



APPLIED TECHNICAL SERVICES

www.atslab.com

1049 Triad Court • Marietta, GA 30062 • 770-423-1400

October 3, 2025

U.S. Nuclear Regulatory Commission
Region III Office
2056 Westings Avenue, Suite 400
Naperville, IL 60563-2657

RE: indirect change of control amendment
License No.: 10-35278-01
Docket No.: 030-38879
Control No.: 649755

Dear Mr. Kelly:

In response to your Request for Information dated September 23, 2025, Applied Technical Services, LLC is submitting a revised amendment package, addressing the items listed in the correspondence. My apologies for the lack of detail on some items. Additionally, our legal department has provided the pre- and post-transaction organizational charts, which were not available at the time of original submittal.

Additionally, please note that SGS North America, Inc. does not possess a U.S. NRC or Agreement State radioactive material license.

The following page lists the items attached to this letter.

If you have any questions during the review of this revised amendment package, please feel free to contact myself or Mark Bottoms, Corporate Radiation Safety Officer.

Sincerely,

Eric Jameson

Digital signature of Eric Jameson
Digitally signed by Eric Jameson
Date: 2025.10.03 22:09:35 -04'00'

Eric Jameson
Assistant Corporate Radiation Safety Officer
Applied Technical Services, LLC.
1049 Triad Court
Marietta, GA 30062
Office: 770-423-1400
Mobile: 404-660-3019
ejameson@atslab.com



List of Attachments:

- Original NRC Form 313, signed 09/03/2025
- Original cover letter describing the indirect transfer of control (Proposed Transaction), signed 09/03/2025
- SGS Press Release dated 2 July 2025 about acquisition of ATS (part of original submittal)
- Updated NUREG 1556 Vol 15, Rev 1, Appendix E “Information Needed for Transfer of Control Application.” Includes responses to RFI dated 9/23/2025, additions are in **blue**.
- ATS Organization Charts, showing the relationship between Radiation Safety, the NDT departments/offices, the Senior VP of NDT/NDI, the COO, and the CEO
- Pre- and Post-Closing Organization Charts, showing the relationship between ATS and its parent companies.



APPLICATION FOR MATERIALS LICENSE

APPROVED BY OMB: NO. 3150-0120

EXPIRES: 07/31/2026

Estimated burden per response to comply with this mandatory collection request: 4.3 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the FOIA, Library, and Information Collections Branch (T-6 A10M), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by email to Infocollects.Resource@nrc.gov, and the OMB Reviewer at: OMB Office of Information and Regulatory Affairs, (3150-0120), Attn: Desk Officer for the Nuclear Regulatory Commission, 725 17th Street NW, Washington, DC 20503. The NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the document requesting or requiring the collection displays a currently valid OMB control number.

INSTRUCTIONS: SEE THE CURRENT VOLUMES OF THE NUREG-1556 TECHNICAL REPORT SERIES ("CONSOLIDATED GUIDANCE ABOUT MATERIALS LICENSES") FOR DETAILED INSTRUCTIONS FOR COMPLETING THIS FORM: <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556>. SEND ONE COPY OF THE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

MATERIALS SAFETY AND TRIBAL LIAISON BRANCH
DIVISION OF MATERIALS SAFETY, SECURITY, STATE AND TRIBAL PROGRAMS
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS
U.S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555-0001

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

IF YOU ARE LOCATED IN:

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA,
GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE,
NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO,
RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN
ISLANDS, OR WEST VIRGINIA,

SEND APPLICATIONS TO:

LICENSING ASSISTANCE TEAM
DIVISION OF RADIOLOGICAL SAFETY AND SECURITY
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
475 ALLENDALE ROAD, SUITE 102
KING OF PRUSSIA, PA 19406-1415
R1DRSSMail.Resource@nrc.gov

*Note: The preferred method to submit NRC Form 313 is email. Any other document (e.g., financial assurance documents) should be sent via mail.

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH
DIVISION OF RADIOLOGICAL SAFETY AND SECURITY
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
2056 WESTINGS AVENUE, SUITE 400
NAPERVILLE, IL 60563-2657
R3-DRSSMAIL.Resource@nrc.gov

*Note: The preferred method to submit NRC Form 313 is email. Any other document (e.g., financial assurance documents) should be sent via mail.

IF YOU ARE LOCATED IN:

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS,
LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH
DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS,
UTAH, WASHINGTON, OR WYOMING,

SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH
DIVISION OF RADIOLOGICAL SAFETY AND SECURITY
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
1600 E. LAMAR BOULEVARD
ARLINGTON, TX 76011-4511
R4licensing@nrc.gov

*Note: The preferred method to submit NRC Form 313 is email. Any other document (e.g., financial assurance documents) should be sent via mail.

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

1. THIS IS AN APPLICATION FOR (Check appropriate item)

A. NEW LICENSE
 B. AMENDMENT TO LICENSE NUMBER 10-35278-01
 C. RENEWAL OF LICENSE NUMBER _____

3. LIST ADDRESS AND/OR TEMPORARY JOB SITE (TJS) ADDRESS, WHERE LICENSED MATERIALS WILL BE USED OR POSSESSED

Applied Technical Services LLC
71 East Saginaw Road
Sanford, Michigan 48657

2. NAME AND MAILING ADDRESS OF APPLICANT (Include zip code)

Applied Technical Services LLC
1049 Triad Court
Marietta, Ga. 30062

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Mark Bottoms

BUSINESS TELEPHONE NUMBER	BUSINESS CELLULAR TELEPHONE NUMBER (770) 313-4240
---------------------------	--

BUSINESS E-MAIL ADDRESS

mbottoms@atslab.com

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE APPLICABLE [LICENSING GUIDANCE](#).

5. RADIOACTIVE MATERIAL

a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time. **same**

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.

10. RADIATION SAFETY PROGRAM. **same**12. LICENSE FEES (Fees required only for new applications, with few exceptions*)
(See 10 CFR 170 and Section 170.31)

*Amendments/Renewals that increase the scope of the existing license to a new or higher fee category will require a fee.

FEES CATEGORY	N/A	AMOUNT ENCLOSED \$	N/A
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PER THE DEBT COLLECTION IMPROVEMENT ACT OF 1996 (PUBLIC LAW 104-134), YOU ARE REQUIRED TO PROVIDE YOUR TAXPAYER IDENTIFICATION NUMBER. PROVIDE THIS INFORMATION BY COMPLETING NRC FORM 531: <https://www.nrc.gov/reading-rm/doc-collections/forms/nrc531info.html>. FAX THE COMPLETED NRC FORM 531 TO (301) 415-6725.

13. CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 37, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

CERTIFYING OFFICER -- TYPED/PRINTED NAME AND TITLE

Eric Jameson Assistant Corporate Radiation Safety Officer

SIGNATURE

DATE

09/03/2025

FOR NRC USE ONLY

TYPE OF FEE	FEE LOG	FEES CATEGORY	\$ AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
APPROVED BY				DATE	



APPLIED TECHNICAL SERVICES

www.atslab.com

1049 Triad Court • Marietta, GA 30062 • 770-423-1400

Date: September 3, 2025

License Number: 10-35278-01

Address: 1049 Triad Court
Marietta, GA 30062

RE: Change of ownership

To Whom it may concern,

Pursuant to an Agreement and Plan of Merger entered on July 1, 2025, SGS North America Inc., a Delaware corporation (SGS NA) wholly owned by SGS S.A., an entity formed under the laws of Switzerland (SGS), will, through a series of mergers, acquire the Licensee's (ATS) indirect parent, Ironclad Holdco, LLC, a Delaware limited liability company. As a result of the Proposed Transaction, SGS NA will indirectly own 100 percent of Licensee's (ATS) issued and outstanding shares. The Proposed Transition is expected to close in the fourth quarter of 2025, subject to satisfaction or waiver of the conditions in the Merger Agreement.

SGS NA does not plan to make any changes to the Licensee's (ATS) organization, location(s), facilities, equipment, or procedures, including Operating or Emergency procedures, ATS will continue to be the license holder and agrees to continue to abide by all commitments and representations previously made following the completion of the Proposed Transaction. SGS NA does not have any plans to alter the Licensee's activities relating to radioactive materials.

Applied Technical Services is requesting an Amendment to our RAM License to show Change of Ownership and we are also requesting that our RAM License stays active and in good standing until the process is complete.

Thank you,

Eric Jameson

Eric Jameson
ATS Assistant Corporate RSO
1049 Triad Court
Marietta, GA 30062
Cell Phone: (404) 660-3019
Email: ejameson@atslab.com



Ad hoc announcement pursuant to Art. 53 LR

Geneva, 2 July 2025

SGS has signed an agreement to acquire ATS, a major American player

SGS, the world's leading testing, inspection and certification company, announces that it has signed a definitive agreement to acquire the entire issued share capital of Applied Technical Services ("ATS"), a leading provider of specialized Testing, Inspection, Calibration and Forensics solutions in North America. ATS is expected to bring USD 460 million of sales and USD 95 million of EBITDA before synergies in 2026.

With close to 60 years of history, ATS is a resilient and diversified pure US player with a strong brand and service culture. It delivers solutions and services in regulated and high-growth end-markets such as Manufacturing, Aerospace & Defense, Power Generation & Distribution, and Insurance. Powered by a team of 2,100 skilled professionals and a network of 85 state-of-the-art facilities strategically located across the United States, ATS serves a large base of blue-chip clients across a broad range of industries.

The proposed transaction will strengthen SGS's position in the US with total annual sales to exceed USD 1.5 billion in North America. This marks a major milestone in SGS's ambition to more than double its sales in the region by 2027 compared to 2023. It will also allow SGS to expand into new attractive segments. The complementarity of the offers and customers opens significant opportunities for cross-selling.

This transaction is valued at USD 1,325 million (Enterprise Value on a debt-free, cash-free basis)* corresponding to a multiple of 11.2 times 2026 EBITDA including run rate synergies. A small portion of less than USD 100 million will be paid in SGS shares to some shareholders and key employees subject to a three-year lock up period. The remainder of the purchase price will be financed through cash and debt while maintaining the leverage around 2 times. EBITDA synergies of at least USD 30 million per year are expected on a run rate basis within 3 years of closing, driven by cost rationalization and cross-selling opportunities. The acquisition will be accretive on the EPS from the first year. It is also expected to enhance SGS's revenue growth and adjusted operating income margin, supported by the synergies.

The transaction is subject to customary closing conditions and is expected to close by late 2025 / early 2026.

Géraldine Picaud, CEO of SGS, commented:

"We are very happy to have signed the acquisition of Applied Technical Services. This transaction will significantly accelerate the execution of Strategy 27 by strengthening our presence in North America. ATS has exceptional teams, highly skilled with strong integrity and customer-oriented culture. By combining our forces in the US, we will deliver sustainable growth and synergies, and create lasting value for our shareholders. We are incredibly excited about the significant opportunities ahead."

* Before IFRS 16 Adjustment on operating leases of USD 65 million

Investor and media contacts

Ariel Bauer

Head of Communications, Investor Relations and Sustainability
t: +41 79 863 49 23

Livia Baratta

Director, Investor Relations
t: +41 79 586 48 53
e: SGS.Investor.relations@sgs.com

ABOUT SGS

SGS is the world's leading Testing, Inspection and Certification company. We operate a network of over 2,500 laboratories and business facilities across 115 countries, supported by a team of 99,500 dedicated professionals. With over 145 years of service excellence, we combine the precision and accuracy that define Swiss companies to help organizations achieve the highest standards of quality, compliance and sustainability.

Our brand promise – *when you need to be sure* – underscores our commitment to trust, integrity and reliability, enabling businesses to thrive with confidence. We proudly deliver our expert services through the SGS name and trusted specialized brands, including Brightsight, Bluesign, Maine Pointe and Nutrasource.

SGS is publicly traded on the SIX Swiss Exchange under the ticker symbol SGSN (ISIN CH1256740924, Reuters SGSN.S, Bloomberg SGSN:SW). For more information visit www.sgs.com

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: Mark Bottoms

Telephone: (770) 423-1400

Email: mbottoms@atslab.com

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.

The Proposed Transaction will not result in any changes to the personnel having control over the licensed activities or other personnel identified in the license or previous license applications.

The attached organization charts that indicate reporting structure from local and Corporate Radiation Safety up to the CEO will remain unchanged. Additionally, there are higher level organization charts that show the pre- and post-transaction corporate structure of the parent companies above Applied Technical Services, LLC.

As a result of the Proposed Transaction, SGS NA will indirectly own 100 percent of the Licensee's issued and outstanding shares. The Proposed Transaction is expected to close in the fourth quarter of 2025, subject to the satisfaction or waiver of the conditions in the Merger Agreement.

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.

No changes in licensed operations, training programs, or personnel.

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 are no planned changes to the facilities, operations, equipment used, or radiation safety program and procedures.
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.

No contamination present. The licensee only possesses sealed sources, cameras are surveyed daily at the beginning and end of use, and routine leak tests (on both sealed sources and cameras) are current and show no contamination.

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.

N/A – licensee only possesses sealed sources; license will remain in effect at same location with no change in operations

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.

Records are continuing to be maintained, tracking public dose via monthly area monitoring OSL badges. Since the licensee only possesses sealed sources, all disposal is via transfer to manufacturer/supplier.

Pursuant to 10 CFR 30.35(g), we shall maintain drawings and records important to decommissioning and will transfer these records to an NRC or Agreement State licensee before licensed activities are transferred, or we will transfer the records to the appropriate NRC regional office before the license is terminated.

Considering that ATS, as the license holder, is currently in possession of all such records, and that ATS will be the license holder after the Proposed Transaction, we commit to maintain such records and will accept the facilities "as is" on the date of the transfer since we know the status of the facilities. Additionally, ATS will continue to accept full responsibility for the decommissioning of the facilities.

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.

Following the Proposed Transaction, the Licensee will continue to be the license holder and agrees to continue to abide by all commitments and representations previously made

to the US NRC. The Licensee will continue to accept full responsibility for any unresolved inspection items and any resulting enforcement actions. The transferor and transferee are in agreement regarding the transfer of control of the licensed material & activity, and the conditions of the transfer. As of the date of this letter, there are no identified open inspection items that require resolution or pending enforcement actions. If this changes, the transferor will provide the transferee the details of such inspection items, the potential resulting enforcement actions, any steps and commitments the transferor has taken, and the responsibility of the transferee to continue to address and comply with these actions.

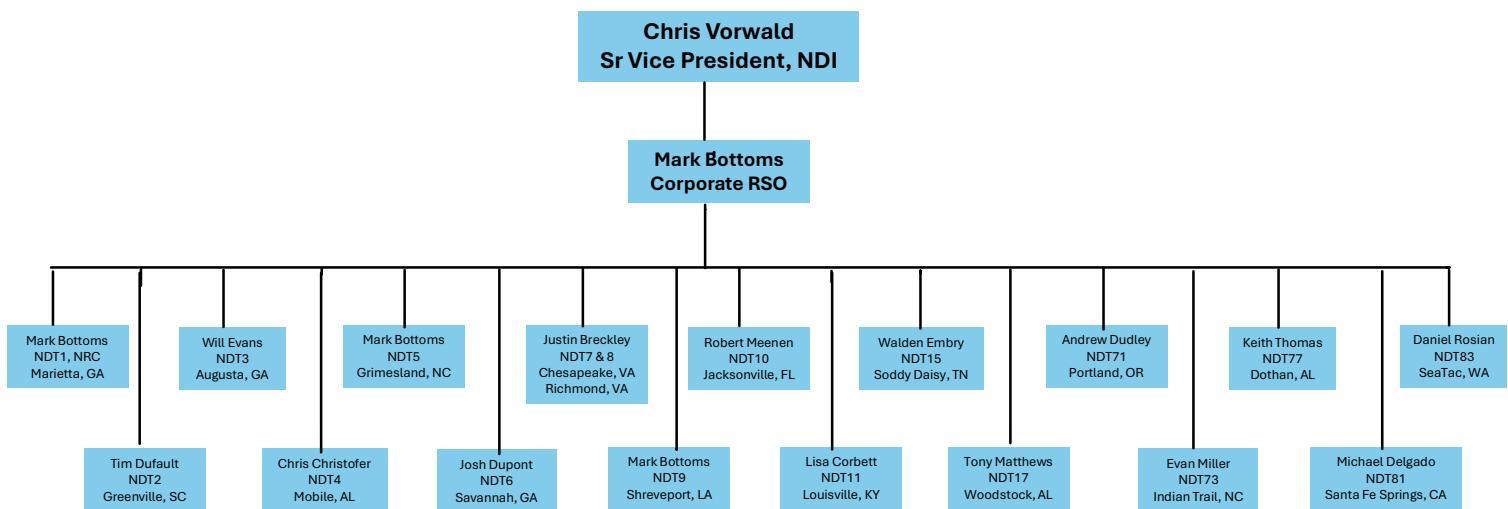
8. Confirm that the transferee will abide by all constraints, conditions, requirements, representations, and commitments of the transferor or that the transferee will submit a complete description of the proposed licensed program.

Following the Proposed Transaction, the Licensee will continue to be the license holder and agrees to continue to abide by all commitments and representations previously made to the US NRC.

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.

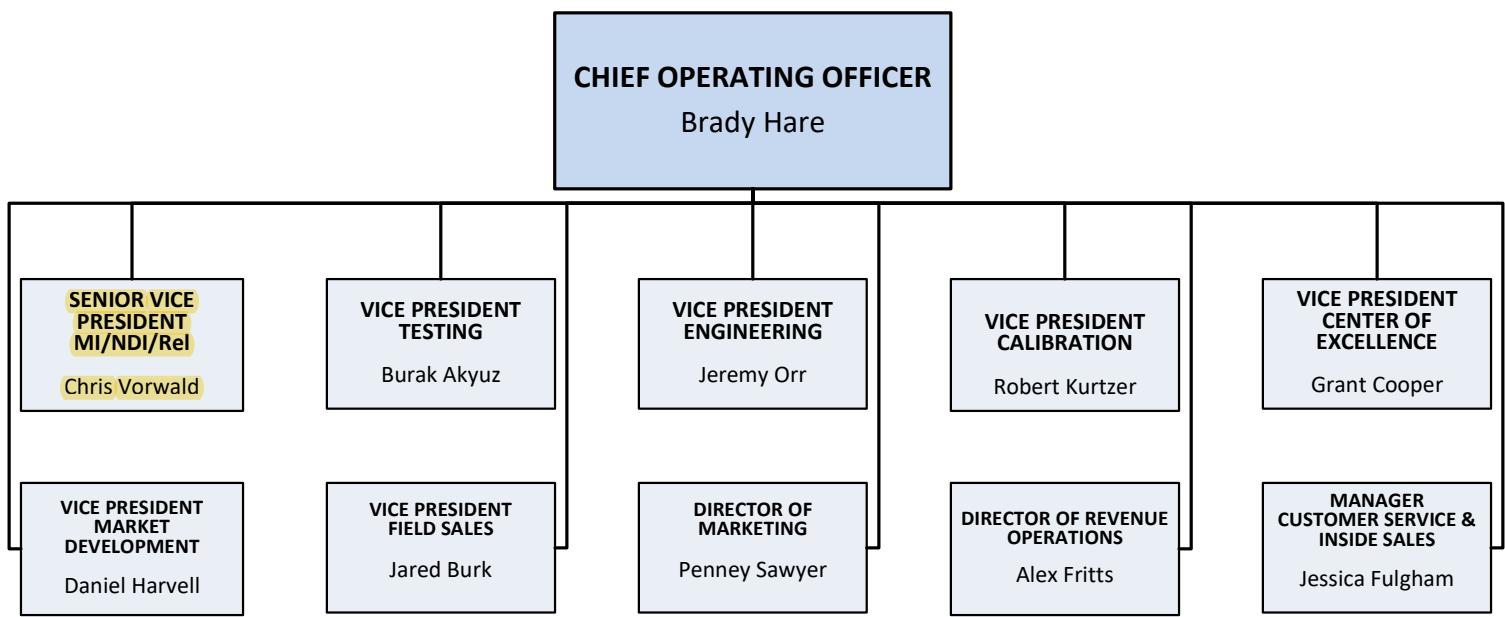
N/A – not a fuel cycle facility

ATS NDT Radiation Safety Officers

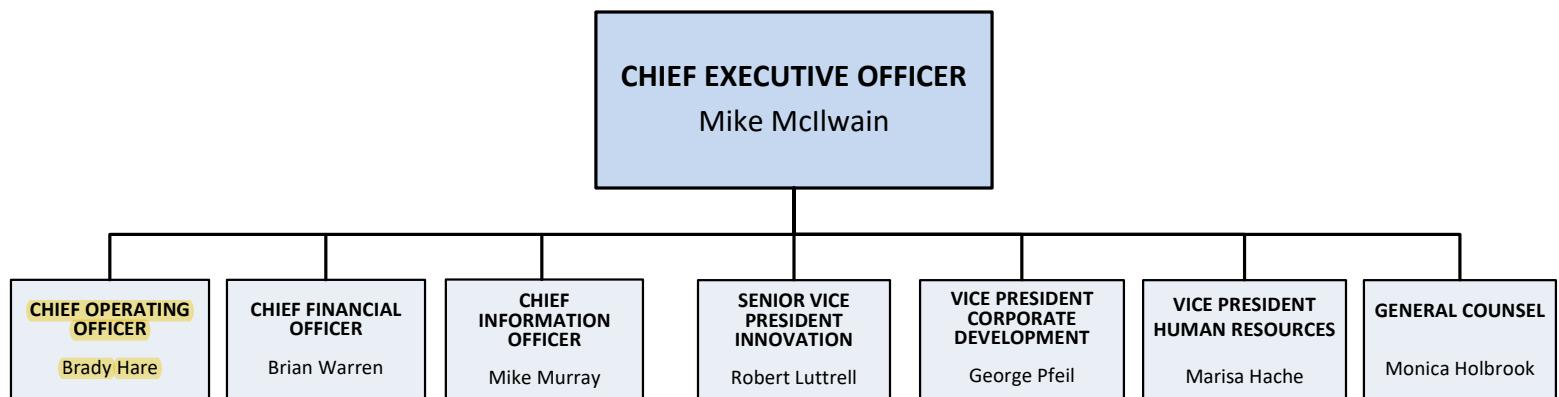


August 7, 2025

APPLIED TECHNICAL SERVICES



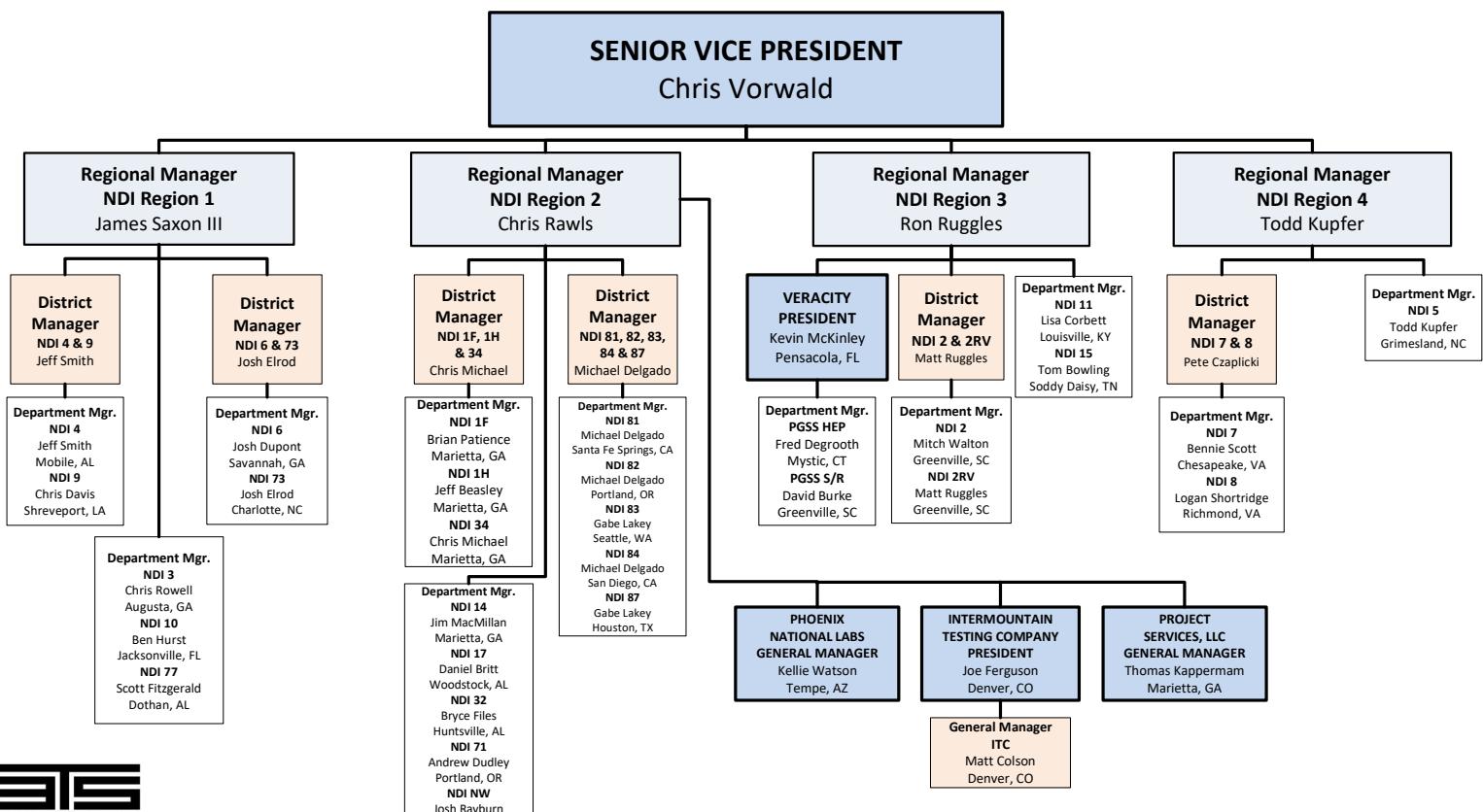
APPLIED TECHNICAL SERVICES



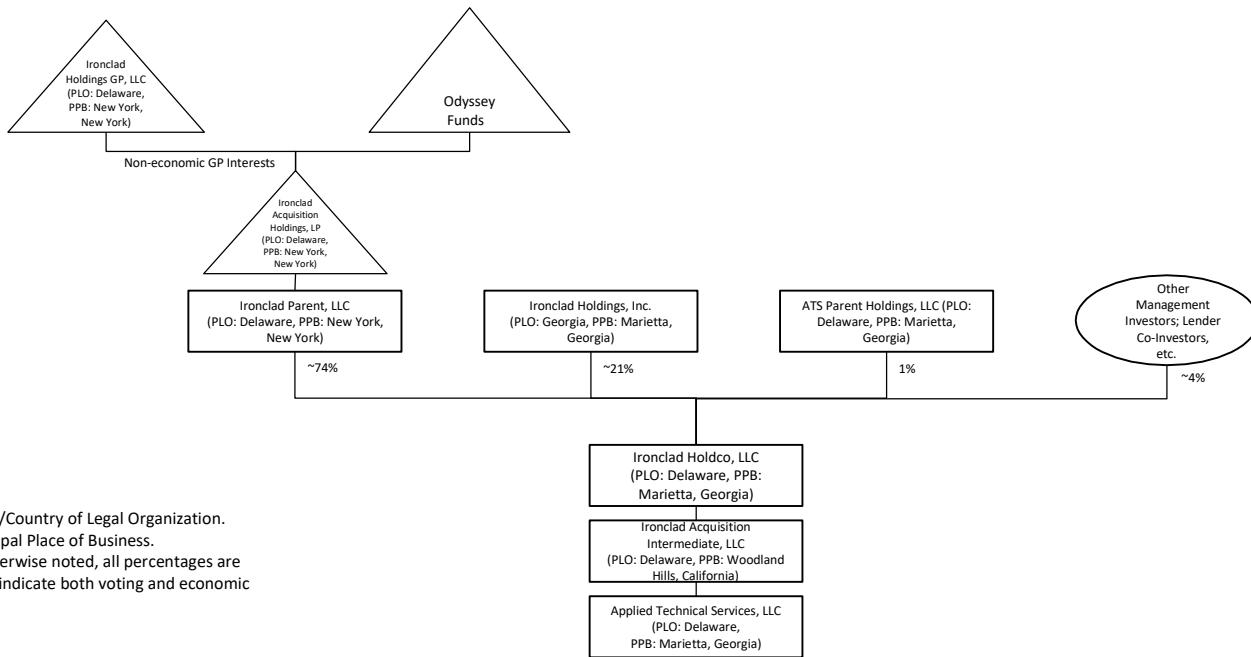
Applied Technical Services

APPLIED TECHNICAL SERVICES

Inspection – NDI Vertical – July 2025



ATS Pre-Closing Organizational Chart

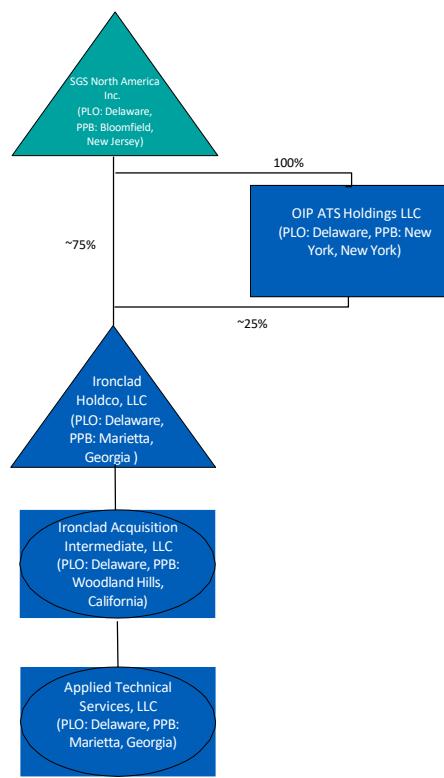


Notes:

- PLO: Place/Country of Legal Organization.
- PPB: Principal Place of Business.
- Unless otherwise noted, all percentages are 100% and indicate both voting and economic interests.

*** 1% owned by Ironclad Employee Holdings, Inc.

ATS Post-Closing Organizational Chart



Notes:

- PLO: Place/Country of Legal Organization.
- PPB: Principal Place of Business.
- Unless otherwise noted, all percentages are 100% and indicate both voting and economic interests.

Martha Pavon

From: Tammy Tomczak
Sent: Thursday, November 13, 2025 8:22 AM
To: Martha Pavon
Cc: Sandy Pavon
Subject: FW: RAM license 10-35278-01 response to RFI
Attachments: 2025-1003 NRC 10-35278-01 change of ownership application, with attachments, revised for RFI-signed.pdf

Good morning, Martha 😊

Can you please add the attached to ADAMS?

Thank you!!
Tammy

From: Eric Jameson <ejameson@atslab.com>
Sent: Friday, October 3, 2025 9:21 PM
To: R3-DRSSMail Resource <R3-DRSSMail.Resource@nrc.gov>; Jason Kelly <Jason.Kelly@nrc.gov>
Cc: Mark Bottoms <mbottoms@atslab.com>
Subject: [External_Sender] RAM license 10-35278-01 response to RFI

As requested in your Request for Information dated 9/23/2025, ATS is providing a revised amendment request for indirect change of control.

The cover letter includes a listing of the documents that comprise the revised amendment request.

If I can be of further assistance, please let me know.

Sincerely,

Eric Jameson
Assistant Radiation Safety Officer
Applied Technical Services, LLC.
1049 Triad Court
Marietta, GA 30062
Office: 770-423-1400
Mobile: 404-660-3019
ejameson@atslab.com

Your opinion is vital to our efforts to continually improve our services. Please tell us how we're doing. [Client Satisfaction Survey](#)

Services provided will be governed by the General Conditions of Service available at: [Sales Order](#)

Acknowledgement

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