

From: [Mandy Blankenship](#)
To: [Roberto Torres](#)
Cc: [Jim Henry](#); [Jordan Lester](#); [John Cosgrove](#)
Subject: [External_Sender] NRC Inspection
Date: Tuesday, July 14, 2026 9:38:33 AM
Attachments: image.png
NRC_Response_Letter_07.14.26.pdf

Dear Mr. Torres,

Attached, please find a copy of a letter on behalf of Alliance Technical Group, LLC regarding the NRC Inspection Exit Meeting Request. A signed hard copy of the letter will also be sent via First-Class Mail.

Please let me know if you have any questions or if you would like to discuss this matter further.

Sincerely,

Mandy Blankenship



Mandy Blankenship
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Via First Class Mail and E-mail (RobertoJ.Torres@nrc.gov)

July 14, 2026

Mr. Roberto J. Torres
Senior Health Physicist
U.S. Nuclear Regulatory Commission
Office of Nuclear Materials Safety and Safeguards
Inspection and Licensing Branch
1600 East Lamar Boulevard
Arlington, TX 76011-4511

Re: Response to Inspection Exit Meeting Request – Change of Control Notification

Dear Mr. Torres:

Alliance Technical Group, LLC (“Alliance”) appreciates the opportunity to respond to the information requested in connection with the recent NRC inspection and related exit meeting for the radioactive materials license associated with the Rapid City laboratory operation acquired by Alliance.

Alliance understands that NRC has requested information addressing the failure to request NRC consent prior to a change of control, the short-term corrective actions taken, the long-term corrective actions to prevent recurrence, and the date when full compliance will be achieved. Alliance’s response is provided below.

Reason for Failure to Request NRC Consent Prior to Change of Control

The failure to obtain NRC consent prior to the change of control resulted from an inadvertent oversight during the acquisition of the licensed entity. Based on Alliance’s review, the obligation to request NRC consent prior to the change of control was a seller obligation that was inadvertently missed during the transaction process.

The requirement was not identified during diligence, closing, or post-closing integration. The license itself did not separately flag the change-of-control consent requirement in a manner that caused it to be identified during the transaction review. After the issue was identified during the NRC inspection process, Alliance reviewed the applicable license requirements and confirmed that the prior consent requirement had not been satisfied before the transaction closed.

Alliance does not understand the missed consent request to have resulted from any intentional disregard of NRC requirements. Rather, it appears to have been an administrative oversight in the transaction process. Licensed activities continued to be conducted under the existing radiation safety program and license controls, and Alliance is not aware of any health, safety, or operational impact resulting from the missed pre-closing consent request.

Short-Term Corrective Actions Taken and Results Achieved

Upon becoming aware of the issue, Alliance initiated a review of the circumstances surrounding the acquisition and the applicable NRC requirements. The issue was disclosed during the NRC inspection process, and the relevant information was escalated to management after Alliance received notice that a violation was in progress.

Alliance has taken the following short-term corrective actions:

- Management reviewed the NRC license and associated requirements to identify any additional reporting, consent, transfer, or notification obligations.
- Alliance reviewed whether any other changes had occurred that would require NRC notification or approval.
- Alliance notified internal stakeholders responsible for legal review, acquisitions, compliance, environmental health and safety, and regulated operations.
- Alliance began preparing the information requested by NRC to address the missed change-of-control consent issue and close out the inspection process.

As a result of these actions, Alliance determined that the matter appears limited to the missed change-of-control consent request. The inspection did not identify other health and safety findings requiring corrective action.

Long-Term Corrective Actions to Prevent Recurrence

Alliance is enhancing its acquisition and integration process to reduce the risk of recurrence. Historically, Alliance's diligence process has requested information regarding permits, licenses, certifications, and other regulated authorizations. Alliance is now adding a more specific requirement to identify radioactive materials licenses and similar nuclear-regulated authorizations separately so that any required consent, pre-closing approval, transfer, or notification obligation can be evaluated and completed before closing when applicable.

Alliance's long-term corrective actions include:

- Adding a specific diligence item for radioactive materials licenses and comparable nuclear-regulated authorizations.
- Requiring confirmation of whether any license transfer, change-of-control consent, pre-closing approval, or regulatory notification is required in connection with an acquisition.
- Incorporating a specific regulatory compliance review step into acquisition and integration planning for entities holding radioactive materials licenses.
- Improving coordination among legal, compliance, environmental health and safety, and acquisition teams when acquired operations hold regulated licenses or permits.

These process improvements are intended to ensure that future transactions are reviewed specifically for NRC radioactive materials license requirements before closing and that required regulatory communications are completed in the appropriate sequence.

Date When Full Compliance Will Be Achieved

Alliance understands the identified violation to relate to the failure to request NRC consent prior to the change of control. Alliance believes the administrative condition giving rise to this matter has been addressed through disclosure to NRC, management review of the license requirements, and submission of this response. Alliance is prepared to provide any additional information or complete any further administrative action NRC requires to formally resolve the matter.

To the extent NRC determines that additional documentation, approval, amendment, termination, transfer, or other administrative action is required, Alliance will promptly cooperate with NRC and complete the required action as directed.

Alliance remains committed to maintaining compliance with NRC requirements and appreciates the NRC staff's assistance throughout the inspection process.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jim Herr", is positioned above the printed name.

Jim Herr
Chief Administrative Officer
Alliance Technical Group, LLC