

## Tomczak, Tammy

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**From:** Pelke, Patricia  
**Sent:** Thursday, April 12, 2018 12:06 PM  
**To:** Tomczak, Tammy  
**Cc:** Frazier, Cassandra  
**Subject:** Fwd: RE: Letter Dated March 12 with attached Certificate of Assumed Name- CARO Community Hospital (NRC License No. 21-26770-01/Docket No. 030-34301)

Hi Tammy,

I think you're holding on to the incoming correspondence that required the email I sent out. This email doesn't include responses to the items - just licensees assessment. Please place the attached email into ADAMs and process the action in as an amendment. The reviewer will need to probe further to obtain the required info for NRC to determine whether or not ownership change occurred. Thanks - Patty

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**From:** "Stacey Roth" <Stacey@cch-mi.org>  
**Subject:** [External\_Sender] RE: Letter Dated March 12 with attached Certificate of Assumed Name- CARO Community Hospital (NRC License No. 21-26770-01/Docket No. 030-34301)  
**Date:** 12 April 2018 10:48  
**To:** "Pelke, Patricia" <Patricia.Pelke@nrc.gov>  
**Cc:** "Marc Augsburger" <marc@cch-mi.org>, "Heather McAllister" <hmcallister@cch-mi.org>

Good morning Patty,

The NRC guidance about material licenses was forwarded to our legal team for review. After reading through this guidance they have concluded that the proposed amendment regarding **name change only** is correct. The legal team's decision was based on the fact that the NRC license did not move. Our provider identification number did not change and neither did our tax identification number. However, the ownership did change and there was a legal name change but according to NUREG-1556, this doesn't meet criteria to file an application for change of ownership or transfer of control.

Please reference page B-2 of NUREG-1556, second paragraph, which states, "For example, the parent corporation of a wholly-owned licensee proposed to merge with another corporation. The licensee, a part-owner and operator of a facility, would, under the proposed merger, remain the holder of the license. Its personnel and operations would be unaffected. The parent corporation's indirect control of the license was eliminated (as opposed to transferred to another entity): the licensee indicated to the NRC that it foresaw no change in control. The licensee provided NRC with full documentation of the proposed changes. The Commission was therefore able to fully review the transactions and agreed that there was not change in control." This was the referenced paragraph in which our legal team based their decision on.

I appreciate your patience as I worked with our legal team to get guidance on this. If you should need any further information, please feel free to contact myself or our President and CEO, Marc Augsburger.

Respectfully,

STACEY R. ROTH, RT(N), CNMT, RSO  
Supervisor of Imaging Services  
stacey@cch-mi.org  
p 989.672.5097 f 989.672.5788  
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**From:** Pelke, Patricia [mailto:Patricia.Pelke@nrc.gov]  
**Sent:** Tuesday, March 20, 2018 2:39 PM  
**To:** Stacey Roth <Stacey@cch-mi.org>  
**Cc:** Tomczak, Tammy <Tammy.Tomczak@nrc.gov>  
**Subject:** Letter Dated March 12 with attached Certificate of Assumed Name- CARO Community Hospital (NRC License No. 21-26770-01/Docket No. 030-34301)

Good afternoon Stacey,  
Based on our conversation this afternoon, please clarify whether or not there was a change or transfer of control or ownership involved with the name change of your organization. Please refer the guidance included in this link to determine whether or not there was an ownership change <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v15/>

Refer to Appendix D for questions to determine whether or not a change of control or ownership has occurred and if "yes" please provide the information outlined in Appendix E.

If you have questions, please give me a call. Thank you for your prompt follow-up – Patty

*Patricia J. Pelke*  
*Chief, Materials Licensing Branch*  
*Division of Nuclear Materials Safety*  
*NRC Region III*  
*Office: 630-829-9868*  
*Cell: 630-453-7639*  
*Fax: 630-515-1259*

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