



June 16, 2017

Q-4

By Federal Express and Electronic Mail

Janice Nguyen, Ph.D.
Senior Health Physicist
U.S. Nuclear Regulatory Commission ("NRC")
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406

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Dear Dr. Nguyen:

We thank Ms. Houseman and you for the discussion you had on May 15, 2017 with the staff of Sibley Memorial Hospital ("Sibley") and Vadim Schick, The Johns Hopkins Health System Corporation ("JHHSC") counsel. We understand that you have determined that the affiliation of Sibley with JHHSC in 2010 constitutes an "indirect transfer of control" from Sibley to JHHSC with respect to Sibley's Material License for Nuclear Material ("License"). This letter confirms our acknowledgement of this determination. Per to your advice and request, we are sending you the following additional information with respect to Sibley's letter dated April 14, 2017 (the "Original Letter"):

1. Regarding paragraph 7 of the Original Letter, by the signatures below, both Sibley, as the transferor, and JHHSC, as transferee, acknowledge the NRC's determination that Sibley's affiliation with JHHSC in 2010 constituted an indirect transfer of control with respect to the License. Accordingly, Sibley and JHHSC confirm that both transferor and transferee agree to transferring control of the License and the conditions of transfer (as provided in Section 2 below) and that the transferee has been made aware of any open inspection items and its responsibility for possible resulting enforcement actions.
2. Regarding paragraph 8 of the Original Letter, by the signatures below, the transferee, JHHSC, confirms that the transferee will abide by all constraints, conditions, requirements, representations, and commitments of the transferor, Sibley, to the extent such constraints, conditions, requirements, representations and commitments are relevant to JHHSC as the sole corporate member of Sibley. For purposes of clarity, as stated during our conversation on May 15, 2017, the NRC acknowledges that the transfer of membership from Sibley to JHHSC in 2010 was a corporate transaction which did not substantially affect Sibley's operations under the License.

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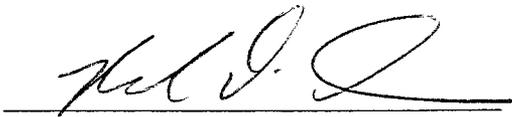
Per your request, enclosed are copies of the organizational charts in place before and after Sibley became affiliated with JHHSC.

We appreciate the time you have dedicated to this issue. Please do not hesitate to contact Vadim Schick, Senior Counsel for JHHSC at [REDACTED] or at [REDACTED] if you have any additional questions about the information provided in this letter.

Sincerely,



Ronald R. Peterson
President
The Johns Hopkins Health System Corporation



Richard O. Davis, Ph.D.
President
Sibley Memorial Hospital

cc: Dennis Reed
Vadim Schick, Esq.

Enclosures: Exhibit A, Organizational Chart for Sibley Memorial Hospital
(before the affiliation with JHHSC)
Exhibit B, Organizational Chart for Sibley Memorial Hospital
(after the affiliation with JHHSC)

Richard O. Davis, Ph.D.
President & CEO

Office of the President & CEO
5255 Loughboro Road, N.W.
Washington, D.C. 20016-2695
[REDACTED] Telephone
202-537-4683 Fax
[REDACTED]



April 14, 2017

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By Federal Express and Electronic Mail

Janice Nguyen, Ph.D.
Senior Health Physicist
U.S. Nuclear Regulatory Commission ("NRC")
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406

Dear Dr. Nguyen:

Per your conversation with the staff of Sibley Memorial Hospital ("Sibley") and our counsel from The Johns Hopkins Health System Corporation ("JHHSC"), we are sending you this letter to describe minimal changes between Sibley and JHHSC, and how these changes affect the radiology program at Sibley licensed by the NRC ("Program"). As you will see from this letter, there are minimal changes to the Program and the control of the license remains with the management team here at Sibley. Per your conversation with JHHSC counsel, this letter is structured based on the information requested in NRC's change of control application, NUREG-1556, Volume 15, Revision 1, Appendix E.

1. JHHSC became the sole corporate member of Sibley in the last quarter of 2010. (Per your request, we are attaching the general JHHSC organizational chart, current as of this year, as Exhibit A to this letter.) Following such affiliation in 2010, JHHSC retained some broad membership rights, including approval of capital budgets and strategic plans, appointment of the President of Sibley, and changes in the mission or corporate documents of the organization. However, the name, address, and contact information of Sibley has remained the same. Also, the affiliation with JHHSC did not affect the Program or its licensure in a substantive way, as discussed below.
2. The affiliation did not result in changes in personnel or duties that relate to the Program, including the training of new personnel. However, as referenced by JHHSC counsel, Mr. Jordie Keck, who had been a Sibley employee, became the employee of The Johns Hopkins University ("JHU"), a separate legal entity but an affiliate of JHHSC as

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of April 2012. His duties as the Senior Clinical Physicist at Sibley have not changed based on the change in the employment entities described above. Similarly, the Chairperson of Sibley's radiology department has traditionally been an employee of Groover, Christie & Merritt, P.C. ("GCM"), a local radiology practice which provided services at Sibley. GCM ceased providing those services at Sibley. Moreover, the new Chair of the Radiology Department at Sibley as of January 14, 2017, is a radiologist who had been associated with GCM through February 20, 2017, when he became the employee of JHU. However, the duties of the chairman with respect to the Program have not changed in a substantive way following these changes in employers noted above.

3. There were no changes in the location, facilities, equipment, radiation safety program, use, possession, waste management, or other procedures that relate to the Program.
4. As noted in the third item above, the location, facilities, equipment, and radiation safety program remain unchanged. As such, no transfer of said facilities or radioactive material has or is planned to occur.
5. There has not been any decommissioning of facilities in that no physical space or services related to the use of nuclear material have been removed from Sibley as a result of the affiliation. As a result, requirements regarding decommissioning funding plans (DFP) are in applicable.
6. Sibley previously sent a letter dated January 4, 2017 to the NRC to decommission one room within the department temporarily for construction and installation of our new PET scanner. However, this is unrelated to and did not involve a transfer of the control over our license. Sibley maintained control over taking the single room out of service and managing the construction and installation of the new PET scanner. The management team at Sibley continues to be in uninterrupted control of the activities under the license.
7. The seventh item, "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" is non-applicable; no transfer is taking place. The authority over the license remains with Sibley. The management team at Sibley continues to be in uninterrupted control of the activities under the license.
8. The eighth item, "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" is non-applicable; no transfer is taking place. The authority over the license remains with Sibley. The management team at Sibley continues to be in uninterrupted control of the activities under the license.

9. The ninth item, "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" is non-applicable; Sibley is not a fuel cycle facility.

We appreciate the time you have dedicated to this issue. Please let us know if you have any questions or comments about the information provided in this letter. We look forward to receiving your feedback.

Sincerely,



Richard O. Davis, Ph.D.
President
Sibley Memorial Hospital

cc: Dennis Reed
Vadim Schick, Esq.

Enclosure: Exhibit A, JHHSC CORPORATE ORGANIZATION CHART