



October 28, 2019

United States Nuclear Regulatory Commission
Region III, Materials Licensing
2443 Warrenville Road, Ste. 210
Lisle, IL 60532-4351

RE: Transfer of Ownership/Control – License Category 3C
VHS Children's Hospital of Michigan, Inc. License No. 21-03298-06

Remove/Add Location of Use – License Category 7C
VHS Children's Hospital of Michigan, Inc. License No. 21-03298-05
Karmanos Cancer Center license No. 21-04127-06

Dear Sir/Madam:

On behalf of VHS Children's Hospital of Michigan, Inc. and Karmanos Cancer Center, we have enclosed two separate requests to be processed concurrently.

To facilitate these requests and to prevent any disruption of clinical practice or patient care, we ask that these requests be expedited. The required documents from both parties are enclosed and signed by executive management.

ITEM #1 – TRANSFER OF OWNERSHIP/CONTROL LICENSE CATEGORY 3C

The transfer of the ownership/control of licensed activities and operating authority from VHS Children's Hospital of Michigan, Inc. License No. 21-03298-06 to Karmanos Cancer Center. (See enclosed documents from CHM and Karmanos – Item 1.)

ITEM #2 – REMOVE/ADD LOCATION OF USE LICENSE CATEGORY 7C

The removal of the PET Center and operating authority from VHS Children's Hospital of Michigan, Inc. License No. 21-03298-05 and concurrently add the location and operating authority to Karmanos Cancer Center License No. 21-04127-06. (See enclosed documents from CHM and Karmanos – Item 2.)





If you have any questions or require additional information, please contact the individuals below:

For VHS Children's Hospital of Michigan, Inc. please contact our physicist/RSO, Cari Dzanbazoff at (734) 662-3197 or email cdzanbazoff@mpcphysics.com.

For Karmanos Cancer Center, please contact our physicist/RSO Joseph T. Rakowski at (313) 576-9616 or email rakwoski@karmanos.org.

Thank you for your time.

Sincerely,

A handwritten signature in black ink, reading "Cari Dzanbazoff".

Cari Dzanbazoff
Radiation Safety Officer
VHS Children's Hospital of Michigan, Inc.

A handwritten signature in blue ink, reading "Joseph T. Rakowski".

Joseph T. Rakowski
Radiation Safety Officer
Karmanos Cancer Center



October 28, 2019

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

Re: **Item #1**
Transfer of Ownership/Control
License No. 21-03298-06, License Category 3C

Dear Sir/Madam:

We request the transfer of ownership/control and operating authority of the PET Cyclotron Center at VHS Children's Hospital of Michigan, Inc. License No. 21-03298-06 to Karmanos Cancer Center.

Transfer of control will be effective December 22, 2019.

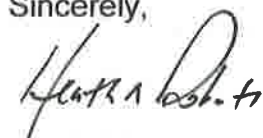
The required Transfer of Ownership/Control documents are enclosed for your review.

All equipment and sealed sources will be transferred upon approval of this amendment.

In order to prevent any disruption of clinical practice or patient care, we ask that you expedite this request and process it concurrently with the amendment requests for the medical licenses (Item #2 – enclosed).

We appreciate your assistance. If you have any questions or require additional information, please contact VHS Children's Hospital of Michigan, Inc. physicist Cari Dzanbazoff at 734-662-3197 or email cdzanbazoff@mpcphysics.com.

Sincerely,



Heath M. Roberts, FACHE
Chief Operating Officer
VHS Children's Hospital of Michigan, Inc.





October 29, 2019

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

Re: **Item #1**
Transfer of Ownership/Control
License No. 21-03298-06, License Category 3C

Dear Reviewer:

Karmanos Cancer Center will be purchasing the assets of the PET Cyclotron Center currently owned and operated by Children's Hospital of Michigan, NRC license number 21-03298-06, upon the completion of all necessary regulatory requirements. We request the transfer of ownership/control and operating authority of VHS Children's Hospital of Michigan, Inc. license No. 21-03298-06 to Karmanos Cancer Center. Children's Hospital and Karmanos Cancer Center are physically continuously connected by a basement corridor that is a busy transit route for patients, employees, and equipment/supplies between these facilities.

Transfer of control will be effective December 22, 2019.

The required Transfer of Ownership/Control documents are enclosed for your review.

All equipment and sealed sources will be transferred upon approval of this amendment.

In order to prevent any disruption of clinical practice or patient care, we ask that you expedite this request and process it concurrently with the amendment requests for the medical licenses (Item #2 – enclosed).

We thank you for your assistance. If you have any questions or require additional information, please contact our RSO Joe Rakowski at (313) 576-9616 or email rakowski@karmanos.org.

Sincerely,

Justin Klamerus
President
Karmanos Cancer Hospital

Brian Gamble
Chief Financial Officer
Karmanos Cancer Institute



October 29, 2019

U.S. Nuclear Regulatory Commission, Region III
Materials Licensing Branch
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

Re: Transfer of Ownership/Control of licensed activities at VHS Children's Hospital of Michigan, Inc. License No. 21-03298-06 to Karmanos Cancer Center.

Transfer of control will be effective December 22, 2019.

Dear Reviewer,

We respectfully request NRC prior written consent to allow transfer of NRC license number 21-03298-06 to the following transferee by purchase:

Karmanos Cancer Center
4100 John R St.
Mail Code GE00RO
Detroit, MI 48201

Contacts:

Thomas Mangner
License Radiation Safety Officer
VHS Children's Hospital of Michigan, Inc.
PET Center
3901 Beaubien Blvd.
Detroit, MI 48201
TMangner@dmc.org

Heath Roberts
COO, Children's Hospital of Michigan, Inc.
3901 Beaubien Blvd.
Detroit, MI 48201
Hroberts3@dmc.org
(313) 745-5852

4100 John R
Detroit, Michigan 48201
(800) KARMANOS (1-800-527-6266)
info@karmanos.org | www.karmanos.org



Mara Jelich
Executive Director, Radiation Oncology and Imaging
Karmanos Cancer Center
4100 John R St., Mail Code GE00RO
Detroit, MI 48201
jelichm@karmanos.org
(313) 576-9555

Christopher Graunstadt
Corporate Director, PM & PI
Oncology Service Line
McLaren Health Care
graunstc@karmanos.org
(313) 576-8616

1. Karmanos Cancer Center will be purchasing the assets of the PET Cyclotron Center currently owned and operated by Children's Hospital of Michigan, NRC license number 21-03298-06, upon the completion of all necessary regulatory requirements.

a. This purchase will not involve any transfer of stock nor will it result in any changes to the Board of Directors of Karmanos.

b. There will be no planned changes in personnel or duties that relate to the licensed program. Any new personnel will be required to complete the same training as was previously required. Shielding calculations and facility diagrams are enclosed.

c. There will be no changes in the location, facilities, equipment, radiation safety program, use, possession, waste management, or other procedures that relate to the licensed program.

d. VHS Children's Hospital of Michigan, Inc. maintains a compliant surveillance program that is audited quarterly to help insure compliance with NRC regulations. All required documents and records are currently kept in accordance with the NRC license conditions. 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. Karmanos will continue to maintain a compliant surveillance program during and after the transfer of ownership/control.

e. The following are operating or being conducted within acceptable NRC standards:

- 1) facilities
- 2) equipment
- 3) radiation safety program
- 4) calibrations
- 5) leak tests
- 6) area surveys
- 7) wipe tests
- 8) training
- 9) quality control

10) related records maintenance

There is no known contamination at present beyond normal operational levels in cyclotron restricted areas.

f. All records concerning the safe and effective decommissioning of the facility will be transferred to Karmanos Cancer Center or to the NRC as appropriate. These include documentation of surveys of ambient radiation levels and fixed and or/removable contamination, including methods and sensitivity.


g. VHS Children's Hospital of Michigan, Inc. and Karmanos Cancer Center agree to the transfer of ownership/ control of materials license no. 21-03298-06 and the licensed material and activity covered under the license, and both parties agree to the conditions of transfer. There are no open inspection items related to materials license number 21-03298-06.

4. The revised decommissioning funding plan (DFP) is enclosed. This is an update to the plan dated July 9, 2012. All financial assurance instruments will be held in the transferee's name. Karmanos Cancer Center will submit, within 30 days of the license transfer, financial instruments reflecting such changes.

5. Karmanos Cancer Center will abide by all constraints, conditions, requirements, representations, and commitments of the VHS Children's Hospital of Michigan, Inc., as specified in NRC license number 21-03298-06 including the following documents as referenced in the license:


- a) Application dated July 11, 2010 (ML102080612)
- b) Letters dated
 - 1) March 23, 2012 (ML12090A396)
 - 2) June 22, 2012 (ML12177A382)
 - 3) June 10, 2014 Item 1 re: Room G108 transfer (ML14162A358)
 - 4) July 31, 2014 Item 1 re: Room G108 transfer (ML14251A560)
 - 5) November 11, 2014 (ML14317A769)
 - 6) February 16, 2015 (ML15049A594)
 - 7) July 10, 2017 (ML17201Q133)

Sincerely,



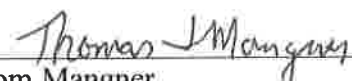
Heath Roberts
COO
VHS Children's Hospital of Michigan, Inc.

10/29/19
Date




Justin Klamerus
President
Karmanos Cancer Hospital

10/31/19
Date



Tom Mangner
License Radiation Safety Officer
VHS Children's Hospital of Michigan, Inc.

10/29/19
Date



Brian Gamble
Chief Financial Officer
Karmanos Cancer Institute

10-29-19
Date

Enclosures:

- 1. Cyclotron shielding calculations and facility diagrams
- 2. Decommissioning funding plan
- 3. Sealed sources inventory and leak test
- 4. Dose calibrators evaluations

Song, Taehoon

From: Gryglak, Magdalena
Sent: Monday, November 25, 2019 11:14 AM
To: Pavon, Sandy; Song, Taehoon
Cc: Tomczak, Tammy
Subject: FW: [EXTERNAL]Transfer of Control for VHS Children's Hospital of Michigan
Attachments: VHS Childrens' Hospital of Michigan Transfer of Control.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Good morning,

Please place the following document in ADAMS:

VHS Children's Hospital of Michigan, Inc.
21-03298-06
030-38328
CN617015

Magdalena

From: Rakowski, Joseph <rakowski@karmanos.org>
Sent: Monday, November 25, 2019 10:05 AM
To: Gryglak, Magdalena <Magdalena.Gryglak@nrc.gov>
Subject: [EXTERNAL]Transfer of Control for VHS Children's Hospital of Michigan

I approve of the posting.

Joe Rakowski