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Corporate Headquarters
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Via Email and U.S. Mail
Randolph.Ragland@nrc.gov

June 1, 2020

Randolph C. Ragland, Jr., CHP
Senior Health Physicist
Division of Nuclear Materials Safety
NRC Region 1
2100 Renaissance Blvd., Suite 100
King of Prussia, PA 19426

**Re: Termination of Craig Testing Laboratories, Inc., Radioactive Materials License
No. 29-18018-01**

Expedited Review and Approval Requested by June 23, 2020

Dear Mr. Ragland:

As you know, by letter dated April 22, 2020, a copy of which is attached as Exhibit A, Maser Consulting P.A. ("Maser") notified the USNRC of a completed transaction between Maser and Craig Testing Laboratories, Inc. ("Craig") in August 2019 that resulted in a change in control of the radioactive materials activities under Craig NRC License No. 29-18018-01. However, it was always Maser's intent to terminate the Craig NRC License because Maser has and will continue to be servicing USNRC regulated projects solely under its existing NRC License No. 29-30494-01 from Maser's facility in Red Bank, NJ.

Accordingly, in lieu of having the USNRC further process our original change of control request, we hereby request the USNRC's expedited review and approval of the termination of Craig NRC License No. 29-18018-01. In support of Maser's request, I have attached as Exhibit B a letter from Craig (the current license holder) requesting termination of Craig NRC License No. 29-18018-01. Moreover, as indicated on the attached NRC Form 314 (Exhibit C), all materials currently in possession at Maser's Mays Landing Facility, previously operated under the Craig NRC License No. 29-18018-01, have been administratively transferred to and will continue to be operated from the Mays Landing Facility under Maser's NJDEP License No. 507930-RAD200001. As such, none of the materials operated under the Craig NRC License No. 29-18018-01 will be physically moved, transferred, or otherwise decommissioned as a result of the requested termination.



Randolph C. Ragland, Jr., CHP
June 1, 2020
Page 2 of 2

Thank you for your time and consideration of this expedited request. Please let us know if you need any additional information or have any questions concerning this matter. We are happy to arrange a call to discuss at your convenience.

Very truly yours,

MASER CONSULTING

A handwritten signature in blue ink, appearing to be 'B. Curtis', with a stylized flourish at the end.

Brian E. Curtis, Esq.
General Counsel
(732) 383-1950
bcurtis@maserconsulting.com

Attachments:

- Exhibit A Maser Letter dated April 22, 2020
- Exhibit B Craig Termination Letter dated May 21, 2020
- Exhibit C NRC Form 314

Exhibit A

April 22, 2020 Craig Testing Laboratories, Inc. Transfer of Control of Radioactive Materials
License No. 29-18018-01

(See attached)



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April 22, 2020

VIA FEDERAL EXPRESS

Mr. Steven Kourtemankhe
United States Nuclear Regulatory Commission
Region 1
2100 Renaissance Blvd.
King of Prussia, PA 19406-2713

Re: Craig Testing Laboratories, Inc., Transfer of Control of Radioactive Materials
License No. 29-18018-01 ("Craig NRC License No. 29-18018-01")

Dear Mr. Kourtemankhe:

We write to notify the United States Nuclear Regulatory Commission ("NRC") of a completed transaction that Maser Consulting P.A. ("Maser") believes constituted a "change in control" of a Title 10 *Code of Federal Regulations* ("CFR") Part 30 license as defined in 10 CFR 30.34. The transaction was consummated between Maser and Craig Testing Laboratories, Inc. ("Craig") in August 2019 and resulted in a change in control of the radioactive materials activities of Craig under Craig NRC License No. 29-18018-01 (the "Transaction").

Accordingly, pursuant to Section 184 of the Atomic Energy Act of 1954, as amended, 42 U.S.C. § 2234 and NUREG-1556, Vol. 15, Rev. 1, *Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses*, Maser submits this notification to obtain the NRC's written consent of the transfer of control pursuant to the Transaction. The following information is submitted consistent with Chapter 5 (Change of Control) and Appendix E (Information Needed for Transfer of Control Application) of NUREG-1556, Vol. 15, Rev. 1, *Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses*.

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.

In August 2019, Maser acquired substantially all of the operating assets of Craig, including the equipment located at Craig's facility in Mays Landing, New Jersey that is subject to Craig NRC



Customer Loyalty
through Client Satisfaction

License No. 29-18018-01. Maser is a national multi-discipline engineering design firm. Craig engaged in materials testing laboratory operations for soils, aggregate, concrete and asphalt. Following the consummation of the Transaction in August 2019, Maser has operated the equipment listed in Craig NRC License No. 29-18018-01 at Craig's former facility located at 5439 Harding Highway, P.O. Box 427, Mays Landing, NJ (the "Mays Landing Facility"). The following information now applies to the new licensee:

Licensee: Maser Consulting P.A.
Address: 5439 Harding Highway, P.O. Box 427, Mays Landing, NJ, 08330-0427
Contact: James J. Serpico, Maser Consulting P.A., 5439 Harding Highway, P.O. Box 427, Mays Landing, NJ, 08330-0427, 609-625-1700.

An organizational chart illustrating the corporate structure of the license holder before and after the Transaction is attached hereto as Exhibit A.

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.

At the time of the Transaction in August 2019, there were no changes in the personnel, duties or training programs related to Craig NRC License No. 29-18018-01. However, on January 29, 2020, the former RSO for the Mays Landing Facility, Ian G. Craig, resigned from Maser. At or about the same time, James J. Serpico was delegated RSO duties by the Management of Maser for Craig NRC License No. 29-18018-01. Mr. Serpico's CV is attached hereto as Exhibit B.

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.

The Transaction did not affect any changes in the location, facilities, equipment, radiation safety program, use, possession, waste management or other procedures that relate to the licensed program or the radiation safety 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 Transaction did not result in any changes in the facilities, equipment or radiation safety program as the same were occupied, used or administered by Craig. At the time of the transaction, all calibrations, leak tests, area surveys, wipe tests, training, quality control, and related records were current. There was, and is, no known contamination at the Mays Landing

Facility and no decommissioning was required in connection with the Transaction or otherwise. All required surveillance has been performed, documented, and reviewed.

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.

No DFPs were changed in connection with or as a result of the Transaction. No financial assurance is required to be maintained under Craig NRC License No. 29-18018-01 because the quantity of licensed materials at the facility is below the regulatory thresholds that require decommissioning financial assurance.

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, as there was not, nor has there been to date, any decommissioning of the Mays Landing Facility, which remains fully operational.

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 Maser. Both Craig and Maser agreed to the transaction, as evidenced by an executed Asset Purchase Agreement, and, as a result, the transfer of control of the licensed material and activity to Maser. At the time of the Transaction in August 2019, and at this time, there are no open inspection items for Craig NRC License No. 29-18018-01 and, accordingly, there are no 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.

Maser will abide by all constraints, conditions, requirements, representations and commitments identified in and attributed to Craig NRC License No. 29-18018-01.

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.

Conclusion

Based on the foregoing, Maser respectfully requests the NRC's written consent of the transfer of control described herein. Thank you for your time and consideration of Maser's request. Please let us know if you need any additional information or have any questions concerning the Transaction.

Very truly yours,

MASER CONSULTING P.A.



Brian E. Curtis, Esq.
General Counsel
(732) 383-1950
bcurtis@maserconsulting.com



James J. Serpico, P.E.
Radiation Safety Officer
(609) 625-1700
jserpico@maserconsulting.com

Attachments:

- | | |
|-----------|---|
| Exhibit A | Organizational Chart regarding corporate structure of the licensee before and after the Craig-Maser Transaction |
| Exhibit B | James J. Serpico CV |

Exhibit B

May 21, 2020 Craig Testing Laboratories, Inc. Termination of Nuclear Gauge License
No. 29-18018-01

(See attached)



5439 Harding Highway • P.O. Box 427 • Mays Landing, NJ 08330 • P:609.625.1700 • F:609.625.1798

May 21, 2020

Commercial, Industrial, R&D, and Academic Branch
Division of Nuclear Materials Safety Region I
2100 Renaissance Blvd.
King of Prussia, PA 19406-2713

Attn.: Mr. Steven R. Courtemanche
Health Physicist

RE: Termination of Nuclear Gauge License No. 29-18018-01

Mr. Courtemanche,

Craig Testing Laboratories, Inc. herein requests that our License No. 29-18018-01 be terminated as a result of the acquisition of Craig Testing Laboratories by Maser Consulting P.A., which included the transfer of all our nuclear gauge equipment to Maser Consulting P.A.

Should you have any questions or require additional information please feel free to contact our office.

Respectfully submitted,
CRAIG TESTING LABORATORIES, INC.

A handwritten signature in black ink, appearing to read 'F. Gordon Craig', is written over a horizontal line.

F. Gordon Craig
CEO

cc: Eduardo Freire / Maser Consulting

Exhibit C

NRC Form 314

(See attached)

**CERTIFICATE OF DISPOSITION
OF MATERIALS**

Estimated burden per response to comply with this mandatory collection request: 30 minutes. This submittal is used by NRC as part of the basis for its determination that the facility is released for unrestricted use. Send comments regarding burden estimate to the FOIA, Privacy, and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to InfoCollections.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0028), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

LICENSEE NAME AND ADDRESS

Craig Testing Laboratories, Inc.
5439 Harding Highway
P.O. Box 427
Mays Landing, NJ 08330

LICENSE NUMBER

29-18018-01

DOCKET NUMBER

030-14353

LICENSE EXPIRATION DATE

March 31, 2024

A. LICENSE STATUS (Check the appropriate box)

- ☐ This license has expired. ☒ This license has not yet expired; please terminate it.

B. DISPOSAL OF RADIOACTIVE MATERIAL

(Check the appropriate boxes and complete as necessary. If additional space is needed, provide attachments)

The licensee, or any individual executing this certificate on behalf of the licensee, certifies that:

- ☐ 1. No radioactive materials have ever been procured or possessed by the licensee under this license.
☒ 2. All activities authorized by this license have ceased, and all radioactive materials procured and/or possessed by the licensee under this license number cited above have been disposed of in the following manner:
☒ a. Transfer of radioactive materials to the licensee listed below:

Maser Consulting P.A., 5439 Harding Highway, Mays Landing, NJ 08330 (NJDEP Lic. No. 507930-RAD190001)

- ☐ b. Disposal of radioactive materials:

☐ 1. Directly by the licensee:

☐ 2. By licensed disposal site:

☐ 3. By waste contractor:

- ☐ c. All radioactive materials have been removed such that any remaining residual radioactivity is within the limits of 10 CFR Part 20, Subpart E, and is ALARA.

C. SURVEYS PERFORMED AND REPORTED

- ☐ 1. A radiation survey was conducted by the licensee. The survey confirms:
☐ a. the absence of licensed radioactive materials
☐ b. that any remaining residual radioactivity is within the limits of 10 CFR 20, Subpart E, and is ALARA.
☐ 2. A copy of the radiation survey results:
☐ a. is attached; or ☐ b. is not attached (Provide explanation); or ☐ c. was forwarded to NRC on: _____ Date _____
☒ 3. A radiation survey is not required as only sealed sources were ever possessed under this license, and
☐ a. The results of the latest leak test are attached; and/or ☒ b. No leaking sources have ever been identified.

The person to be contacted regarding the information provided on this form:

NAME	TITLE	TELEPHONE (Include Area Code)	E-MAIL ADDRESS
Eduardo Freire, P.E.	Geographic Discipline Leader	(609) 625-1700	efreire@maserconsulting.com

Mail all future correspondence regarding this license to:

5439 Harding Highway, Mays Landing, NJ 08330

C. CERTIFYING OFFICIAL

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT

PRINTED NAME AND TITLE

Eduardo Freire, P.E., Geographic Discipline Leader

SIGNATURE

DATE

05/22/2020

WARNING: FALSE STATEMENTS IN THIS CERTIFICATE MAY BE SUBJECT TO CIVIL AND/OR CRIMINAL PENALTIES. NRC REGULATIONS REQUIRE THAT SUBMISSIONS TO THE NRC BE COMPLETE AND ACCURATE IN ALL MATERIAL RESPECT. 18 U.S.C. SECTION 1001 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.