

Reuter-Stokes, LLC

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October 15th, 2019

Frank Tran, Health Physicist
U.S. Nuclear Regulatory Commission, Region III
Division of Nuclear Materials Safety
2443 Warrenville Road, Suite 210
Lisle, Illinois 60532-4352

SUBJECT: Response to Request for Information
SNM-1826, Docket No. 70-02872

This letter responds to your email request for information dated October 4, 2019. Baker Hughes, a GE company ("Baker Hughes") acquired indirect ownership and control of Reuter-Stokes, LLC ("Reuter-Stokes") on July 3, 2017. The NRC gave its prior written consent to this change in control by letter dated June 8, 2017 (ADAMS Accession No. ML17159A597). Thus, Baker Hughes has been and remains an indirect parent holding company in control of Reuter-Stokes.

Baker Hughes is a publicly traded company, and as of July 3, 2017, General Electric Company ("GE") exercised control of Baker Hughes through a Stockholders Agreement dated July 3, 2017 and then through an Amended and Restated Stockholders Agreement dated November 18, 2018 ("Stockholders Agreement"). Thus, Baker Hughes itself was subject to control by GE, even though it was a publicly traded company.

On September 16, 2019, GE sold a portion of its ownership in Baker Hughes in a public offering, and it surrendered its rights of control pursuant to the Stockholders Agreement. GE now has a non-controlling approximately 36.7% ownership interest in Baker Hughes. As such GE no longer holds a controlling interest in Baker Hughes. The GE shares that were sold in September 2019 were sold to various public stockholders so that Baker Hughes is now owned by a majority of public stockholders versus being controlled by GE. No new entity has acquired control of Baker Hughes.

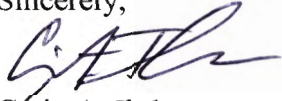
Although GE has surrendered its prior control over Baker Hughes, there has been no indirect transfer of control of Reuter-Stokes that requires NRC's prior consent pursuant to 10 CFR 70.36. Rather, Baker Hughes retained control of Reuter-Stokes through its subsidiaries, the intermediary holding companies that own and control Reuter-Stokes. The prior and current control of Reuter-Stokes is depicted in the attached Figures 1 and 2.

"Baker Hughes, a GE company," intends to change its name to "Baker Hughes Company" effective October 17, 2019. In addition, Reuter-Stokes's immediate parent company, Baker Hughes, a GE company, LLC intends to change its name in 2020. Because these are just name changes, there will be no impact on the control or ownership of Reuter-Stokes, nor will the name changes affect any licenses or permits held in the name of Reuter-Stokes.

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If you have any questions, please do not hesitate to contact Kimberly Kuhls, Radiation Safety Officer, at 330.351.4788 or kimberly.kuhls@bhge.com.

Sincerely,

A handwritten signature in dark ink, appearing to read 'CA Ihrke', written over a light blue rectangular background.

Craig A. Ihrke
President
Reuter-Stokes, LLC.

Figure 1: SIMPLIFIED ORGANIZATION CHART (July 3, 2017)

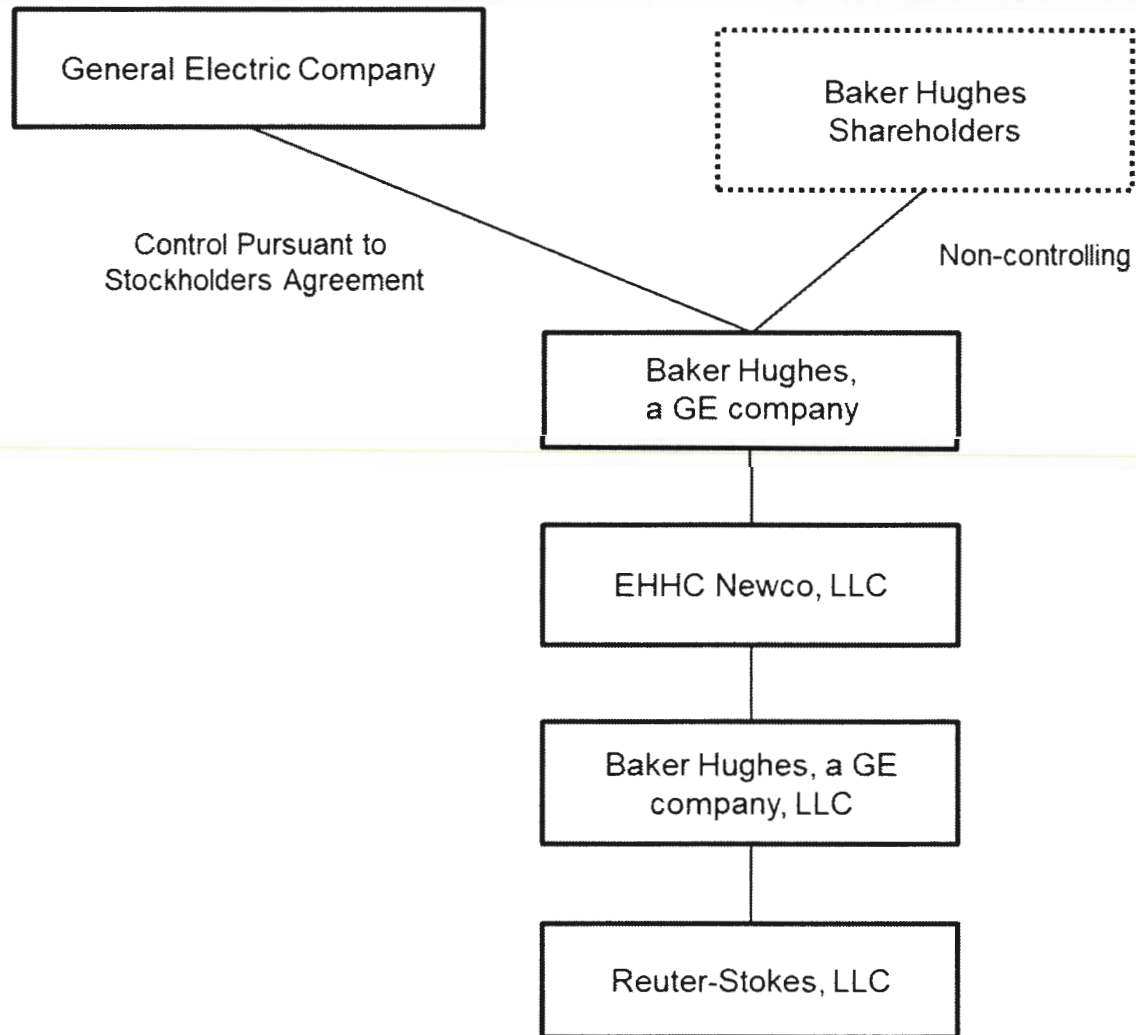
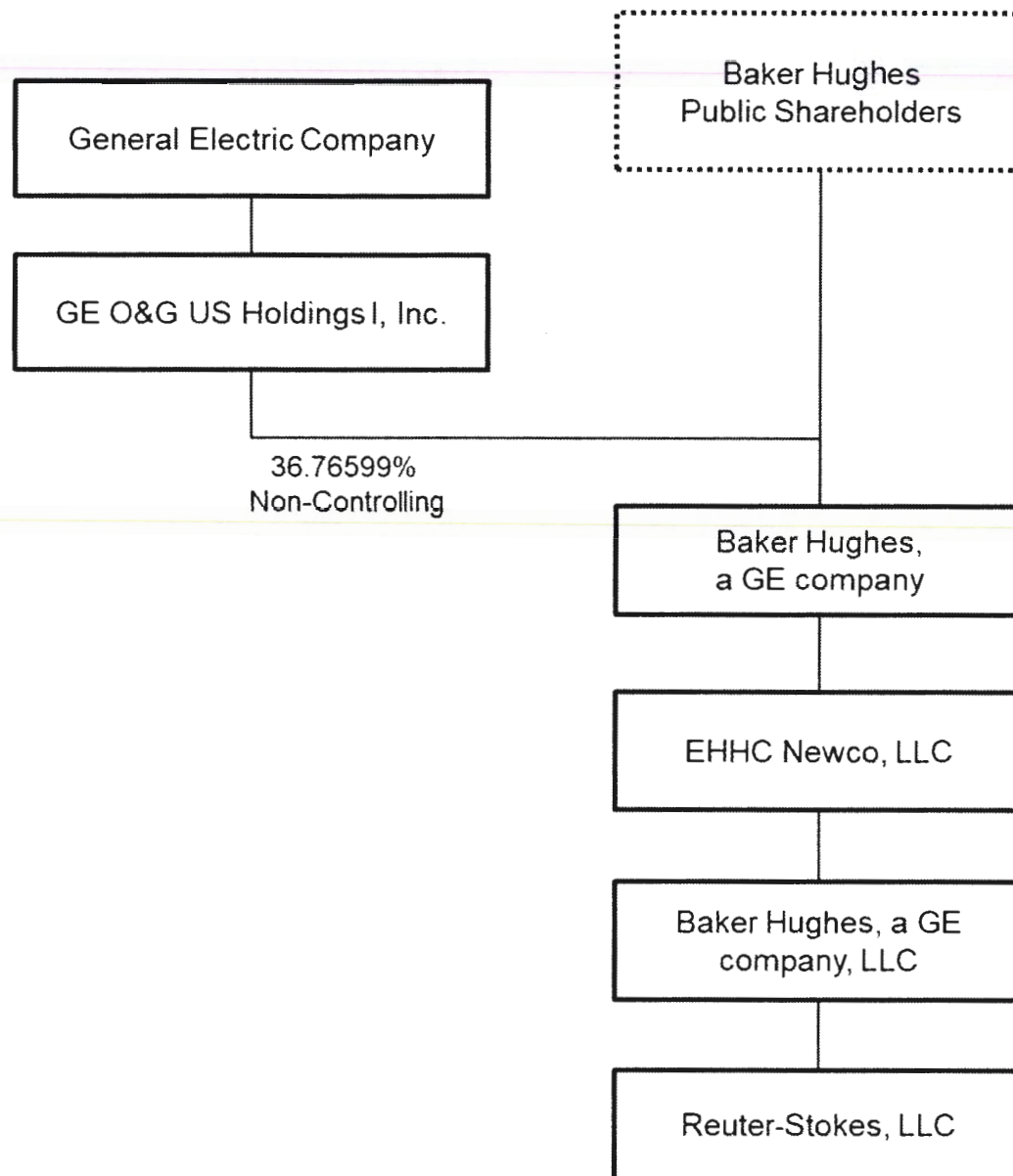


Figure 2: SIMPLIFIED ORGANIZATION CHART (September 16, 2019)



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