



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
2443 WARRENVILLE RD. SUITE 210  
LISLE, IL 60532-4352

FEB 05 2020

Scott C. Brower, R.Ph., BCNP  
President, Essential Isotopes, LLC  
Secretary/Treasurer, Mid-America Cyclotron, Inc.  
6207 Bentpath Dr.  
Columbia, MO 65203

SUBJECT: REQUESTS FOR CONSENT TO NRC LICENSE TRANSFERS

By letter dated November 27, 2019, Essential Isotopes LLC submitted to the U.S. Nuclear Regulatory Commission (NRC) a request for consent to an indirect license transfer of NRC Materials License Nos. 24-32762-01MD and 24-32762-02. Based on the information provided, the NRC understands that 100 percent of the ownership interest in Mid-America Cyclotron, Inc., which currently owns 55 percent of Essential Isotopes, will be acquired by PharmaLogic Holdings Corp. Following the sale, Essential Isotopes will become a majority-owned subsidiary of Mid-America Cyclotron, and Mid-America Cyclotron will become a wholly-owned subsidiary of PharmaLogic Holdings Corp. We further understand that this transfer will not result in any changes to the licensee name, licensed materials, persons using the licensed material, location of use, or persons responsible for the radiation safety program.

Based on the above understandings and as more fully detailed in the enclosed NRC staff's Safety Evaluation Reports (one for each affected license), which document the NRC staff's review of the requests, we consent to the proposed transfers. Please note that you will need to notify us promptly, in writing, after the transaction has been finalized and include a signed copy of the sales agreement(s) confirming completion of the transaction. If this transaction has not been consummated within 30 days of the date of this letter, please notify us in writing. Please contact me at 678-828-7050, or by e-mail at [bryan.parker@nrc.gov](mailto:bryan.parker@nrc.gov).

Future changes to either license such as the licensee's name, licensed use, licensed materials, licensed location, or persons responsible for licensed material require submission of a request to amend the license(s). NRC approval must be received prior to implementation of the proposed change(s).

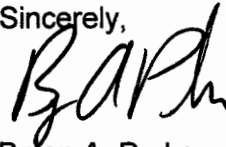
Also, with regard to NRC License No. 24-32762-02, Title 10 of the Code of Federal Regulations (CFR) 30.35(f) requires that for any information changes, such as a licensee name change, financial assurance instruments reflecting such changes must be submitted within 30 days. Please be advised that you may be required to submit revised financial assurance documents following the completion of the transaction.

The NRC's Safety Culture Policy Statement became effective in June 2011. While a policy statement and not a regulation, it sets forth the agency's *expectations* for individuals and organizations to establish and maintain a positive safety culture. You can access the policy statement and supporting material that may benefit your organization on NRC's safety culture Web site at <http://www.nrc.gov/about-nrc/regulatory/enforcement/safety-culture.html>. We

strongly encourage you to review this material and adapt it to your particular needs in order to develop and maintain a positive safety culture as you engage in NRC-regulated activities.

In accordance with Title 10 of the *Code of Federal Regulations* Section 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,

A handwritten signature in black ink, appearing to read 'BAPh', is written over the word 'Sincerely,'.

Bryan A. Parker  
Senior Health Physicist  
Materials Licensing Branch

License Nos. 24-32762-01MD  
24-32762-02

Docket Nos. 030-38129  
030-38132

Enclosures:

- 1) Safety Evaluation Report for License No. 24-32762-01MD
- 2) Safety Evaluation Report for License No. 24-32762-02