

# NORTHSTAR<sup>SM</sup>

health system

July 30, 2014

**VIA FACSIMILE (630) 515-1259**

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

Re: Confirmation of Transfer of Ownership and Control  
And Request for Amendment to NRC License #21-18586-01

Dear Mr. Reichold:

In follow up to your letter of June 30, 2014, in which the Nuclear Regulatory Commission ("NRC") provided written consent to the transfer of control of NorthStar Health System ("NorthStar"), please accept this confirmation that the transfer of control was completed on July 1, 2014 as described to the NRC in NorthStar's Request for Prior Written Consent. I am again providing the change of control information from that letter as requested with this letter.

In addition to the confirmation of the transfer of control, I am requesting an Amendment to NorthStar's Materials License to reflect that the new name of the licensee is NorthStar Health System, Inc.

As required, I have attached a Form 313 filled in to express that the new name of the licensee is the only change requested to the license.

If you have any questions or need further information, please feel free to contact me at (906) 265-0446.

Sincerely,

  
Connie Koutouzos  
President/CEO

Attachment and Enclosures

### CHANGE OF CONTROL INFORMATION

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.

The corporate structure of NorthStar changed from a directorship nonprofit corporation, which legally has no "owners" but is controlled by a board or directors, to a nonprofit membership corporation. As a membership corporation, NorthStar has been renamed "NorthStar Health System, Inc." and has one corporate member (substantially equivalent to a shareholder in a non-profit context). The new member is Aspirus, Inc., a Wisconsin nonprofit corporation. NorthStar Health System, Inc. will carry on and operate as a critical access hospital in the same manner as NorthStar did before the corporate reorganization.

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

There will not be any changes in personnel or duties that relate to the licensed program. There are no personnel changes contemplated.

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

There will be no changes in organization, location, facilities, equipment or procedures that relate to the licensed program in connection with this transaction. The organization, location, facilities, equipment, and procedures that relate to the licensed program will remain intact after the transaction.

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.

The surveillance program (surveys, wipe test, quality control) records are complete and up to date. The surveillance program will continue without change following the transaction. Records of program audits are available for review as are the NRC inspection results and there are no open items requiring corrective action at this time.

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.

NorthSTAR has not decommissioned any facility with respect to its nuclear medicine program and no decommissioning will be performed as a result of the transaction. All records that would be required for possible future decommissioning will remain at

NorthSTAR and be available to assist in performing decommissioning if it becomes necessary.

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.

See Attachment A for Aspirus' confirmation that the transferee will abide by all constraints, conditions, requirements and commitments of the transferor.

7. Provide documentation that the transferor and transferee agree to the change in ownership or control of the licensed material and activity, and the conditions of transfer; and the transferee is made aware of all open inspection items and its responsibility for possible resulting enforcement actions.

See Attachment A for NorthSTAR's and Aspirus' agreement to the change in control of the licensed material and activity, conditions of the transferee, and certification that Aspirus is aware of all open inspection items and its responsibility for possible resulting enforcement actions.

If you have any questions or need further information regarding the specifics of NorthSTAR's nuclear medicine program, please feel free to contact Sharon Dedo (her contact information is on the attached Form 313). Ms. Dedo is NorthSTAR's current Radiation Safety Officer and will continue in that role following the NRC's consent and completion of the transaction.

If you have any questions or need further information related to the transaction itself, please feel free to contact me at (906) 265-0446.

**ATTACHMENT TO FORM 313****5. RADIOACTIVE MATERIAL****a. Element and mass number;**

No Change from current license.

1. Any byproduct material permitted by 10 CFR 35.100
2. Any byproduct material permitted by 10 CFR 35.200
3. Any byproduct material permitted by 10 CFR 31.11

**b. Chemical and/or physical form;**

No change from current license.

1. Any
2. Any
3. Prepackaged Kits

**c. Maximum amount which will be possessed at any one time.**

No change from current license.

1. As needed
2. As needed
3. 10 Millicuries

**6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.**

No change from current license.

1. Any uptake, dilution and excretion study permitted by 10 CFR 35.100
2. Any imaging and localization study permitted by 10 CFR 35.200
3. In vitro studies

**7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE.**

No change from current license. Personnel with radiation oversight components of the radiation safety program will remain unchanged.

8. TRAINING FOR INDIVIDUALS WORKING OR FREQUENTING  
RESTRICTED AREAS:

No change from current license. All components of radiation safety training program will remain unchanged.

9. FACILITIES AND EQUIPMENT.

No change from current license. All components of facilities and equipment will remain unchanged.

10. RADIATION SAFETY PROGRAM.

No change from current license. All components of the radiation safety program will remain unchanged.

11. WASTE MANAGEMENT.

No change from current license. All components of the waste management will remain unchanged.

DET02:1909803.1

**ATTACHMENT A**

Upon closing the affiliation of Aspirus, Inc. and NorthSTAR Health System, Aspirus, as Transferee, agrees and certifies that it will abide by all constraints, conditions, requirements and commitments of NorthSTAR Health System, as Transferor, with respect to the transfer of Transferor's Nuclear Regulatory Commission License #21-18586-01.

Transferee further certifies that Transferee agrees to the change in control of Transferor's licensed material and activity and Transferee has been made aware of all open inspection items and Transferee's responsibility for possible resulting enforcement actions

**"Transferee"**

Aspirus, Inc.


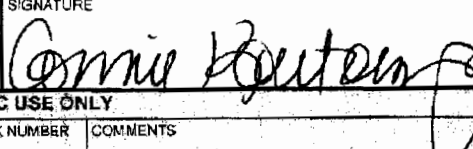
By: Matthew F. Heywood  
Matthew F. Heywood  
Its: President/Chief Executive Officer

**"Transferor"**

NorthSTAR Health System

By: Mark Fousigniant  
Mark Fousigniant  
Its: Chairperson of the Board

DET02:1864069.2

<b>NRC FORM 313</b> (03-2014) 10 CFR 30, 32, 33, 34 35, 36, 37, 39, and 40	<b>U.S. NUCLEAR REGULATORY COMMISSION</b>    <b>APPLICATION FOR MATERIALS LICENSE</b>	<b>APPROVED BY OMB: NO. 3150-0120</b> Estimated burden per response to comply with this mandatory collection request: 4.3 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. 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 Internet e-mail to <a href="mailto:InfoCollections.Resource@nrc.gov">InfoCollections.Resource@nrc.gov</a> , and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0120), 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.				
<b>EXPIRES: 05/31/2015</b>						
<b>INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW. *AMENDMENTS/RENEWALS THAT INCREASE THE SCOPE OF THE EXISTING LICENSE TO A NEW OR HIGHER FEE CATEGORY WILL REQUIRE A FEE.</b>						
<b>APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:</b>  OFFICE OF FEDERAL & STATE MATERIALS AND ENVIRONMENTAL MANAGEMENT PROGRAMS DIVISION OF MATERIALS SAFETY AND STATE AGREEMENTS U.S. NUCLEAR REGULATORY COMMISSION WASHINGTON, DC 20555-0001  <b>ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:</b> <b>IF YOU ARE LOCATED IN:</b>  ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA,  <b>SEND APPLICATIONS TO:</b>  LICENSING ASSISTANCE TEAM DIVISION OF NUCLEAR MATERIALS SAFETY U.S. NUCLEAR REGULATORY COMMISSION, REGION I 2100 RENAISSANCE BOULEVARD, SUITE 100 KING OF PRUSSIA, PA 19406-2713		<b>IF YOU ARE LOCATED IN:</b>  ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, <b>SEND APPLICATIONS TO:</b>  MATERIALS LICENSING BRANCH U.S. NUCLEAR REGULATORY COMMISSION, REGION III 2443 WARRENVILLE ROAD, SUITE 210 Lisle, IL 60532-4352  ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING,  <b>SEND APPLICATIONS TO:</b>  NUCLEAR MATERIALS LICENSING BRANCH U.S. NUCLEAR REGULATORY COMMISSION, REGION IV 1600 E. LAMAR BOULEVARD ARLINGTON, TX 76011-4511				
<b>PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.</b>						
1. THIS IS AN APPLICATION FOR (Check appropriate item)  <input type="checkbox"/> A. NEW LICENSE <input checked="" type="checkbox"/> B. AMENDMENT TO LICENSE NUMBER <u>21-18586-01</u> <input type="checkbox"/> C. RENEWAL OF LICENSE NUMBER _____		2. NAME AND MAILING ADDRESS OF APPLICANT (Include ZIP code)  NorthSTAR Health System, Inc. 1400 West Ice Lake Road Iron River, Michigan 49935				
3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED  1400 West Ice Lake Road Iron River, Michigan 49935		4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION Sharon Dedo <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:50%;">BUSINESS TELEPHONE NUMBER (906) 265-0429</td> <td style="width:50%;">BUSINESS CELLULAR TELEPHONE NUMBER N/A</td> </tr> <tr> <td colspan="2">BUSINESS EMAIL ADDRESS <a href="mailto:sharon.dedo@northstar.org">sharon.dedo@northstar.org</a></td> </tr> </table>	BUSINESS TELEPHONE NUMBER (906) 265-0429	BUSINESS CELLULAR TELEPHONE NUMBER N/A	BUSINESS EMAIL ADDRESS <a href="mailto:sharon.dedo@northstar.org">sharon.dedo@northstar.org</a>	
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BUSINESS EMAIL ADDRESS <a href="mailto:sharon.dedo@northstar.org">sharon.dedo@northstar.org</a>						
SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.						
5. RADIOACTIVE MATERIAL a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.		6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.				
8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.		7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE.				
10. RADIATION SAFETY PROGRAM.		9. FACILITIES AND EQUIPMENT.				
12. LICENSE FEES (Fees required only for new applications, with few exceptions*) (See 10 CFR 170 and Section 170.31)		11. WASTE MANAGEMENT.				
<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:50%;">FEE CATEGORY</td> <td style="width:50%;">AMOUNT ENCLOSED \$</td> </tr> </table>			FEE CATEGORY	AMOUNT ENCLOSED \$		
FEE CATEGORY	AMOUNT ENCLOSED \$					
13. CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.  THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 37, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF. WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 749 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.						
CERTIFYING OFFICER - TYPED/PRINTED NAME AND TITLE  Connie Koutouzos, President and CEO		SIGNATURE  DATE 7/30/14				
<b>FOR NRC USE ONLY</b>						
TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED \$	CHECK NUMBER	COMMENTS	
APPROVED BY				DATE		