



June 16, 2026

Jane Marshall, Director  
Division of Decommissioning, Uranium Recovery, and Waste Programs  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852-2738

Subject: Notification and Request for Consent to Indirect Change of Control, DISA Technologies, Inc., License No. SUA-1605, Docket No. 40-38417

Dear Ms. Marshall:

DISA Technologies, Inc. (DISA) is pleased to submit this notification and request for NRC consent to an indirect change of control to the subject license. DISA is writing to provide notice to the NRC of an anticipated corporate transaction described below to allow the NRC to review and consent to the transaction and indirect change of control. DISA's license will not be transferred to another entity. The indirect change of control is limited to the creation of a parent company of the license holder, DISA. The parent company will be majority owned by DISA shareholders.

This request for consent to the indirect change of control has been prepared pursuant to the guidance in NUREG-1556, Volume 15, Revision 1, "Consolidated Guidance About Materials Licenses". Information provided in this request includes a description of the transaction; any changes in personnel; any changes in location, equipment, and procedures; surveillance records; and decommissioning and related records, as requested in the guidance. As detailed herein, other than the creation of a parent company over DISA, the indirect change of control will not affect or alter DISA's personnel, operations, recordkeeping, or other activities associated with DISA's NRC materials license.

DISA intends to close the transaction by the end of July 2026 and respectfully requests NRC consent as soon as possible and no later than July 22, 2026.

#### **DESCRIPTION OF TRANSACTION**

DISA Technologies, Inc. is the current holder of the subject license. DISA will be creating a holding company called DISA Uranium, Inc. (DISA Uranium) where the majority of DISA Uranium will be held by DISA shareholders. [

] Current and post-transaction organizational charts are presented below.

The post-closing DISA Uranium Board of Directors will consist of a majority of the existing DISA Board. [

.] As previously stated, License No. SUA-1605 will not be transferred to DISA Uranium.

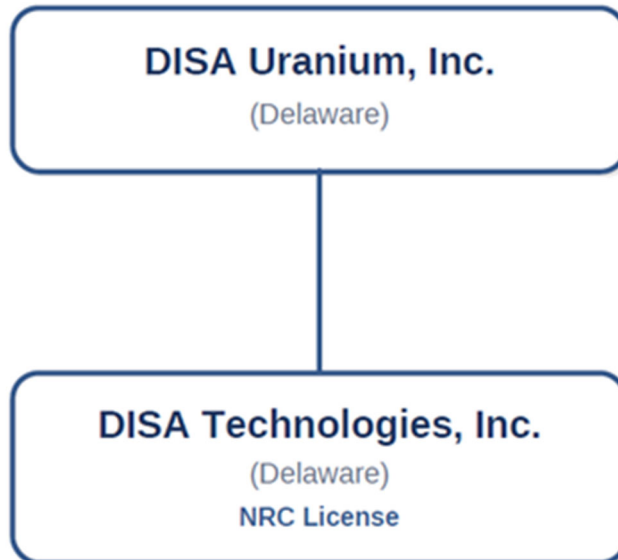


DISA Technologies, Inc. will remain the licensee, and there will be no changes to its name, mailing address, or contact information.

### Pre-Transaction Corporate Structure



### Post-Transaction Corporate Structure



### CHANGES OF PERSONNEL

There will be no changes in personnel or duties that related to DISA's NRC license because of the corporate transaction and ensuing indirect change of control. Currently, the personnel responsible for License No. SUA-1605 are Greyson Buckingham, CEO, and Stephen J. Cohen, Radiation Safety Officer (RSO). Both Mr. Buckingham and Mr. Cohen will remain in their roles following the transaction. As a service provider licensee, the list of authorized users is developed for each jobsite and maintained at the DISA headquarters in Mills, Wyoming. However, DISA has not yet performed a project. Therefore, the authorized users list is not fully developed, but will be maintained and updated as projects are brought on line consistent with the subject license.



## **CHANGES IN LOCATION, FACILITIES, EQUIPMENT, AND RADIATION SAFETY PROGRAM**

No changes in location, facilities, equipment, or radiation safety program will occur because of the corporate transaction and ensuing indirect change of control. DISA's headquarters will remain in Mills, Wyoming, and the facilities and equipment will be the same as represented in its approved license application and supplements. DISA's radiation safety program will also remain unchanged from what was approved in the referenced license. Furthermore, no changes will occur in any procedures regarding the use and possession of licensed radioactive materials and waste management, as a result of this transaction.

## **SURVEILLANCE RECORDS**

DISA's surveillance records are limited because DISA has not completed a project under License SUA-1605. The records that exist under this license include the following:

1. Pre-Mobilization Notification, October Uranium Mine Waste Pile Remediation, Revision 1 (ML26044A176)
2. Pre-Mobilization Notification, Mary Ann Uranium Mine Waste Pile Remediation, Revision 1 (ML26084A517)
3. Analytical Data Associated with the October and Mary Ann Pre-Mobilization Notifications
4. GPS-Gamma Walkover Survey data for the October and Mary Ann Projects
5. Background survey data for the October and Mary Ann Projects
6. Radiation instrument calibration and function check data
7. Occupational dose measurements (OSL badges)

More data will be generated once DISA's projects start. All surveillance records generated for this project will be stored at DISA's, Wyoming, headquarters, as prescribed in the referenced license.

## **DECOMMISSIONING AND RELATED RECORDS TRANSFERS**

DISA's license is unique among most other NRC licenses. DISA's decommissioning and financial assurance frameworks are based on agreed upon costs for individual projects - not on a specific facility. For example, according to DISA's approved license application (ML25087A095), DISA's required financial assurance for sites that are 1 to 20 acres in size is \$48,931.41. This amount escalates as the size of the project grows. Therefore, once the NRC staff approves a Pre-Mobilization Notification for a site of that particular size, DISA will be required to fund the financial assurance as prescribed by the NRC. To date, no Pre-Mobilization Notification has been approved; therefore, no financial assurance has been posted. In addition, no other records or documents related to decommissioning have been generated, except the following:

1. Characterization GPS-gamma walkover scans
2. Background GPS-gamma scans and soil sampling

Lastly, because the license will not be transferred (licensee will remain the same), no records transfer will occur. All decommissioning records generated for this project will be stored at DISA's Mills, Wyoming, headquarters.

## **TRANSFeree'S COMMITMENT TO ABIDE BY THE TRANSFEROR'S COMMITMENTS**

This discussion requested by the guidance does not appear to apply because the DISA license will not be transferred to another entity, as has previously been outlined in this correspondence.



To the extent that confirmation is needed that DISA Uranium (the indirect transferee of control) will abide by all constraints, conditions, requirements, representations and commitments of DISA, that is confirmed.

In conclusion, DISA will be creating a holding company, DISA Uranium, that will be the new parent company of DISA Technologies, Inc., the current licensee. DISA Technologies, Inc. will remain the licensee. Consequently, the effects of the change of control are as follows:

1. Personnel, especially radiation protection personnel, will not change.
2. The location, equipment, facilities, and radiation protection program will remain the same.
3. Due to the nascent stage of DISA's license-authorized projects, surveillance and decommissioning records are limited.

As demonstrated above, the indirect change of control will not affect DISA's ability to implement License No. SUA-1605. As such, DISA respectfully requests that the NRC grant DISA's request for consent to the proposed an indirect change of control as outlined in this correspondence. All required surveillance and related records required to date under License SUA-1605 have been performed, documented, and reviewed; no required surveillance item is incomplete; and no known contamination or decontamination issue exists as a result of licensed activities.

DISA appreciates your efforts to review this notification, and if you have any questions, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Greyson Buckingham", with a long horizontal flourish extending to the right.

Greyson Buckingham, CEO  
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