



May 12, 2020

Robert I Gallagher
Health Physicist
US NRC, Region 1
2100 Renaissance Blvd.
King of Prussia, PA 19406

Re: Control 618648; License: 41-31476-01

Mr. Gallagher,

Thank you for your response to our change of RSO request for RAM License 41-31476-01. Alexandra Coll is a current PharmaLogic employee. Invivo Molecular Imaging was assumed by Diagnostic Laboratories prior to purchase by PharmaLogic. A transfer control was completed when PharmaLogic purchased Diagnostic Laboratories in 2015. Your specific questions are answered below:

1. *Describe any planned changes in the organization, including but not limited to, transfer of stocks or assets and mergers, change in members on Board of Directors, etc. Provide the new licensee name, mailing address, and contact information, including phone numbers. Clearly identify when the amendment request is due to a name change only.*

There are no planned changes in the Diagnostic Laboratories or the parent company, y Pharmalogic, at this time. The only change being requested is to the position of radiation safety officer.

2. *Describe any changes in personnel or duties that relate to the licensed program. Include training and experience for new personnel and any changes in the training program.*

The change request submitted March 24, 2020 was for a change in Radiation Safety Officer, to replace Mr. Blaine Beining with Ms. Alexandra Coll. No changes to the training program have been requested. The training and experience for Ms. Coll was submitted with the amendment request on March 24, 2020.

3. *Describe any changes in the location, facilities, equipment, radiation safety program, use, possession, waste management, or other procedures that relate to the licensed program.*

Not applicable

4. *Describe the status of the licensee's facilities, equipment, and radiation safety program, including any known contamination and whether decontamination will occur prior to transfer. Include the status of calibrations, leak tests, area surveys, wipe tests, training, quality control, and related records.*

PharmaLogic Holdings Corp
1 South Ocean Blvd, Suite 206 • Boca Raton, FL 33432
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The facilities, equipment and radiation safety program remain maintained and unchanged.

5. *If current decommissioning funding plans (DFP) will be changed as a result of the transfer, the revised DFP should be submitted. If other financial assurance documents will be changed as a result of the transfer, confirm that all financial assurance instruments associated with the license will be held in the transferee's name before the license is transferred, and as required by 10 CFR 30.35(f), the licensee must, within 30 days, submit financial instruments reflecting such changes.*

Not applicable

6. *Confirm that all records concerning the safe and effective decommissioning of the facility will be transferred to the transferee or to NRC, as appropriate. These records include documentation of surveys of ambient radiation levels and fixed and/or removable contamination, including methods and sensitivity.*

Not applicable

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.*

Not applicable

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.*

Not applicable

9. *The transferee, in the case of fuel cycle facilities, shall provide documentation showing that it is financially qualified to conduct normal operations. The information can be in the form of income statements and balance sheet forecasts.*

Not applicable

If you have any questions, do not hesitate to reach me at jcomstock@radiopharmacy.com or 541.517.6984.

Sincerely,



Jessica Comstock, PharmD, BCNP
Director of Quality and Regulatory
PharmaLogic Holdings