



Attn: Ms. Erin Kennedy

U.S. Nuclear Regulatory Commission
Region III
Division of Radiological Safety and Security
Materials Licensing Branch

Re: Request for NRC Consent to Transfer NRC Materials License No. 21-18680-01 (Portable Nuclear Moisture/Density Gauges)

Dear Ms. Kennedy:

Pursuant to 10 CFR 30.34(b) and in accordance with the guidance in NUREG-1556, Volume 1, *Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Portable Gauge Licenses*, **Construction Testing Services (CTS)** hereby requests the U.S. Nuclear Regulatory Commission's written consent to transfer NRC Materials License No. **21-18680-01** to **G2 Consulting Group, LLC (G2)** as the result of an **asset purchase transaction**.

1. Description of the Proposed Transaction

Construction Testing Services has entered into an asset purchase agreement with G2 Consulting Group, LLC under which the portable nuclear moisture/density gauges and associated licensed activities will be transferred to the transferee. Upon completion of the transaction, G2 Consulting Group will assume full responsibility for possession, use, and control of the licensed radioactive material.

The proposed transfer is expected to occur on or about **February 1, 2026**, subject to NRC approval. No licensed material will be transferred or used by the transferee prior to NRC's written consent.

2. Licensed Material and Authorized Use

The license authorizes possession and use of portable nuclear moisture/density gauges containing sealed radioactive sources, including Cesium-137 and Americium-241/Beryllium.

The proposed transfer will not involve any changes to:

- Authorized radionuclides or source strengths
- Types or models of licensed devices
- Authorized uses
- Temporary job site operations

All licensed material will remain under continuous regulatory control throughout the transfer process.

3. Storage Location

Following NRC approval of the transfer, **all transferred gauges will continue to be stored at the current, NRC-authorized storage location** identified on the CTS license as **3300 E. Bristol Rd., Burton, MI 48529**. No changes to storage location, security arrangements, or access controls are proposed as a result of this transaction.

4. Radiation Safety Program and Compliance

G2 Consulting Group, LLC confirms that it will implement and maintain a radiation safety program that meets or exceeds the requirements of 10 CFR Parts 19, 20, 30, and 71 and is consistent with the guidance in NUREG-1556, Volume 1.

Specifically:

- Existing operating, emergency, and security procedures for portable gauges will be adopted without reduction in effectiveness.
- Required leak testing, inventories, training, audits, and recordkeeping will continue without interruption.
- Transportation of gauges will continue to comply with all applicable NRC and U.S. Department of Transportation requirements.

5. Radiation Safety Officer and Authorized Users

Bruce J. Wilberding (Current G2 Radiation Safety Office) will continue to serve as Radiation Safety Officer (RSO) for the transferee and meets the qualification criteria described in NUREG-1556, Volume 1. RSO Officer Course, Certificate of Completion is attached with this letter.

All authorized users will remain properly trained and qualified in accordance with the license conditions and NRC guidance for portable gauge use.

6. Decommissioning

No decommissioning is planned or proposed as part of this license transfer. Licensed activities will continue under the transferee without interruption, and all radioactive material will remain in authorized use and storage.

7. Commitments

Upon NRC approval of this request:

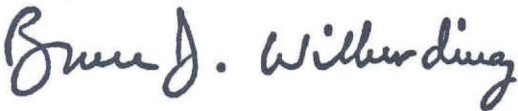
- G2 Consulting Group will assume full responsibility for compliance with the NRC license and applicable regulations.
- The transfer of licensed material and control will not occur until written NRC consent is received.
- Any required conforming license amendment requests (e.g., licensee name or administrative updates) will be submitted as directed by NRC staff.

8. Certification

I certify that the statements made in this request are true and correct to the best of my knowledge and belief.

If you have any questions or require additional information, please contact **Bruce J. Wilberding, RSO** at **248.640.4557** or **bwilberding@g2consultinggroup.com**

Respectfully submitted,



Bruce J. Wilberding, P.E., RSO
Founding Principal
G2 Consulting Group, LLC
1775 Crooks Road
Suite 100
Troy, MI 48084

Attachments:

- Construction Testing Services Portable Gauge List
- CTS Portable Gauge Leak Tests
- B. Wilberding, RSO Officer Course, Certificate of Completion

Certificate of Completion

This certifies that

Bruce J Wilberding

has successfully completed the

Troxler Radiation Safety Officer Course

conducted by the training department of

Troxler Electronic Laboratories, Inc.

Greg Farnen

Greg Farnen
Instructor

November 30, 2000
Date

William F. Troxler, Jr.
President



Martha Pavon

From: Tammy Tomczak
Sent: Tuesday, January 20, 2026 11:08 AM
To: Martha Pavon
Cc: Sandy Pavon
Subject: FW: Request for NRC Consent to Transfer NRC Materials License No. 21-18680-01 (Portable Nuclear Moisture/Density Gauges)
Attachments: Transfer Request Letter_Combine.pdf

Hi Martha 😊

Can you please add the attached to ADAMS?

Thank you!!
Tammy

From: Bob Orlikowski <Robert.Orlikowski@nrc.gov>
Sent: Tuesday, January 20, 2026 11:03 AM
To: Tammy Tomczak <Tammy.Tomczak@nrc.gov>
Subject: FW: Request for NRC Consent to Transfer NRC Materials License No. 21-18680-01 (Portable Nuclear Moisture/Density Gauges)

Hi Tammy,

Did Erin already forward this to you? IF not, can you please process it in?

Looks like they sent it to Erin and also the R3 Rids email.

Thanks,

Bob

From: RidsRgn3DRSS Resource <RidsRgn3DRSS.Resource@nrc.gov>
Sent: Tuesday, January 20, 2026 10:38 AM
To: Bob Orlikowski <Robert.Orlikowski@nrc.gov>
Subject: FW: Request for NRC Consent to Transfer NRC Materials License No. 21-18680-01 (Portable Nuclear Moisture/Density Gauges)

From: RidsRgn3MailCenter Resource <RidsRgn3MailCenter.Resource@nrc.gov>
Sent: Tuesday, January 20, 2026 5:41 AM
To: RidsRgn3Ora Resource <RidsRgn3Ora.Resource@nrc.gov>; RidsRgn3DRSS Resource <RidsRgn3DRSS.Resource@nrc.gov>; RidsRgn3DORS Resource <RidsRgn3DORS.Resource@nrc.gov>
Subject: FW: Request for NRC Consent to Transfer NRC Materials License No. 21-18680-01 (Portable Nuclear Moisture/Density Gauges)

From: Bruce Wilberding <bwilberding@g2consultinggroup.com>

Sent: Monday, January 19, 2026 1:42 PM

To: Erin Kennedy <Erin.Kennedy@nrc.gov>

Cc: RidsRgn3MailCenter Resource <RidsRgn3MailCenter.Resource@nrc.gov>

Subject: [External_Sender] Request for NRC Consent to Transfer NRC Materials License No. 21-18680-01 (Portable Nuclear Moisture/Density Gauges)

Dear NRC Region III Materials Licensing Branch,

On behalf of Construction Testing Services (Transferer) and G2 Consulting Group, LLC (Transferee), I am writing to formally request approval for the transfer of Materials License No. 21-18680-01 in accordance with applicable NRC regulations.

The proposed transfer involves the transfer of licensed activities from Construction Testing Services to G2 Consulting Group, LLC. The transfer is expected to be effective on or about February 1, 2026, contingent upon NRC approval. The licensed activities, locations of use, and authorized materials will remain unchanged.

A letter requesting the consent for material license transfer is attached to this email and includes the following:

- Gauge List for materials currently licensed under 21-18680-01
- Most recent Gauge Leak Test Results
- G2 Radiation Safety Officer designation and qualifications

The proposed transferee affirms its commitment to comply with all applicable NRC regulations and license conditions and to assume full responsibility for the licensed material upon approval of the transfer.

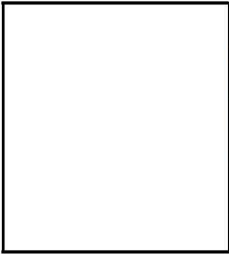
If additional information or clarification is required to support this request, please contact me. We appreciate your consideration of this request and look forward to your response.

Sincerely,

Bruce J. Wilberding

Radiation Safety Office

G2 Consulting Group, LLC



Bruce J. Wilberding, P.E.
Principal
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www.g2consultinggroup.com



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