

Associated Physicians Group, PLC

Berkley Medical Building • 1695 W. Twelve Mile Road • Suite 200 • Berkley, Michigan 48072 • Telephone (248) 548-9090

Neelum Gupta, M.D.
Jeffrey Meer, M.D.
David Pawlowski, D.O.
Robert J. Pikal, M.D.
Vishnuvardhan Reddy, M.D.
Camelia Salanta, M.D.

August 20, 2018

United States Nuclear Regulatory Commission
Region III, Materials Licensing
2443 Warrenville Road, Ste 210
Lisle, IL 60532-43521

Re: Amendment to NRC License # 21-35304-01

Dear Sir/Madam:

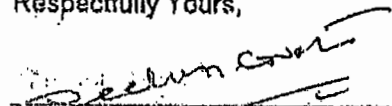
The purpose of this letter is to amend our current NRC license to reflect the following changes. We are requesting a Transfer of Control amendment, and new tax identification number. Please find the enclosed information pertaining to both matters enclosed. Upon your request we will send surveys and wipes for the department close-out.

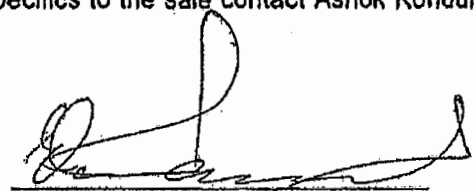
Item #1: We are requesting a transfer of control of Associated Physicians Group, P.L.C. to Dearborn Cardiology. We have included the required information for this transfer for your review. Our name is changing, but our location will remain the same.

Item #2: The new tax identification number is # 463480758.

We appreciate your assistance with this amendment. If you have any questions or require additional information, please contact our medical physics consultant, Laura Luna at 734-662-3197, or if inquiring about specifics to the sale contact Ashok Kondur, M.D. at 248-946-1551.

Respectfully Yours,


Neelum Gupta, M.D.
CEO
Associated Physicians Group, P.L.C.


Elias Kassab, M.D.
CEO
Dearborn Cardiology

TRANSFER OF CONTROL

PER INFORMATION APPENDIX G, NUREG-1556, VOL. 15

1. All assets pertaining to the nuclear medicine department (imaging equipment, measuring equipment, exercise equipment and facility) have been purchased from Neelum Gupta, MD. of Associated Physicians Group by Dearborn Cardiology. The new name of the practice is changing to Dearborn Cardiology. Control of these assets will be given to Dearborn Cardiology by Associated Physicians Group, P.L.C. when Transfer of Ownership is granted by the Nuclear Regulatory Commission. The Associated Physicians Groups NRC license will cease to exist. Dr. Kondur can be reached at 248-946-1551, if you have any further questions.
2. The new CEO will be Elias Kassab, M.D., authorized users will change to the current Dearborn Cardiology authorized users, Dr.'s Ashok Kondur, M.D. and Jehan R. Barbat, M.D.. The Radiation Safety Officer will be Laura Luna, B.S. These are all current on Dearborn Cardiology's license.
3. Dearborn Cardiology has purchased and will obtain possession of the nuclear medicine camera, radioactive materials, sealed sources and radiation safety equipment upon your approval. The location will remain the same, 1695 W. 12 Mile Rd., Berkley, MI 48072.
4. All required documents and records are currently kept in accordance with the NRC license condition. These include, but are not limited to the annual calibration of survey instruments, semi-annual leak testing of non-exempt sealed radioactive sources, radiation monitoring and personnel exposure monitoring reports. Radiation monitoring is performed on a daily basis for acceptable radiation levels and weekly for removable contamination. Upon your approval and a request, we will send these documents from Associated Physicians Group, P.L.C. and the following work day we will resume operations under Dearborn Cardiology, license # 21-35304-01.

The areas of storage, preparation, handling, and administration of radioactive materials are surveyed daily for acceptable radiation levels and weekly for removable contamination. If contamination of these areas is detected during these daily or weekly surveys, decontamination is undertaken and completed at that time. We have enclosed a diagram of the department.
5. Due to the small quantities and short half-lives of the unsealed radioactive materials, which we use, we are exempt from showing financial assurance for decommissioning. We do not use any unsealed radioactive materials with a half-life greater than 60 days and there are no open inspection items.
6. All parties involved with the transfer are aware and agree to the planned transfer of ownership. Please see the enclosed, signed agreement page.

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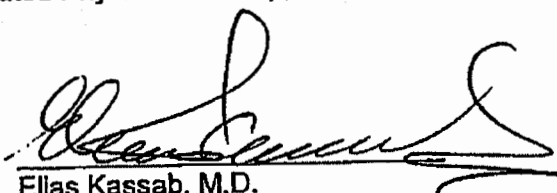
AGREEMENT TO NRC LICENSE CONDITIONS

We hereby agree, as the management of Dearborn Cardiology, to all of the constraints, conditions, requirements, and commitments identified in the existing Nuclear Regulatory Commission license # 21-35150-01 for Associated Physicians Group, P.L.C.

Signed:



Neelum Gupta, M.D., CEO
Associated Physicians Group, P.L.C.



Elias Kassab, M.D.
Dearborn Cardiology

Gryglak, Magdalena

From: Leann Pontello <lpontello@associatedphysiciansgroupplc.com>
Sent: Monday, August 20, 2018 9:26 AM
To: Gryglak, Magdalena; 'Cristina Garza'
Cc: 'Laurie Luna'
Subject: [External_Sender] RE: Transfer of Control , NRC license no. 21-35150-01, Associated Physicians Group PLC to Dearborn Cardiology, NRC license no. 21-35304-02
Attachments: 20180820102312369.pdf

Hi Ms. Gryglak,

I have made the changes your requested.

Please let me know if this is to your satisfaction.

Regards,

Leann Pontello, Practice Administrator
Associated Physicians Group PLC
1695 W 12 Mile Road, Suite 200
Berkley, MI 48072
Phone: 248-548-9090 Ext. 1210
Fax: 248-548-8462
lpontello@associatedphysiciansgroupplc.com

From: Gryglak, Magdalena [mailto:Magdalena.Gryglak@nrc.gov]
Sent: Friday, August 17, 2018 6:26 PM
To: Leann Pontello; 'Cristina Garza'
Cc: 'Laurie Luna'
Subject: Transfer of Control , NRC license no. 21-35150-01, Associated Physicians Group PLC to Dearborn Cardiology, NRC license no. 21-35304-02

Ms. Pontello and Ms. Garza,

Could you please resubmit the above document with the exception of the letter head for Associated Physicians Group P.L.C. (the attached letter contains the Dearborn Cardiology name on top). Please place a new date and have both doctors sign the letter again.

Please attach all the same pages as you see in the attached document and email the document directly to me.

Thank you for your cooperation!

Magdalena

From: Gryglak, Magdalena [mailto:Magdalena.Gryglak@nrc.gov]
Sent: Wednesday, August 01, 2018 11:28 AM

To: Cristina Garza

Cc: Laurie Luna; lpontello@associatedphysiciansgroupplc.com

Subject: Transfer of Control , NRC license no. 21-35150-01, Associated Physicians Group PLC

Ms. Garza,

As you and I discussed this morning, please provide the following documentation to process your request as documented in letter dated June 18, 2018 regarding the transfer of control of NRC license no. 21-35150-01 for Associated Physicians Group PLC:

For consent to transfer of control, please provide the following:

- 1) Please resubmit the letter dated June 18, 2018, redated and signed by Dr. Gupta and Dr. Kassab with a cover letter from Associated Physicians Group PLC;
- 2) Please attach the same information except for the facility diagram.

To add a new location of use to license no 21-35304-01, Dearborn Cardiology, please provide the following:

- 1) A cover letter signed by Dr. Kassab requesting addition of a new location of use at 1695 W. 12 Mile Rd., Berkley, MI 48072.
- 2) Reference and attach the diagram for the location
- 3) Add the following details in the diagram:
 - Specify direction of north
 - Specify "outside"
 - Add location for the storage of radioactive material in the diagram, indicate whether it is shielded radioactive material storage.
 - Revise "waste storage" to "shielded radioactive waste storage" (if the waste is shielded, L-block etc.)

To terminate license no. 21-35150-01, Associated Physicians Group PLC, please provide the following:

- 1) Cover letter from Associated Physicians, signed by Dr. Gupta requesting to terminate license no. 21-35150-01 with statement that all radioactive material including sealed sources will be transferred to Dearborn Cardiology, license no. 21-35304-01 after the NRC provides the consent to transfer of control.
- 2) Completed NRC form 314, dated and signed by Dr. Gupta (form attached).
- 3) List of radioisotopes used (unsealed material) at Associated Physicians Group PLC;
- 4) Contamination and radiation surveys for all areas where materials were used or stored under the license (since the location is not being released for unrestricted use, please provide surveys after the last time that unsealed material was used in June 2018);
 - a. A survey map providing contamination and exposure rates keyed to specific locations within each room where radioactive material was used and stored;
 - b. Background readings as well as guidance/action levels;
 - c. Instrumentation used including the manufacturer's names and model numbers, last calibration date, and efficiency factors for well counter;
 - d. Date and name/s of individuals performing the final status survey;
- 5) List of sealed sources used;
- 6) Most recent leak test results for the sealed sources

- 7) State the final location of the sealed sources (sealed sources are stored in the hot lab pending transfer to Dearborn Cardiology, license no. 21-35304-01).
- 8) State whether there is any radioactive waste present and how you disposed of it (decay in storage, transfer to a radioactive waste broker for disposal etc.)
- 9) Confirm that all residual radioactive material readings are within background.

Please email the requested information as a pdf document directly to me by August 15, 2018.

If you have any questions, please do not hesitate to contact me.

Thank you
Magdalena R. Gryglak
U.S. NRC Region III
630-829-9875