



November 1, 2019

Regional Administrator
ATTN: Director, Division of Nuclear Material Safety
US Nuclear Regulatory Commission Region I
2100 Renaissance Boulevard
King of Prussia, PA 19406-2713

Re: **UP-SIDE RADIOLOGICAL SERVICES, LLC
REQUEST FOR TRANSFER OF LICENSE TO UP-SIDE MANAGEMENT
COMPANY, LLC; MATERIALS LICENSE NO. 09-29309-01, DOCKET
NO. 030-38878**

Dear Director:

Up-Side Radiological Services, (USRS) is making a request pursuant to NUREG-1556 Volume 15 and 18, Revision 1 to transfer ownership and control of the Service Provider License to Up-side Management Company, LLC (U-SMC). USRS was a joint-venture (JV) between Radiological Survey & Remedial Services, LLC (RSRS) and U-SMC. USRS has expended their capacity allowed by the JV and no longer requires a License.

1. The name of the new licensed organization is Up-side Management Services. The EIN of the firm is 26-0204619.
2. The primary business address remains the same, 324 E. Third Street, Jacksonville, FL, 32206. Mr. Daryl DeLong, the licensee's current Radiation Safety Officer (RSO) will remain in possession of all license files and materials, and he may be reached by telephone at 415.308.7027. The primary location for all records associated with the license will remain the same at 15220 NW Laidlaw Road, Suite 265, Portland, Oregon 97229.
3. Mr. Daryl DeLong will remain the RSO overseeing the license. Mr. Victor Letourneaut has delegated all license authority to Mr. DeLong. There are no other individuals who will perform licensed activities.
4. The transferor, USRS, will no longer remain in business. As previous co-owner of USRS, RSRS will continue to perform work under the license, as necessary, by subcontracting to U-SMC to utilize the license.
5. No changes to locations where radioactive materials are used, nor to other equipment and facilities are necessary. U-SMC has accepted for use all USRS license procedures in their entirety.
6. Because the license is a service-providers license, there are no changes in the possession, location or storage of licensed materials. There are no materials currently under control of the license.
7. There are no changes in the organization, location, facilities, equipment, procedures, or personnel that would require a license amendment.

324 East Third St.
Jacksonville, FL 32206

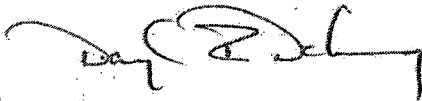
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NMSS/RGN1 MATERIALS-002

REC RG1 11 05 19 AM 0653

8. All surveillance items and records, including surveys, calibration records, inventories, and accountability and audit records are current as of the date of this letter.
9. There are no records pursuant to 10 CFR 30.35(g).
10. There are no facilities currently maintained under the license.
11. Decommissioning plans are not required under the license because the license is for services incidental to decontamination and decommissioning of other licensees.
12. The transferee agrees to abide by all commitments and representations previously made to the NRC by USRS. There are no open inspection items, and the transferee agrees to accept responsibility for any resulting enforcement actions for inspection items that are discovered during previous periods.
13. USRS agrees to transfer control of the license, including any activities, and U-SMC is aware that there are no open inspection items; U-SMC agrees to accept responsibility for possible resulting enforcement actions for items that occurred during USRS's utilization of the license.
14. U-SMC commits to abide by all constraints, conditions, requirements, representations, and commitments identified in the existing license.

If you have any additional questions, please don't hesitate to call Mr. Daryl DeLong at (415) 308-7027 or Mr. Victor Letourneaut at (904) 423-0989.

Regards,



Daryl DeLong
Radiation Safety Officer
Up-side Management Company, LLC



Victor Letourneaut
President
Up-side Management Company, LLC



OFFICE MEMORANDUM

TO: ALL EMPLOYEES

FROM: VICTOR LETOURNEAUT
PRESIDENT, U-SMC

SUBJECT: DELAGATION OF AUTHORITY –RADIATION SAFETY OFFICER

DATE: 11/1/19

Mr. Daryl DeLong has been appointed Radiation Safety Officer and is responsible for ensuring the safe use of byproduct material. The Radiation Safety Officer is responsible for managing the radiation safety program; identifying radiation safety problems; initiating, recommending, or providing corrective actions; verifying implementation of corrective actions; and ensuring compliance with regulations for the use of byproduct material. The Radiation Safety Officer is hereby delegated the authority necessary to meet these responsibilities. The Radiation Safety Officer has the authority to immediately stop any operations involving the use of byproduct material in which health and safety may be compromised or may result in non-compliance with NRC requirements.



OFFICE MEMORANDUM

TO: ALL EMPLOYEES

FROM: VICTOR LETOURNEAUT
PRESIDENT, U-SMC

SUBJECT: ACCEPTANCE OF NRC MATERIALS LICENSE PROCEDURES FROM USRS

DATE: 11/1/19

As of the date of this memorandum, Up-side Management Company accepts all procedures from Up-Side Radiological Services, LLC under U.S. Nuclear Regulatory Commission License 09-29309-01 (Docket No. 030-38878).



ACKNOWLEDGEMENT - RECEIPT OF CORRESPONDENCE

Name and Address of Applicant and/or Licensee

Up-Side Radiological Services, LLC
Attn: Daryl DeLong
Radiation Safety Officer
324 East Third Street
Jacksonville, FL 32206

Date

12/05/2019

License Number(s)

09-29309-01

Mail Control Number(s)

Change of Control - 617164

Licensing and/or Technical Reviewer or Branch

Commercial, Industrial, R&D, and Academic Branch

This is to acknowledge receipt of your: ☒ Letter and/or ☐ Application Dated: 11/01/2019

The initial processing, which included an administrative review, has been performed.

☐ Amendment ☐ Termination ☐ New License ☐ Renewal

☒ There were no administrative omissions identified during our initial review.

☐ This is to acknowledge receipt of your application for renewal of the material(s) license identified above. Your application is deemed timely filed, and accordingly, the license will not expire until final action has been taken by this office.

☐ Your application for a new NRC license did not include your taxpayer identification number. Please complete and submit NRC Form 531, Request for Taxpayer Identification Number, located at the following link: <http://www.nrc.gov/reading-rm/doc-collections/forms/nrc531.pdf>
Follow the instructions on the form for submission.

☐ The following administrative omissions have been identified:

Your application has been assigned the above listed MAIL CONTROL NUMBER. When calling to inquire about this action, please refer to this control number. Your application has been forwarded to a technical reviewer. Please note that the technical review, which is normally completed within 180 days for a renewal application (90 days for all other requests), may identify additional omissions or require additional information. If you have any questions concerning the processing of your application, our contact information is listed below:

Region I
U. S. Nuclear Regulatory Commission
Division of Nuclear Materials Safety
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713
(610) 337-5260, (610) 337-5313,
(610) 337-5398, (610) 337-5513 or (610) 337-5239