

**Mid-America Cyclotron, Inc.
6207 Bentpath Drive
Columbia, MO 65203**

November 27, 2019

US Nuclear Regulatory Commission
Region III Licensing Branch
2443 Warrenville Road
Suite 210
Lisle, Illinois 60532-4352

RE: Radioactive Materials License – Request for Consent to Transfer of Control for License Number 24-32762-01MD; 24-32762-02

Dear Administrator:

Essential Isotopes LLC. ("Essential Isotopes") located at 1513 Research Park Drive, Columbia MO 65211 and Mid-America Cyclotron Inc. ("Mid-America Cyclotron") wishes to provide notification that a change in the indirect control of its facilities will occur on or about February 27, 2020, or as such earlier time as the U.S. NRC provides consent. We respectfully request the NRC consent to the indirect transfer of control that will result from this transaction, as set forth below.

PharmaLogic Holdings Corp. will acquire 100% of the ownership interest of Mid-America Cyclotron, the current 55% owner of Essential Isotopes, on or about February 27, 2020 or as such earlier time as the U.S. NRC provides consent. Essential Isotopes and Mid-America Cyclotron will retain their corporate names and federal employer identification numbers. They will also continue to operate their businesses. In other words, there will be no change in ownership of the licensed Essential Isotopes facility as a result of the transaction. Pre- and post-closing organizational charts are enclosed for your reference.

All RAM license conditions included in the application and amendments will remain in effect without change. There has been no change in the licensed personnel at the facility.

Specifically:

- At the time of acquisition, there will be no changes in personnel named in the license, such as radiation safety officer, authorized users, or any other persons identified in previous license applications, as responsible for radiation safety or use of licensed material.
- It is confirmed that there are no planned changes in organization, location, facility, equipment, or procedures at this time.
- It is confirmed that there are no planned changes in the use, possession, location, or storage of the licensed materials at this time.
- Essential Isotopes will continue to maintain compliance as it relates to surveys, wipe tests, quality control and related records, including those related to facility decommissioning,

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presently and upon closing of the transaction. This includes responsibility for any open regulatory inspection items and/or any enforcement actions.

- It is confirmed that all records concerning the safe and effective decommissioning of the facility, public dose, and waste disposal by release to sewers, incineration, radioactive material spills, and on-site burials, will be retained by the licensee.
- It is confirmed that the facility is in good condition, and there is no documented contamination present. If any contamination becomes present during the transition period, it is confirmed that sufficient decontamination will occur before the transfer.
- Essential Isotopes and Mid-America Cyclotron confirm that PharmaLogic Holdings Corp. agrees to abide by all conditions, constraints and requirements of the Radioactive Materials License.
- PharmaLogic Holdings Corp. does not currently hold any State or Federal Government licenses, registrations, or authorizations which would be related to the same operations in which the radioactive material will be used. The company does hold a number of radioactive materials licenses from the NRC and Agreement States. We have enclosed a summary table of these licenses. The corporate office for PharmaLogic Holdings Corp. is located in Boca Raton, FL. The corporate officers of PharmaLogic Holdings Corp. are: (1) Steve Chilinski, President and CEO; (2) Frank Edwards, CFO; (3) Glen Palmer, Vice President; and (4) Anthony Medel, Controller. PharmaLogic Holdings Corp. is owned by Webster Equity Partners, a private equity firm located in Waltham, MA.

In summary, there will be no change in the operations at the facilities and no change in the direct owner and operator of the facilities as a result of this transaction. Because there will be a change in the indirect owner of the facilities, we are submitting this Request for Consent to Transfer of Control for your review and approval.

Should you have any questions please contact me. My contact information is below.

Sincerely,



Scott C. Brower R.Ph, BCNP
President, Essential Isotopes, LLC
Secretary/Treasurer, Mid-America Cyclotron, Inc.
Mobile telephone: 573-864-7358

Cc: Brigitte Serfaty, Vice-President PET Quality & Regulatory; bserfaty@radiopharmacy.com

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We hereby certify that the details of this transaction are accurate and we agree to all commitments in or referenced by this letter.



Name

President

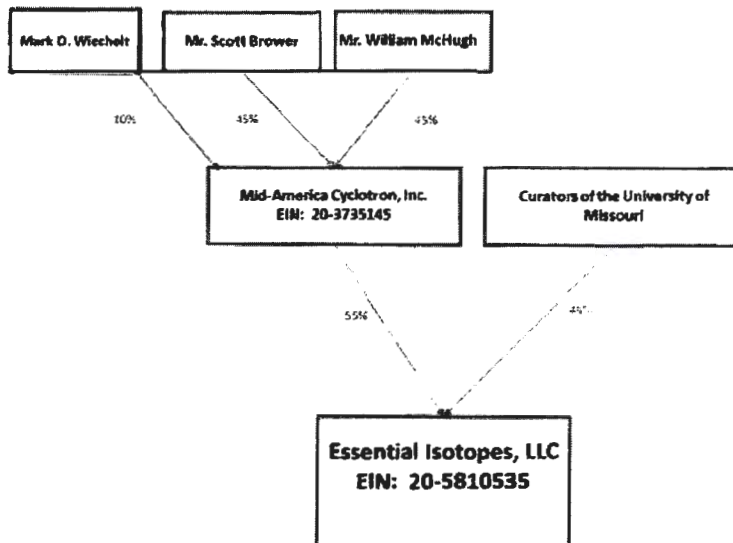
Title

PharmaLogic Holdings Corp.

Date: 11/27/19 _____.

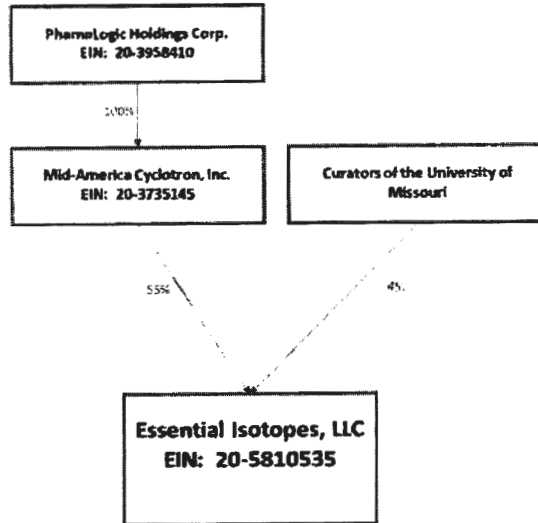
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**Pre-Transaction Essential Isotopes, LLC
Organizational Structure**



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Columbia, MO 65203

Post Transaction Essential Isotopes, LLC
Organizational Structure



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6207 Bentpath Drive
Columbia, MO 65203

PharmaLogic RAM License Summary

Name	Address	City, State, ZIP	RAML #
PharmaLogic, Ltd. (Vermont)	1191 S. Brownell Rd., Suite # 40	Williston VT 05495	44-30124-01MD
PharmaLogic Penn Ltd.	2608 Elmira St. Suite 3	Sayre, PA 18840	PA0730
PharmaLogic WV, Ltd.	#9 W. Benedum Industrial Park Drive	Bridgeport, WV 26330	47-25375-01MD
PharmaLogic Michigan	1501 Cass Street	Traverse City, MI 49684	21-32190-01MD
PharmaLogic Syracuse	6464 Ridings Road	Syracuse, NY 13206	C2936
PharmaLogic Albany	14 Walker Way, Suite 5	Albany, NY 12205	C3231
PharmaLogic WV-Huntington	5842 B. Davis Creek Road	Barboursville, WV 25504	47-25375-01MD
PharmaLogic Wyoming	3480 Trigood Drive	Casper, WY 82609	49-27629-01MD
PharmaLogic Montana	4404 Expressway, Suite 109	Missoula, MT 59808	09-29398-01MD
PharmaLogic Maine	12 Edison Drive	Augusta, ME 04330-6008	11713-01MD
Clinical Pharmacy Services	101 Dillon Court (800 Suncrest Drive, Ste 1)	Gray, TN 37615	R-90046-A26
Blue Ridge Isotopes/ PN of Virginia	1630 Midland Road	Salem, VA 24153	161-479-1
Precision Nuclear LLC	101 Dillon Court	Gray, TN 37615	R-90033-F26
Mid-America Isotopes	706 E. Liberty Lane	Ashland, MO 65010	24-24641-01MD
RadioPharmacy, Inc. Evansville	1409 E. Virginia Street	Evansville, IN 47711	13-26246-01MD
Radiopharmacy of Paducah, Inc.	230 Berger Road	Paducah, KY 42003-4522	202-221-32
Rio Grande Valley Isotopes	1717 Savannah Ave	McAllen, TX 78503	L06202
HotShots Davenport	2017 E Kimberly Rd	Davenport, IA 52807	0207-1-82-NP
HotShots Peoria	1127 N North St.	Peoria, IL 61606	IL-01874-01
HotShots Cedar Rapids	1601 1st Ave SE	Cedar Rapids, IA 52403	0289-1-57-NP
HotShots Rockford	4330 Charles St	Rockford, IL 61108	IL-01874-01
HotShots Lansing	3960 Patient Care Way Ste. 105	Lansing, MI 48911	21-26597-01MD
HotShots Marquette	2296 US 41 South	Marquette, MI 49855	21-32812-01MD

ORIGIN ID:PHKA (561) 569-3490
 FRANK EDWARDS
 PHC
 1 SOUTH OCEAN BLVD
 SUITE 206
 BOCA RATON, FL 33432
 UNITED STATES US

SHIP DATE: 27NOV19
 ACTWGT: 0.50 LB
 CAD: 107242339/INET4160

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TO **REGION III LICENSING BRANCH**
US NUCLEAR REGULATORY COMMISSION
2443 WARRENVILLE RD
SUITE 210
LISLE IL 60532

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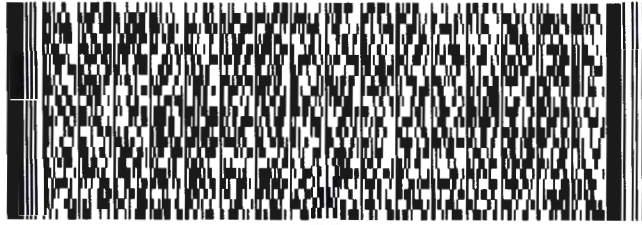
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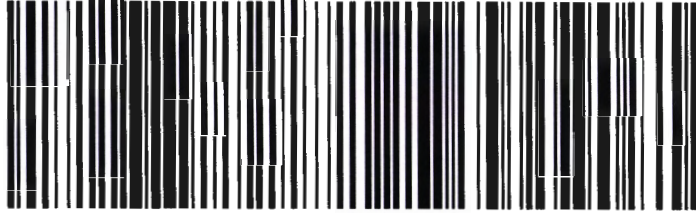
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