



**David C. Pratt Cancer Center**  
Radiation Safety  
607 S. New Ballas Rd.  
St. Louis, MO 63141  
www.mercy.net

June 21, 2012

**Via Certified Mail/Return Receipt Requested**

Nuclear Material Licensing Branch  
Region III, U.S.N.R.C.  
2443 Warrenville Road, Suite 210  
Lisle, IL 60532-4352

ATTN: Ms. Toye Simmons  
Senior Reviewer

Via email: [Toye.Simmons@NRC.gov](mailto:Toye.Simmons@NRC.gov) and Fax No: 630-515-1078

RE: Change of Ownership/Acquisition of Patients First Health Care, LLC by Mercy Health East Communities and its wholly owned affiliates Mercy Hospitals East Communities and Mercy Clinic East Communities (collectively "Mercy")

Dear Ms. Simmons:

This letter is documentation that Mercy Hospitals East Communities d/b/a Mercy Hospital St. Louis ("Mercy Hospital"), Material License 24-00794-03, agrees to the transfer to it of ownership and control of the licensed material and activity of Patients First Health Care, LLC ("Patients First"), Material License 24-32304-01 with facilities located at:

1. 901 Patients First Drive, Washington, Missouri 63090  
Telephone (636) 390-1750  
Fax (636) 239-1553
2. 101 Progress Parkway, Sullivan, Missouri 63080  
Telephone (573) 468-3555  
Fax (573) 468-3554
3. 12855 North Forty Drive, Suite 280, Creve Coeur, Missouri 63141  
Telephone (314) 432-4415  
Fax (314) 432-1986
4. 3844 South Lindbergh Blvd., Suite 160, Sunset Hills, Missouri 63127  
Telephone (314) 698-2500  
Fax (314) 698-2323

Mercy Hospital is requesting an amendment to add the locations of use and assets of Patients First to its license, upon approval from the NRC of the asset transfer. Please consider expedition of this request so that uninterrupted clinical operations may continue at these facilities. John M. Mohart, M.D., Radiation Safety Officer for Patients First, or his designee and Robert F. Turco, Ph.D, Radiation Safety Officer for Mercy Hospital, will be available to coordinate all required activities and transfer of records to Mercy Hospital.

Ms. Toye Simmons  
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Mercy Hospital is providing the following information in accordance with NUREG 1556, Vol. 9, Revision 2, Appendix G:

1. The transaction will include a transfer of assets and personnel in an asset transfer scheduled to be effective July 1, 2012. The facilities will operate by Mercy under Mercy Hospital and/or Mercy Clinic. The NRC may contact Robert F. Turco, Ph.D, Radiation Safety Officer at 314-251-6657. In the event Dr. Turco, Ph.D is unavailable, the NRC may contact Jeanne Cantalin, Mercy Vice President and Regional General Counsel at 314-628-3527.
2. The only change in personnel and duties, as it relates to NRC regulated activities, at these facilities will be that of the Radiation Safety Officer (RSO). These duties will be performed by Robert F. Turco, Ph.D., who is the RSO for Mercy. John M. Mohart, M.D. is the current RSO for Patients First and will assist Dr. Turco with this transaction.

The personnel and duties as they relate to NRC regulated activities of all other staff will remain unchanged. The individuals on the attached list who are Authorized User(s) under the Patient First license will be issued a user's permit through the Radiation Safety Committee of Mercy for authorized use of any radioactive material and for any imaging and localization use permitted by 10 CFR 35.100 and 10 CFR 35.200.

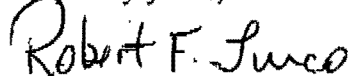
3. There will not be any changes, other than what has been previously described above, in the organization, locations, facilities, equipment, or procedures as related to NRC regulated activities at these facilities.

The status of the surveillance program, as it relates to NRC regulated activities will not change as a result of this asset transfer. All surveys, wipe tests, and other quality assurance control procedures outlined in the material license application for Patients First shall continue without change. All required surveillance has been performed, documented, reviewed and is up to date.

4. In addition, Mercy Hospital will also be accepting Patient First's inventory of sealed sources located at each facility. Mercy Hospital will obtain leak test records as required by 10 CFR 35.2067. Mercy Hospital shall provide written attestation of receipt of these sealed sources to the NRC by facsimile following its transfer, if required.
5. Mercy will abide by all constraints, conditions, requirements and commitments of the current material license of Patients First.

For any questions, I may be reached at 314-251-6844.

Very truly yours,



Robert F. Turco, Ph.D.  
Radiation Safety Officer

CC: Jeanne Cantalin

# Fax



To: Ms. Toye Simmons

From: Dr Robert Turco

Fax: 630.515.1078

Pages:

Phone:

Date: 6/21/12

Re: Change of ownership/acquisition

cc:

- URGENT
- FOR REVIEW
- PLEASE COMMENT
- PLEASE REPLY
- PLEASE RECYCLE
- CONFIDENTIAL

Ms. Simmons,

Please find a letter included requesting the change of ownership / acquisition of Patients First Health Care, LLC, by Mercy.

Thank you.

