



10/4/2019

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- ☐ Immediate Release
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- ☐ A.3 Sensitive-Security Related
☐ A.7 Sensitive Internal
☐ Other: _____

Reviewer: ATZ Date: 10-7-19

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Roberto J. Torres, M.S. - Senior Health Physicist
U.S. Nuclear Regulatory Commission - Region IV
1600 East Lamar Boulevard
Arlington, TX 76011-4511
817-200-1189

**RE: Information Needed for Transfer of Control, License 49-29405-01
Docket No.: 030-38364**

Dear Mr. Torres,

On October 1, 2019 Pace Analytical Services, LLC (Pace) purchased Inter-Mountain Laboratories, Inc. (IML) According to NUREG-1556 (Volume 15, rev. 1), the following information must be provided to the U.S. NRC in order to transfer the permit.

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.

Pace completed a stock purchase of IML. The new licensee should be stated on the amended license as: "Pace Analytical - Sheridan, WY". The operation will have the same mailing address and contact information. Local employees and management will not change, though they will now report to Pace Analytical's Corporate Management.

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.

There will be no changes in the above items due to this purchase.

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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 of the above items due to this purchase.

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 status of the licensee's facilities, equipment and radiation safety program will not change. Pace completed a Safety and Health Due Diligence Audit of the operation and found that IML's Radiation Safety Program was in compliance with regulations. All compliance documentation will continue on the schedule it is currently on.

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.

The DFP will not change - or is not anticipated to change - as a result of the purchase. If the NRC requires any information regarding insurance or financial information for Pace, we can provide.

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.

Not applicable - this operation will continue to operate as it currently is.

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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.

Confirmed by both transferor and transferee with signatures below.

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.

Confirmed by both transferor and transferee with signatures below.

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.

Not applicable.

If the NRC has any questions we will be happy to supply information as requested. Overall, Pace does not anticipate the general operations and laboratory processes will change in any way.

Regards,

Dennis Leeke
Regional General Manager - N.W. Region
TRANSFEE
1700 Elm Street
Minneapolis, MN 55414
Direct (612) 656-2279

Kevin Chartier
General Manager - IML
TRANSFEROR
555 Absaraka Street
Sheridan, WY 82801
Direct: (307) 461-4935

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Torres, Roberto

From: Kevin Chartier <kchartier@imlinc.com>
Sent: Monday, October 07, 2019 4:22 PM
To: Torres, Roberto
Cc: 'Adam Netzer'; Dennis Leeke; 'Margaret Elliott'
Subject: [External_Sender] RE: license #49-29405-01
Attachments: NRC Letter - Information Needed for Transfer of Control 10-4-2019.pdf

Mr. Torres:

The attached PDF contains a letter containing information relating to the transfer of Inter-Mountain Laboratories' license. A form 313 has also been prepared and will follow shortly. Please contact me if any additional information is required.

Best regards,

Kevin Chartier
General Manager
Inter-Mountain Labs
A division of Pace Analytical Services
555 Absaraka Street
Sheridan, Wyoming 82801
Direct: (307) 461-4935

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Reviewer: RTZ Date: 10-7-19

From: Torres, Roberto [mailto:RobertoJ.Torres@nrc.gov]
Sent: Friday, October 04, 2019 5:56 AM
To: Kevin Chartier
Cc: Adam Netzer
Subject: RE: license #49-29405-01

Mr. Chartier:

Sorry for the late response, had a backlog. Here is the transfer of control information. I will follow up with a phone call after sending this email.

NUREG-1556, Volume 15, revision 1, provides licensing guidance for a transfer of control (see attached).

1. Appendix C of the attachment has examples of what constitutes an indirect change of control, a direct change of control and no change of control.
2. Appendix D has examples of the licensee changes and suggested NRC licensing actions.
3. Appendix E contains information that needs to be submitted to the NRC in support of a change of control or no change of control.

Request a license amendment by sending a signed and dated letter containing the information requested in Appendix E (both parties, transferee and transferor have to sign the letter). Send the amendment request as a pdf file by reply email to our licensing assistant carol.hill@nrc.gov.

Roberto J. Torres, M.S.

Senior Health Physicist
U.S. Nuclear Regulatory Commission, Region IV
1600 East Lamar Boulevard
Arlington, TX 76011-4511
817-200-1189

From: Kevin Chartier <kchartier@imlinc.com>
Sent: Thursday, October 03, 2019 5:26 PM
To: Torres, Roberto <RobertoJ.Torres@nrc.gov>
Cc: Adam Netzer <Adam.Netzer@pacelabs.com>
Subject: [External_Sender] license #49-29405-01

Roberto,

I have been trying to reach you by phone for several days and left a couple of voice messages. Inter-Mountain Laboratories, Inc. (IML) holds the referenced material license. On October 1, Pace Analytical Services, LLC purchased the stock of IML. I would like to discuss with you the required steps necessary to transfer the license.

Best regards,
Kevin Chartier

Kevin Chartier
General Manager
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A division of Pace Analytical Services
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