

P-7

Information Needed For Transfer of Control Application

Include a contact name and either U.S. Nuclear Regulatory Commission (NRC) regional office or Headquarters telephone numbers for follow-up information, as required.

NRC Region: U.S. NRC Region 1

Contact: Dennis Lawyer

Telephone: 610-337-5366

Fax:

07-30504-01
03034949

Information Needed for Transfer of Control

Licensees must provide full information and obtain NRC's **prior written consent** before transferring control of the license. 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.

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 name, mailing address, and contact information, including phone numbers. Clearly identify when the amendment request is due to a name change only.**

BLUEFIN, LLC purchased the assets (with a few exceptions) of Professional Roof Services Inc. (PRSI) on September 4, 2018. There will be no PRSI representation on the BLUEFIN Board of Directors; however, PRSI's 90% shareholder is being retained on a consulting basis through the end of 2018, and its 10% shareholder, Michael McGonigle, is now a BLUEFIN employee. Mr. McGonigle will still have responsibility for operations of our Newark, Delaware office. The other full-time PRSI employees have also accepted employment offers at BLUEFIN and will continue to perform essentially the same jobs as they did at PRSI. Bluefin LLC does not currently have a Radioactive Material License or control over one with the NRC or other agreement state. The Newark Delaware office will continue to be known as Professional Roof Services Inc. This office is where the Troxler 3216 Roof Gauge is housed and only employees of the Professional Roof Services Inc. segment of Bluefin have access to this gauge. No other Bluefin employees have access to this gauge.

A Bluefin organizational chart is included to show how Professional Roof Services reports to Bluefin management.

License information:

- Licensee name: Bluefin, LLC
- Mailing address: 6312 S Fiddlers Green Circle, Greenwood Village, CO 80111
- Contacts Jim Gould - RSO 610-731-1413 (Cell)

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.**

Jim Gould will remain Radiation Safety Officer, Liz Thompson that was hired in October 2018. Our

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current plan is for her to complete her Hazmat training by the end of 2018. Cindy Chipola will be leaving PRSI by the end of 2018.

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.***
There will be no changes in the program. Jim Gould will remain the Radiation Safety Officer. The Troxler 3216 Roof Gauge will continue to be housed in the Newark, Delaware office. There will be no changes regarding the radiation safety program, use and possession of equipment, waste management, or any other procedures related to the licensed program.
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.***

The gauge is currently and will continue to be housed at 229 Lake Drive, Newark, DE 19702. This is a Class B Mixed use office/industrial building. There has been no known contamination and no decontamination will occur prior to transfer.

Attached are several documents relating to the gauge:

- The latest leak test and calibration on the Troxel Model 3216, serial #188 completed on February 02, 2018.
 - A copy of Professional Roof Services Inventory log, Inventory was last taken on August 15, 2018.
 - Calculation of exposure from the gauge while in storage at 229 Lake Drive, Newark, De 19702.
 - Hazmat training certifications for the five (5) employees of Professional Roof Services that have access to the gauge.
 - Our latest Occupational Radiation Exposure Report from Troxler dated July 17, 2018. Two (2) former employees are listed, Jeff Buck and Ken Myers.
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 E-1 license is transferred, and as required by 10 CFR 30.35(f), the licensee must, within 30 days, submit financial instruments reflecting such changes.***

N/A

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.***

All records related to the Troxler 3216 Roof Gauge will be transferred to Bluefin LLC. All records will still be maintained at 229 Lake Drive, Newark, DE 19702

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.**

PRSI, Inc. and BLUEFIN, LLC agree to the transfer of control of the license material and activity, as well as the conditions of transfer. BLUEFIN has been made aware of any open inspection items and its responsibility for possible resulting enforcement actions.

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.**

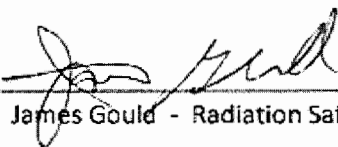
BLUEFIN agrees to abide by all constraints, conditions, requirements, representations, and commitments of PRSI and will submit a complete description of the proposed license program. The program is not changing; BLUEFIN is adopting PRSI's program.

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.**

N/A

Transferor:

Professional Roof Services Inc.

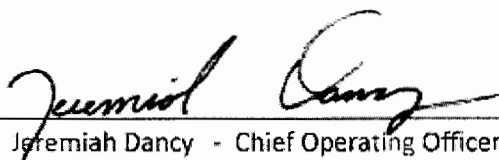

James Gould - Radiation Safety Officer

Date

11/16/2018

Transferee:

Bluefin LLC.


Jeremiah Dancy - Chief Operating Officer

Date

11/16/2018