

December 22, 2017

VIA ELECTRONIC MAIL

Robert L. Gallagher
Health Physicist
U.S. NRC, Region I
2100 Renaissance Blvd.
King of Prussia, PA 19406

SUBJECT: Response to December 7, 2017 Request for Additional Information; Courtesy Notification of Corporate Consolidation, Conversion, and Rebranding, as Related to License Nos. 54-28275-02MD (Docket No. 03030793) and 54-28275-01 (Docket No. 03030788)

Dear Mr. Gallagher:

Nordion (Canada) Inc. ("Nordion") provides the following responses to your December 7, 2017 email requesting additional information about the November 7 corporate consolidation, conversion, and rebranding of Sotera Health and certain subsidiaries of Sotera Health.

RAI #1: Describe any changes in the organization due to the change from a limited liability company to a corporation (i.e. membership of the board of directors).

Nordion's Response: The only entity that converted on November 7, 2017, from a Delaware limited liability company to a Delaware corporation, was Sterigenics-Nordion Topco, LLC. That conversion was performed by operation of Delaware state law. There was no change to Sterigenics-Nordion Topco, LLC that is material to a direct or indirect change of control of Nordion because the sole member of the limited liability company became the sole stockholder of the Delaware corporation, and officers of the limited liability company became the corporation's board of directors.

RAI #2: Confirm that there are no changes in the reporting structure between the Radiation Safety Officer and Hospital management regarding radiation safety and activities authorized by your license.

Nordion's Response: Confirmed. As stated in Nordion's November 16, 2017 letter, none of the activities described above results in any changes to Nordion's name, organization, NRC-licensed activities, or personnel responsible for such licensed activities. The RAI suggests

447 March Road

Ottawa, ON Canada K2K 1X8

613-592-3400 | nordion.com



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A Sotera Health company

that Nordion's RSO reporting chain includes a U.S. Hospital. For clarity, Nordion does not operate a U.S. Hospital, and its RSO does not have a U.S. Hospital in its reporting chain.

Should you have any additional questions as you continue your review, please contact me at 1.613.592.3400 or Richard.Wassenaar@nordion.com.

Sincerely,

Richard Wassenaar

Senior Manager, Transportation Licensing & Gamma Radiation Safety
Nordion (Canada) Inc.

cc: A. Polonsky, Morgan Lewis & Bockius, LLP
M. Klaben, General Counsel, Sotera Health LLC