

May 26, 2020

Attention: Leo Wardrobe
Division of Nuclear Materials Safety
U.S. Nuclear Regulatory Commission, Region I
2100 Renaissance Blvd, Suite 100
King of Prussia, Pennsylvania 19406

**SUBJECT: Response to NRC May 20, 2020 Request for Additional Information
Request for Approval of Transfer of Control
NRC License No. 06-20581-01 (Docket No. 030-19941)**

On May 13, 2020, Goodrich Corporation (“Goodrich”) and AMERGINT Technologies, Inc. (“AMERGINT”) (collectively, the “Applicants”) requested written approval by the U.S. Nuclear Regulatory Commission (“NRC”) for the proposed transfer of License No. 06-20581-01 (the “License”) to an affiliate of AMERGINT named Danbury Mission Technologies, LLC (“Danbury”) (the “Application”). On May 20, 2020, the NRC requested additional information about whether the entity acquiring the License, Danbury, was a “known entity” to the NRC.

As described in the Application, Danbury is a wholly-owned subsidiary of AMERGINT. AMERGINT itself is majority-owned by investment funds managed by The Blackstone Group Inc. (“Blackstone”). In addition to the information provided in the application, explaining that AMERGINT holds a top-secret Facility Security Clearance issued by the Department of Defense, and that Blackstone is a publicly-traded company, we would like to note that investment funds managed by Blackstone indirectly hold an interest in Curium US LLC (“Curium”). Curium owns a significant radiopharmaceutical processing and manufacturing facility in Maryland Heights, Missouri and holds three NRC radioactive materials licenses related to its nuclear medicine operations: License Nos. 24-04206-01, 24-04206-02, and 24-04206-05MD.

To more specifically describe the relationship between Blackstone and Curium, Blackstone invests in Curium through investment funds managed by GSO Capital Partners LP (“GSO”). Blackstone’s GSO platform is described in more detail on the Blackstone website¹ and in filings made by Blackstone with the U.S. Securities and Exchange Commission.² GSO, through investment funds it manages, is a minority investor in Curium. GSO’s investment in Curium is described by Curium in a 2016 license transfer application filed by Curium and its affiliates (at the time Curium was known as Mallinckrodt Nuclear Medicine LLC), which the NRC reviewed and evaluated.³

¹ See Blackstone Website, [https://www.blackstone.com/our-businesses/credit-\(gso\)](https://www.blackstone.com/our-businesses/credit-(gso)).

² See Blackstone 2019 Form 10K Annual Report (filed with the U.S. Securities and Exchange Commission Feb. 28, 2020), <https://www.sec.gov/ix?doc=/Archives/edgar/data/1393818/000119312520056733/d844019d10k.htm>.

³ See Mallinckrodt Nuclear Medicine LLC License Transfer Application, Attach. 1, footnote 3 (Sept. 2, 2016) (Accession No. ML16250A581); NRC Consent to License Transfer (Dec. 1, 2016) (Accession No. ML16336A274).

If you have any further questions pertaining to this response or the Application, please contact AMERGINT's counsel for nuclear regulatory matters, Amy Roma, at Hogan Lovells US LLP (202-637-6831/amy.roma@hoganlovells.com).

I declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge the information contained in this Response to NRC May 20, 2020 Request for Additional Information pertaining to Danbury Mission Technologies, LLC and its affiliates is true and correct.

Executed on May 26, 2020



Yong Chang
Chief Operating Officer
Danbury Mission Technologies, LLC

cc: Amy Roma, Hogan Lovells US LLP
Current Licensee's Radiation Safety Officer, Ryan Hannan
NRC Document Control Desk
Adelicia Cliffe, Crowell & Moring LLP