

St. Vincent's
Medical Center



2800 Main Street, Bridgeport, Connecticut 06606

27 June 2019

To:
U.S. Nuclear Regulatory Commission
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713

From:
St. Vincent's Medical Center
2800 Main Street
Bridgeport, Connecticut 06606
RAM License Number: 06-00843-03

Re: Radioactive Materials License (RAML) Amendment Request for In-Direct Transfer of Control

This letter is being sent to comply with federal law related to notification of transfer or change of control over our U.S. Nuclear Regulatory Commission ("U.S.NRC") license. SVMC (SVMC) holds a U.S. Nuclear Regulatory Commission ("NRC") Radioactive Materials License Number: 06-00843-03 SVMC will be acquired by Hartford HealthCare with an anticipated transaction completion date of September 30th 2019.

10 CFR 30.34(b)(1) requires that "no license issued or granted pursuant to the regulations in this part and parts 31 through 36, and 39 nor any right under a license shall be transferred, assigned or in any manner disposed of either voluntarily or involuntarily, directly or indirectly, through transfer of control of any license to any person, unless the Commission shall, after securing full information, find that the transfer is in accordance with the provisions of the Act and shall give its consent in writing."

Hartford Healthcare Corporation ("HHC") was formed on or about August 21, 1985. HHC was formed in order to establish an integrated health system. Since its establishment, HHC has grown by affiliating with many medical practices and medical institutions. Each affiliate has its own president and management group that work in conjunction with the leadership of HHC towards the mutual goal of quality health care. Attached please find the HHC corporate organization chart indicating the addition of SVMC to the HHC Organization (Attachment A)

In regards to the U.S.NRC and the SVMC radioactive materials license, the use of radioactive material will continued to operate under local leadership as defined in Attachment A. Management responsibilities and control of the radiation programs at SVMC will remain with SVMC. SVMC is monitored by the Radiation Safety Committee and remains responsible for radioactive materials and radiation protection programs. At the time of transfer, there are no anticipated changes regarding the use and storage of radioactive materials.

Changes will not occur regarding personnel, personnel duties, or the training program related to the licensed program as a result of the In-direct transfer of control.

Changes will not occur regarding the radiation safety program, use, possession, waste management, or other procedures that relate to the licensed program as a result of the In-direct transfer of control.

Facility changes in equipment and radiation safety program content will not occur as a result of the In-direct transfer of control. Decontamination was not required prior to the in-direct transfer. Equipment calibrations, leak tests, area surveys, wipe tests, training, quality control, and all related program records will be up to date at the time of the In-direct transfer of control.

St. Vincent's Medical Center and Hartford HealthCare acknowledge the NRC required indirect control of licensed material and the conditions of transfer. Hartford HealthCare was made aware of any open inspection items and the responsibility for enforcement actions.

If HHC would choose to exercise any indirect control over the SVMC radioactive material license, HHC will abide by all constraints, conditions, requirements, representations, and commitments of the SVMC radioactive material license or HHC will submit a complete description of the proposed licensed program.

612631
NMSS/RGN1 MATERIALS-002



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From:
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RAM License Number: 06-00843-03

Re: Radioactive Materials License (RAML) Amendment Request for In-Direct Transfer of Control

Please contact me with any questions.

Thank you,

A handwritten signature in black ink, appearing to read "Christopher Willey", written over a horizontal line.

Christopher Willey MBA, CMPE, RT (N)
Vice President of Operations MSG
Cardiology & Radiology Services
St. Vincent's Medical Center
Christopher.Willey@ascension.org

A handwritten signature in black ink, appearing to read "Stuart K Markowitz", written over a horizontal line.

Stuart K Markowitz MD FACR
Senior VP, Hartford Healthcare
Physician-in-Chief, Strategic Imaging & Radiation Safety
Stuart.Markowitz@hhchealth.org



June 25, 2019

U.S. Nuclear Regulatory Commission
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406-2713

Re: Radioactive Materials License Transfer

To Whom it May Concern,

For all Hartford HealthCare facilities that are licensed for use of radioactive materials, including SVMC Holdings, Inc. (the Hartford HealthCare entity that will acquire substantially all of the assets of St. Vincent's Medical Center), the control of such radioactive materials remains and will remain at the local hospital level. Further, the clinical care provided at these Hartford HealthCare facilities is governed by the hospital's Board of Directors and not by the Hartford HealthCare Corporation Board of Directors.

An abridged corporate organization chart is attached to this letter to display the affiliation between Hartford HealthCare Corporation, as the parent company, and its wholly owned affiliate hospitals.

Sincerely,

A handwritten signature in cursive script that reads "Kevin Tuttle".

Kevin Tuttle
Associate General Counsel
Hartford HealthCare Corporation

HHC Legal Department
30 Seymour Street, P.O. Box 5037, Hartford, CT 06102-5037

Attachment 1
Abridged Hartford HealthCare Org Chart

CORPORATE ORGANIZATION CHART
Hartford HealthCare Corporation

