



NORTHSTARSM
health system

May 20, 2014

VIA FACSIMILE (630) 515-1078

Materials Licensing Branch
U.S. Nuclear Regulatory Commission, Region III
2443 Warrenville Road, Suite 210
Lisle, IL 60532-4352

Re: Request for Prior Written Consent of Suspected Change of Control
NRC License #21-18586-01

Dear Sir/Madam:

Please accept this expedited request for the U.S. Nuclear Regulatory Commission's ("NRC") consent to a suspected change of control of NorthSTAR Health System ("NorthSTAR"), a nuclear material licensee.

To assist in our request for consent, the following is a description of the contemplated transaction giving rise to the suspected change of control and additional information we believe the NRC will require. Also, we have attached a completed NRC Form 313 for amending the current license to reflect the name change (which is the only substantive change to the license) and no other changes to the current license.

NorthSTAR is a critical access hospital serving the people of northern Michigan and Wisconsin. Currently, NorthSTAR is licensed by NRC to use:

- a. Any byproduct material permitted by 10 CFR 35.100 for any uptake, dilution and excretion study;
- b. Any byproduct material permitted by 10 CFR 35.200 for any imaging and localization study; and
- c. Any byproduct material permitted by 10 CFR 31.11 for in vitro studies.

In order to streamline operations and better serve the patients and community served by NorthSTAR, NorthSTAR will be restructured from a directorship corporation to a membership corporation. Specifically, the corporate structure of NorthSTAR will change from a directorship nonprofit corporation, which legally has no "owners" but is controlled by a board of directors, to a nonprofit membership corporation. As a membership corporation, NorthSTAR will be renamed "Aspirus NorthSTAR, Inc." and will have one corporate member (substantially equivalent to a shareholder in a non-profit context). The sole corporate member will be Aspirus, Inc., a Wisconsin nonprofit corporation.

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Aspirus NorthSTAR will then carry on and operate as a critical access hospital in the same manner as NorthSTAR did before the corporate reorganization.

In addition to that description of the transaction, we are providing the following consistent with our understanding of additional information the NRC will require to provide its consent:

1. Description of any changes in personnel or duties that relate to the licensed program, including training and experience for new personnel.

There will not be any changes in personnel or duties that relate to the licensed program. There are no personnel changes contemplated.

2. Description of any changes in organization, location, facilities, equipment or procedures that relate to the licensed program.

There will be no changes in organization, location, facilities, equipment or procedures that relate to the licensed program in connection with this transaction. The organization, location, facilities, equipment, and procedures that relate to the licensed program will remain intact after the transaction.

3. Description of 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 (surveys, wipe test, quality control) records are complete and up to date. The surveillance program will continue without change following the transaction. Records of program audits are available for review as are the NRC inspection results and there are no open items requiring corrective action at this time.

The annual review of NorthSTAR's radiation safety program was conducted on April 12th, 2014. The results of that review are attached in full. At the current time, a quarterly audit was also conducted in August, 2014 and another is expected to be conducted in November, 2014 by SAHCI, a Consultant Physicist. This status will not change at the time that control is to be transferred.

4. Confirmation 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.

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NorthSTAR has not decommissioned any facility with respect to its nuclear medicine program and no decommissioning will be performed as a result of the transaction. All records that would be required for possible future decommissioning will remain at NorthSTAR and be available to assist in performing decommissioning if it becomes necessary.

5. Confirmation 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.

See Attachment A for Aspirus' confirmation that the transferee will abide by all constraints, conditions, requirements and commitments of the transferor.

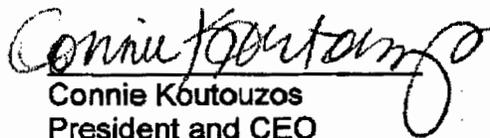
6. Provide documentation that the transferor and transferee agree to the change in ownership or control of the licensed material and activity, and the conditions of transfer; and the transferee is made aware of all open inspection items and its responsibility for possible resulting enforcement actions.

See Attachment A for NorthSTAR's and Aspirus' agreement to the change in control of the licensed material and activity, conditions of the transferee, and certification that Aspirus is aware of all open inspection items and its responsibility for possible resulting enforcement actions.

If you have any questions or need further information regarding the specifics of NorthSTAR's nuclear medicine program, please feel free to contact Sharon Dedo (her contact information is on the attached Form 313). Ms. Dedo is NorthSTAR's current Radiation Safety Officer and will continue in that role following the NRC's consent and completion of the transaction.

If you have any questions or need further information related to the transaction itself, please feel free to contact me at (906) 265-0446.

Sincerely,


Connie Koutouzos
President and CEO

Attachment and Enclosures

ATTACHMENT A

Upon closing the affiliation of Aspirus, Inc. and NorthSTAR Health System, Aspirus, as Transferee, agrees and certifies that it will abide by all constraints, conditions, requirements and commitments of NorthSTAR Health System, as Transferor, with respect to the transfer of Transferor's Nuclear Regulatory Commission License #21-18586-01.

Transferee further certifies that Transferee agrees to the change in control of Transferor's licensed material and activity and Transferee has been made aware of all open inspection items and Transferee's responsibility for possible resulting enforcement actions

"Transferee"

Aspirus, Inc.

By: Matthew F. Heywood
Matthew F. Heywood
Its: President/Chief Executive Officer

"Transferor"

NorthSTAR Health System

By: Mark Fousignant
Mark Fousignant
Its: Chairperson of the Board

<p>NRC FORM 313 U.S. NUCLEAR REGULATORY COMMISSION (03-2014) 10 CFR 30, 32, 33, 34 35, 36, 37, 39, and 40</p>  <p style="text-align: center;">APPLICATION FOR MATERIALS LICENSE</p>	<p style="text-align: right;">APPROVED BY OMB: NO. 3150-0120 EXPIRES: 05/31/2015</p> <p>Estimated burden per response to comply with this mandatory collection request: 4.3 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the FOIA, Privacy, and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollections.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.</p>
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INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW. *AMENDMENTS/RENEWALS THAT INCREASE THE SCOPE OF THE EXISTING LICENSE TO A NEW OR HIGHER FEE CATEGORY WILL REQUIRE A FEE.

<p>APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:</p> <p>OFFICE OF FEDERAL & STATE MATERIALS AND ENVIRONMENTAL MANAGEMENT PROGRAMS DIVISION OF MATERIALS SAFETY AND STATE AGREEMENTS U.S. NUCLEAR REGULATORY COMMISSION WASHINGTON, DC 20555-0001</p> <p>ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:</p> <p>IF YOU ARE LOCATED IN:</p> <p>ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA,</p> <p>SEND APPLICATIONS TO:</p> <p>LICENSING ASSISTANCE TEAM DIVISION OF NUCLEAR MATERIALS SAFETY U.S. NUCLEAR REGULATORY COMMISSION, REGION I 2100 RENAISSANCE BOULEVARD, SUITE 100 KING OF PRUSSIA, PA 19406-2713</p>	<p>IF YOU ARE LOCATED IN:</p> <p>ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:</p> <p>MATERIALS LICENSING BRANCH U.S. NUCLEAR REGULATORY COMMISSION, REGION III 2443 WARRENVILLE ROAD, SUITE 210 LISLE, IL 60532-4352</p> <p>ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING,</p> <p>SEND APPLICATIONS TO:</p> <p>NUCLEAR MATERIALS LICENSING BRANCH U.S. NUCLEAR REGULATORY COMMISSION, REGION IV 1600 E. LAMAR BOULEVARD ARLINGTON, TX 76011-4511</p>
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PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

<p>1. THIS IS AN APPLICATION FOR (Check appropriate item)</p> <p><input type="checkbox"/> A. NEW LICENSE</p> <p><input checked="" type="checkbox"/> B. AMENDMENT TO LICENSE NUMBER <u>21-18586-01</u></p> <p><input type="checkbox"/> C. RENEWAL OF LICENSE NUMBER _____</p>	<p>2. NAME AND MAILING ADDRESS OF APPLICANT (Include ZIP code)</p> <p>Aspirus NorthSTAR, Inc. 1400 West Ice Lake Road Iron River, Michigan 49935</p>				
<p>3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED</p> <p>1400 West Ice Lake Road Iron River, Michigan 49935</p>	<p>4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION</p> <p>Sharon Dedo</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:50%;">BUSINESS TELEPHONE NUMBER (906) 265-0429</td> <td style="width:50%;">BUSINESS CELLULAR TELEPHONE NUMBER N/A</td> </tr> <tr> <td colspan="2">BUSINESS EMAIL ADDRESS sharon.dedo@northstarhs.org</td> </tr> </table>	BUSINESS TELEPHONE NUMBER (906) 265-0429	BUSINESS CELLULAR TELEPHONE NUMBER N/A	BUSINESS EMAIL ADDRESS sharon.dedo@northstarhs.org	
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<p><small>SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.</small></p>					
<p>5. RADIOACTIVE MATERIAL</p> <p>a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.</p>	<p>6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.</p>				
<p>8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.</p>	<p>7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE.</p>				
<p>10. RADIATION SAFETY PROGRAM.</p>	<p>9. FACILITIES AND EQUIPMENT.</p>				
<p>12. LICENSE FEES (Fees required only for new applications, with few exceptions*) <small>(See 10 CFR 170 and Section 170.31)</small></p>	<p>11. WASTE MANAGEMENT.</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:50%;">FEE CATEGORY 7C</td> <td style="width:50%;">AMOUNT ENCLOSED \$ _____</td> </tr> </table>	FEE CATEGORY 7C	AMOUNT ENCLOSED \$ _____		
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<p>13. CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.</p> <p>THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 37, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.</p> <p>WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.</p>					

<p>CERTIFYING OFFICER -- TYPED/PRINTED NAME AND TITLE</p> <p>Connie Koutouzos, President and CEO</p>	<p>SIGNATURE</p> 	<p>DATE</p> <p>5-20-14</p>
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FOR NRC USE ONLY					
APPROVED BY	DATE	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS

5. RADIOACTIVE MATERIAL

a. Element and mass number;

No Change from current license.

- 1. Any byproduct material permitted by 10 CFR 35.100**
- 2. Any byproduct material permitted by 10 CFR 35.200**
- 3. Any byproduct material permitted by 10 CFR 31.11**

b. Chemical and/or physical form;

No change from current license.

- 1. Any**
- 2. Any**
- 3. Prepackaged Kits**

c. Maximum amount which will be possessed at any one time.

No change from current license.

- 1. As needed**
- 2. As needed**
- 3. 10 Millicuries**

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.

No change from current license.

- 1. Any uptake, dilution and excretion study permitted by 10 CFR 35.100**
- 2. Any imaging and localization study permitted by 10 CFR 35.200**
- 3. In vitro studies**

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE.

No change from current license. Personnel with radiation oversight components of the radiation safety program will remain unchanged.

8. TRAINING FOR INDIVIDUALS WORKING OR FREQUENTING RESTRICTED AREAS.

No change from current license. All components of radiation safety training program will remain unchanged.

9. FACILITIES AND EQUIPMENT.

No change from current license. All components of facilities and equipment will remain unchanged.

10. RADIATION SAFETY PROGRAM.

No change from current license. All components of the radiation safety program will remain unchanged.

11. WASTE MANAGEMENT.

No change from current license. All components of the waste management will remain unchanged.

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