



March 15, 2017

Via Federal Express Overnight Delivery

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

**Re: Change of Control of St. Anthony's Medical Center
Request for Expedited Review
Material License No. 24—1041-04**

Dear Sir or Madam:

Please be advised that St. Anthony's Medical Center ("Licensee") has entered into an Affiliation Agreement with Mercy Health pursuant to which Mercy Health East Communities, an affiliate of Mercy Health, will become the sole corporate member of Licensee (the "Transaction"). Licensee holds the above referenced Materials License issued by the NRC. This Transaction may be considered a change of control of Licensee under applicable NRC rules and regulations. Thus, we are seeking the NRC's written consent to the proposed Transaction.

Information to comply with the provisions of U.S. Nuclear Regulatory Commission NUREG-1556, "Consolidated Guidance About Materials Licenses," Volume 15, "Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Material Licenses," Appendix E, follows:

1. Describe any planned changes in the organization, including but not limited to, transfer of stocks or assets and mergers, change in members on Board of Directors, etc. Provide the new licensee name, mailing address, and contact information, including phone numbers. Clearly identify when the amendment request is due to a name change only.

Licensee is a Missouri nonprofit corporation. Nonprofit corporations do not have owners. As such, Licensee does not have any owners. Licensee presently does not have any members, either, and is controlled by a self-perpetuating board of directors. Pursuant to the proposed Transaction, Mercy Health East Communities, an affiliate of Mercy Health ("Mercy"), will become the sole corporate member of Licensee. Mercy will not own Licensee or its assets. Rather, Mercy will have control of Licensee as a result of being the sole corporate member of Licensee. As the sole corporate member, Mercy will have the right to, among other things, appoint the board of directors of Licensee. Licensee's legal name and tax identification number

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will not change in connection with the Transaction, but it is contemplated that, following closing of the Transaction, Licensee will begin using the name "St. Anthony's Medical Center – Affiliated with Mercy" as an assumed name.

The proposed Transaction is expected to close as soon as practicable after receipt of all required regulatory approvals, which is expected to occur during the second calendar quarter of 2017. Because of the projected closing date, we are requesting an expedited review and appreciate your consideration in advance. Additional information about the Transaction may be obtained from the following individuals:

For Licensee

For Mercy

**Joseph Catanzaro
(314) 525-1215**

**Steven Bollin
(314)-251-1906**

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

The Transaction will not result in any changes in personnel or duties that relate to the licensed program.

3. Describe any changes in the location, facilities, radiation safety program, use, possession, waste management, or other procedures that relate to the licensed program.

The Transaction will not result in any changes in the location, facilities, radiation safety program, use, possession, waste management, or other procedures that relate to the licensed program.

4. Describe the status of the licensee's facilities, equipment, and radiation safety program, including any known contamination and whether decontamination will occur prior to transfer. Include the status of calibrations, leak tests, area surveys, wipe tests, training, quality control, and related records.

Licensee is current and up-to-date on all calibrations, leak tests, area surveys, wipe tests and training. The summary of Licensee's Radiation Safety Program, attached hereto as Exhibit A, describes applicable committees and programs. There is presently no known contamination. In connection with the Transaction, there will be no alteration to the surveillance program and the surveillance program will remain unchanged. The surveillance program activities and records will remain current.

5. If current decommissioning funding plans (DFP) will be changed as a result of the transfer, the revised DFP should be submitted. If other financial assurance documents will be changed as a result of the transfer, confirm that all financial assurance instruments associated with the license will be held in the transferee's name before the license is transferred, and as

required by 10 CFR 30.35(f), the licensee must, within 30 days, submit financial instruments reflecting such changes.

There will be no changes to decommissioning funding as Licensee does not have any decommissioning funding plans. There will be no changes to financial assurance documents as Licensee does not meet the threshold to be required to post financial assurance.

6. 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.

After the Transaction, Licensee will continue to own, control and maintain all records.

7. Confirm that both transferor and transferee agree to transferring control of the licensed material and activity, and the conditions of transfer, and that the transferee has been made aware of any open inspection items and its responsibility for possible resulting enforcement actions.

Control of licensed material will remain with Licensee. Mercy has been made aware that there are currently no open inspection items and of potential responsibility for future enforcement actions.

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

Following the closing of the Transaction, Mercy will abide by, and Licensee will continue to abide by, applicable constraints, conditions, requirements, representations and commitments of the NRC licensed program.

9. The transferee, in the case of fuel cycle facilities, shall provide documentation showing that it is financially qualified to conduct normal operations. The information can be in the form of income statements and balance sheet forecasts.

Not applicable because Licensee does not own a fuel cycle facility.

Based on the above noted information, Licensee respectfully requests NRC's written consent to the Transaction and is asking that the NRC provide an expedited review to accommodate the projected closing date for the Transaction. If any further information is required to obtain NRC's consent, Licensee and Mercy will be happy to provide that information. If you have any questions please contact the undersigned. Thank you for your prompt attention to this matter.

Very truly yours,

St. Anthony's Medical Center

By: 

Joseph Catanzaro
Senior Vice President

Mercy Health East Communities

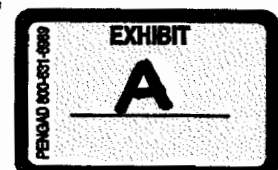
By: 

Steven Bollin
Regional Vice President

Radiation Safety Program:

- Regulatory Committee – meets bi-weekly with representation from:
 1. EVS
 2. Security
 3. Building Services
 4. ED
 5. OR
 6. IR/Cath Lab
 7. Radiology
 8. Radiation Oncology
 9. EPIC/I.S.
- Radiation Safety Committee – meets quarterly with representation from:
 1. Building Services
 2. Nursing
 3. Senior Leadership
 4. Physician (Chair)
 5. Physicist (Tim Keys)
 6. Radiation Oncology
 7. Radiology
 8. Pharmacy
 9. Security
- Lead (Pb) Apron Program – meets annually
 1. X-ray
 2. CT
 3. Radiation Oncology
 4. OR
 5. IR/Cath Lab
 6. EP Lab
 7. Endoscopy
 8. Urgent Care
 9. Plaza (Diagnostic & Breast Center)
- Dosimetry Program (Landauer)
 1. Radiation badges
 2. Low Radiation Dose Program - Computer Tomography (CT)
- There is no known contamination within the facility.
- Please see the attachment for survey instruments
- Leak testing, area surveys, quality control (annual physics report) for each area, wipe tests can found in the quarterly summary attached
- Training is done through Healthstream (annually – 2nd quarter) as well as in-services during department staff meetings.
- Other related records include: Dosimetry Program through Landauer.

All radiation safety related documentation can be found on the G:Drive under “Radiation Safety”
2/28/2017



Saint Anthony's Medical Center
Survey Instruments

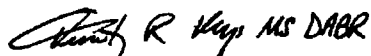
Department	Instrument Make	Instrument Model	Serial Number	Detector Type	Inspection Month	Last Inspection
Radiation Oncolo	Victoreen	451B-DE-SI-RYR	2407	Ion Chamber	January	1/11/2017
Radiation Oncology	Ludlum	14C	170458	44-7 & Internal GM	December	1/11/2017
Radiation Oncolo	Arrow-Tech	138	115240	Ion Chamber	March	3/9/2016
Radiation Oncolo	Arrow-Tech	138	115241	Ion Chamber	March	3/9/2016
Radiation Oncolo	Arrow-Tech	138	115242	Ion Chamber	March	3/9/2016
Radiation Oncolo	Arrow-Tech	138	115243	Ion Chamber	March	3/9/2016
Radiation Oncolo	Arrow-Tech	138	115244	Ion Chamber	March	3/9/2016
Radiation Oncolo	Arrow-Tech	138	115245	Ion Chamber	March	3/9/2016
Radiation Oncolo	Arrow-Tech	138	115246	Ion Chamber	March	3/9/2016
Radiation Oncolo	Arrow-Tech	138	115247	Ion Chamber	March	3/9/2016
Radiation Oncolo	Victoreen	Primalert 35	2996017	Energy Comp G.M.	April	4/25/2016
Emergency Room	Ludlum	26-1	PF006301	Pancake G.M.	April	4/25/2016
Radiation Oncolo	Ludlum	14C	236751	44-9 PR249570 and Int	May	5/6/2016
Heart Specialty Assoc - South County	Ludlum	14C	159412	44-7 PR163888	May	5/12/2016
Hear Specialty Assoc. Kirkwood	Ludlum	14C	173522	44-7 PR179656	May	5/13/2016
Nuclear Medicine	Victoreen	290	2299	493-50 #5165	July	7/8/2016
Nuclear Medicine	Ludlum	177	145848	44-9 PR150407	July	7/8/2016
Nuclear Medicine	Ludlum	14C	213015	44-7 PR151319	July	7/22/2016
PET	Biodex	14C	137480	44-9 PR141161	September	9/2/2016
Radiation Oncology I131	Ludlum	3	174982	44-7 PR180476	September	9/21/2016
Radiation Oncology	Ludlum	14C	297549	Int. G.M. & PR321250	October	10/18/2016
Radiation Oncology	Ludlum	14C	155399	44-7 PR50286	November	11/9/2016

10CFR Part 20 - Standards for Protection Against Radiation

#	Code	Description	Yes	No	N/A
1	20.1201	Annual limits for all radiation workers less than 0.05 SV (5rem)TEDE 0.5 SV (50 rem) Organ dose 0.15 SV (15 rem) Eye dose 0.5SV (50 rem) Skin Dose NVLAP approved	x		
2	20.1201(d), 20.2104	Occupational dose for new employees			x
3	20.1206	Any planned special exposures			x
4	20.1208	Any exposed pregnant women If yes, fetal exposure less than 5 mSV (film badge review) Employee formally declare pregnancy			x x x
5	20.1301	Dose level in any unrestricted areas <0.02mSV/hr and less than 1 mSV/year (2 mRem/hr and 100 mRem/yr)	x		
6	20.1302	Surveys available demonstrating compliance (measurement and/or calculation showing less than 0.02 mSv in one hour and less than 0.50 mSv/yr to an individual) Dates reviewed (spot check): 11/10/2017 1/31/2017	x		
7	License 20.1502	Dosimetry badges available, frequency: NRC MONTHLY Other Ring, Chest Monitoring for individuals entering high radiation areas (1 mSV/hr or 100 mRem/hr at 30 cm from the source) Comment: Dosimetry badge worn chest high or at collar. Ring badge worn. All employees below ALARA Level I Last Report: In binder, myHDR also available Signed off by RSO	x		x x
8	20.1801,20.18	All radioactive material recorded and under constant surveillance Comment: Keypad	x		
9	20.1902	All rooms with radioactive materials posted with a "radioactive materials signs" All room with exposure rates >0.02 mSv/hr (2mrem/hr) posted	x		
10	20.1906(b),(c)	All radioactive material external surfaces are to be monitored for contamination and radiation level within 3 hours or on the next working day. Dates reviewed (spot check): 11/10/2017 1/31/2017 Comment: Efficiency of well counter measured 1/31/2017 for Cs-137 27%	x		
11	20.1906(e)	Procedures for opening are available Comment:	x		
12	20.2001	Waste materials disposed by transfer to an authorized recipient: manufacturer transfer to authorized waste disposal to effluents	x		x x
13	35.92	by decay - 10 half-lives, at background Comment: F-18 primarily	x		
14	20.2102(b)	Records retained for 3 years Comment:	TBD		
15	20.2201	Reports of stolen, lost or missing sources or other incidents on file			x

41	35.70(a)	Surveyed at the end of each day of use areas of prep and administration Comment: Always record EOD, following last administration. Survey Dates Reviewed (spot check): 11/10/2017 1/31/2017 *inquire re: field or GM check Weekly Wipe Dates Reviewed (spot check): 11/10/2017 1/31/2017	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
42	35.75	Compliance with release criteria of less than 5mSv (TEDE) exposure to any individual from patients released post administration of radiopharmaceuticals or permanent implants.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
43	35.75 (b)	Instructions, including written instructions, given to released individuals per guidelines of Reg Guide 8.39. Breast feeding individuals provided with guidance and information to reduce dose to breast feeding infants or children per Reg. Guide 8.39	TBD	<input type="checkbox"/>	<input type="checkbox"/>
44	35.75 (c)	Records maintained for 3 years -- basis for release	TBD	<input type="checkbox"/>	<input type="checkbox"/>
45	35.92(a)	Decay in Storage performed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
46	35.92(a)(1)	Survey prior to disposal	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
47	35.92(a)(2)	Records for 3 years Comment:	TBD	<input type="checkbox"/>	<input type="checkbox"/>
48	35.204	<0.15 µCi of Mo-99 per mCi of Tc-99m	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
49	35.31	Safety instruction provided to personnel caring for patients who can not be released under 35.75	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Subpart L – Records					
50	35.2024	Record of Radiation Safety Program	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
51	35.2026	Record of Radiation Safety Program Changes	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
52	35.2041	Records for procedures requiring written directive	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
53	35.206	Records of Calibrations of Dose Calibrators	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
54	35.2061	Records of Survey Instrument Calibrations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
55	35.2063	Records of doses of unsealed byproduct material	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
56	35.2067	Records of leak tests of sealed sources	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
57	35.207	Records of surveys of ambient exposure rate	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
58	35.2075	Records of release of patients containing unsealed byproduct material	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
59	35.2092	Records of Decay in Storage	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
60	35.231	Records of Safety instruction to those caring for patients not released under 35.310, 35.410, 35.610	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
61	Part 19	Location of License, operating instructions, etc. posted	TBD	<input type="checkbox"/>	<input type="checkbox"/>
62	EPA 40CFR6	Clean Air Act Emissions evaluated annually Comment: None.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
63	General	Records of Annual Safety instruction to Radiation Workers. Hewet Iskandar (314-974-0286), Erin Cejka Comment: DOT Hazmat completed March 2014. DUE Mar 2017	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
64	General	Annual Safety instruction to: Security, Housekeeping, Maintenance Comment: Verify Documentation Same as hospital	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
65	General	Procedure manual annually reviewed by RSO Comment: Continue to Intercompare hospital/PET programs.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Physicist Reviewer:



Timothy R. Keys, MS, DABR
Diagnostic Medical Physicist

Reviewed by:

James Monroe PhD
Radiation Safety Officer

POSTING NOTICE TO EMPLOYEES

TO: All Nuclear Medicine Department personnel and all other interested personnel

SUBJECT: Posting Requirements

In accordance with 10 CFR 19.11(d), this notice is to inform you that documents listed below may be found and examined in the following area(s):

1. Nuclear Regulatory Commission (NRC) License, license conditions, and license amendments.

a. Office of RSO: James Monroe, PhD

SAMC Office: 314-525-4064

Dept of Radiation Oncology: 314-525-1688

2. Code of Federal Regulations (CFR) Title 10, Parts 19, 20, 31, and 35.

a. Office of RSO: James Monroe, PhD

b. available by Internet

<http://www.nrc.gov/reading-rm/doc-collections/cfr/>

3. NRC Form 3

Notice to Employees

rev: August 2012

a. Nuclear Medicine Department

b. Cardiovascular Services

c. Radiation Oncology

d. PET Imaging

4. Safe Operating Procedures that are applicable to activities conducted under our NRC License.

a. Nuclear Medicine Department

b. Cardiovascular Services

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1 From
 Date: 3/15/17
 Sender's Name: JOC CATANZARO Phone: 314 525-1000
 Company: ST ANTHONYS MED CENTER
 Address: 10010 KENNERLY RD
 City: SAINT LOUIS State: MO ZIP: 63128-2106

2 Your Internal Billing Reference

3 To
 Recipient's Name: MATERIALS LICENSING BOARD
 Company: US NUCLEAR REGULATORY COMMISSION PAVILION
 Address: 2443 WARRAVILLE ROAD
 Address: SUITE 210
 City: LISLE State: IL ZIP: 60532

4 Express Package Service *To most locations. NOTE: Service order has changed. Please select carefully. Packages up to 150 lbs. For packages over 150 lbs., use the FedEx Express Freight US Airbill.

Next Business Day
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 FedEx Priority Overnight
 FedEx Standard Overnight

2 or 3 Business Days
 FedEx 2Day A.M.
 FedEx 2Day
 FedEx Express Saver

5 Packaging *Declared value limit \$20K

FedEx Envelope* FedEx Pak* FedEx Box FedEx Tube Other

6 Special Handling and Delivery Signature Options

SATURDAY Delivery
 No Signature Required
 Direct Signature
 Indirect Signature

Does this shipment contain dangerous goods?

No Yes Yes Dry Ice Cargo Aircraft Only

7 Payment Bill to:

Sender Acct. No. in Section 1 (not to be used)
 Recipient Third Party Credit Card Cash/Check



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THU - 16 MAR AA STANDARD OVERNIGHT

XH ENLA

60532 IL-US ORD



FID 350061 15MAR17 SUSA 546C4/7965/0CBA

RT 493 FZ

6 15:00 D 6027 03.16

