

# JEFFERSON RADIOLOGY

DIAGNOSTIC & INTERVENTIONAL SPECIALISTS

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04/26/2018

Robin Elliot  
Health Physicist  
Division of Nuclear Materials  
U.S. NRC, Region I  
2100 Renaissance Boulevard, Suite 100  
King of Prussia, PA 19406-2713

Licensee: Jefferson Radiology, PC  
License No.: 06-28502-01  
Docket No.: 030-31642  
CN: 602654

Ms. Elliot,

This refers to your email request dated April 02, 2018, concerning a request for additional information. Below is the list of questions with our responses in orange italics.

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.*

*The new licensee is CIP. The letter is counter signed by Hartford Healthcare who is a joint owner with Jefferson radiology (an affiliate of Mednax) to comprise CIP.*

*The Mednax transaction is explained in the letter dated 02/26/18, where the former owners of JR sold 100% of their ownership interest to Mednax. Following the sale, Jefferson's operations remain the same, to wit, its name, legal structure, clinical and technical staff, management team and operations, including all locations and scope of services, remain unchanged. Similarly, the authority of Jefferson Radiology's Materials License did not change and Jefferson's radiation-related equipment, processes, staff and Radiology Safety Officer remain the same and at the same physical location. The contact for the Materials License is unchanged and the surveillance program is current and will continue to remain current.*

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<b>Administration</b>	111 Founders Plaza	Suite 400	East Hartford	Connecticut	06108-3240

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- 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.

*Attached*

- c. Indicate the date of the transfer.

*The date of transfer of ownership interest to Mednax was on 09/27/2017. The date of transfer of ownership to CIP occurred on 01/05/2018.*

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.

*There are no new personnel to be added to the license. There is no change in the training program it remains the same.*

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.

*Our facilities, equipment and radiation safety program is in good standing. There are no contaminations; there is no transfer of any equipment or materials. Calibrations, leak tests, area surveys; wipe tests, training, quality control and related records are up to date and in good standing.*

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."

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*Although we are not transferring any licensed activities, it is confirmed that we will "... 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." if the need arises.*

- 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.

*There are no records to the transfer since we are not decommissioning any facilities.*

- c. Provide a commitment by the transferee to maintain the records received from the transferor.

*There are no records to the transfer since we are not decommissioning any facilities.*

- d. Describe any decontamination to prepare the facility for decommissioning prior to the change of control.

*There is no decontamination to prepare the facility; we are not decommissioning any facilities.*

- 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.

*We are not decommissioning any facilities.*

- 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.

*There is no transfer of process or decommissioning; only a name change of ownership.*

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.

*There is no change of control, transfer/change of the program, nor change in services.*

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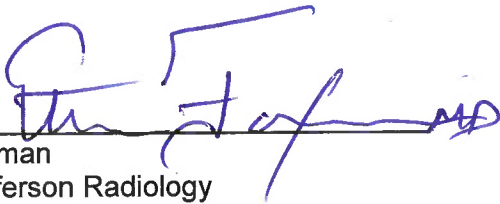
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- b. Confirm that both transferor and transferee agree to transferring control of the licensed material and activity, and the conditions of transfer, and that the transferee has been made aware of any open inspection items and its responsibility for possible resulting enforcement actions.

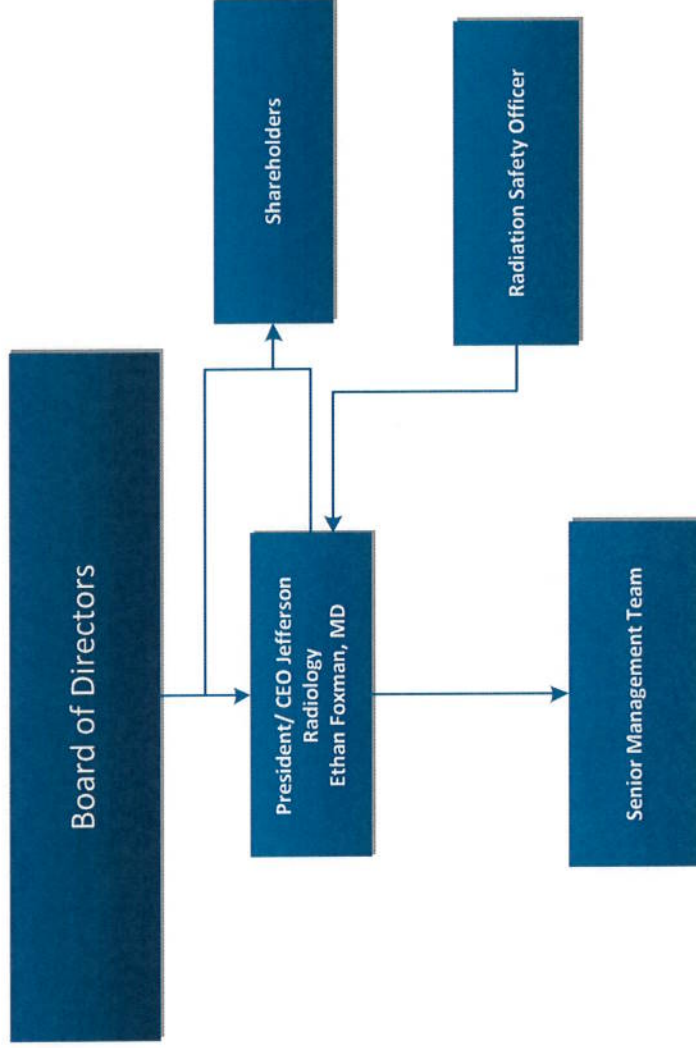
*There is no transfer of control of the material license.*

Please let us know if you need further information.

Sincerely,



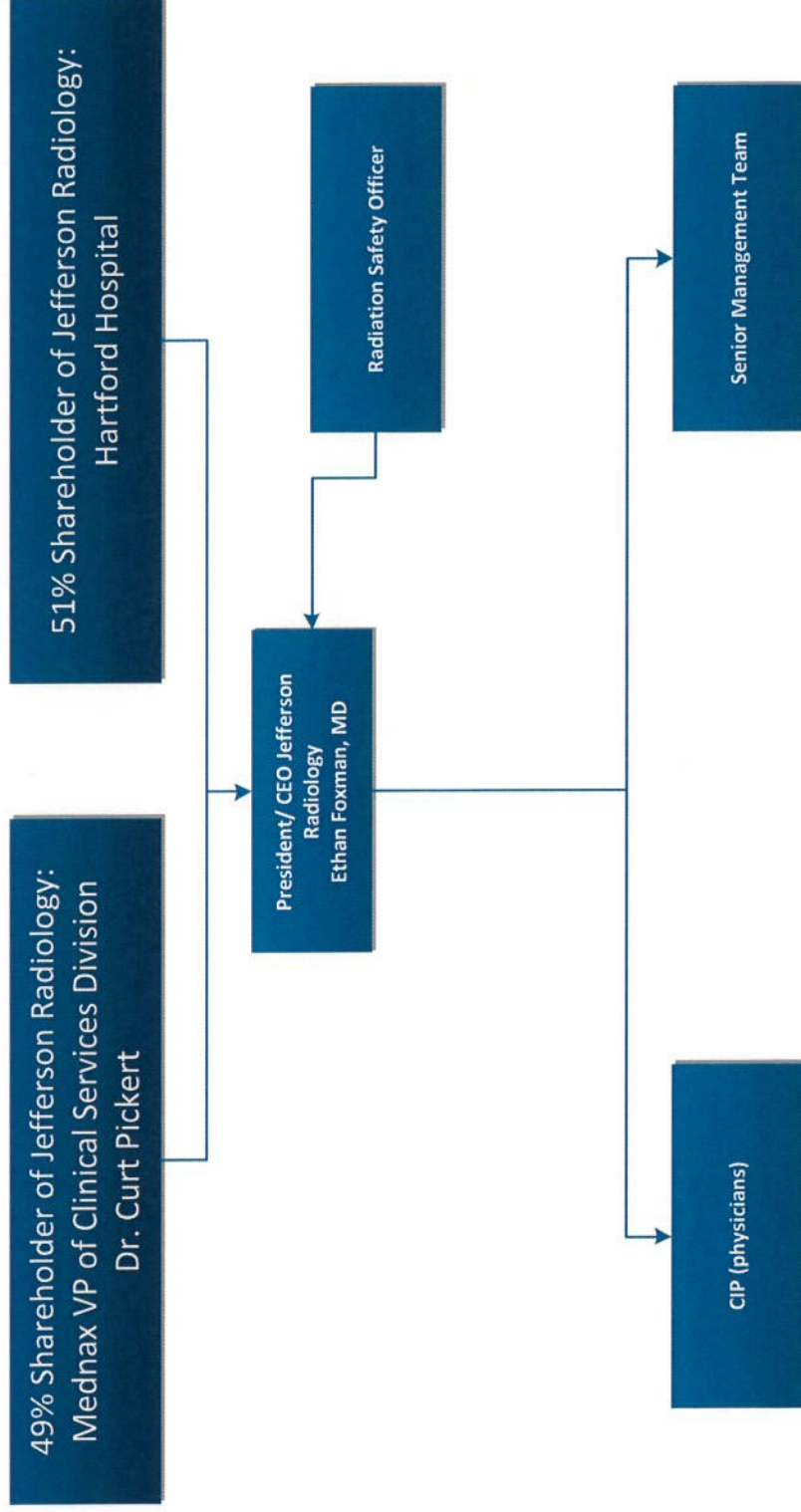
Dr. Ethan Foxman  
President, Jefferson Radiology  
111 Founders Plaza, Suite 400  
East Hartford, CT 06108



\* Reporting to the Board of Directors

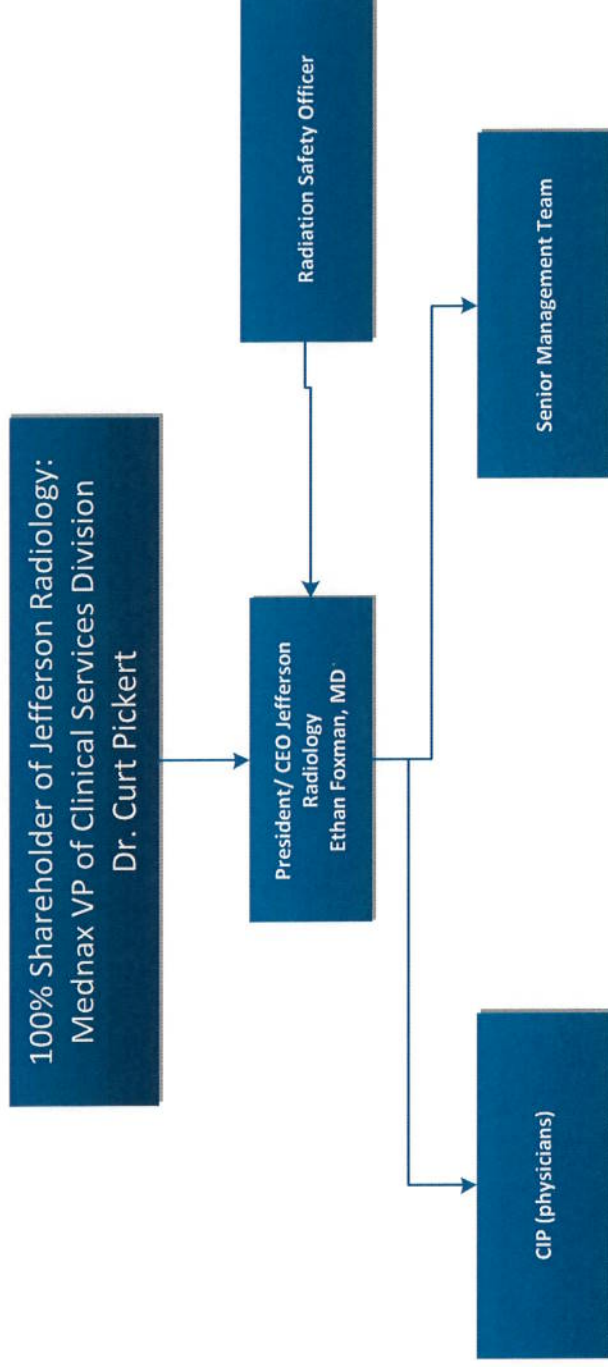






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