



September 29, 2021

Materials Licensing Branch
United States Nuclear Regulatory Commission
Region III
24443 Warrenville Road
Lisle, Illinois 60532-4352

Dear Sirs:

I am submitting the following documentation as outlined in Appendix E of NUREG – 1556 Volume 15 to comply with a transfer of control of NRC Materials License number 13-32698-01 issued to IndyVet Emergency and Specialty Hospital for I 131 use for the treatment of hyperthyroidism in cats, to NVA IndyVet Veterinary Management, LLC, a new Indiana Limited Liability Company. NVA IndyVet Veterinary Management, LLC will have 95% ownership by National Veterinary Associates, Inc., a Delaware corporation, and 5% by GH Veterinary Services, LLC that is wholly owned by Joe Huber and Tracey Gillespie, DVM that were former minority shareholders in IndyVet Emergency and Specialty Hospital. I, James Speiser DVM, will be relinquishing my majority ownership shares in IndyVet Emergency and Specialty Hospital upon the merger acquisition and will be retiring within 12 months. Explanations, documentation, and answers to the six (6) questions listed in Appendix E of NUREG – 1556 follow.

1. As of September 30th 2021, IndyVet Emergency and Specialty Hospital, LLC of which James Speiser DVM had 52% ownership, with 24% minority ownership shared each by Joe Huber and Tracey Gillespie DVM, will undergo a merger acquisition with National Veterinary Associates to form a new Indiana Limited Liability Company, NVA IndyVet Veterinary Management, LLC. NVA IndyVet Veterinary Management, LLC will have 95% ownership by National Veterinary Associates, Inc., a Delaware corporation, and 5% by GH Veterinary Services, LLC that is wholly owned equally by Joe Huber and Tracey Gillespie, DVM. All assets of IndyVet Emergency and Specialty hospital will be transferred to the new entity. I have included documentation to substantiate the formation of the new corporation, and the establishment of the new corporation with the IRS as an LLC with EIN, the mailing address, and contact information on NRC Form 531. Further questions regarding this transition may be directed to James R. Speiser, DVM at 317-782-4484.
2. There will be no change or addition of personnel or duties in the administration of I 131 to cats.
3. There will be no change in the location, facilities, equipment, procedures, or waste disposal that relate to the licensed program. All organizational changes are outlined in (1) above

and relate only to the legal name of the entity, change in ultimate majority control of the organization, and change in ownership stock distribution. Full authority for the use of, and the annual training of the staff authorized to access and administer I 131 to cats remains exclusively with the current Radiation Safety Officers, Tracey Gillespie DVM, and James Speiser, DVM.

4. The status of the surveillance program is fully documented in the administration and disposal logs and will remain perfectly documented as outlined for the license approval. There has been no contamination during the entirety of the program, and no decontamination procedures will be performed prior to transfer. There will be no change in the procedure subsequent to the merger. All instrumentation for the program have been calibrated within the past one year, and records are present on site showing that they have been serviced and calibrated each year. All leak tests, area surveys, wipe tests, and training logs are present on site and are complete and accurate. Radiation safety training, and SOP training for the administration of I 131, and the handling of cats during and post treatment occurs annually and has been documented with participant signatures each year, and has been completed for 2021.
5. All records regarding the safe and effective decommissioning of the facility in the future, should the administration of I131 no longer become a recommended treatment or is otherwise determined to be undesirable, including the necessary documentation of ambient radiation surveys, removable contamination, etc., remain with the program documentation in the facility.
6. There are no decommissioning records for the facility. The facility is not discontinuing I 131 therapy.
7. The transferor and the transferee agree to transferring control of the licensed material and activity as well as the conditions of the transfer. There are no, nor have there ever been, any open inspection items following previous inspections.
8. The transferee will continue to abide by all constraints, conditions, requirements, and commitments of IndyVet Emergency and Specialty Hospital, LLC as outlined in the license renewal of July 11, 2018 which was granted with expiration date of January 31, 2034.

The regulation of NUREG – 1556 Volume 15 Appendix E is clear in stating that this information is to be submitted and approved prior to any transfer occurring. We have voluntarily suspended appointing further treatments until we receive approval from the NRC, however it is hoped to have this approval accomplished expeditiously, as there are many patients in need of this valuable therapy, and we are one of only two facilities that offer this treatment in the State of Indiana.

Sincerely,



James R. Speiser, DVM, RSO

From: [Tomczak, Tammy](#)
To: [Payon, Sandy](#)
Cc: [Payon, Martha](#)
Subject: FW: Re: Re: Change of Control Guidance for IndyVet Emergency and Specialty Hospital
Date: Monday, October 4, 2021 7:55:47 AM
Attachments: [doc010289.pdf](#)

Hi Sandy and Martha,

Please add the attached to ADAMS.

Thank you,
Tammy

From: James Speiser <jspeiser@indyvet.com>
Sent: Wednesday, September 29, 2021 2:00 PM
To: Tomczak, Tammy <Tammy.Tomczak@nrc.gov>
Subject: [External_Sender] Re: Re: Change of Control Guidance for IndyVet Emergency and Specialty Hospital

Tammy,

Attached is the documentation for the change of control of our I 131 Material License 13-32698-01. Thank you for allowing me to email it to you for quicker review. I feel confident I have included all the information you require, but if I am incorrect, please reach out to me and I will assure I get any additional documentation you require.

Thank you again for your help. Your assistance has been fantastic.

On Wed, Sep 29, 2021 at 2:09 PM James Speiser <jspeiser@indyvet.com> wrote:

Thank you! You are awesome.

On Wed, Sep 29, 2021 at 12:00 PM Tomczak, Tammy <Tammy.Tomczak@nrc.gov> wrote:

James Speiser, DVM, ABVP (Canine & Feline), CCRT
IndyVet Emergency and Specialty Hospital
5425 Victory Dr. | Indianapolis, IN 46203
Office: (317) 782-4484 Ext.103
Fax: (317)-786-4484

From: [Forster, Sara](#)
To: [Pavon, Martha](#); [Pavon, Sandy](#)
Cc: [Tomczak, Tammy](#)
Subject: FW: Case incoming documents to be profiled in ADAMS - CN 628741
Date: Wednesday, November 17, 2021 12:41:22 PM
Attachments: [628741 Incoming Change of Control 665.pdf](#)
[CN628741.Lic13-32698-01 incoming change of control Form 665 public version for posting.pdf](#)
[02400.628741.13-32698-01 IndyVet Emergency and Specialty Hospital LLC Request for Consent to Transfer of Control public version.pdf](#)

Good afternoon, Sandy & Martha:

Could you please add the non-public sensitive PII profile to the original incoming document (Accession No. ML21277A072) that is already in ADAMS? Please also place the attached 3-page publicly available document in ADAMS and add the public profile information as noted.

Tammy:

Once the publicly available version is in ADAMS, could you please have the letter posted to the NRC's change of control website, for 30 days? Please let me know once the clock starts, so I know when the consent may be issued.

Thank you!

Sara

From: Tomczak, Tammy <Tammy.Tomczak@nrc.gov>
Sent: Tuesday, October 12, 2021 11:00 AM
To: Forster, Sara <Sara.Forster@nrc.gov>
Subject: FW: Case to be assigned - CN 628741

Hi Sara,

Bob has assigned the following case to you.

I hope you have a great day!!!!

Tammy

From: Orlikowski, Robert <Robert.Orlikowski@nrc.gov>
Sent: Tuesday, October 12, 2021 10:48 AM
To: Tomczak, Tammy <Tammy.Tomczak@nrc.gov>
Subject: RE: Case to be assigned - CN 628741

Hi Tammy,

Please assign to Sara.

Thanks,

Bob

From: Tomczak, Tammy <Tammy.Tomczak@nrc.gov>

Sent: Monday, October 04, 2021 11:59 AM

To: Orlikowski, Robert <Robert.Orlikowski@nrc.gov>

Subject: Case to be assigned - CN 628741

Hi Bob,

The following case needs to be assigned to a reviewer.

Active as of 1/9/2019

MS-22 Sara

CN 609384

PC 02400

Thank you!!

Tammy

[View ADAMS Properties ML21277A072](#)

[Open ADAMS Document \(Change of Control - IndyVet Emergency and Specialty Hospital\)](#)