



**UNITED STATES  
NUCLEAR REGULATORY COMMISSION**  
REGION IV  
1600 EAST LAMAR BOULEVARD  
ARLINGTON, TEXAS 76011-4511

June 23, 2025

Kevin Bennett, Radiation Safety Officer  
Standard Testing and Engineering, LLC  
dba Standard Engineering &  
Field Services, LLC  
3400 N. Lincoln Boulevard  
Oklahoma City, OK 73105

**SUBJECT: STANDARD TESTING AND ENGINEERING, LLC DBA STANDARD  
ENGINEERING & FIELD SERVICES, LLC – NRC INSPECTION REPORT  
030-12123/2024-001; AND NOTICE OF VIOLATION**

Dear Kevin Bennett:

This letter refers to the U.S. Nuclear Regulatory Commission's (NRC) in-office review of the transfer of control that was submitted to the NRC Region IV office by Standard Testing and Engineering, LLC dba Standard Engineering & Field Services, LLC, in the email dated December 4, 2024 (ADAMS Accession No. ML24345A236). Specifically, the actual transfer of control occurred in 2017, between Standard Testing and Engineering, LLC and Soltani Testing & Engineering, LLC. A final exit briefing was conducted telephonically with you on June 12, 2025.

Based on the information provided to the NRC in the email dated December 4, 2024, the NRC has determined that one Severity Level IV violation of NRC requirements occurred. The violation was evaluated in accordance with the NRC Enforcement Policy. The current Enforcement Policy is included on the NRC's Web site at (<http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>). The violation is cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding it are described in detail in the subject inspection report. The violation is being cited in the Notice because it was identified by NRC during a change of control submitted by Standard Testing and Engineering, LLC.

The NRC has concluded that information regarding: (1) the reason for the violation(s); (2) the corrective actions that have been taken and the results achieved; and (3) the date when full compliance will be (was) achieved is already adequately addressed on the docket in your email dated April 8, 2025. Therefore, you are not required to respond to this letter unless the description herein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response, 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 Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy or proprietary, information so that it can be made available to the Public without redaction.

If you have any questions regarding this in-office review, please feel free to contact Samantha Everett at 817-200-1124 or [samantha.everett@nrc.gov](mailto:samantha.everett@nrc.gov).

Sincerely,



Signed by Simmons, Michelle  
on 06/23/25

Michelle R. Simmons, Branch Chief  
Materials Licensing Branch  
Division of Radiological Safety and Security

Docket No. 030-12123  
License No. 35-17054-01  
Mail Control No. 644447

Enclosure:  
Notice of Violation

STANDARD TESTING AND ENGINEERING, LLC – NRC INSPECTION REPORT  
030-12123/2024-001; AND NOTICE OF VIOLATION – DATED JUNE 23, 2025

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DOCUMENT NAME: STANDARD TESTING & ENGINEERING, LLC – NRC INSPECTION REPORT  
030-12123/2024-001; AND NOTICE OF VIOLATION  
ADAMS ACCESSION NUMBER: **ML25167A300**

SUNSI Review      ADAMS:       Non-Sensitive       Non-Publicly Available      Keyword  
By: SJE       Yes     No       Sensitive       Publicly Available      NRC-002

OFFICE	HP:DRSS/MLB	BC:DRSS/MIB	C:DRSS/MLB	
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DATE	06/16/25	06/17/25	06/23/25	

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## NOTICE OF VIOLATION

Standard Testing and Engineering, LLC  
Oklahoma City, OK

Docket No. 030-12123  
License No. 35-17054-01

During an NRC in-office review conducted during December 4, 2024, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

Title 10 CFR 30.34(b) requires, in part, that no license issued or granted pursuant to the regulations shall be transferred, assigned, or in any manner disposed of, either voluntarily or involuntarily, directly or indirectly, through transfer of control of any license to any person, unless the Commission shall, after securing full information, find that the transfer is in accordance with the provisions of the Act and shall give its consent in writing.

Contrary to the above, in 2017, the licensee completed a transfer of control of NRC license number 35-17054-01, without receiving the Commission's consent in writing. Specifically, NRC licensee Standard Testing and Engineering, LLC, and Soltani Testing, LLC, completed a transfer of control in which Soltani Testing, LLC acquired 100 percent ownership of Standard Testing and Engineering, LLC, which constituted a change of control under 10 CFR 30.34(b), without receiving prior NRC approval and consent in writing.

This is a Severity Level IV violation (NRC Enforcement Policy Section 6.3.d.7).

The NRC has concluded that information regarding: (1) the reason for the violation(s); (2) the corrective actions that have been taken and the results achieved; and (3) the date when full compliance will be achieved is already adequately addressed on the docket in your email dated April 8, 2025. Therefore, you are not required to respond to this letter unless the description herein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

If you contest this enforcement action, you should also provide a copy of your response, with the basis for your denial, to the Director, Office of Enforcement, United States Nuclear Regulatory Commission, Washington, DC 20555-0001.

Enclosure

Your response will be made available electronically for public inspection in the NRC Public Document Room or in the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the public without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.390(b) to support a request for withholding confidential commercial or financial information).

In accordance with 10 CFR 19.11, you may be required to post this Notice within 2 working days of receipt.

Dated this 23<sup>rd</sup> day of June 2025