





ATTACHED FILE(S): 501-100-000000-1031713  
VHS-002-005-0000

VIA FACSIMILE (630-515-1259) & FEDERAL EXPRESS DELIVERY

October 1, 2013

Materials Licensing Branch  
U.S. Nuclear Regulatory Commission, Region III  
2443 Warrenville Road, Suite 210  
Lisle, IL 60532-4352

RE: VHS Children's Hospital of Michigan, Inc.: NRC License No.: 21-03298-05

To Whom It May Concern:

As follow up to conversations with Colleen Carol Casey earlier this week, this letter and attached Transfer of Control Questionnaire serve as notification that the ultimate parent owner of the above-referenced hospital will be involved in a transaction resulting in a new ultimate parent entity. As you will see in Attachment A (Current Ownership Structure), the organizational structure involving the above-referenced hospital includes multiple levels of ownership. Pursuant to the transaction, Vanguard Health Systems, Inc., a publicly traded company, ("Vanguard"), which is the ultimate parent entity of the hospital, has entered into a Plan of Merger to sell 100% of its stock (by way of merger) to Tenet Healthcare Corporation, a publicly traded company ("Tenet"). As shown in Attachment B (New Ownership Structure), upon closing, Vanguard became a wholly-owned subsidiary of Tenet, with Tenet as the new ultimate parent of Vanguard and its subsidiaries. Vanguard continues to exist and its down-stream subsidiary, VHS of Michigan, Inc., continues to be the owner of the above-referenced hospital. Thus, only the ultimate parent entity of Vanguard changed. The transaction occurred on October 1, 2013.

The transaction is not expected to result in any clinical or policy changes affecting the individual hospital or its departments, including the radiation safety programs and types of radioactive materials handled. Additionally, the radiation safety officer and related personnel will not be changing as a result of the transaction.


Based on NRC Guidance on the Transfer of Ownership or Control of Licensed Activities, we have concluded that the transaction does not result in a change of ownership or control of the licensed activities; however, out of an abundance of caution, we are submitting this notification. For your reference, attached is the following information:

- Attachment A: Organizational chart that shows the structure of the Vanguard system, including the above-referenced hospitals, prior to October 1, 2013.
- Attachment B: Organizational chart that shows the structure of the Vanguard system, including the above-referenced hospitals, as of and after October 1, 2013.

- Attachment C: Transfer of Control Questionnaire

To further facilitate your review of this transaction, please contact Tammy Woffenden, (512) 305-4776, or Lane Wood, (214) 740-8513, if you have any questions or need any additional information. Thank you for your assistance with this matter.

Sincerely,

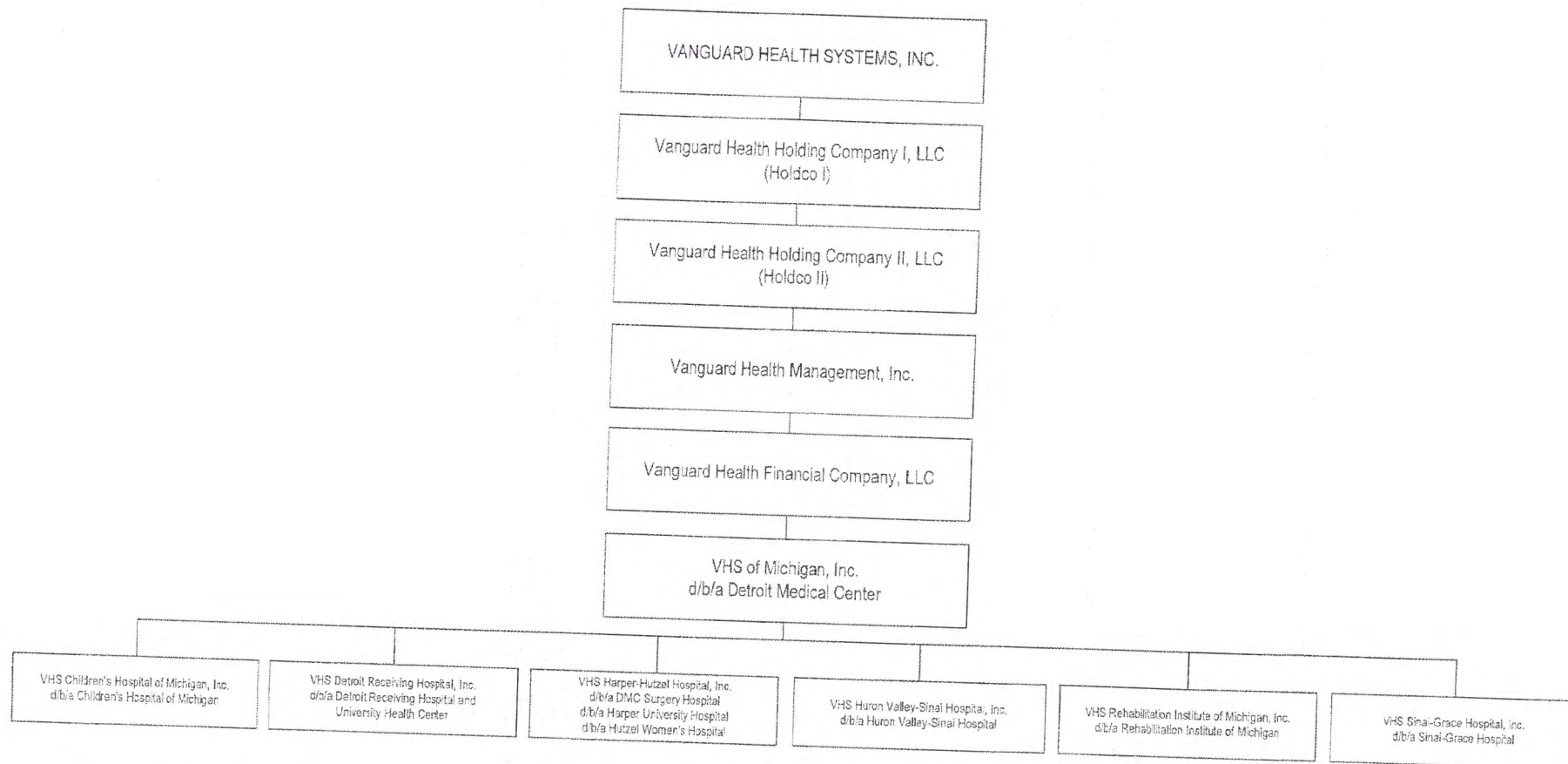
  
Chad Grant  
Radiation Safety Officer

Enclosures

# Attachment A



## MICHIGAN





## Attachment C

### Transfer of Control Questionnaire

- (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 whom the NRC may contact if more information is needed.

Response: As shown in Attachment A (Current Ownership Structure), the organizational structure involving the hospital includes multiple levels of ownership. Pursuant to the transaction, Vanguard Health Systems, Inc., a publicly traded company, ("Vanguard"), which is the ultimate parent entity of the hospital, has entered into a Plan of Merger to sell 100% of its stock (by way of merger) to Tenet Healthcare Corporation, a publicly traded company ("Tenet"). As shown in Attachment B (New Ownership Structure), upon closing, Vanguard became a wholly-owned subsidiary of Tenet, with Tenet as the new ultimate parent of Vanguard and its subsidiaries. Vanguard continues to exist and its down-stream subsidiary, VHS of Michigan, Inc., continues to be the owner of the licensed hospital. Thus, only the ultimate parent entity of Vanguard changed. The transaction occurred on October 1, 2013.

The hospital, which holds the NRC materials license, will not change name or tax identification number.

You may contact Tammy Woffenden, with Locke Lord, LLP, at 512-305-4776 or Lane Wood, with Locke Lord, LLP, at 214-740-8513 if more information is needed.

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

Response: There will be no changes in personnel named in the license or duties that relate to the licensed program.

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

Response: There will be no changes in the organization, location, facilities, equipment, or procedures that relate to the licensed program.

- (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.

Response: All surveillances and records pertaining to the use of radioactive material were current at the time of transfer and continue as such.

- (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.

Response: All records concerning the safe and effective decommissioning of the facility will remain in control of the current hospital and its licensed radiation control program, as the change in parent control discussed in this Questionnaire does not change the licensed hospital entity, its direct ownership or its radiation control program. Thus, the records will not be "transferred" to another entity.

- (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.

Response: Because the change in parent control discussed in this Questionnaire does not change the licensed hospital entity, its direct ownership or its radiation control program, there is no transfer of the hospital's radioactive materials license. The hospital and its current program, as licensed, agree to continue to abide by all constraints, conditions, requirements, and commitments of the licensed program.