

From: [Elliott, Robin](#)
To: "Vicki Novick"
Cc: [Berkley, Daniel](#)
Subject: Request for Additional Information, License No. 47-18320-01, CN611765
Date: Wednesday, April 10, 2019 2:23:46 PM

License No.: 47-18320-01

Docket No: 030-14841

Control No: 611765

Licensee Name: Wetzel County Hospital

This refers to your request to amend your license dated March 28, 2019. In order to continue our review of your request, the following additional information is needed:

NUREG-1556, Volume 15, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Material Licenses," which can be found here:

<https://www.nrc.gov/docs/ML1618/ML16181A003.pdf>, provides guidance to licensees for requesting a Change of Control. Please provide answers to the following questions or indicate if they are not applicable:

1. Section 5.1 of NUREG 1556 Volume 15, Rev.1, Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses, provides guidance to licensees regarding information to be included in their request which describes the transaction.
 - a. Since this action involves an indirect transfer of control, the March 28, 2019, letter should have been signed by senior management of West Virginia University Hospital Association (WVUH) and Wetzel County Hospital (WCH). In your reply to this letter, please have correspondence signed by senior management of both entities, and please confirm that they abide by all statements and commitments made in the March 28, 2019 letter.
 - b. Please indicate if there were any planned changes in the organization, including but not limited to, transfer of stocks or assets and mergers, change in members on Wetzel County Hospital's Board of Directors, etc. that occurred as a result of the 2018 transfer of control.
 - c. Provide a pre- and post-transaction organizational chart showing the corporate structure of the license holder and its parent company. Include the reporting line to the Radiation Safety Officer.
 - d. Confirm that the transfer occurred on October 1, 2018.
2. Section 5.2 of NUREG 1556 Volume 15, Rev.1 Guidance about Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses provides guidance to licensees regarding changes in personnel.
 - a. Please describe any changes in personnel or duties that relate to the licensed program that occurred as a result of the 2018 transfer, and include any changes in the training program.
3. Section 5.3 of NUREG 1556 Volume 15, Rev.1 Guidance about Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses provides guidance to licensees regarding facilities, equipment and procedures.
 - a. Please describe any changes in the radiation safety program, use, possession, waste

management, or other procedures that relate to the licensed program that occurred as a result of the 2018 transfer.

4. Section 5.4 of NUREG 1556 Volume 15, Rev.1 Guidance about Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses provides guidance to licensees regarding surveillance records.
 - a. Please describe the status of the licensee's facilities, equipment, and radiation safety program, including any known contamination, at the time of the transfer, and indicate if any decontamination occurred prior to transfer. Please confirm that calibrations, leak tests, area surveys, wipe tests, training, quality control, and related records were up to date at the time of the transfer.
5. Section 5.5 of NUREG 1556 Volume 15, Rev.1 Guidance about Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses, provides guidance to licensees regarding decommissioning records.
 - a. Please confirm that all records concerning the safe and effective decommissioning of the facility have and will be maintained by the licensee and/or transferee, or transferred to the NRC, as appropriate. These records include documentation of surveys of ambient radiation levels and fixed and/or removable contamination, including methods and sensitivity.
 - b. Please confirm that there was no contamination at the time of the transfer, and that the transferee accepted the facility "as is" on the date of transfer
5. Section 5.6 of NUREG 1556 Volume 15, Rev.1 Guidance about Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses, provides guidance to licensees regarding licensee commitments.
 - a. Please confirm that both transferor and transferee agreed to transferring indirect control of the licensed material and activity, and the conditions of transfer, and that the transferee was made aware of any open inspection items and its responsibility for possible resulting enforcement actions.
 - b. If WVUH would choose to exercise any indirect control over WCH's radioactive material license, please confirm that the WVUH will abide by all constraints, conditions, requirements, representations, and commitments of the WCH or that WVUH will submit a complete description of the proposed licensed program.

Your reply must be an originally signed and dated letter. The letter may be scanned and submitted as a pdf document attached to an email; or it may be transmitted by facsimile to (610) 337-5269; or it may be sent by regular mail. In order for us to provide a prompt review of your request, please reply within 30 calendar days from the date of this e-mail.

Please respond by e-mail to acknowledge that you have received the e-mail request for additional information.

Regards,

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