

June 24, 2026
U.S. Nuclear Regulatory Commission
Region IV
1600 E. Lamar Blvd
Arlington, TX 76011-4511

Mail Control Number: 659999
Docket Number : 3038881
License Number : 46-35280-01
Licensee Name : Hayre McElroy & Associates, LLC

Re: Request for NRC Consent to Indirect Change of Control
License No. 46-35280-01 – Hayre McElroy & Associates, LLC
Redmond, WA 98052

To Whom It May Concern:

Please accept this letter as a request for U.S. Nuclear Regulatory Commission (NRC) consent to an indirect change of control of NRC License No. 46-35280-01 pursuant to 10 CFR 30.34(b). On June 11, 2026, GEI Consultants, Inc. (GEI) acquired [REDACTED] of the membership interests of Hayre McElroy & Associates, LLC (HMA). Supporting information responsive to the guidance contained in NUREG-1556, Volume 15, Appendix E, is included with this request and accompanying attachments.

Based upon the guidance provided in NUREG-1556, Volume 15, Appendix C, and the requirements of 10 CFR 30.34(b), GEI has determined that the proposed transaction constitutes an indirect change of control requiring NRC consent. As of June 11, 2026, HMA became a [REDACTED] subsidiary of GEI.

NRC License No. 46-35280-01 will remain in the name of HMA. Licensed activities will continue as currently authorized, and there will be no change to the licensee's legal entity name, Employer Identification Number (EIN), licensed locations, licensed inventory, authorized uses, or radiation safety program as a result of this transaction. [REDACTED]

GEI understands that this transaction is most analogous to Indirect Change of Control Example (6) described in Appendix C of NUREG-1556, Volume 15. As in that example, the NRC license will remain with the existing licensee, there will be no transfer of licensed activities to the purchaser, and there will be no changes to personnel responsible for radiation safety. However, because GEI will ultimately possess the authority to direct and control the activities conducted under the license, NRC consent is required pursuant to 10 CFR 30.34(b).

In accordance with the information requested by NUREG-1556, Volume 15, Appendix E, the narrative below contains, verbatim, the Appendix E “Information Needed for Transfer of Control” GEI confirms the following:

1. Appendix E – Item 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’s name, mailing address, and contact information, including phone numbers. Clearly identify when the amendment request is due to a name change only.

GEI Response: The transaction involved GEI acquiring [REDACTED] of the membership interests of HMA, with HMA becoming a [REDACTED] subsidiary of GEI. Documentation supporting the transaction, [REDACTED] is attached for NRC review. These attachments provide supporting information regarding the proposed indirect change of control and the matters addressed in Items 1 through 8 below.

2. Appendix E – Item 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.

GEI Response: There will be no changes to licensed material locations, facilities, equipment, operating procedures, authorized activities, or the radiation safety program associated with NRC License No. 46-35280-01 during the NRC review period or to receipt of NRC consent.

3. Appendix E – Item 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.

GEI Response: There will be no changes to the possession, use, storage, transportation, waste management practices, or other procedures associated with licensed material during the NRC review period or prior to receipt of NRC consent.

4. Appendix E – Item 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.

GEI Response: There will be no changes to the status of the licensee's facilities, equipment, or radiation safety program. Existing requirements for instrument calibrations, leak testing, surveys, wipe testing, personnel training, and other radiation safety program elements will remain in effect and continue to be implemented in accordance with license conditions and regulatory requirements.

5. Appendix E – Item 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.

GEI Response: No Decommissioning Funding Plan (DFP) is associated with or affected by the proposed indirect change of control.

6. Appendix E – Item 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.

GEI Response: No facility decommissioning activities are planned in connection with the proposed transaction. Accordingly, no transfer of decommissioning records is required beyond those already maintained by the licensee in accordance with NRC requirements.

7. Appendix E – Item 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.

GEI Response: Both the transferor and transferee agree with the proposed indirect change of control and the associated transfer of authority over licensed activities. The transferee has been informed of all applicable license conditions, regulatory obligations, and any open NRC inspection findings or enforcement matters, if any, and acknowledges responsibility for compliance following closing.

8. Appendix E – Item 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.

GEI Response: The transferee agrees to abide by all existing license conditions, commitments, representations, and obligations applicable to NRC License No. 46-35280-01. Attached for NRC review are organizational charts depicting the corporate structures.

9. Appendix E – Item 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.

GEI Response: Not Applicable to this transaction

GEI Consultants, Inc. currently possesses NRC Materials License No. 21-32834-01 in Region III. GEI was inspected by the NRC in 2021 and most recently on May 5, 2026, Docket Number 030-38491, with a conclusion of no violations identified in both instances. This inspection history demonstrates GEI's continued commitment to regulatory compliance and effective radiation safety program management.

Accordingly, GEI Consultants, Inc. respectfully requests NRC review and approval of this request for consent to an indirect change of control of NRC License No. 46-35280-01.

Closing

Should the NRC require any additional information or clarification regarding this request, please contact the undersigned at (906) 629-1377.

Sincerely,

GEI CONSULTANTS, INC.



Isaac N. Roberts, P.E.
Radiation Safety Officer (21-32834-01)



Jamie S. Matus, P.G., CPG
Senior Vice President

Attachments:

Appendices

Appendix A License No. 46-35280-01



Appendix C Radiation Safety Plan and Emergency Procedures

Appendix D Leak Test and Calibration Reports

Appendix E NUREG-1556, Volume 15



cc: James McElroy (HMA)
Gurdip Hayre (HMA)
Martin Lagazo Jr. (HMA)
Scott Wallington (GEI)
Joseph Lockwood (GEI)
Chris Abraham (GEI)

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