

**SAFETY EVALUATION REPORT  
PROPOSED CHANGE OF CONTROL FOR BYPRODUCT MATERIALS LICENSE  
NUMBER 06-20581-01, GOODRICH CORPORATION**

**DATE:** June 15, 2020

**DOCKET NO.:** 030-19941

**LICENSE NO.:** 06-20581-01

**LICENSEE:** Goodrich Corporation  
100 Wooster Heights Road  
Danbury, CT 06810

**TECHNICAL REVIEWER:** Leonardo Wardrobe

**SUMMARY AND CONCLUSIONS**

The Goodrich Corporation (Goodrich) is, in part, an electro-optical solutions business authorized by NRC License 06-20581-01 for the possession and use of byproduct material for the purposes of testing subassemblies for products. The U.S. Nuclear Regulatory Commission (NRC) staff reviewed a request for consent for a direct change of control submitted by Goodrich that will result from an asset transfer transaction between Goodrich and Danbury Mission Technologies, LLC (Danbury). Goodrich is an indirect, wholly-owned subsidiary of Raytheon Technologies Corporation (Raytheon Technologies). As part of the U.S. Department of Justice approval for the merger between Raytheon Company and United Technologies Corporation (now called Raytheon Technologies) completed on April 3, 2020, Raytheon Technologies is required to divest its electro-optical solutions business. Danbury, which is a subsidiary of AMERGINT Technologies, Inc. (AMERGINT), is seeking to acquire through an asset transfer transaction, Goodrich's NRC licensed materials program the licensed material of Goodrich. The direct transfer of control is described in Agency Documents Access and Management System (ADAMS) accession number ML20136A005.

The request for consent was reviewed by NRC staff for a direct change of control of a 10 CFR Part 30 license using the guidance in NUREG-1556, Volume 15, Revision 1, "Consolidated Guidance About Materials Licenses - Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses," dated June 2016. The NRC staff finds that the information submitted by Goodrich Corporation sufficiently describes and documents the transaction and commitments made by Danbury and Goodrich Corporation.

As required by 10 CFR 30.34 and section 184 of the Atomic Energy Act of 1954, as amended (the Act), NRC staff has reviewed the application and finds that the proposed change of control is in accordance with the Act. The staff finds that, after the change of control, Danbury will be qualified to use byproduct material for the purpose requested and will have the equipment, facilities, and procedures needed to protect public health and safety, and promote the security of licensed material.

## **SAFETY AND SECURITY REVIEW**

According to data obtained from the NRC's Web-Based Licensing System (WBL), Goodrich Corporation has been an NRC licensee since January 19, 1983. The NRC conducted a main office inspection of Goodrich on August 23, 2017, and no violations were identified during this inspection. The commitments made by Danbury and Goodrich state that Danbury (License No. 06-20581-01):

- A. will not change the radiation safety officer listed in the NRC license;
- B. will not change the personnel involved in licensed activities;
- C. will not change the locations, facilities, and equipment authorized in the NRC license;
- D. will not change the radiation safety program authorized in the NRC license;
- E. will change the organization's name listed in the NRC license; and
- F. will keep regulatory required surveillance records and decommissioning records.

Danbury is a wholly-owned subsidiary of AMERGINT. AMERGINT itself is majority owned by investment funds managed by The Blackstone Group (Blackstone). Blackstone indirectly holds an interest in Curium U.S. LLC, which holds NRC Licenses 24-04206-01, 24-04206-02 and 24-04206-05MD. Therefore, for security purposes, Danbury is considered a known entity following the guidance provided by the NRC's Office of Nuclear Material Safety and Safeguards (NMSS) "Checklist to Provide a Basis for Confidence that Radioactive Materials Will be Used as Specified on the License", January 29, 2019 revision. The purpose of this checklist is for the NRC to obtain reasonable assurance from new license applicants or NRC licensees transferring control of licensed activities that the licensed material will be used for its intended purpose and not for malevolent use.

Goodrich is not required to have decommissioning financial assurance based on the types and amount of material authorized in License No. 06-20581-01.

## **REGULATORY FRAMEWORK**

Goodrich's License No. 06-20581-01, was issued under 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material." The NRC is required by 10 CFR 30.34 to determine if the change of control is in accordance with the provisions of the Act and give its consent in writing.

10 CFR 30.34(b) states:

No license issued or granted pursuant to the regulations in this part and parts 31 through 36, and 39 nor any right under a license shall be transferred, assigned or in any manner disposed of, either voluntarily or involuntarily, directly or indirectly, through transfer of control of any license to any person, unless the Commission shall, after securing full information, find that the transfer is in accordance with the provisions of the Act and shall give its consent in writing.

As previously indicated, the staff evaluation is based on guidance in NUREG-1556, Volume 15, Revision 1. The central issue is whether the authority over the license has changed. Goodrich's request for consent describes a direct change of control resulting from a planned asset transfer transaction between Goodrich, an indirect wholly-owned subsidiary of Raytheon Technologies, and Danbury a subsidiary of AMERGINT and, as such, the transfer requires NRC consent.

## **DESCRIPTION OF TRANSACTION**

The transaction is described in ADAMS accession number ML20136A006. After completion of the transaction, Danbury will become the licensee and control all licensed activities under Materials License No. 06-20581-01. The NRC staff finds that the request for consent adequately provides a complete and clear description of the transaction, and is consistent with the guidance provided in Appendix F of NUREG-1556, Volume 15, Rev. 1.

## **TRANSFeree'S COMMITMENT TO ABIDE BY THE TRANSFEROR'S COMMITMENTS**

The NRC staff finds that the information submitted by Goodrich sufficiently describes and documents the commitments made by Danbury and Goodrich and is consistent with the guidance in NUREG-1556, Volume 15, Revision 1.

## **ENVIRONMENTAL REVIEW**

An environmental assessment for this action is not required because the approval of the describe transfer of control and the associate administrative license amendment are categorically excluded under 10 CFR 51.22(c)(21).

## **CONCLUSION**

The staff has reviewed the request for consent submitted by both parties with regard to a direct change of control of byproduct materials license No. 06-20581-01 and approves the application pursuant to 10 CFR 30.34(b).

The submitted information sufficiently describes the transaction; documents the understanding of the license and commitments; demonstrates that personnel have the experience and training to properly implement and maintain the license and that they will maintain the existing records; And, in the future, will abide by all existing commitments to the license, consistent with the guidance in NUREG-1556, Volume 15, Revision 1.

Therefore, the staff concludes that the proposed change in control would not alter the previous findings, made under 10 CFR Part 30, that licensed operations will not be inimical to the common defense and security, or to the health and safety of the public.