

From: [Elliott, Robin](#)
To: jscalise@jeffersonradiology.com
Cc: [Gallagher, Robert](#)
Subject: Jefferson Radiology License No. 06-28502-01, CN 602654, Request for additional information
Date: Monday, April 02, 2018 9:47:00 AM

License No.: 06-28502-01

Docket No: 030-31642

Control No: 602654

Licensee Name: Jefferson Radiology, PC

This refers to your request dated February 22, 2018, concerning a change of control. In order to continue our review of your request, the following additional information is needed:

1. Section 5.1 of NUREG 1556 Volume 15, Rev.1, Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses, provides guidance to licensees regarding information to be included in their request which describes the transaction which will occur. Please provide the following:
 - a. 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, facsimile number and email address. Clearly identify when the amendment request is due to a name change only. It was unclear if the new licensee is Connecticut Imaging Partners, LLC (CIP) since the letter was countersigned by a representative from Hartford Healthcare and not CIP. In addition, there is a September 2017 letter posted to your website stating that MEDNAX, Inc. acquired Jefferson Radiology. Please explain this relationship, as it was not included in your request.
 - b. Provide a pre- and post-transaction organizational chart showing the corporate structure of the license holder and its parent company. Include the reporting line to the Radiation Safety Officer.
 - c. Indicate the date of the transfer.
2. Section 5.2 of NUREG 1556 Volume 15, Rev.1 Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses provides guidance to licensees regarding changes in personnel.
 - a. Provide training and experience for new personnel to be added to the license and any changes in the training program.
3. Section 5.3 of NUREG 1556 Volume 15, Rev.1 Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses provides guidance to licensees regarding facilities, equipment and procedures.
 - a. 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.
4. Section 5.5 of NUREG 1556 Volume 15, Rev.1 Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses, provides guidance to licensees regarding decommissioning records.
 - a. Please confirm the following: "Pursuant to 10 CFR 30.35(g), we shall maintain drawings and records important to decommissioning and will transfer these records to an NRC or Agreement State license before licensed activities are transferred; or we will transfer the records to the appropriate NRC regional office before the license

- is terminated.”
- b. 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. Describe the method and proposed timetable for the transfer of required records.
 - c. Provide a commitment by the transferee to maintain the records received from the transferor.
 - d. Describe any decontamination to prepare the facility for decommissioning prior to the change of control.
 - e. If decommissioning will not occur until after the change of control, describe any contamination and confirm that the transferee is knowledgeable of the extent and levels of contamination and applicable decommissioning requirements.
 - f. Indicate whether operations will continue during the transfer process; if so, provide either an agreement to perform a survey confirming that the facility is free of contamination or agreement by the transferee to accept the facility “as is” on the date of the transfer.
5. Section 5.6 of NUREG 1556 Volume 15, Rev.1 Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses, provides guidance to licensees regarding licensee commitments.
- a. Provide an agreement to abide by all constraints, license conditions, requirements, representations, and commitments identified in and attributed to the existing license or a description of the transferee’s program to ensure compliance with the license and regulations.
 - b. 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.

Your reply must be an originally signed and dated letter. The letter may be scanned and submitted as a pdf document attached to an email; or it may be transmitted by facsimile to (610) 337-5269; or it may be sent by regular mail. If we do not receive a reply from you within 30 calendar days from the date of this e-mail, we will assume that you do not wish to pursue your request for change of control.

Please respond by e-mail to acknowledge that you have received the e-mail request for additional information.

Regards,

Robin L. Elliott

Health Physicist
Medical & Licensing Assistance Branch
Division of Nuclear Materials
U.S. NRC, Region I
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713
(610) 337-5076 voice
(610) 337-5269 fax

Robin.Elliott@nrc.gov