



February 24, 2020

Division of Nuclear Materials Safety
U.S. Nuclear Regulatory Commission, Region III
2443 Warrenville Rd., Suite 210
Lisle, IL 60532-4352

**SUBJECT: Response to February 24, 2020 Request for Information
Application for Approval of Transfer of Control
License No. 13-35179-02 (Docket No. 030-38841)
License No. 13-35179-03 (Docket No. 030-38903)**

On December 20, 2019, Curium US Holdings LLC ("Curium"), and Illinois Health and Science ("IHS") (collectively the "Applicants") requested written approval by the U.S. Nuclear Regulatory Commission ("NRC") for the proposed transfer of control of the above-listed NRC Licenses (the "Licenses"), held by Global Isotopes, LLC, d/b/a Zevacor Molecular ("Zevacor Molecular"), an indirect subsidiary of IHS (the "Application").

On February 24, 2020, the NRC issued a request for additional information seeking confirmation that Curium will abide by statements made by Zevacor Molecular in its January 10, 2019 letter to the NRC, responding to inspection findings and violations identified from the NRC's October 22, 2018 inspection. This letter provides the requisite confirmation. The Applicants' responses to Item Nos. 7 and 8 from its Application are hereby updated as follows (changes underlined).

7. Confirm that both transferor and transferee agree to transferring control of the licensed material and activity, and the conditions of transfer, and that the transferee has been made aware of any open inspection items and its responsibility for possible resulting enforcement actions.

The Applicants confirm that they have agreed to the change in control over the Licenses. There are no open inspection items pertaining to the Licenses. Curium has been made aware of any open inspection items and its responsibility for possible resulting enforcement actions. Curium has been made aware of Zevacor Molecular's statements made in its January 10, 2019 letter to the NRC, and Curium will abide by those statements.

8. Confirm that the transferee will abide by all constraints, conditions, requirements, representations, and commitments of the transferor or that the

transferee will submit a complete description of the proposed licensed program.

Curium confirms that post-Closing Curium US PET, and to the extent necessary, Curium, will continue to abide by all constraints, conditions, requirements, representations and commitments identified in and attributed to the existing Licenses. Curium has been made aware of Zevacor Molecular's statements made in its January 10, 2019 letter to the NRC, and Curium will abide by those statements.

The parties also respectfully reiterate their request for expedited review and approval of this application by February 27, 2020, to permit closing of the transaction within the month of February.

If you have any questions or comments pertaining to this transaction, please contact Curium's counsel for nuclear regulatory matters, Amy Roma, at Hogan Lovells US LLP (202-637-6831/amy.roma@hoganlovells.com).

I declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge the information contained in the Response to February 24, 2020 Request for Information, pertaining to Curium US Holdings LLC and its affiliates, is true and correct.

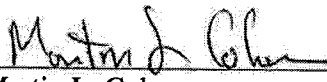
Executed on February 24, 2020

A handwritten signature in black ink, appearing to read "Robert T. Budenholzer", with a long horizontal flourish extending to the right.

Robert T. Budenholzer
Curium US Holdings LLC
Vice President and General Counsel
111 Westport Plaza Drive, Suite 800
St. Louis, MO 63146

I declare under penalty of perjury under the laws of the United States of America that to the best of my knowledge the information contained in the Response to February 24, 2020 Request for Information, pertaining to Global Isotopes, LLC, d/b/a Zevacor Molecular, is true and correct.

Executed on February 24, 2020



Martin L. Cohen
Global Isotopes, LLC
Manager and Chief Executive Officer
14395 Bergen Boulevard
Noblesville, Indiana

Song, Taehoon

From: Forster, Sara
Sent: Tuesday, February 25, 2020 8:11 AM
To: Song, Taehoon; Pavon, Sandy
Cc: Tomczak, Tammy
Subject: FW: RE: Additional Information Request re Transfer of Control of Zevacor Molecular, NRC Lic. Nos. 13-35179-02, 13-35179-03; CNs 617322, 617323
Attachments: Curium Zevacor Response to NRC RAI (2-24-20).pdf

Good morning, Tae and Sandy:

Could you please scan this in and return to me? It is additional information regarding the referenced actions.

Thank you,

Sara

From: Desai, Sachin <sachin.desai@hoganlovells.com>
Sent: Monday, February 24, 2020 4:40 PM
To: Forster, Sara <Sara.Forster@nrc.gov>
Cc: Roma, Amy C. <amy.roma@hoganlovells.com>; Matthew Trusner <mtrusner@zevacor.com>
Subject: [External_Sender] RE: Additional Information Request re Transfer of Control of Zevacor Molecular, NRC Lic. Nos. 13-35179-02, 13-35179-03; CNs 617322, 617323

Sara,

Attached is the response to the Request for Additional Information, in the form of a dated letter signed by representatives from both Curium and Zevacor. Please let us know if you have any questions.

Kind regards,
Sachin

From: Forster, Sara [<mailto:Sara.Forster@nrc.gov>]
Sent: Monday, February 24, 2020 1:55 PM
To: Desai, Sachin
Cc: Roma, Amy C.; Matthew Trusner
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
Direct: (630) 829-9892
Facsimile: (630) 515-1078



From: Desai, Sachin <sachin.desai@hoganlovells.com>
Sent: Thursday, February 13, 2020 4:34 PM
To: Forster, Sara <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.

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

From: Desai, Sachin <sachin.desai@hoganlovells.com>
Sent: Thursday, February 13, 2020 11:55 AM
To: Forster, Sara <Sara.Forster@nrc.gov>
Cc: Roma, Amy C. <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

Hogan Lovells US LLP
Columbia Square
555 Thirteenth Street, NW
Washington, DC 20004

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

Please consider the environment before printing this e-mail.

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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Washington, DC 20004

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