Triad Isotopes®
patient focused. community driven.

17 May 2011

U.S. Nuclear Regulatory Commission
Nuclear Materials Licensing Section
Region III
2443 Warrenville Road
Lisle, IL 60532-4351

RE: Amendment RAM license #09-32781-01MD
Triad Isotopes, Inc.-St Louis
1827 Belt Way Drive
Overland, MO 63114-5815

Dear License Reviewer:

The following amendment requests to license #09-32781-01MD are submitted below:

1. Please, add Jerrod Brown, as authorized nuclear pharmacist and RSO to this RAM. Mr. Brown will be returning as a staff pharmacist and RSO in this location, where he previously worked in the same capacity. Mr. Brown was previously listed as RSO on NRC license #24-04206-08MD, which was transferred to Triad Isotopes, Inc. on 5/28/2010. A copy of the referenced RAM License and the request for license transfer are attached for your review. A copy of Mr. Brown's Missouri pharmacist license #2002004556 is also attached. He will be given sufficient time, authority and organizational freedom to perform required RSO duties.

2. Please, remove as Authorized Nuclear Pharmacists to this RAM license Dennis Davis, Kyle Oelrichs, Andrew Farrow, Joseph Blair, and Adam Rahman.

We appreciate an expedited review of this request. Please contact Brigette Nelson, Senior Director, Quality and Safety, if you have any questions at 904-220-7210. A completed copy of the amendment request can be sent to the Triad Corporate offices at 200 S. Orange Ave., Ste. 2100, Orlando, FL 32801 and/or to the St. Louis (Overland) pharmacy address to the RSO's attention.

Thanks,

Brigette Nelson, MS, PharmD, BCNP
Sr. Director, Quality & Safety
1554 Nottingham Knoll Drive
Jacksonville, FL 32225
(904)-220-7210 (office)
(904)-220-6980 (fax)
(904)-562-8260 (cell)
bnelson@triadisotopes.com
Cc: Shannon Julian, file, Neil Stubbs

RECEIVED MAY 20 2011

200 S. Orange Avenue • Suite 2100 • Orlando, FL 32801-3439
phone 407.455.6700
www.triadisotopes.com

State of Missouri

Department of Insurance, Financial Institutions and Professional Registration
Division of Professional Registration
Missouri Board of Pharmacy

Pharmacist

VALID THROUGH OCTOBER 31, 2012
ORIGINAL CERTIFICATE/LICENSE NO. 2002004556

JERROD S BROWN

EXECUTIVE DIRECTOR

DIVISION DIRECTOR

NRC FORM 374

U.S. NUCLEAR REGULATORY COMMISSION

Amendment No. 38

MATERIALS LICENSE

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 36, 39, 40, and 70, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s) This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below

Licensee	
1 Mallinckrodt Inc.	In accordance with letter dated **June 17, 2009,** 3 License number 24-04206-08MD is amended in its entirety to read as follows:
2. 675 McDonnell Boulevard P O Box 5840 St. Louis, MO 63134	4. Expiration date July 31, 2017 5 Docket No. 030-18546 Reference No

6 Byproduct, source, and/or special nuclear material	7 Chemical and/or physical form	8 Maximum amount that licensee may possess at any one time under this license
A. Any byproduct material with atomic numbers 3 through 83 except molybdenum-99, iodine-131, technetium-99m, Yttrium-90 and xenon-133	A Any form initially distrubuted in accordance with a specific license issued pursuant to 10 CFR 32 72 or equivalent Agreement State regulations	A 700 millicuries per nuclide total possession not to exceed 1 curie
B. Molybdenum-99	B. Any molybdenum-99/technetium-99m generator initially distributed in accordance with a specific license issued pursuant to 10 CFR 32.72 or equivalent Agreement State regulations	B. 200 curies
C. Technetium-99m	C. Any	C. 200 curies
D. Xenon-133	D. Any	D. 6 curies
E Iodine-131	E. Any	E 5 Curies
F. Any byproduct material listed in 10 CFR 31.11(a)	F. Prepackaged units for in vitro diagnostic tests	F 20 millicuries

MATERIALS LICENSE
SUPPLEMENTARY SHEET

License Number
24-04206-08MD

Docket or Reference Number
030-18546

Amendment No. 38

G. Any byproduct material authorized under 10 CFR 35.65	G. Any sealed source listed in 10 CFR 35.65 that has been manufactured, labeled, packaged, and distributed in accordance with a specific license issued pursuant to 10 CFR 32 74 or equivalent Agreement State regulations	G. 300 millicuries
H. Uranium (depleted in the isotope Uranium-235)	H. Metal encased in stainless steel	H. 400 kilograms
I Yttrium-90	I. Any	I. 1 curie
J Thallium-201	J Any	J. 2 curies
K. Indium-111	K. Any	K. 500 millicuries
L. Fluorine-18	L. Any	L. 4 curies
M. Gallium-67	M. Any	M. 1 curie
N. Iodine-123	N. Any	N. 500 millicuries

9. Authorized Use:

A. through E., I. and J through N. Preparation and distribution of radioactive drugs including redistribution of unused molybdenum-99/technetium-99m to authorized recipients on accordance with 10 CFR 32 72.

F Redistribution to specific licensees or general licensees pursuant to 10 CFR 31.11 provided the packaging and labeling remain unchanged

G. Redistribution of sources to specifically authorized recipients Pursuant to 10 CFR 32.74, the licensee is authorized to redistribute sourcesto persons licensed pursuant to 10 CFR 35 65 or under equivalent licenses of Agreement States

H. Shielding for Mo-99/Tc-99m generators.

Pursuant to 10 CFR 32.72 and 32.74, the licensee is authorized to distribute the byproduct material described in Items 6 and 7.A. through G. and I of this license to persons licensed pursuant to Sections 35.100, 35 200 and 35.300 of 10 CFR Part 35, or under equivalent licenses of Agreement States.

MATERIALS LICENSE
SUPPLEMENTARY SHEET

License Number
24-04206-08MD

Docket or Reference Number
030-18546

Amendment No. 38

CONDITIONS

10 License material shall be used only at the licensee's facilities located at 1827 Belt Way Drive, Overland, Missouri.

11. The Radiation Safety Officer for this license is Jerrod Brown, R.Ph

12. Licensed material shall be used by, or under the supervision of:

A. A pharmacist working or designated as an authorized nuclear pharmacist in accordance with 10 CFR 32.72(b)(2) and (4), or

B. **Authorized nuclear pharmacists:**

Dennis Davis	Chau Bosgraaf	
Debra (Debrowiak) Ross	Andrew J. Farrow	Joseph M. Huber
Todd Kliche	David Wright Persinger	Fred Gattas
David McLeland	Stephen Pugh	Jerrod Brown
Kyle Oelrichs	Jonathan Vaught	Adam Rahman
Joseph Blair		

13. A. Sealed sources shall be tested for leakage and/or contamination at intervals not to exceed the intervals specified in the certificate of registration issued by NRC under 10 CFR 32.210 or by an Agreement State.

B In the absence of a certificate from a transferor indicating that a leak test has been made within the intervals specified in the certificate of registration issued by NRC under 10 CFR 32.210 or by an Agreement State prior to the transfer, a sealed source received from another person shall not be put into use until tested.

C Sealed sources need not be tested if they are in storage and are not being used. However, when they are removed from storage for use or transferred to another person, and have not been tested within the required leak test interval, they shall be tested before use or transfer No sealed source shall be stored for a period of more than 10 years without being tested for leakage and/or contamination.

D. The leak test shall be capable of detecting the presence of 0.005 microcurie (185 becquerels) of radioactive material on the test sample. If the test reveals the presence of 0.005 microcurie (185 becquerels) or more of removable contamination, a report shall be filed with the U.S. Nuclear Regulatory Commission in accordance with 10 CFR 30.50(c)(2), and the source shall be removed immediately from service and decontaminated, repaied, or disposed of in accordance with Commission regulations

MATERIALS LICENSE
SUPPLEMENTARY SHEET

License Number
24-04206-08MD

Docket or Reference Number
030-18546

Amendment No. 38

E. Tests for leakage and/or contamination shall be performed by the licensee or other persons specifically licensed by the Commission or an Agreement State to perform such services. In addition, the licensee is authorized to collect leak test samples for analysis by persons specifically licensed by the Commission or an Agreement State to perform such services.

14. Sealed sources containing licensed material shall not be opened

15. The licensee shall conduct a physical inventory every 6months to account for all sources and/or devices received and possessed under the license.

16. The licensee may transport licensed material in accordance with the provisions of 10CFR Part 71, "Packaging and Transportation of Radioactive Material."

17. The licensee is authorized to hold radioactive material with a physical halflife of less than 120 days for decay-in-storage before disposal in ordinary trash provided:

A. Before disposal as ordinary trash, byproduct material shall be surveyed at the container surface with the appropriate survey meter set on its most sensitive scale and with no interposed shielding to determine that its radioactivity cannot be distinguished from background. All radiation labels shall be removed or obliterated.

B. A record of each disposal permitted under this License Condition shall be retained for three years. The record must include the date of disposal, the date on which the byproduct material was placed in storage, the radionuclides disposed, the survey instrument used, the background dose rate, the dose rate measured at the surface of each waste container, and the name of the individual who performed the disposal.

18. Radioactive waste may be picked up from the licensee's customers and disposed of in accordance with the procedures, statements and representations in application dated February 15, 2007.

19 Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents including any enclosures, listed below. The Nuclear Regulatory Commission's regulations shall govern unless the statements, representations and procedures in the licensee's application and correspondence are more restrictive than the regulations.

A. Application dated February 15, 2007; and

MATERIALS LICENSE
SUPPLEMENTARY SHEET

License Number
24-04206-08MD

Docket or Reference Number
030-18546

Amendment No. 38

B. Letters dated June 21, 2007, July 19, 2007, June 17, 2008, July 3, 2008, February 10, 2009, March 31, 2009, May 28, 2009 and June 11, 2009.

FOR THE U.S NUCLEAR REGULATORY COMMISSION

Date JUL 08 2009

By
James R Mullauer, M.H.S
Materials Licensing Branch
Region III

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

JUL 08 2009

April Chance, Manager
Radiological Affairs
Mallinckrodt, Inc.
675 McDonnell Blvd.
St. Louis, MO 63134

Dear Ms. Chance:

Enclosed is Amendment No 38 to your NRC Material License No. 24-04206-08MD in accordance with your request dated June 17, 2009. Please note that the changes made to your license are printed in **bold** font.

Please review the enclosed document carefully and be sure that you understand all conditions If there are any errors or questions, please notify the U.S. Nuclear Regulatory Commission, Region III office at (630) 829-9887 so that we can provide appropriate corrections and answers

You will be periodically inspected by NRC Failure to conduct your program in accordance with NRC regulations, license conditions, and representations made in your license application and supplemental correspondence with NRC will result in enforcement action against you This could include issuance of a notice of violation, or imposition of a civil penalty or an order suspending, modifying or revoking your license as specified in the General Statement of Policy and Procedure for NRC Enforcement Actions. Since serious consequences to employees and the public can result from failure to comply with NRC requirements, prompt and vigorous enforcement action will be taken when dealing with licensees who do not achieve the necessary meticulous attention to detail and the high standard of compliance which NRC expects of its licensees.

In accordance with 10 CFR 2 390 of the NRC's "Rules of Practice," a copy of this letter andits enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS) The NRC's document system is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room)

Sincerely,

James R. Mullauer, M H S
Health Physicist
Materials Licensing Branch

License No 24-04206-08MD
Docket No 030-18546

Enclosure: Amendment No. 38

CARDINAL HEALTH
NUCLEAR PHARMACY SERVICES

certifies that

Jerrod Brown

successfully completed the

Authorized Users Training Program

on

March 13, 2003

Jack L Coffey
Senior Vice President, Quality & Regulatory

K L Sujet
Executive Director, Quality & Regulatory

U.S. NUCLEAR REGULATORY COMMISSION

MATERIALS LICENSE

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 36, 39, 40, and 70, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

Licensee	
1. Triad Isotopes, Inc.	3. License number 09-32781-01MD
2. 200 South Orange Avenue Suite 2100 Orlando, FL 32801	4. Expiration date July 31, 2017
	5. Docket No. 030-38276 Reference No.

6. Byproduct, source, and/or special nuclear material	7. Chemical and/or physical form	8. Maximum amount that licensee may possess at any one time under this license
A. Any byproduct material with atomic numbers 3 through 83 except molybdenum-99, iodine-131, technetium-99m, Yttrium-90 and xenon-133	A. Any form initially distributed in accordance with a specific license issued pursuant to 10 CFR 32.72 or equivalent Agreement State regulations	A. 700 millicuries per nuclide total possession not to exceed 1 curie
B. Molybdenum-99	B. Any molybdenum-99/technetium-99m generator initially distributed in accordance with a specific license issued pursuant to 10 CFR 32.72 or equivalent Agreement State regulations	B. 200 curies
C. Technetium-99m	C. Any	C. 200 curies
D. Xenon-133	D. Any	D. 6 curies
E. Iodine-131	E. Any	E. 5 Curies
F. Any byproduct material listed in 10 CFR 31.11(a)	F. Prepackaged units for in vitro diagnostic tests	F. 20 millicuries

MATERIALS LICENSE
SUPPLEMENTARY SHEET

License Number
09-32781-01MD

Docket or Reference Number
030-38276

G. Any byproduct material authorized under 10 CFR 35.65	G. Any sealed source listed in 10 CFR 35.65 that has been manufactured, labeled, packaged, and distributed in accordance with a specific license issued pursuant to 10 CFR 32.74 or equivalent Agreement State regulations	G. 300 millicuries
H. Uranium (depleted in the isotope Uranium-235)	H. Metal encased in stainless steel	H. 400 kilograms
I. Yttrium-90	I. Any	I. 1 curie
J. Thallium-201	J. Any	J. 2 curies
K. Indium-111	K. Any	K. 500 millicuries
L. Fluorine-18	L. Any	L. 4 curies
M. Gallium-67	M. Any	M. 1 curie
N. Iodine-123	N. Any	N. 500 millicuries

9. Authorized Use:

A. through E., I. and J through N. Preparation and distribution of radioactive drugs including redistribution of unused molybdenum-99/technetium-99m to authorized recipients on accordance with 10 CFR 32.72..

F. Redistribution to specific licensees or general licensees pursuant to 10 CFR 31.11 provided the packaging and labeling remain unchanged.

G. Redistribution of sources to specifically authorized recipients. Pursuant to 10 CFR 32.74, the licensee is authorized to redistribute sources to persons licensed pursuant to 10 CFR 35.65 or under equivalent licenses of Agreement States.

H. Shielding for Mo-99/Tc-99m generators.

Pursuant to 10 CFR 32.72 and 32.74, the licensee is authorized to distribute the byproduct material described in Items 6 and 7.A. through G. and I. of this license to persons licensed pursuant to Sections 35.100, 35.200 and 35.300 of 10 CFR Part 35, or under equivalent licenses of Agreement States.

MATERIALS LICENSE
SUPPLEMENTARY SHEET

License Number
09-32781-01MD

Docket or Reference Number
030-38276

CONDITIONS

10. License material shall be used only at the licensee's facilities located at 1827 Belt Way Drive, Overland, Missouri 63114-5815.

11. The Radiation Safety Officer for this license is Todd Kliche, R.Ph.

12. Licensed material shall be used by, or under the supervision of:

    A. A pharmacist working or designated as an authorized nuclear pharmacist in accordance with 10 CFR 32.72(b)(2) and (4), or

    B. Authorized nuclear pharmacists:

Dennis Davis	Chau Bosgraaf	Jonathan Vaught
Debra (Debrowiak) Ross	Andrew J. Farrow	Joseph M. Huber
Todd Kliche	David Wright Persinger	Fred Gattas
David McLeland	Joseph Blair	Adam Rahman
Kyle Oelrichs		

13. A. Sealed sources shall be tested for leakage and/or contamination at intervals not to exceed the intervals specified in the certificate of registration issued by NRC under 10 CFR 32.210 or by an Agreement State.

    B. In the absence of a certificate from a transferor indicating that a leak test has been made within the intervals specified in the certificate of registration issued by NRC under 10 CFR 32.210 or by an Agreement State prior to the transfer, a sealed source received from another person shall not be put into use until tested.

    C. Sealed sources need not be tested if they are in storage and are not being used. However, when they are removed from storage for use or transferred to another person, and have not been tested within the required leak test interval, they shall be tested before use or transfer. No sealed source shall be stored for a period of more than 10 years without being tested for leakage and/or contamination.

    D. The leak test shall be capable of detecting the presence of 0.005 microcurie (185 becquerels) of radioactive material on the test sample. If the test reveals the presence of 0.005 microcurie (185 becquerels) or more of removable contamination, a report shall be filed with the U.S. Nuclear Regulatory Commission in accordance with 10 CFR 30.50(c)(2), and the source shall be removed immediately from service and decontaminated, repaired, or disposed of in accordance with Commission regulations.

MATERIALS LICENSE
SUPPLEMENTARY SHEET

License Number
09-32781-01MD

Docket or Reference Number
030-38276

E. Tests for leakage and/or contamination shall be performed by the licensee or other persons specifically licensed by the Commission or an Agreement State to perform such services. In addition, the licensee is authorized to collect leak test samples for analysis by persons specifically licensed by the Commission or an Agreement State to perform such services.

14. Sealed sources containing licensed material shall not be opened.

15. The licensee shall conduct a physical inventory every 6 months to account for all sources and/or devices received and possessed under the license.

16. The licensee may transport licensed material in accordance with the provisions of 10 CFR Part 71, "Packaging and Transportation of Radioactive Material."

17. The licensee is authorized to hold radioactive material with a physical half-life of less than 120 days for decay-in-storage before disposal in ordinary trash provided:

    A. Before disposal as ordinary trash, byproduct material shall be surveyed at the container surface with the appropriate survey meter set on its most sensitive scale and with no interposed shielding to determine that its radioactivity cannot be distinguished from background. All radiation labels shall be removed or obliterated.

    B. A record of each disposal permitted under this License Condition shall be retained for three years. The record must include the date of disposal, the date on which the byproduct material was placed in storage, the radionuclides disposed, the survey instrument used, the background dose rate, the dose rate measured at the surface of each waste container, and the name of the individual who performed the disposal.

18. Radioactive waste may be picked up from the licensee's customers and disposed of in accordance with the procedures, statements and representations in application dated February 15, 2007.

License Number
09-32781-01MD

Docket or Reference Number
030-38276

MATERIALS LICENSE
SUPPLEMENTARY SHEET

19. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents including any enclosures, listed below. The Nuclear Regulatory Commission's regulations shall govern unless the statements, representations and procedures in the licensee's application and correspondence are more restrictive than the regulations.

A. Application dated February 15, 2007; and

B. Letters dated June 21, 2007, July 19, 2007, June 17, 2008, July 3, 2008, February 10, 2009, March 31, 2009, May 28, 2009, June 11, 2009, January 7, 2010, March 29, 2010 and April 22, 2010.

UNITED STATES NUCLEAR REGULATORY COMMISSION

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Date MAY 28 2010

By Toye L. Simmons
Toye L. Simmons
Materials Licensing Branch
Region III

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLNOIS 60532-4352

MAY 28 2010

William P. McCormick
Senior Vice-President/General Counsel
Triad Isotopes, Inc.
Suite 2100
200 South Orange Avenue
Orlando, FL 32801

Dear Mr. McCormick:

Enclosed is your NRC Material License No. 09-32781-01MD in accordance with your request.

Please review the enclosed document carefully and be sure that you understand all conditions. If there are any errors or questions, please notify the U.S. Nuclear Regulatory Commission, Region III office at (630) 829-9887 so that we can provide appropriate corrections and answers.

Please be advised that your license expires at the end of the day, in the month, and year stated in the license. Unless your license has been terminated, you must conduct your program involving byproduct materials in accordance with the conditions of your NRC license, representations made in your license application, and NRC regulations. In particular, note that you must:

1. Operate in accordance with NRC regulations 10 CFR Part 19, "Notices, Instructions and Reports to Workers; Inspections," 10 CFR Part 20, "Standards for Protection Against Radiation," and other applicable regulations.

2. Notify NRC, in writing, within 30 days:

   a. When an authorized user or Radiation Safety Officer permanently discontinues performance of duties under the license or has a name change; or

   b. When the mailing address listed on the license changes.

3. In accordance with 10 CFR 30.36(d) and/or license condition, notify NRC, promptly, in writing, and request termination of the license when you decide to terminate all activities involving materials authorized under the license.

4. Request and obtain a license amendment before you:

   a. Receive or use byproduct material for a clinical procedure permitted under Part 35 but not permitted by your license issued pursuant to this Part;

   b. Permit anyone, except individuals described in 10 CFR 35.13(b), to work as an authorized user under the license;

   c. Change Radiation Safety Officers except as provided by 10 CFR 35.24;

d. Order byproduct material in excess of the amount, or radionuclide, or form different than authorized on the license;

e. Add or change the areas of use or address or addresses of use identified in the license application or on the license except as provided by 10 CFR 35.14; or

f. Change ownership of your organization.

5. Submit a complete renewal application with proper fee or termination request at least 30 days before the expiration date of your license. You will receive a reminder notice approximately 90 days before the expiration date. Possession of byproduct material after your license expires is a violation of NRC regulations. A license will not normally be renewed, except on a case-by-case basis, in instances where licensed material has never been possessed or used.

In addition, please note that NRC Form 313 requires the applicant, by his/her signature, to verify that the applicant understands that all statements contained in the application are true and correct to the best of the applicant's knowledge. The signatory for the application should be the licensee or certifying official rather than a consultant.

You will be periodically inspected by NRC. Failure to conduct your program in accordance with NRC regulations, license conditions, and representations made in your license application and supplemental correspondence with NRC will result in enforcement action against you. This could include issuance of a notice of violation, or imposition of a civil penalty, or an order suspending, modifying or revoking your license as specified in the General Statement of Policy and Procedure for NRC Enforcement Actions. Since serious consequences to employees and the public can result from failure to comply with NRC requirements, prompt and vigorous enforcement action will be taken when dealing with licensees who do not achieve the necessary meticulous attention to detail and the high standard of compliance which NRC expects of its licensees.

W. P. McCormick

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). The NRC's document system is accessible from the NRC Web site at http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Sincerely,

Toye L. Simmons
Materials Licensing Branch

License No. 09-32781-01MD
Docket No. 030-38276

Enclosures:
1. License No. 09-32781-01MD
2. 10 CFR Part 19
3. 10 CFR Part 20
4. 10 CFR Part 30
5. 10 CFR Part 35
6. Form NRC-3

Mallinckrodt Inc.

COVIDIEN

Via Federal Express

January 7, 2010

U.S. Nuclear Regulatory Commission
Region III
Nuclear Materials Licensing Section
801 Warrenville Road
Lisle, IL 60532-4351

RE: Mallinckrodt Inc.'s Request for Approval to Transfer License #s:

24-04206-08MD
1827 Beltway Drive
St. Louis, MO 63114

24-04206-11MD
2795 Universal Drive
Saginaw, MI 48603

24-04206-10MD
2252 East 14 Mile Road
Warren, MI 48092

24-04206-12MD
712 Westport Road
Kansas City, MO 64111

Dear Sir or Madam:

This letter is to notify you that on or about December 16, 2009 Mallinckrodt Inc. entered into an Asset Purchase Agreement to sell the above referenced nuclear pharmacy operations to Triad Isotopes, Inc. (Triad). The closing of this transaction is tentatively scheduled for March 31, 2010, subject to the approval of all applicable regulatory agencies, including the NRC. A copy of a press release dated December 17, 2009 is attached for reference purposes and it describes the proposed transaction in greater detail.

By this letter, Mallinckrodt Inc. is requesting NRC's approval to transfer the above referenced license to Triad as of March 31, 2010. On the date the transaction closes, an additional correspondence will be sent to your office, confirming that the change of ownership has been finalized. As required by 10 CFR §30.34 (b), Mallinckrodt is providing the following information to assist the NRC in evaluating this request for approval of this license transfer.

1. The new name of the licensed organization and their headquarters address;

   Triad Isotopes, Inc.
   200 South Orange Avenue, Suite 2100
   Orlando, Florida 32801

2. The new licensee contact and telephone number(s) to facilitate communications;

675 McDonnell Boulevard
Hazelwood, MO
63042

314-654-2000 [T]

William P. McCormick
Senior Vice-President/General Counsel
Triad Isotopes, Inc.
200 South Orange Avenue, Suite 2100
Orlando, Florida 32801
Phone- 407-455-6704
Fax- 407-455-6732
E-mail: wmccormick@triadisotopes.com

3. List any changes in personnel having control over licensed activities and any changes in personnel named in the license;

   Triad does not anticipate any changes to the current Radiation Safety Officer or authorized users at the above referenced pharmacy facility as a result of this transaction. If any changes do occur, Triad will promptly notify NRC, in writing. A listing of the Triad corporate officers and directors is attached hereto as Exhibit "A."

4. An indication of whether the transferor will remain in non-licensed business without a license.

   No, but Mallinckrodt Inc. (d/b/a Covidien) will remain in the business of the bulk manufacture of radiopharmaceutical products and distribution to nuclear pharmacies of bulk product and will retain an NRC license for its Maryland Heights, MO manufacturing (License # 24-04206-01MD/24-04206-05MD) and Hazelwood, MO Research and Development operations (License # 24-17450-01) in connection with those activities. Mallinckrodt Inc. is also undergoing licensed decommissioning activities at its St. Louis, MO facility for a different NRC license. Mallinckrodt Inc. will have no involvement with the ownership or operation of the above referenced, nuclear pharmacy after the closing of the transaction, on or about March 31, 2010.

5. A complete, clear description of the transaction, including any transfer of stocks or assets, mergers, etc., so that legal counsel is able, when necessary, to differentiate between name changes and changes of ownership.

   This license transfer is necessary due to a change in ownership of the above referenced nuclear pharmacy. Mallinckrodt will sell all of the assets of the above nuclear pharmacy pursuant to the Asset Purchase Agreement dated December 16, 2009 with Triad. Mallinckrodt Inc. did not transfer any stock and Triad is an independent corporation which currently owns and operates nuclear pharmacies licensed by several agreement states. Triad's current locations are listed at www.triadisotopes.com.

6. A complete description of any planned changes in organization, location, facility, equipment, or procedures.

   At this time, Triad has not planned any specific changes to the pharmacy operations. If Triad plans to modify or change the organizational structure, Triad will advise NRC at that time. Triad understands that any proposed changes will need to be communicated to the NRC.

7. A detailed description of any changes in the use, possession, location or storage of licensed materials.

   There are no changes anticipated in the use, possession, location, or storage of the licensed materials.

8. Any changes in organization, location, facilities, equipment, procedures, or personnel that would require a license amendment even without the change of ownership.

   There are no such changes to the licenses that fall within this category.

9. An indication of whether all surveillance items and records will be current at the time of transfer. A description of the status of all surveillance requirements and records should also be provided.

   There should be no changes in location of records because of the sale. All pertinent and required records applicable to pharmacy operations will be retained at the pharmacy or provided to Triad at the time of final closing.

10. Confirmation that all records concerning the safe and effective decommissioning of the facility, pursuant to 10 CFR 30.35(g), 40.36(f), 70.25(g), and 72.30(d); public dose; and waste disposal by release to sewers, incineration, radioactive spills, and on-site burials, have been transferred to the new licensee, if licensed activities will continue at the same location, or to the NRC for license termination.

    Refer to the response offered in Item 9.

11. A description of the status of the facility. Specifically, the presence or absence of contamination should be documented. If contamination is present, will decontamination occur before transfer? If not, does the successor company agree to assume full liability for the decontamination of the facility or site?

    Triad, as the successor company, has agreed to take possession of each facility in its current condition, since the facility will continue operation as a nuclear pharmacy. Responsibility for pre-closing and post closing environmental issues is apportioned between Mallinckrodt Inc. and Triad, in the Asset Purchase Agreement dated December 16, 2009. The successor company will assume full liability for final decommissioning of the above referenced facility if it is shut down at any time in the future.

12. A description of any decontamination plans, including financial assurance arrangements of the transferee, as specified in 10 CFR 30.35, 40.36, and 70.25. This should include information about how the transferee and transferor propose to divide the transferee's assets, and responsibility for any cleanup needed at the time of transfer.

    See response to Item 11.

13. Confirmation that the transferee agrees to abide by all commitments and representations previously made to the NRC by the transferor. These include, but are not limited to: maintaining decommissioning records required by 10 CFR 30.35(g); implementing decontamination activities and decommissioning of the site; and completing corrective actions for open inspection items and enforcement actions.

    All of the existing license conditions will be maintained, and constraints, conditions, requirements, representations and commitments identified in the above referenced license will be followed by Triad upon license transfer. All of the existing radiation safety programs will be maintained and followed by Triad, as required by applicable regulation.

14. Documentation that the transferor and transferee agree to the change in ownership or control of the licensed material and activity, and the conditions of transfer; and the transferee is made aware of all open inspection items and its responsibility for possible resulting enforcement actions.

    Refer to response offered in Item 13. Triad has been notified of any open inspection items and subject to the terms of the Asset Purchase Agreement dated December 16, 2009, has agreed to be responsible for resolving any existing, open issues in connection with the transfer of the assets, including the above-referenced license.

15. A commitment by the transferee to abide by all constraints, conditions, requirements, representations, and commitments identified in the existing license.

    Triad agrees to perform and abide by all of the constraints, conditions, requirements, representations and commitments identified in the above-referenced license. In addition, please refer to the response offered in Item 14.

Please note that we would appreciate your expeditious review and approval of the above-referenced license transfer approval request. If you have any questions regarding the foregoing, please contact Kay Yoder, Mallinckrodt's Director of Radiation, Environment, Safety and Health at 314-654-7432 or Patricia Duft, Mallinckrodt's Chief EHS Counsel at 314-654-6314. Bill McCormick, Triad's General Counsel, is also available at 407-455-6704. Thank you for your attention to this matter.

On behalf of Mallinckrodt Inc.;

Patricia H. Duft
Vice-President, Legal

On behalf of Triad Isotopes, Inc.;

William P. McCormick
Senior Vice-President
General Counsel

Enc:
Mallinckrodt Inc. press release dated 12/17/09
Exhibit "A"- Triad Officer and Director List

cc: file
Bill McCormick (Triad)
Brigette Nelson (Triad)
Shannon Julian (Triad)

Joe Blair, Lead RPH/RSO – Saginaw

COVIDIEN

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News Release

Covidien Announces Definitive Agreement to Sell U.S. Radiopharmacies

DUBLIN, Dec 17, 2009 (BUSINESS WIRE) -- Covidien (NYSE: COV), a leading global provider of healthcare products, today announced a definitive agreement to sell its radiopharmacies in the United States to Triad Isotopes, Inc. of Orlando, Florida. Triad operates a network of 26 nuclear radiopharmacies and six cyclotron facilities in the southeast United States. Financial terms of the transaction were not disclosed.

The decision to divest the network of 37 Mallinckrodt radiopharmacies was made following a thorough review and evaluation of a number of strategic alternatives. The decision is consistent with Covidien's strategy to streamline its portfolio and reallocate resources to its faster-growing, higher-margin businesses, where the Company has or can develop a global competitive advantage. The move allows the Company greater focus on continuing to develop and provide quality products that deliver better value and help to improve patient outcomes.

Covidien's radiopharmacy net sales were approximately $180 million in fiscal 2009.

Completion of the transaction is subject to customary closing conditions, as well as receipt by Triad of necessary state and federal licenses and Triad's ability to secure financing for the transaction, with closing expected during the second calendar quarter of 2010. The transaction is not expected to have a material effect on Covidien's operating income or earnings per share for fiscal 2010 or 2011.

ABOUT COVIDIEN

Covidien is a leading global healthcare products company that creates innovative medical solutions for better patient outcomes and delivers value through clinical leadership and excellence. Covidien manufactures, distributes and services a diverse range of industry-leading product lines in three segments: Medical Devices, Pharmaceuticals and Medical Supplies. With 2009 revenue in excess of $10 billion, Covidien has 42,000 employees worldwide in more than 60 countries, and its products are sold in over 140 countries. Please visit http://cts.businesswire.com/ct/CT?id=smartlink&url=http%3A%2F%2Fwww.covidien.com&esheet=6122817&lan=en_US&anchor=www.covidien.com&index=1&md5=43c801b654b1891cf4437a6ccfcd8d85 to learn more about our business.

FORWARD-LOOKING STATEMENTS

Any statements contained in this communication that do not describe historical facts may constitute forward-looking statements as that term is defined in the Private Securities Litigation Reform Act of 1995. Any forward-looking statements contained herein are based on our management's current beliefs and expectations, but are subject to a number of risks, uncertainties and changes in circumstances, which may cause actual results or Company actions to differ materially from what is expressed or implied by these statements. The factors that could cause actual future results to differ materially from current expectations include, but are not limited to, the possibility that the transaction will not close or that the closing may be delayed, our ability to effectively introduce and market new products or keep pace with advances in technology, the reimbursement practices of a small number of large public and private insurers, cost-containment efforts of customers, purchasing groups, third-party payers and governmental organizations, intellectual property rights disputes, complex and costly regulation, including healthcare fraud and abuse regulations, manufacturing or supply chain problems or disruptions, rising commodity costs, recalls or safety alerts and negative publicity relating to Covidien or its products, product liability losses and other litigation liability, including legacy Tyco-related litigation, divestitures of some of our businesses or product lines, our ability to execute strategic acquisitions of, investments in or alliances with other companies and businesses, competition, risks associated with doing business outside of the United States, foreign currency exchange rates or potential environmental liabilities. These and other factors are identified and described in more detail in our filings with the SEC. We disclaim any obligation to update these forward-looking statements other than as required by law.

SOURCE: Covidien

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Director, Communications
Pharmaceuticals
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or
Coleman Lannum, CFA, 508-452-4343
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or
Brian Nameth, 508-452-4363
Director
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brian.nameth@covidien.com

Exhibit "A"

Triad Isotopes, Inc.
200 South Orange Avenue, Suite 2100
Orlando, Florida 32801
FEIN# 20-5744906

Officers & Directors of Triad Isotopes, Inc.

Officers

Name and Address	Title
Domenic Anthony Meffe, Jr. 6507 Rosella Ct. Windermere, Fl. 34786	President and Chief Executive Officer
Claudia Noyes Griffiths 1581 Chippewa Trail Maitland, FL 32751	SVP Finance and Administration
William Patrick McCormick 1514 Holly Hill Drive Bethel Park, PA 15102	SVP General Counsel and Secretary
H. Bradley Sloan 3446 Scott Street San Francisco, CA 94123	SVP Assistant Secretary

Directors

Name, Address and Phone Number	Title
Dominic Anthony Meffe, Jr. 6507 Rosella Ct. Windermere, Fl. 34786 Phone- 407-876-5504	Director
H. Bradley Sloan 3446 Scott Street San Francisco, CA 94123 Phone- 415-902-5810	Director
David J. Ament 37 Circuit Road Chestnut Hill, MA 02467 Phone- 617-470-6958	Director

From: (904) 220-7210
Brigette Nelson
Triad Isotopes
1554 Nottingham Knoll

Jacksonville, FL 32225

Origin ID: USTA

FedEx Express

J11151102250225

Ship Date: 19MAY11
ActWgt: 1.0 LB
CAD: 2600876/INET3130

Delivery Address Bar Code

Ref #
Invoice #
PO #
Dept #

SHIP TO: (904) 562-8260 BILL SENDER

Region III Licensing
U.S NRC Materials Licensing Section
2443 WARRENVILLE RD

LISLE, IL 60532

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