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June 15, 2007

Attn: Richard McKinley  
Division of Nuclear Materials Safety  
U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406-1415

**Re: Westwood Imaging Center, Disposition of Materials under  
License No. 06-28283-01**

Dear Mr. McKinley:

03030803

This letter serves as a response to the questions posed in your letter of April 19, 2007 regarding the change of ownership of Westwood Imaging Center and its respective NRC License.

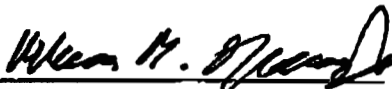
- a. Marc B. d'Avignon, M.D., P.C., dba Westwood Imaging Center ("Westwood") owns and operates medical imaging centers and holds an NRC license, No. 06-28283-01, Docket No. 030-90803. Marc B. d'Avignon, M.D. is the sole shareholder of Westwood and determines corporate policy of the professional corporation. Dr. d'Avignon is a Board Certified Radiologist, licensed in the state of Connecticut and has control of the NRC license. An Asset Purchase Agreement between Marc B. d'Avignon, M.D., P.C., dba Westwood Imaging Center ("Westwood") and Jefferson Radiology, P.C. ("Jefferson") was executed on April 6, 2007 (the "Purchase Agreement") with a closing date scheduled on or around June 1, 2007 (the "Closing Date"). Pursuant to the Purchase Agreement, effective as of the Closing Date, Jefferson will purchase all of the assets of Westwood used in the operation of Westwood's business, including its medical imaging equipment and materials used in connection with the NRC license. Jefferson also owns and operates medical imaging centers and holds an NRC license, No. 06-28502-01. Effective as of the Closing Date, Dr. d'Avignon should be added onto Jefferson's NRC license, No. 06-28502-01 and Docket No. 030-31642, as an authorized user for the same uses identified on Westwood's current license. Additionally, effective as of the Closing Date, Westwood Imaging Center requests that its NRC License, No. 06-28283-01, be terminated.
- b. On the Closing Date, the Assets of Westwood will be transferred to Jefferson. Dr. Ronald J. Rosenberg, the authorized user and the Radiation Safety Officer on Jefferson Radiology's NRC license, No. 06-28502-01, can be reached at 860-246-6589 should additional information be needed. Additionally, Marc B. d'Avignon may also be reached, at 860-677-7015, if additional information is needed.

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- c. The licensed program relating to the NRC license, No. 06-28283-01, is currently managed by Dr. Marc B. d'Avignon. Dr. Rosenberg currently manages the program relating to Jefferson's NRC license, No. 06-28283-01, and will continue to do so subsequent to the Closing Date. There is no anticipated change in personnel or duties that relate to the licensed program.
- d. Pursuant to the Purchase Agreement, the Assets of Westwood will be transferred to Jefferson on the Closing Date. There is no anticipated change in the location, facilities and equipment that relates to the licensed program.
- e. Currently the status of surveillance programs of Westwood meets all recommended standards proscribed by the NRC, which include but are not limited to (1) daily, weekly and quarterly surveys; (2) daily, weekly and quarterly wipe tests; (3) quality assurance and control; (4) ALARA being observed and documented by the RSO; and (5) quarterly review by Gerald J. Randall, MS, Health Physicist.
- f. Effective as of the Closing Date, Jefferson will exercise control of the practice, accept the transfer of Westwood's materials maintained under License No. 06-28283-01 as is, and will thereafter maintain and be responsible for the surveillance programs proscribed by the NRC in substantially the same manner maintained by Westwood prior to the Closing Date. Dr. d'Avignon confirms that, as of the Closing Date, all records concerning the radiation exposure and history records will be transferred to Dr. Rosenberg, Jefferson's RSO.

Acknowledged and Agreed:

**MARC B. D'AVIGNON, M.D., P.C.**

By:   
Name: Marc B. d'Avignon, M.D.  
Its Duly Authorized President