
Fee Category: 3P  
Exp. Date: 02/28/2025  
Fee Comments:  
Decom Fin Assur Req: N

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## License Fee Worksheet - License Fee Transmittal

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### A. REGION

#### 1. APPLICATION ATTACHED

Applicant/Licensee: Rock Engineering & Testing Laboratory, Inc.  
Received Date: 04/22/2025  
Docket Number: 3038793  
Mail Control Number: 646474  
License Number: 42-35196-01  
Action Type: Change of Control

#### 2. FEE ATTACHED

Amount: N/A

Check No.: N/A

#### 3. COMMENTS

Signed: Giavanna Muffelletto

Date: 04/24/25

### B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered / / )

1. Fee Category and Amount: \_\_\_\_\_

#### 2. Correct Fee Paid. Application may be processed for:

Amendment: \_\_\_\_\_

Renewal: \_\_\_\_\_

License: \_\_\_\_\_

#### 3. OTHER \_\_\_\_\_

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

Agency: NRC

## WBL WORKSHEET

DOCKET NUMBER: 3038793	LICENSE NUMBER: 42-35196-01	STATUS: Pending Amendment
MAIL CONTROL NUMBER: 646474	RECEIPT DATE: 04/22/2025	ACTION TYPE: Change of Control
DUE DATE: 10/19/2025	INST. CODE: 35196	LICENSE REGION: Region 4
LICENSE TYPE: 30	ENTITY TYPE: C	LICENSE GROUP: Industrial
ISSUE DATE:	ORIGINAL DATE: 02/12/2015	EXPIRATION DATE: 02/28/2025
DECOMMISSIONING CATEGORY: Group 1	LAST ISSUE DATE:	
LICENSEE NAME: Rock Engineering & Testing Laboratory, Inc.	DECOM FIN ASSUR REQD: N SUBM: N	
MAILING ADDRESS LINE1: 10856 Vandale Street	CONT PLAN REQD: N      APPRV: N	
MAILING ADDRESS LINE 2:		
CITY: San Antonio	STATE: TX	ZIP: 78216
CONTACT PERSON: PREFIX:	FIRST NAME: Nathan	MIDDLE INITIAL:
LAST NAME: Ruckstuhl	SUFFIX:	
JOB TITLE: Radiation Safety Officer	PHONE: 210-495-8000 FAX:	EMAIL: nathan.ruckstuhl@rock
BILLING ADDRESS LINE 1:		
BILLING ADDRESS LINE 2:		
CITY:	STATE: Texas	ZIP:
BILLING CONTACT PERSON: FIRST NAME:	MIDDLE INITIAL:	LAST NAME:
PHONE:	EMAIL:	FAX:
PRIMARY PGM CODE: 03121	SECONDARY PGM CODE:	
INSPECTION REGION: Region 4	PRIORITY: 5	
RSO: PREFIX:	FIRST NAME: Nathan	MIDDLE INITIAL:      LAST NAME Ruckstuhl
SUFFIX:	RSO JOB TITLE: Radiation Safety Officer	
RSO PHONE: 210-495-8000	RSO FAX:	RSO EMAIL: nathan.ruckstuhl@rocktesting.com
STATES WHERE USE IS AUTHORIZED:	0- ALL LISTED STATES 1- SAME AS STATE IN ADDRESS 2- ALL STATES 3- NON-AGREEMENT-STATES	
AUTHORIZED STATES (USE ONLY IF ABOVE IS ZERO):		