

# JEFFERSON RADIOLOGY

DIAGNOSTIC & INTERVENTIONAL SPECIALISTS

Avon Bloomfield Enfield Farmington Glastonbury Granby Hartford West Hartford Wethersfield

05/29/2018

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, and our detailed discussion that occurred on May 23/2018 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 reason the new licensee name is being requested to change to CIP is due to the ownership structure. It is 49% Mednax and 51% Hartford Hospital. All our other joint ventures with Hartford Hospital previously fell under this CIP name. The CIP entities utilize Jefferson Radiology to manage the operations of the site.*

*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*

Phone 860.289.3375 Fax 860.291.6594 Web jeffersonradiology.com  
Administration 111 Founders Plaza Suite 400 East Hartford Connecticut 06108-3240

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*same physical location. The contact for the Materials License is unchanged and the surveillance program is current and will continue to remain current.*

*Note: Ethan Foxman, MD remains the main contact. His contact information is;  
111 Founders Plaza Suite 400  
East Hartford, CT 06108-3240  
(P) 860-291-6561  
(F) 860-783-5767*

- 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.

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- 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."

*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.

*In accordance with the Nuclear Regulatory guidelines, all records concerning the safe and effective decommission of the facility that were in place prior to the transfer remain in place post transaction.*

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

*Connecticut Imaging Partners commits to maintain records received from Jefferson Radiology.*

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

*No decontamination is required as there were no facilities decommissioned 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.

*There was no contamination requiring decontamination at the time of the transaction. All surveys meet the required regulations set forth by the Nuclear Regulatory Commission.*

- 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.

*Operations continued during the transfer and the transferee accepted all facilities as is.*

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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.

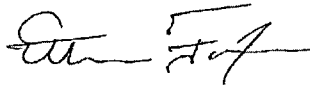
*We agree to abide by all constraints, license conditions, requirements, representations, and commitments identified in and attributed to the existing license.*

- 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.

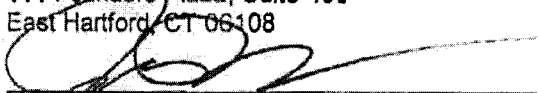
*We confirm that both the transferor and the transferee agree to transferring control of the licensed material and activity, and the conditions of transfer to Connecticut Imaging Partners, LLC.*

Please let us know if you need further information.

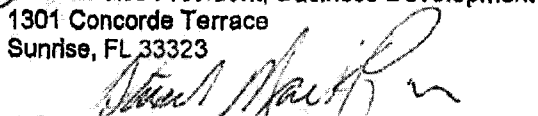
Sincerely,



Dr. Ethan Foxman  
President, Jefferson Radiology & Connecticut Imaging Partners, LLC Voting Board Member  
111 Founders Plaza, Suite 400  
East Hartford, CT 06108



Josh Peck  
Mednax Vice President, Business Development  
1301 Concorde Terrace  
Sunrise, FL 33323



Dr. Stuart Markowitz  
Hartford Healthcare  
Senior Vice President, Physician in Chief Strategic Imaging  
1 State Street  
Hartford, CT 06102

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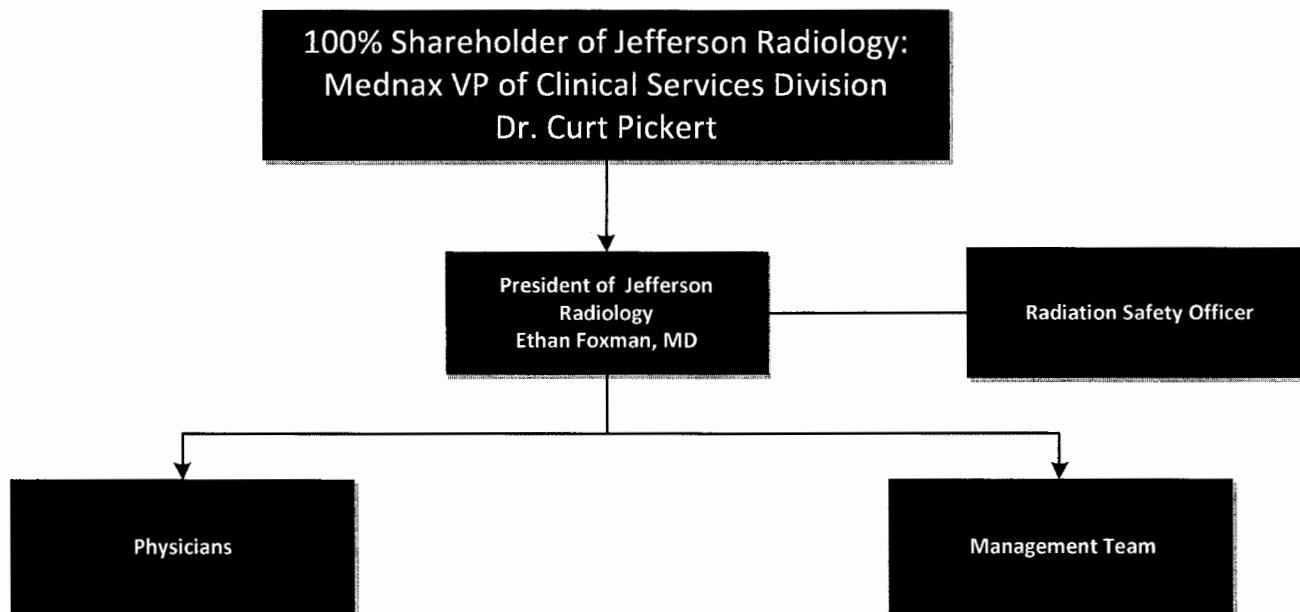
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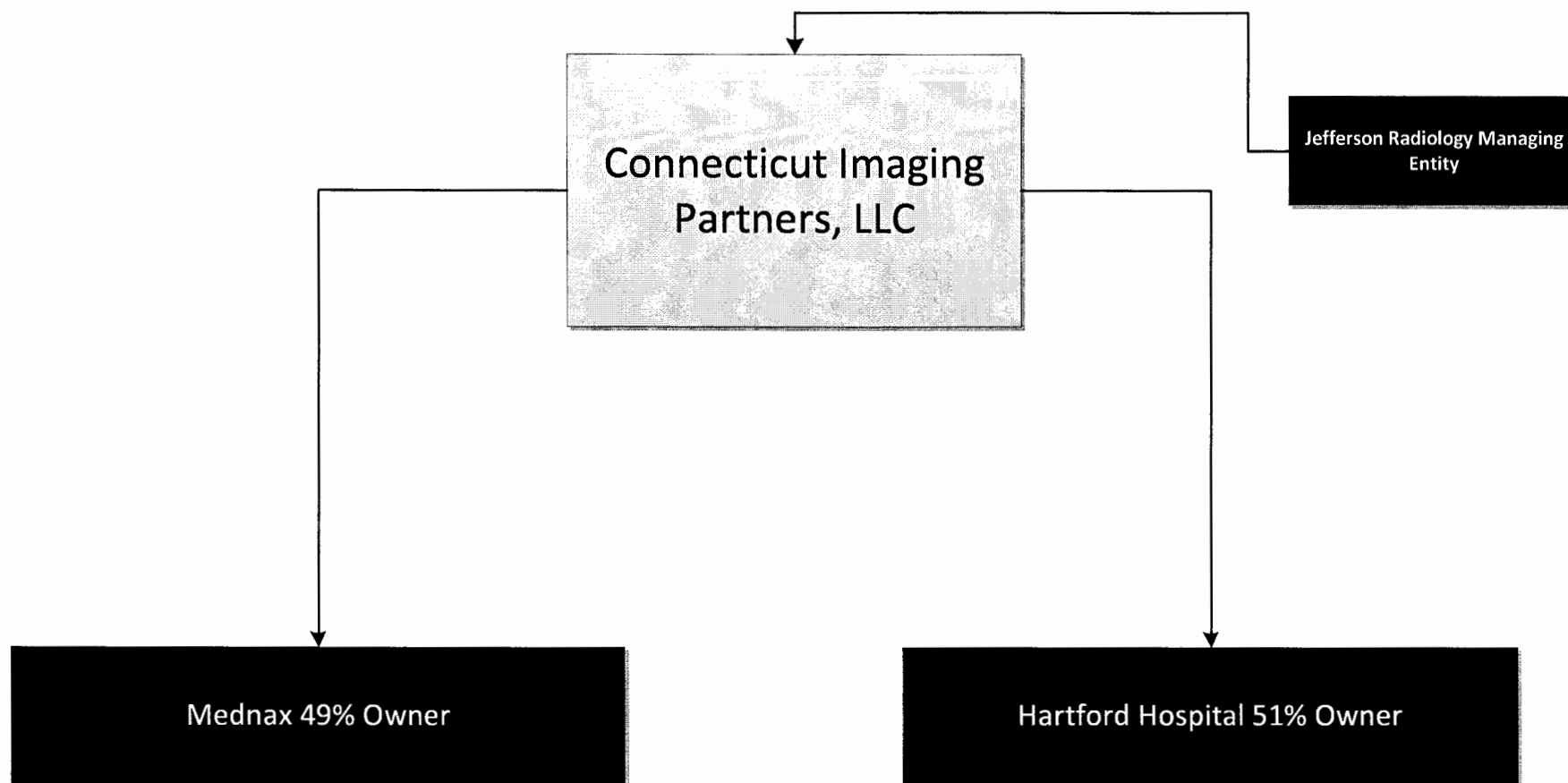
Org Chart post 9.27.17 transaction with Mednax



\* Reporting to the Board of Directors



Rev 02/08/18



\* Reporting to the Board of Directors

