

May 19, 2017

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

Re: Request for Written Consent to Planned Direct Transfer of NRC Radioactive Materials License 24-32827-01MD

To Whom It May Concern

Global Isotopes, LLC d/b/a Zevacor Molecular ("Zevacor"), currently licensed under NRC Radioactive Materials License Number 24-32827-01MD, hereby requests that the Nuclear Regulatory Commission grant written consent for the direct transfer of control of this license. Attachment 1 provides the basis for this request. The parties to the planned transaction that is the basis for this request intend to close the transaction no later than August 3, 2017. Accordingly, we respectfully request that the Nuclear Regulatory Commission, Region III perform a prompt review of this request so that the transaction can close in a timely manner.

Please contact Jill Wilson at (201) 697-0076, Frank Plastini at (518) 357-8645 (office) or (518) 313-2369 (cell), or via email to regulatoryaffairs@zevacor.com with any questions regarding this issue. Sincerely,

Timothy D. Stone, Jr. President & CEO

Illinois Health & Science

Patrick Phelps President & CEO Sofie Network, Inc.

Enclosure: Attachment 1, Application for Consent to License Transfer

Attachment 2, Resume for Mr. Frank Plastini



Attachment 1

Application for Consent to License Transfer

Global Isotopes LLC d/b/a Zevacor Molecular License Number 24-32827-01MD



This information is submitted consistent with U.S. Nuclear Regulatory Commission ("NRC") guidance in NUREG-1556, Vol. 15, Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses, at Section 5.1 through 5.6.

1. DESCRIPTION OF TRANSACTION

Global Isotopes, LLC d/b/a Zevacor Molecular ("Zevacor") develops, manufactures, and distributes radiopharmaceutical products and supporting services. The Nuclear Regulatory Commission, Region III has licensed activities at Zevacor's Springfield, Missouri facility under NRC Radioactive Materials License Number 24-32827-01MD (the "License").

The pending change of ownership will occur as a result of an asset purchase agreement whereby Global Isotopes LLC is selling its assets to Sofie Network, Inc. Prior to the transaction, Global Isotopes, LLC owns and operates the facility in Springfield, Missouri associated with License Number 24-32827-01MD. Once the transaction is complete, Sofie Network, Inc. will become the new owner and license holder of the facility. The transaction is scheduled to take place no later than August 3, 2017.

2. CHANGES OF PERSONNEL

All personnel engaged in activities licensed by the Nuclear Regulatory Commission, Region III at the Springfield, Missouri facility will remain at the facility and become employees of Sofie Network, Inc. There will be no new individuals having control over licensed activities at the Springfield, Missouri facility (i.e., authorized users or authorized nuclear pharmacists) as a result of the planned transaction. The Site Radiation Safety Officer will remain Rachel Ziegler. There will be no change in corporate personnel having control of licensed facilities; however, an additional corporate management position of Director of Radiation Compliance and Environmental Health & Safety has been added to the organization, reporting to Ms. Jill Wilson, the Interim Head of QA/RA/EHS. Ms. Wilson has assumed the role formerly held by Todd Hockemeyer. The Director of Radiation Compliance and Environmental Health & Safety is Mr. Frank Plastini. Please address future correspondence regarding this license to Mr. Plastini's attention at 21000 Atlantic Blvd., Suite 730, Dulles, VA 20166; or via email to regulatoryaffairs@zevacor.com.

3. CHANGES OF LOCATION, EQUIPMENT & PROCEDURES

There will be no changes in the organization, location, facility, equipment, or procedures associated with the License and licensed activity as a result of the planned transaction. There will be no changes in the use, possession, location or storage of the radioactive materials resulting from the planned transaction.



4. SURVEILLANCE RECORDS

To the extent such records are required to be maintained under the Licenses, the planned transaction will have no effect on the surveillance records. All licensed activities and related records are current and will continue on an ongoing basis without interruption as required under the Licenses. Such records will continue to be maintained in their existing state and in accordance with applicable requirements.

5. DECOMMISSIONING AND RELATED RECORDS TRANSFERS

Decommissioning of the Springfield, Missouri facility is not planned at this time. It is the intent of Sofie Network, Inc. to continue to operate this facility for the foreseeable future following the change of control.

Contamination and ambient radiation levels at the Springfield, Missouri facility are consistent with those expected at operating facilities that produce and distribute the types and quantities of radioactive materials that are handled at this site. Contamination and ambient radiation levels are in compliance with the regulations and License requirements. Sofie Network, Inc. is knowledgeable of the extent and levels of contamination at the Springfield, Missouri facility and applicable decommissioning requirements, and agrees to assume full liability for the decontamination of the facility.

As there are no changes to the facility, equipment, or storage location of records as a result of the planned transaction, required records related to contamination and decommissioning will continue to remain available at the current location of use.

6. TRANSFEREE'S COMMITMENT TO ABIDE BY THE TRANSFEROR'S COMMITMENTS

Following the proposed transaction, Sofie Network, Inc. agrees to abide by all constraints, license conditions, requirements, representations and commitments identified in and attributed to the existing License, including any decommissioning and decommissioning funding obligations. Sofie Network, Inc. agrees to accept full responsibility for any open inspection items and resulting enforcement actions.



Attachment 2

RESUME FOR MR. FRANK PLASTINI

Frank L. Plastini

Objective

To lead a dynamic, proactive team of Environmental, Health & Safety professionals that can be responsive to our customers needs.

Experience

3/2017-Present Zevacor Pharma Albany, NY

Director Radiation Compliance & EHS/CRSO

- Managed the Radiation Compliance Program for 14 Nuclear Pharmacies, including state RAM Licenses, NYS DEC Effluent Permit. Maintain compliance with OSHA Standards and Company Polices. Additional responsibilities include maintaining our RAM license for our Research and Development facility in Somerset, NJ.
- Develop and present training classes for Hazard Communication, Blood-borne Pathogens,
 LOTO, Radiation & Chemical Emergency Response and Accident & Incident investigations.
- Provide Auditing of Nuclear Pharmacies to review compliance with ALARA principles,
 adherence to license conditions and regulations as well as GMP and FDA requirements.
- Updated our Radiation Safety Manual and SOPs.
- Regulatory Interface during State and NRC Radiation inspections.

3/2006-3/2017 Siemens Molecular Imaging Albany, NY

EHS Specialist/RSO

- Managed the EHS Program for 15 Nuclear Pharmacies, including state RAM Licenses, NYS
 DEC Effluent Permit, DOT Transportation Permits. Maintain compliance with OSHA Standards and Company Polices.
- Develop and present training classes for Hazard Communication, Blood-borne Pathogens,
 LOTO, Radiation & Chemical Emergency Response and Accident & Incident investigations.
- Provide Auditing of Nuclear Pharmacies to review compliance with ALARA principles,
 adherence to license conditions and regulations as well as GMP and FDA requirements.
- Provide PM assistance during facility renovations to ensure our facilities maintain compliance with Federal and State Building Codes as well as NFPA and FM guidelines.
- Developed waste program improvements to reduce hazardous waste costs by 70%.

8/2001-3/2006 GE Global Research Center Niskayuna, NY

Radiation Safety Manager/RSO

Managed the Research Center's Broad Scope RAM License to include ordering of isotopes,
 compliance with NYS regulations and our broad scope license, maintained our film badge

- database, x-ray producing equipment inventory & registration, and RAM survey reports. Radiatic Safety Officer for the facility.
- Developed and assisted with the renovation and building of a new Hot Lab for development of PET imaging agents. Ensure that the new facility complies with the New York State Building Code, and NFPA Life Safety Code.
- Developed and implemented training & compliance programs for Radiation, Chemical & Biological Safety, as well as emergency response team training.
- Provided Regulatory Agency interaction during routine inspections by the DEC, DOL, and DEA. Maintained the facilities DEA, RAM and Asbestos License's.
- Radiation/Chemical Safety Officer for our Emergency Response Team.
- Responsible for the management of three chemical stock rooms including MSDS creation & tracking and chemical inventory.
- Provided industrial hygiene monitoring services for our construction project to support their application to become the first GE sponsored construction project to successfully achieve VPP status.

10/1997-8/2001 Texas Instruments

Merrimack, NH

Health & Safety Engineer

- Provided emergency response services, chemical labeling, industrial hygiene monitoring, project management, occupational health & safety program development and implementation, contractor supervision for 4" & 6 " M-Fab semiconductor facility.
- Radiation Safety Officer for our facility to include surveys, badge exchange, training of staff and data analysis.
- Managed a variety of Environmental Remediation Projects, including surveys, preparation of budgets, as well as plans and specifications.
- Assisted with the management of our contract workforce during the design and construction of a new 15,000sf class 100 clean room.
- Coordinated and managed our medical services contractor. Including accident investigations, preparation of paperwork, OSHA log and injury/illness statistics.
 Additionally, coordination with Human Resources on workers compensation issues and return to work programs.

7/1996-10/1997 ET Environmental Consultants Andover, MA

Project Manager

- Developed a comprehensive Health and Safety Plan for a 16 acre hazardous waste site undergoing remediation. The project included training numerous subcontractors, scheduling waste shipments and maintaining the project budget.
- Provided training for all subcontractors performing work at our various projects.

4/1993-7/1996

Clean Harbors

South Boston, MA

EHS Engineer

- Maintained, coordinated and scheduled all the training, medical surveillance and accident records for the largest field service division of Clean Harbors.
- Served as the incident commander/sso for our emergency response projects.
- Conducted OSHA compliance air sampling, data analysis and report documentation for field work performed at various locations.
- Managed several remediation projects involving decontamination of radiological laboratories involving Tritium, & Cobalt.

11/1990-4/1993

M/A-COM

Burlington, MA

Staff EHS Engineer

- Provided emergency response services, auditing of laboratories, industrial hygiene monitoring, project management, occupational health & safety program development and implementation, contractor supervision for the Burlington Semiconductor Division of M/A-COM.
- Assisted the Facility Manager with training his work force on such topics as Hazcom, Electrical Safety, Chemical Safety & PPE programs to name a few.
- Coordinated accident investigations and workers compensation issues with our Medical and Human Resources Departments.
- Radiation Safety Officer for our Tritium and Cobalt 60 laboratory

6/1988–11/1990Balsam Environmental Consultants

Salem, NH

Field Engineer

- Team Leader for asbestos abatement services.
- Provided design services for renovations and upgrades on exhaust systems.
- Provided training to our in-house staff of engineers and field personnel.

Education

M.S., Industrial Hygiene, University of Massachusetts, Amherst, MA

B.S. Biology/Chemistry, State University of New York, Albany, NY

Specialized Training

ORAU Radiation Safety Officer Training,

ABSA Biosafety Officer Training,

ATMI Toxic Gas Control Systems Training,

Asbestos Building Inspector, USEPA,

40hr HAZWOPER, OSHA

Albany Medical College, "Handling Laboratory Animals"

References Available upon request



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