



BY EMAIL: *Maryann.Abogunde@nrc.gov*

August 21, 2013

Maryann Abogunde
Medical / Health Physicist
U.S. NRC Region 1
610-337-5090 (voice)
610-337-5269 (fax)

RE: License amendment for Connecticut Heart & Vascular Center, PC
Licensee(s): Connecticut Heart & Vascular Center, PC
(Request involving change of licensee name to PriMed, LLC dba Connecticut Heart & Vascular Center)
License No.: 06-30537-01 // Docket No.: 030-35233 // Control No.: 581102

Dear Ms. Abogunde:

Thank you for your email of July 9, 2013. Our responses appear below each of your questions.

1. Your request states that Connecticut Heart & Vascular Center, PC merged with the practice of PriMed, LLC. Please clarify if there has been a change or transfer of control.
All of the physicians formerly associated with CTHVC joined the medical practice of PriMed, LLC ("PriMed") as either owners or employees, effective January 1, 2012. The nuclear cardiac imaging equipment in question was leased, not owned by CTHVC. As described below, CTHVC has assigned the relevant leases to PriMed effective January 1, 2012.

With regards to changes of control (transferor and/or transferee, as appropriate):

- a. Provide a complete description of the transaction (transfer of stocks or assets, or merger). Indicate whether the name has changed and include the new name. Include the name and telephone number of a licensee contact who NRC may contact if more information is needed.

PriMed is a multispecialty group medical practice operating in the Greater Bridgeport, Connecticut area. In addition to internal "organic" growth, over the last few years PriMed has brought in several established medical practices. Although PriMed casually refers to such a transaction as a "merger," the transaction does not constitute a merger on a legal sense. Instead, each owner of the targeted practice is admitted as an owner of PriMed pursuant to a written "Agreement to Transfer Assets in Exchange for Limited Liability Company Interests" or "ATA." Pursuant to the ATA, the old practice entity, e.g. CTHVC, transfers substantially all of its assets other than cash and accounts receivable to PriMed as a capital contribution on behalf of its owner-physicians, and PriMed admits the owner-physicians as new owner-physicians of PriMed. PriMed does not normally assume any liabilities of the old practice other than liabilities under any leases that may be assigned. The old practice entity remains in existence for purposes of collecting its accounts receivables and satisfying its pre-transfer liabilities. In summary, CTHVC is still in existence, but all of the CTHVC physicians became associated with PriMed, and all of the tangible assets or leases of tangible assets, were transferred to PriMed pursuant to the ATA. Since



January 1, 2012, PriMed has billed globally under the unified PriMed billing number for the services performed using the Nuclear Equipment. Conversely, CTHVC has not billed for any such services performed after December 31, 2011. The NRC may contact Robert Chasin, PriMed Chief Operating Officer, at 203-944-1940 or by email at Rob_Chasin@PriMedMD.com

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

There are no changes in personnel or duties that relate to the licensed program.

- c. Describe any changes in the organization, location, facilities, equipment or procedures that relate to the licensed program.

There are no changes in the organization, equipment or procedures that relate to the licensed program. The licensed program will move from its current location at 2979 Main Street, Bridgeport, Connecticut to a new facility at 112 Quarry Road Suite 400, Trumbull, Connecticut on or around October 1, 2013.

- d. Describe the status of the surveillance program (surveys, wipe tests, quality control) at the present time and the expected status at the time that control is to be transferred.

The surveillance program has remained uninterrupted and is up-to-date. We expect it to continue without interruption.

- e. 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.

All records concerning the safe and effective decommissioning of the facility will be transferred to the transferee or to the NRC, as appropriate.

- f. Confirm that the transferee will abide by all constraints, conditions, requirements and commitments of the transferor or that the transferee will submit a complete description of the proposed licensed program.

The transferee will abide by all constraints, conditions, requirements and commitments of the transferor.

(As requested, the above information is signed below by senior management from Connecticut Heart & Vascular Center, PC and PriMed, LLC)



Robert Sackstein, MD
President
Connecticut Heart & Vascular Center, PC



Amit Rastogi, MD
President/CEO
PriMed, LLC

2. The letter you submitted was signed by you, with your title as Radiation Safety Officer. In order to complete review of this license action, please confirm that you are also a senior management representative of this facility. Otherwise, please have a senior management representative review and confirm that they are in agreement with the information provided in this response and your amendment request letter dated May 31, 2013.

Robert Sackstein, MD serves as Managing Partner of PriMed Connecticut Heart & Vascular Center (PriMed Cardiology). Dr. Sackstein also serves as a member of PriMed's Management Committee and is a specialist representative on PriMed's Executive Committee.

3. Please confirm that PriMed, LLC does not perform any activities that fall under any other active NRC licenses.

PriMed, LLC does not perform any activities that fall under any other active NRC licenses.

4. Please confirm that you want to keep the mailing address that is currently listed on your license as 2979 Main Street, Bridgeport, Connecticut 06606. Otherwise, provide a current mailing address that you would like listed on your license.

Please keep the current mailing address listed on our license. We will notify you of an address change once we have moved in to our new location at 112 Quarry Road Suite 400, Trumbull, Connecticut 06611.

5. With regards to adding a new facility, please provide the following additional information. Please be aware that information (including diagrams) that provide the exact location of materials or depict specific locations of safety or security equipment should be marked as "security-related information – withhold under 2.390":

- a. Please confirm that the proposed location of use is not a location of use for any other active NRC license.

The new office location is not a location of use with/for another active NRC license.

- b. Please indicate room numbers (if any) for all areas of byproduct material use or preparation for use (e.g. hot lab).

Room numbers have not been designated for the interior of the suite.

- c. The diagram you provided titled Rooms specific to our nuclear cardiac service is not legible. Please re-submit a facility diagram that is legible.

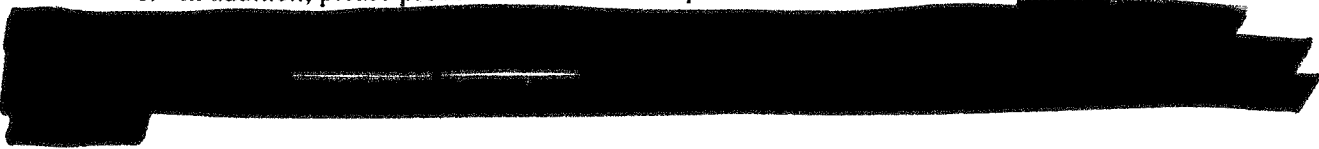
A clearer image for your review is attached as a pdf diagram, entitled "CHVC_QuarryRd_NucRoom_1305r.pdf"

- d. A scaled diagram and detailed description of your hot-lab room and indicate the position of each of the areas described below:



- i. Storage of radiopharmaceuticals;
- ii. Storage of radioactive waste, including decay-in-storage prior to disposal as nonradioactive waste; and
- iii. Preparation and dispensing of radiopharmaceuticals (e.g., lead glass L-block, etc.).

e. In addition, please provide a detailed description of:



- i. Any radioactive waste storage areas outside of the hot lab room; and
- ii. Shielding for the dose storage, dose preparation, waste storage, and radiopharmaceutical administration areas.

6. In order to facilitate future communications, please provide a current contact e-mail address, telephone, and fax number for you and your senior management representative that can be made public.

Robert Sackstein, MD
Robert_Sackstein@PriMedMD.com (email)
Phone: 203-333-8800 (voice)
Fax: 203-333-6054 (fax)

I appreciate your assistance in changing the licensee name to PriMed, LLC and sensitivity to our timeline in licensing our new location.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert Sackstein', is written over a horizontal line.

Robert Sackstein, MD
Managing Partner, PriMed CHVC

Copy to:
Amit Rastogi, MD, PriMed President/CEO