

April 23, 2015

U.S. NRC Region III  
Materials Licensing Branch  
2443 Warrenville Road  
Suite 210  
Lisle, Illinois 60532-4352  
Attn: Colleen Casey

**Re: Control number 585825: U.S. Nuclear Regulatory Commission Materials License Request for Written Consent of Proposed Transaction**

Dear Ms. Casey:

I am writing on behalf of Associated Imaging, Inc. d/b/a The Imaging Center ("Imaging Center"), to provide the U.S. Nuclear Regulatory Commission (the "NRC") further updated information and supplement that certain Letter dated February 9, 2012, regarding a proposed transaction involving the Imaging Center and IOM Health System, L.P. d/b/a Lutheran Hospital of Indiana (the "Hospital"). The licensing action describer in the Letter was assigned control number 585825. Since our letter dated February 9, 2012, more details of the transaction have developed which we would like to provide to the NRC. As described more fully below, the Proposed Transaction remains a purchase of substantially all of the assets of the Imaging Center and will not result in any change in the local administrative management, personnel responsible for the use or control of radioactive materials, or operations involving radioactive materials subject to the jurisdiction of the NRC. We are submitting this letter and the enclosed information to ensure that the NRC is provided with all relevant details of the proposed transaction.

Updated Description of the Proposed Transaction

The Imaging Center owns and operates a free-standing outpatient diagnostic imaging center located at 7631 W. Jefferson Boulevard, Fort Wayne, Indiana, 46804 (the "Facility"). Pursuant to an Asset Purchase Agreement between the Hospital and the Imaging Center, the Hospital will purchase substantially all of the assets (the "Assets") of the Imaging Center which are directly or indirectly related to, necessary for, or used in connection with, the operating of the Facility (the "Proposed Transaction") through a two-step transaction process. Pursuant to the Asset Purchase Agreement, the Imaging Center will transfer the Assets to an affiliate of the Hospital, Fort Wayne Indiana Ancillary Services, LLC ("Affiliate"), which was specifically formed for the Proposed Transaction. The Assets will be temporarily owned by the Affiliate for a brief time while the Assets are being conformed to Hospital standards. Once the conformation is

Ms. Colleen Casey  
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made, the Affiliate will transfer the Assets to the Hospital, and the Hospital will operate the Facility as an outpatient department. It is currently anticipated that the Proposed Transaction will close, and the Assets will be transferred to the Affiliate on or about June 1, 2015. The transfer of the Assets from the Affiliate to the Hospital is targeted at forty-five (45) days after closing, but improvements may take longer.

Other than changes resulting in the ordinary course of business, no change in the local administrative management or day-to-day operations of the Facility is anticipated as a result of the Proposed Transaction. In particular, the Proposed Transaction will not result in any change in the use, possession, location, or storage of licensed radioactive material by the Facility, nor will it result in any change in the Facility's equipment, procedures, or personnel operating under the Facility's current Radioactive Materials License.

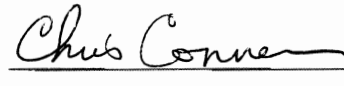
Notice Requirements and Required Documentation

Pursuant to the instructions of your office, we have enclosed as Exhibit A responses to the questions posed by the NRC in situations involving changes in ownership or transfers of control.

It is our understanding that this letter and the enclosed information fulfill the Imaging Center's obligation to request written consent the NRC of the Proposed Transaction, and that no further action is required. If this understanding is incorrect, or if you have any questions, please do not hesitate to contact Chris Connor at (260) 436-7770 or (260) 494-0461.

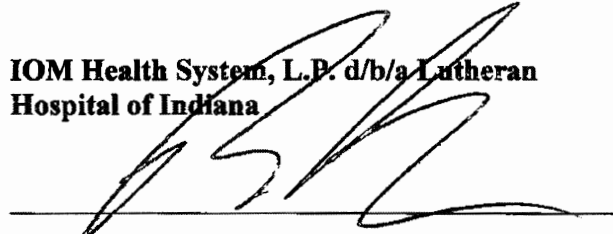
Very truly yours,

**Associated Imaging, Inc. d/b/a The Imaging  
Center**

 4/23/2015

By: Chris Connor  
Its: Corporate Secretary

**IOM Health System, L.P. d/b/a Lutheran  
Hospital of Indiana**



By: Brian Bauer  
Its: Authorized Representative

## EXHIBIT A

### RESPONSES TO QUESTIONS POSED BY THE DEPARTMENT

**1. 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 whom NRC may contact if more information is needed.**

*Response:* As described in the letter to which this Exhibit A is attached, the Hospital and the Imaging Center are parties to an Asset Purchase Agreement that, subject to the satisfaction or waiver of certain conditions, will result in the two-step purchase of substantially all of the assets of the Imaging Center which are directly or indirectly related to, necessary for, or used in connection with, the operating of the Facility (the "Proposed Transaction"). Following the closing of the Proposed Transaction and the temporary operation by the Affiliate for conformation to Hospital standards, the Facility will be operated as an outpatient department of Lutheran Hospital of Indiana.

Following the closing of the Proposed Transaction, please temporarily change the name of the licensee from Associated Imaging, Inc. d/b/a The Imaging Center to Fort Wayne Indiana Ancillary Services, LLC. The permanent name of the licensee will be IOM Health System, L.P. d/b/a Lutheran Hospital of Indiana. If more information is needed concerning the Proposed Transaction, please contact Chris Connor, at (260) 436-7770 or (260) 494-0461.

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

*Response:* There are no changes in personnel or duties that relate to the licensed program anticipated as a result of the Proposed Transaction.

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

*Response:* There are no changes anticipated in the organization, location, facility, equipment, or procedures that relate to the licensed program as a result of the Proposed Transaction.

**4. 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.**

*Response:* There are no changes anticipated in the status of the surveillance program as a result of the Proposed Transaction.

**5. 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.**

*Response:* As a result of the Proposed Transaction all records concerning the safe and effective decommissioning of the Facility will be transferred temporarily to the Affiliate and then permanently to the Hospital.

**6. 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.**

*Response:* The Affiliate and Hospital will abide by all constraints, conditions, requirements, and commitments of the Imaging Center currently in place with respect to the licensed program.

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2 Your Internal Billing Reference

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Company U.S. NRC REGION III  
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