



July 15, 2025

Dear U. S. NRC:

As a follow up to the recent Asset Purchase Agreement between Universal Security Instruments, Inc. and Feit Electric Company, Inc., all the assets / inventory related to ionization type smoke alarms including radioactive material Americium 241 have been transferred to Feit Electric Company, Inc., 4901 Gregg Road, Pico Rivera, CA 90660-2108.

Note that the associated radioactive material possession licenses; Maryland Department of Environment Radioactive Material License MD-05-090-01 and California Department of Public Health Radioactive Material License 7161-19 have also been recently transferred to Feit Electric Company, Inc. (see attachments)

Therefore, I am requesting Change of Control of both Universal Security Instruments' NRC E-License 19-23643-01E and related Sealed Source Device Registry NR-0657-D-101-E to be transferred to Feit Electric Company, Inc. as soon as possible.

Thank you for your assistance.

Sincerely,

Stephen F. Babiniec
Product Coordinating Engineer / RSO
11407 Cronhill Drive Suite A
Owings Mills, Maryland 21117

FYI - Updated Contact Information

New Ownership: Feit Electric Company, Inc.
Address: 4901 Gregg Rd., Pico Rivera, CA 90660-2108
Primary Contact: Sunil Ramchandani, Chief Strategy Officer & ARSO

Site Locations:

- 1) 2850 E. Del Amo Blvd., Carson, CA 90221
- 2) 4901 Gregg Rd., Pico Rivera, CA 90660-2108

Information Needed for Transfer of Control Application
(Includes Change of Name)
Source: NUREG-1556, Volume 15, Rev. 1

Include a contact name and either U.S. Nuclear Regulatory Commission (NRC) regional office or Headquarters telephone numbers for follow-up information, as required.

Contact: SUNIL RAMCHANDANI
Telephone: (562) 463 - 2852 x379
Fax: N/A

Definitions:

Control: Control of a license is in the hands of the person or persons who are empowered to decide when and how that license will be used. That control is to be found in the person or persons who, because of ownership or authority explicitly delegated by the owners, possess the power to determine corporate policy and, thus, the direction of the activities under the license.

Transferee: A transferee is an entity that proposes to purchase or otherwise gain control of an NRC-licensed operation.

Transferor: A transferor is an NRC licensee selling or otherwise giving up control of a licensed operation.

Information Needed for Transfer of Control

Licensees must provide full information and obtain NRC's **prior written consent** before transferring control of the license. Provide the following information concerning changes of control by the applicant (transferor and/or transferee, as appropriate). **If any items are not applicable, so state.**

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 name, mailing address, and contact information, including phone numbers. **Clearly identify when the amendment request is due to a name change only.**
 - On October 29, 2024, Universal Security Instruments, Inc. (USI) and its wholly-owned subsidiary, USI Electric, Inc. entered into an Asset Purchase Agreement with Feit Electric Company, Inc., pursuant to which Feit Electric agreed to acquire certain assets of the Company, including the USI brands, existing inventory of ionization type smoke alarms. The Asset Sale was approved by USI's shareholders on April 15, 2025 and sale ultimately closed on May 22, 2025. Feit Electric intends to continue importing, storing and distributing Ionization type smoke alarms, as USI had done in the past.
 - New Licensee Name: Feit Electric Company, Inc.
 - Mailing Address: 4901 Gregg Road, Pico Rivera, CA 90660-2108

- Primary Contact: Sunil Ramchandani, Chief Strategy Officer and ARSO
 - Email: sramchandani@feit.com
 - Phone: 562-463-2852
2. Describe any changes in personnel or duties that relate to the licensed program. Include training and experience for new personnel and any changes in the training program.
- Change to Alternate Radiation Safety Officer (ARSO). New ARSO is Sunil Ramchandani, contact info listed above. Training forms provided for both RSO and ARSO (CA Form 2050 attached for reference). Feit Electric Ionization training manual and Radiation Safety Program documents attached for reference.
3. Describe any changes in the location, facilities, equipment, radiation safety program, use, possession, waste management, or other procedures that relate to the licensed program.
- See updated "Radiation Safety Program" (RSP) document (attached)
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.
- See updated RSP document (attached)
 - New ownership: Feit Electric Company, Inc.
 - One additional facility added (details in RSP document attached)
5. If current decommissioning 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.
6. Confirm that all records concerning the safe and effective decommissioning of the facility will be transferred to the transferee or to NRC, as appropriate. These records include documentation of surveys of ambient radiation levels and fixed and/or removable contamination, including methods and sensitivity.
- Transferred – Confirmed.
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.
- Confirmed and Agreed. See attached letter from USI requesting change of control as a result of ownership change..

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.
 - Confirmed. See attached RSP for program details.
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.
 - Not applicable