



## CONVERSATION RECORD

NAME OF PERSON(S)/TITLE CONTACTED OR IN CONTACT WITH YOU Matthew Trusner (Radiation Safety Officer); Amy Roma (Partner, Hogan Lovells US LLP) Sachin Desai (Sr. Associate, Hogan Lovells US LLP)		DATE OF CONTACT 02/24/2020	TYPE OF CONVERSATION <input checked="" type="checkbox"/> E-MAIL <input type="checkbox"/> TELEPHONE <input type="checkbox"/> INCOMING <input checked="" type="checkbox"/> OUTGOING	
E-MAIL ADDRESS mtrusner@zevacor.com; amy.roma@hoganlovells.com (202-637-6831), sachin.desai@hoganlovells.com (202-637-3671)		TELEPHONE NUMBER 217-433-7902		
ORGANIZATION Zevacor Molecular		DOCKET NUMBER(S) 030-38841; 030-38903		
LICENSE NAME AND NUMBER(S) 13-35179-02; 13-35179-03		MAIL CONTROL NUMBER(S) 617322, 617323		
SUBJECT Information Needed for NRC consent to Transfer of Control (TOC) pursuant to 10 CFR 30.34 and NUREG 1556, Vol. 15, rev. 1				
<p><b>SUMMARY AND ACTION REQUIRED (IF ANY)</b> In accordance with <a href="#">Title 10 of the Code of Federal Regulations (CFR) Section 30.34, "Terms and conditions of licenses,"</a> and <a href="#">NUREG 1556, Vol. 15, rev. 1, "Consolidated Guidance about Materials Licensees: Guidance about Changes of Control and about Bankruptcy involving Byproduct, Source, or Special Nuclear Materials Licenses,"</a> a proposed license transferee must confirm awareness of all open inspection items and that it will continue to abide by all of the transferor's constraints, conditions, etc., following the transfer. Upon review, we have determined that additional information is needed to confirm awareness of statements made by Zevacor in response to the NRC's October 22, 2018 inspection findings. A detailed summary of information needed is provided on the following page.</p> <p><b>Please provide your response in the form of a dated letter, signed by representatives from both Curium and Zevacor.</b> For quickest processing, you may scan your letter in and submit as a pdf file, attached to an email. Please submit your response within 14 days of this record (on or before March 9, 2020).</p> <p>For additional guidance, please refer to NUREG 1556, Vol. 15, rev. 1.</p> <p>In accordance with <a href="#">10 CFR 2.390</a> of the <a href="#">NRC's "Rules of Practice and Procedure,"</a> a copy of this record 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 <a href="http://www.nrc.gov/reading-rm/adams.html">http://www.nrc.gov/reading-rm/adams.html</a>.</p>				
NAME OF PERSON DOCUMENTING CONVERSATION Sara A. Forster, Health Physicist, Materials Licensing Branch, Division of Nuclear Materials Safety, Region III				
SIGNATURE <i>Sara A. Forster</i>			DATE OF SIGNATURE 02/24/2020	

CONVERSATION RECORD (continued)

LICENSE NAME AND NUMBER(S)

13-35179-02; 13-35179-03

MAIL CONTROL NUMBER(S)

617322, 617323

SUMMARY AND ACTION REQUIRED (IF ANY) (Continued)

With regard to open inspection items, in your letter dated December 20, 2019, Item No. 7, Zevacor Molecular (Zevacor) - via its parent company Illinois Health and Science (IHS) - and Curium US PET LLC (Curium US PET) - via its parent company Curium US Holdings LLC (Curium) - indicated that there are no open inspection items. Regarding abiding by all of Zevacor's constraints, conditions, etc., in Item No. 8, Curium and Curium US PET agreed only to abide by constraint's, conditions, etc. identified in the existing licenses. No reference is made to Zevacor's statements made to close out its October 22, 2018 inspection. The December 20, 2019 letter may be found in the NRC's Agencywide Document and Management System (ADAMS) at Accession No. ML19357A266.

In letter dated January 10, 2019, Zevacor provided statements regarding corrective actions made to close out the NRC's October 22, 2018 inspection findings. Although the inspection was closed, the three violations associated with those findings remain open until the NRC has confirmed the corrective actions, at a future inspection. However, there is no reference to these corrective actions in the December 20, 2019 letter. The January 10, 2019 letter may be found in NRC's ADAMS at Accession No. ML19015A023.

**Additional information is needed from you to continue our review. Accordingly, please update Item Nos. 7 and 8 of your December 20, 2019 letter, as applicable, to clarify that Curium has been made aware of Zevacor's statements made in the January 10, 2019 letter, and that Curium will abide by those statements.**

## Song, Taehoon

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**From:** Forster, Sara  
**Sent:** Monday, February 24, 2020 12:57 PM  
**To:** Song, Taehoon; Pavon, Sandy  
**Cc:** Tomczak, Tammy  
**Subject:** FW: Additional Information Request re Transfer of Control of Zevacor Molecular, NRC Lic. Nos. 13-35179-02, 13-35179-03; CNs 617322, 617323  
**Attachments:** 03210.617322.13-35179-03 TOC NRC 699 additional info request signed.pdf

Good afternoon, Tae...

Could you please scan this message in and return to me?

Thank you! - Sara

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**From:** Forster, Sara  
**Sent:** Monday, February 24, 2020 12:55 PM  
**To:** Desai, Sachin <sachin.desai@hoganlovells.com>  
**Cc:** Roma, Amy C. <amy.roma@hoganlovells.com>; Matthew Trusner <mtrusner@zevacor.com>  
**Subject:** Additional Information Request re Transfer of Control of Zevacor Molecular, NRC Lic. Nos. 13-35179-02, 13-35179-03; CNs 617322, 617323

Dear Mr. Desai:

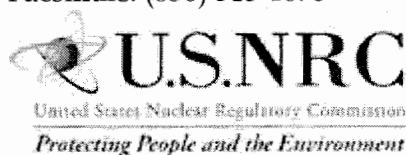
Our office has reviewed Zevacor Molecular's (your) December 20, 2019 letter (ML19357A266) requesting NRC consent for a Transfer of Control (TOC) of the referenced licensee to Curium US PET LLC. Upon review, we have noted that additional information is necessary to complete our review, which is documented in the attached NRC Form 699, "Conversation Record."

Please review the attached form, and provide additional information as requested. As noted in the attached form your response should be provided in the form of a dated letter, signed by representatives from both Curium and Zevacor. For quickest processing, you may scan your letter in and submit as a pdf file, attached to an email. Please submit your response within 14 days of this record (on or before March 9, 2020).

If you have any questions, please do not hesitate to contact me via phone or email.

Sincerely yours,

Sara A. Forster, Health Physicist Licensing Reviewer  
U.S. Nuclear Regulatory Commission - Region III  
Division of Nuclear Materials Safety  
2443 Warrenville Rd. - Ste. 210  
Lisle, IL 60532-4352  
[sara.forster@nrc.gov](mailto:sara.forster@nrc.gov)  
Direct: (630) 829-9892  
Facsimile: (630) 515-1078



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**From:** Desai, Sachin <[sachin.desai@hoganlovells.com](mailto:sachin.desai@hoganlovells.com)>  
**Sent:** Thursday, February 13, 2020 4:34 PM  
**To:** Forster, Sara <[Sara.Forster@nrc.gov](mailto:Sara.Forster@nrc.gov)>  
**Subject:** [External\_Sender] RE: Global Isotopes License Transfer Application

Thanks for letting me know. I look forward to connecting when you are back.

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**From:** Forster, Sara [<mailto:Sara.Forster@nrc.gov>]  
**Sent:** Thursday, February 13, 2020 4:51 PM  
**To:** Desai, Sachin  
**Subject:** RE: Global Isotopes License Transfer Application

Dear Mr. Desai:

I am currently out of the office but will return on Tuesday 2/18. We will do our best to connect with you between 2/19 and 2/21 to discuss the status of the review.

Sincerely,

Sara Forster  
U.S. NRC

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**From:** Desai, Sachin <[sachin.desai@hoganlovells.com](mailto:sachin.desai@hoganlovells.com)>  
**Sent:** Thursday, February 13, 2020 11:55 AM  
**To:** Forster, Sara <[Sara.Forster@nrc.gov](mailto:Sara.Forster@nrc.gov)>  
**Cc:** Roma, Amy C. <[amy.roma@hoganlovells.com](mailto:amy.roma@hoganlovells.com)>  
**Subject:** [External\_Sender] Global Isotopes License Transfer Application

Hi Sara,

I hope you are doing well this February. I left a message, but just to e-mail if that is easier--I wanted to check in on the license transfer application involving Global Isotopes and Curium (License Nos. 13-35179-02 and 13-35179-03). The parties are preparing logistics for closing the last week of February and we wanted to ask if there was anything to resolve related to the application, or if there is anything we can provide. We understand that the public comment period does not end until February 20, but please let us know if there is any issue that may prevent NRC approval shortly after that period.

Again, thank you for everything and we appreciate your time and attention in reviewing the filing. My contact information is below if it helps to talk on the phone.

Kind regards,  
Sachin

**Sachin Desai**  
Senior Associate

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Cell: +1 347 735 3008  
Fax: +1 202 637 5910  
Email: sachin.desai@hoganlovells.com  
www.hoganlovells.com

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**From:** Desai, Sachin  
**Sent:** Thursday, January 09, 2020 2:59 PM  
**To:** 'sara.forster@nrc.gov'  
**Cc:** Roma, Amy C.  
**Subject:** Contact Information for License Transfer Filing

Sara,

It was great to connect and thank you for your time taking my call. Please feel free to reach out if there are questions pertaining to the December 20, 2019 license transfer application concerning Global Isotopes, LLC, d/b/a Zevacor Molecular (License Nos. 13-35179-02 and 13-35179-03). My contact information is below.

Have a great afternoon,  
Sachin

**Sachin Desai**  
Senior Associate

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