

July 5, 2017

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

Re: Licensee: Zevacor Pharma, Inc. d/b/a Zevacor
License Number: 45-25221-05
Docket Number: 030-38113
Mail Control Number: 599647

AND

Licensee: Global Isotopes LLC d/b/a Zevacor Molecular
License Number: 24-32827-01MD
Docket Number: 030-38460
Mail Control Number: 599648

To Whom It May Concern:

In letters dated May 15, 2017 and May 19, 2017, Zevacor Pharma, Inc. ("Zevacor") requested that the NRC grant written consent to the change of control of the materials licenses listed above. Zevacor is currently licensed under license (1) above for Kansas City, Missouri, and separately under license (2) for Springfield, Missouri. These licenses authorize the production and distribution of various radioactive materials, which are primarily distributed to medical use licensees. Via email dated June 28, 2017, Mr. Bryan Parker of NRC Region III requested additional information regarding this request. Each item of information requested is quoted below in bold, followed by our response.

1. Please describe any planned change in members on the Board of Directors, etc.



The directors of Sofie Network, Inc. will be Patrick Phelps, Stanislav Berman, and Philipp Czernin. Patrick Phelps will be the new President and CEO of Zevacor Pharma.

2. Please describe any changes in the radiation safety program, use, possession, or waste management that relate to the licensed program.

There will be no changes in the radiation safety program, use, possession, or waste management that relate to the licensed program.

3. 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. Since decommissioning is not anticipated at this current time, please describe any contamination and confirm that the transferee is knowledgeable of the extent and levels of contamination and applicable decommissioning requirements.

Contamination and ambient radiation levels at the referenced facilities are consistent with those expected at operating facilities that produce and distribute the types and quantities of radioactive materials that are handled at these sites. Contamination and ambient radiation levels are in compliance with the regulations and license requirements. Calibrations, leak tests, area surveys, wipe tests, training, quality control, and related records are in compliance with the regulations and license requirements. By signature below, the transferee confirms knowledge of the extent and levels of contamination and applicable decommissioning requirements.

- 4. It is our understanding that operations will continue through the transfer process. If this understanding is correct, provide either an agreement to perform a survey confirming that the facility is free of contamination or an agreement by the transferee to accept the facility “as is” on the date of transfer.**

Your understanding is correct – operations will continue uninterrupted through the ownership transfer. By signature below, the transferee confirms our agreement to accept the facility “as is” on the date of transfer.

- 5. Please 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 their responsibility for possible resulting enforcement actions.**

By signature below, the transferor and transferee confirm agreement to transferring control of the licensed material and activity, and the conditions of transfer. By signature below, the transferee confirms awareness of any open inspection items and our responsibility for possible enforcement actions.

- 6. Please confirm that both transferor and 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.**

By signature below, the transferor and transferee confirm agreement to abide by all constraints, conditions, requirements, representations, and commitments of the transferor regarding the licensed program.

- 7. Timothy D. Stone, Jr. is currently listed as the President and Chief Executive Officer (CEO) of Zevacor Pharma, Inc. Please confirm that Mr. Stone is also the President and CEO of Illinois Health and Science. After the change of control, please indicate if Mr. Stone will remain President and CEO of Zevacor Pharma, Inc. If not, please indicate his replacement.**

Timothy D. Stone, Jr. is the President and CEO of Illinois Health and Science, as well as the outgoing President and CEO of Zevacor Pharma, Inc. Following the indirect transfer of control, Patrick Phelps will be the new President and CEO of Zevacor Pharma, Inc.

- 8. In order for the NRC to determine if this indirect change of control is to a “known entity,” please indicate if Sofie Network, Inc. possesses any NRC or Agreement State licenses. If so, please provide a copy.**

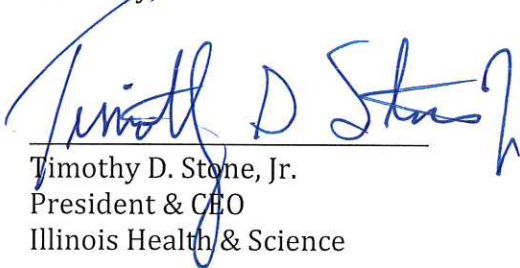
Sofie Network, Inc. is a newly formed entity and does not currently possess any NRC or Agreement State licenses in its name. Prior to the transaction, Sofie Network personnel have experience with a radioactive material program under California radioactive material license number 7762-19 issued to Momentum Biosciences (attached). Momentum Biosciences is a business incubator facility involved in research and development of preclinical PET imaging. Melissa Moore, Ph.D. is that license’s named Radiation Safety Officer, and Ms. Moore will remain with Sofie Network as Chief Technology Officer. As a result of the transaction, all existing Zevacor facility personnel will remain with the facilities; providing extensive experience operating the radioactive material program for these facilities. Furthermore, existing corporate program oversight personnel will remain in the roles they now hold for Zevacor, including Ms. Jill Wilson, the Interim Head of QA/RA/EHS; and Mr. Frank



Plastini, Director of Radiation Compliance and Environmental Health & Safety. As a result of the transaction, Sofie Network will manage a total of 18 radioactive material licenses at 15 different Zevacor facilities, plus 14 registered radiation machines and several affiliated environmental permits.

The parties to the planned transaction that is the basis for these consent requests intend to close the transaction no later than August 3, 2017. Accordingly, we appreciate the NRC's prompt review so that the transaction can close in a timely manner. Please contact James York at (571) 992-2969, 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: Momentum Biosciences Radioactive Material License