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YALE-NEW HAVEN HOSPITAL  
RADIATION SAFETY OFFICE

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August 15, 2006

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MS-16

License No.: 06-30445-01  
Docket No.: 030-34705  
Control No.: 139001

U.S. Nuclear Regulatory Commission, Region I  
475 Allendale Road  
King of Prussia, PA 19406-1415

Subject: Yale-New Haven Hospital (YNHH) Response to NRC's Additional Information  
Request Dated August 1, 2006

Dear Ladies and Gentlemen:

YNHH's response to each item identified in the e-mail communication dated August 1, 2006 are listed below.

**A. It is necessary for your request to be signed by a member of senior management. Please resubmit it under signature of senior management, including the following additional information.**

**YNHH Response:** Arthur P. Lemay, M.S., R.Ph., the Executive Director of Oncology Services is currently the management representative listed on YNHH's NRC broad scope license No. 06-00819-03. He is the management representative who is assigned the responsibility to administer the license, attends the Radiation Safety Committee Meetings and signs all official correspondence with the NRC.

**B. Please indicate whether the corporate reorganization effort will also involve a transfer of control for NRC licenses 06-00819-03 and 06-00819-05 issued to Yale-New Haven Hospital.**

**YNHH Response:** The corporate reorganization combines the "Yale-New Haven Ambulatory Services Corporation (YNHASC)" into the existing Yale-New Haven Hospital that currently holds two NRC licenses, 06-00819-03 (medical broad scope) and 06-00819-05 (blood irradiator). Our amendment requests that the YNHASC GammaKnife License No. 06-30445-01 be incorporated into the existing YNHH licensing structure.

20 York Street  
New Haven, CT 06504

139001

NMSS/RGNI MATERIALS-002

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**C. For each affected license, please provide the "Information Needed for Transfer of Control" listed in Appendix F to NUREG-1556, Vol. 15, as follows, noting that a number of the items may not be applicable:**

**"Licensees must provide full information and obtain NRC's prior written consent before transferring control of the license. Control of a license is in the hands of the person or persons who are empowered to decide when and how that license will be used. That control is to be found in the person or persons who, because of ownership or authority explicitly delegated by the owners, possess the power to determine corporate policy and thus the direction of the activities under the license. A transferee is an entity that proposes to purchase or otherwise gain control of an NRC-licensed operation. A transferor is an NRC licensee selling or otherwise giving up control of a licensed operation. Provide the following information concerning changes of control by the applicant (transferor and/or transferee, as appropriate). If any items are not applicable, so state.**

**1. Provide a complete description of the transaction (transfer of stocks or assets, or merger). Indicate whether the name has changed and include the new name. Include the name and telephone number of a licensee contact who NRC may contact if more information is needed.**

**YNHH Response:** YNHASC and YNHH were formerly subsidiaries of the Yale New Haven Health System (YNHHS). The previous corporate organization separated health services provided outside the hospital proper, under YNHASC and all hospital based services under YNHH. The reorganization combines these two affiliated entities into the unified organization now termed "Yale-New Haven Hospital". This is an internal corporate reorganization only, there is no transfer of stocks, assets or merger "per se" involved in this event.

**2. Describe any changes in personnel or duties that relate to the licensed program. Include training and experience for any new personnel.**

**YNHH Response:** The YNHH Radiation Safety Office was responsible for all three licenses before the reorganization and will continue to be responsible after the reorganization. The only significant change will be to the responsible administrator for the license. Alvin D. Greenberg, M.D. was the responsible administrator named on the GammaKnife NRC License No. 06-30445-01. He has retired and the administrative responsibility will be transferred to the Executive Director of Oncology Services, Arthur P. Lemay, M.S., R.Ph., who is currently the named administrator on the Hospital's medical broad scope NRC License No. 06-00819-03.

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**3. Describe any changes in the organization, location, facilities, equipment or procedures that relate to the licensed program.**

**YNHH Response:** The location, facilities, equipment and procedures that relate to the licensed program will remain the same except that the GammaKnife operations will become part of the YNHH's Radiation Safety Committee's (RSC) responsibility and the responsible administrator change detailed above.

**4. Describe the status of the surveillance program (surveys, wipe tests, quality control) at the present time and the expected status at the time that control is to be transferred.**

**YNHH Response:** There is no change to the surveillance program affected by this change, other than the administrative changes outlined above concerning the RSC and responsible administrator.

**5. 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.**

**YNHH Response:** This change will have no effect since the records have been and are currently held by the YNHH Radiation Safety Office.

**6. Confirm that the transferee will abide by all constraints, conditions, requirements and commitments of the transferor or that the transferee will submit a complete description of the proposed licensed program."**

**YNHH Response:** YNHH will abide by all constraints conditions, requirements and commitments outlined by the existing license and licensee correspondence with the NRC.

**In addition, if your license requires financial assurance for decommissioning, you will need to address changes to financial assurance for name changes and/or change in ownership (control). If your organization's name is changing and there is no change of ownership, you will need to amend your financial assurance instruments and supporting documents to address the change in name. If there has been a change of ownership (control), the transferee must submit new financial assurance in accordance with Chapter 4 to Volume 3 of NUREG-1757, "Consolidated NMSS Decommissioning Guidance."**

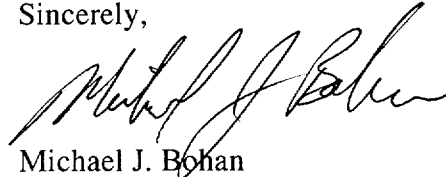
**YNHH Response:** This change should have no effect on the financial assurances for decommissioning.

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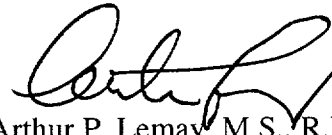
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If you have any further questions, please feel free to contact the Radiation Safety Officer at the address or phone number above.

Sincerely,



Michael J. Bohan  
Radiation Safety Officer/Health Physicist



Arthur P. Lemay, M.S., R.Ph.  
Exec. Director, Oncology Services

cc: State of Connecticut - Dept. of Environmental Protection, Rad. Control Unit  
Marna P. Borgstrom, President, Chief Executive Officer