



## Transfer of Control Request

27 August, 2025

To: Tammy Tomzak  
US NRC Region III  
2056 Westings Ave.  
Suite 400  
Naperville, IL 60563

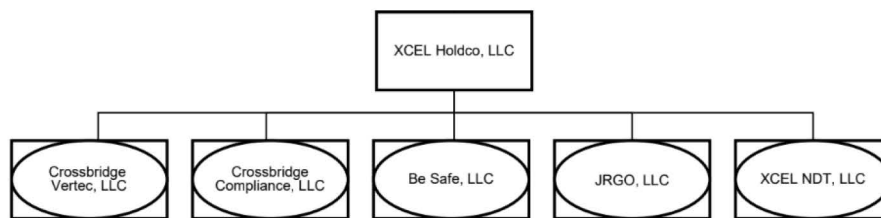
Mrs. Tomzak,

Per your email request dated 27 August, 2025, JRGO LLC. d/b/a Integrity Assessment Group Docket No. 030-38303 and Xcel Holdco LLC. Docket No. 030-39171 intend to merge companies effective as soon as 29 August, 2025. JRGO LLC d/b/a Integrity Assessment Group is considered the transferor and Xcel Holdco is considered the transferee per NUREG 1556 Volume 15. As a result of this transaction, there will be no changes to the management staff, procedures, licensed location(s), facilities, equipment, radiation safety program, use, possession, waste management as applied to the JRGO LLC. d/b/a Integrity Assessment Group radiation safety program.


The JRGO LLC. d/b/a Integrity Assessment Group and Xcel Holdco radiation protection programs currently in-place will continue to operate independent of one another at this time.


JRGO LLC. d/b/a Integrity Assessment Group has no current open inspection items however, the transferor is aware of its responsibility for possible resulting in enforcement actions.

Below, is the new organization chart for reference.



Prepared by:  
Richard Karrmann  
RSO  
JRGO LLC. d/b/a Integrity Assessment Group

Signed  
  
Cole Morehead (Aug 27, 2025 09:14:59 MDT)  
Cole Morehead  
Chief Executive Officer  
Xcel NDT

  
Cory Hoffmann  
Secretary and Treasurer  
JRGO LLC. d/b/a Integrity Assessment Group









# Docket 030-38303 Transfer of Control Cover Letter

Final Audit Report

2025-08-27

Created:	2025-08-27
By:	Richard Karrmann (RKarrmann@int-grp.com)
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## "Docket 030-38303 Transfer of Control Cover Letter" History

-  Document created by Richard Karrmann (RKarrmann@int-grp.com)  
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-  Agreement completed.  
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## Information Needed For Transfer of Control Application

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

NRC Region: III

Contact: Jason M. Kelly

Telephone: (630) 829-9737 - Fax: (630) 515-1078

### 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.

Transferor JRGO LLC. d/b/a Integrity Assessment Group (Docket 030-38303) intends to merge with Transferee Xcel Hold Co LLC. (Docket 030-39171) effective 29 August, 2025. All current JRGO LLC. and Xcel Hold Co LLC. management staff will remain unchanged and continue to operate independently with respect to the radiation safety and protection plans, procedures and practices. The license name, mailing address and contact name will remain the same.

JRGO LLC.

d/b/a Integrity Assessment Group

7445 Whitepine Rd

Richmond, VA 23237



Contact Richard Karrmann (804) 337-1398 rkarrmann@int-grp.com

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.

At this time, there are no changes to personnel or duties as they relate to the radiation safety program. Training and experience for new personnel as well as the training program for new personnel and/or previously certified radiographers will remain unchanged.

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.

There will be no changes to the licensed location, facilities, equipment, radiation safety program, use, possession, waste management, or other procedures that relate to the current licensed program.

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.

The current licensee facility, equipment and radiation safety program are in working order with no known contamination. Personnel dosimetry calibrations are performed annually. Calibrated and operational personnel dosimetry is available for all radiographic personnel. Survey meters are calibrated at 90-day intervals and are currently available for use. Leak tests, area surveys, wipe test results, training and quality control records are available and maintained at the local level.

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.

Decommissioning funding plans, financial assurance documents and instruments are not applicable to this transfer of control.

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.

All records concerning the safe and effective decommissioning of the facility will be transferred to the transferee (Xcel Hold Co LLC.) or the NRC as appropriate. Including documentation of surveys of ambient radiation levels and fixed and/or removable contamination, including methods and sensitivity.

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 transferor (JRGO LLC d/b/a Integrity Assessment Group and the transferee (Xcel Hold Co LLC.) agree to transfer control of the licensed material and activity, and the conditions of the transfer. The transferee has no current open inspection items however, the transferor is aware of its responsibility for possible resulting in enforcement actions.

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.

The transferee (Xcel Hold Co LLC.) will abide by all constraints, conditions, requirements, representations, and commitments of the transferor (JRGO LLC d/b/a Integrity Assessment Group), or will submit a complete description of the proposed licensed program.

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 to this transfer of control

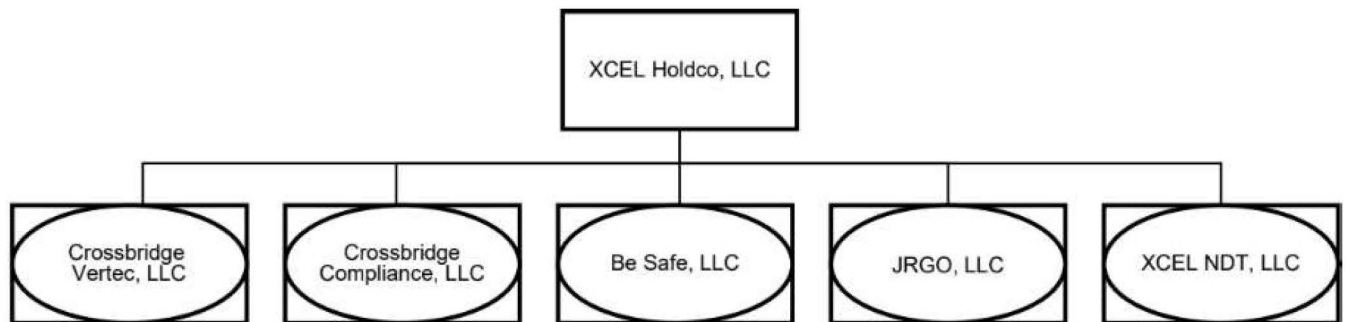


Figure 1. New Organization Chart

### TIME SENSITIVE DOCUMENT

JRGO LLC. and XCEL HOLD CO LLC. request this TOC be executed on or before 29 August, 2025

Document prepared by Richard Karrmann  
Radiation Safety Officer  
JRGO LLC. d/b/a Integrity Assessment Group

Document Reviewed by Stewart White  
Radiation Safety Officer  
Xcel NDT

Document signed by Cory Hoffmann

A handwritten signature in black ink, appearing to read 'C. Hoffmann', with a stylized flourish at the end.

Secretary and Treasurer

JRGO LLC. d/b/a Integrity Assessment Group

# Transfer of Control Docket 030-38303

Final Audit Report

2025-08-26

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## "Transfer of Control Docket 030-38303" History



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Agreement completed.

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## Martha Pavon

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**From:** Tammy Tomczak  
**Sent:** Tuesday, August 26, 2025 11:16 AM  
**To:** Martha Pavon  
**Cc:** Sandy Pavon  
**Subject:** FW: Time Sensitive Transfer of Control Docket 030-38303/030-39171  
**Attachments:** Transfer of Control Docket 030-38303 - signed.pdf  
  
**Importance:** High

Hi Martha 😊

Can you please add the attached to ADAMS?

Thank you!!  
Tammy



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**From:** Richard Karrmann (IAG Petro Chem) <RKarrmann@int-grp.com>  
**Sent:** Tuesday, August 26, 2025 11:02 AM  
**To:** R3-DRSSMail Resource <R3-DRSSMail.Resource@nrc.gov>  
**Cc:** Cole Morehead <cmorehead@xcelgrp.com>; Stewart White <swhite@xcelgrp.com>; Joe Powell (IAG Corporate) <joe@int-grp.com>  
**Subject:** [External\_Sender] Time Sensitive Transfer of Control Docket 030-38303/030-39171  
**Importance:** High

Region 3 Licensing,

Please review the attached Transfer of Control questionnaire taken from NUREG 1556 Volume 15 for a company merger between JRGO LLC. and Xcel Hold Co LLC, both of which are licensed by the NRC for Industrial Radiography. The contract between the two companies is expected to close on 29 August, 2025. If possible, we respectfully request this TOC be escalated.

For any questions/concerns, I can be contacted direct at (804) 337-1398 – Business Cell  
Thank you

 <p><b>INTEGRITY</b> ASSESSMENT GROUP</p>  <p><b>Respect • Accountability • Integrity • Safety • Excellence</b></p>	<p><b>Rich Karrmann</b> Service Manager, Mechanical Integrity Radiation Safety Officer</p> <p><b>Integrity Assessment Group</b></p> <p>7445 Whitepine Rd Richmond, VA 23237 ☎ 804-337-1398 Business Cell ✉ <a href="mailto:RKarrmann@int-grp.com">RKarrmann@int-grp.com</a> 🌐 <a href="http://www.int-grp.com">www.int-grp.com</a></p>
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