

From: [Ulrich, Elizabeth](mailto:Ulrich.Elizabeth@frontier.com)
To: bilco99@frontier.com
Subject: your letter dated October 4, 2017 to NRC
Date: Monday, November 06, 2017 10:34:00 AM

OK Construction Co., Inc
(Rock Forge Bridge Co. LLC)
License No. 47-25217-01
Docket No. 030-323899
Control No. 601377

Mr. Faulkes,

It appears from your letter that a possible change of ownership (control) has occurred. Licensees must provide full information and obtain NRC's **prior written consent** before transferring control of the license. 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. A transferee is an entity that proposes to purchase or otherwise gain control of an NRC-licensed operation. A transferor is an NRC licensee selling or otherwise giving up control of a licensed operation.

1. In accordance with NUREG-1556, "Consolidated Guidance about Materials Licensees", Volume 15, Revision 1, "Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses" (NUREG-1556, Volume 15), 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.
2. In accordance with Section 5.1 of NUREG-1556, Volume 15,
 - a. provide a complete description of the transaction (transfer of stocks or assets, or merger).
 - b. Indicate whether the name has changed and include the new name if applicable.
 - c. Include the name and telephone number of a licensee contact who NRC may contact if more information is needed.
 - d. provide a pre- and post-transaction organization chart showing the corporate structure of the license holder and its parent companies, if any.
3. In accordance with Section 5.2 of NUREG-1556, Volume 15, describe changes in personnel or duties, particularly those requiring a license amendment, regardless of the change of control. Provide the training and experience for any new personnel to be listed on the NRC license. Alternately, state if there will be no changes to personnel.
4. In accordance with Section 5.3 of NUREG-1556, Volume 15, describe changes in

the place of use, including potentially affected adjacent areas, as required. Describe changes in facilities where licensed materials are to be used or stored. If there are any relevant procedures that are changed, please submit the new or revised procedures.

5. In accordance with Section 5.4 of NUREG-1556, Volume 15, submit a statement that all required surveillance has been performed, documented, and reviewed, including the results where appropriate. Surveillance includes surveys, leak tests, inventory, etcetera. If surveillance activities are, or will not be completed prior to the change of control, submit the reasons, corrective actions if appropriate, and the date of expected completion.
6. In accordance with Section 5.5 of NUREG-1556, Volume 15, state the following:
“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.” In addition,
 - a. provide a commitment from the transferee to maintain the records received from the transferor
 - b. provide a description of the facility with regard to contamination and ambient radiation levels.
 - c. indicate whether operations will continue during the transfer process if so, provide either an agreement to perform a survey confirming that the facility is free of contamination or agreement by the transferee to accept the facility “as is” on the date of transfer.
7. In accordance with Section 5.6 of NUREG-1556, Volume 15, confirm that the transferee will abide by all constraints, license conditions, requirements, representations, and commitments identified in and attributed to the existing license. Alternately, submit a complete description of the transferee’s proposed program to ensure compliance with the license and regulation.

If you need additional information, here is a link to NUREG-1556, Volume 15:

<https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v15/>

Your reply must be an originally signed and dated letter. The letter may be scanned and submitted as a pdf document attached to an email; or it may be transmitted by facsimile to (610) 337-5269; or it may be sent by regular mail. Please reply from within 30 calendar days from the date of this e-mail. If you need to contact me, my contact information is below.

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