



**CATS
RADIOIODINE**
TREATMENT CENTERS

May 24, 2019

US NRC, Region 3
2443 Warrenville Rd, Ste 210
Lisle, IL
Attn: Colleen Carol Casey,
Materials Licensing Branch

Re: additional information for Control Number: 611959

STATEMENT OF FACTS:

- A. Cats Radioiodine Treatment Centers, PC (CRITC), a Michigan S Corporation currently holds an NRC Materials Licensee; number: 21-26539-01 for the possession and use of iodine-131.
- B. Dan H. Marshall, DVM (Transferor) was formerly the sole owner & officer of CRITC.
- C. While CRITC has no formal board of directors Dan H. Marshall, DVM and Steven J. Bailey, DVM, DABVP (board certified feline specialist) have served as the de facto board of directors for more than 5 years. During that period, any and all changes in facility management, as well as dose and treatment changes have been under direction of both Steven J. Bailey DVM, DABVP, and Dan H. Marshall DVM.
- D. On October 31, 2018, CRITC was transferred to Steven J. Bailey, DVM, DABVP (Transferee). The transferor no longer has an equity interests but remains a consultant of CRITC.
- E. The Transferor and Transferee (Parties) did not properly obtain prior written consent from the NRC to the change of ownership as required by 10 CFR 30.34(b)(1) and 30.34(b). As such, until the transfer of ownership and control is complete, the Parties share licensee management responsibilities.

REQUEST TO TRANSFER CONTROL

We request of the NRC consent for a **Direct Transfer of Control** of the licensee, CRITC from Dan H. Marshall, DVM, transferor, to Steven J. Bailey, DVM, DABVP, transferee.

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Page 1

6650 Highland Road, Ste 116 • Waterford, MI 48327 • 248-666-5287
www.catsradioiodine.com • email: ccats@ccats.vet • fax: 206-333-1135

INFORMATION NEEDED BY NRC FOR TRANSFER OF CONTROL.

1. Changes to the organization:
 - a. All outstanding 1,000 shares of corporate stock for CRITC were transferred to the Transferee. The Transferee is now the sole owner, officer, and director of the board. The name of the licensee remains the same.
 - b. Other than ownership (control) of the license, this transaction does not result in any changes to the license, authorized materials users, or facilities. The radiation safety officer remains the same.
2. There are no changes in personnel, training programs, or authorized users.
 - a. The Transferee who will now exercise control has been an authorized materials user under this license for 15 years (Amendment #9) and has had extensive training regarding treating patients and handling license materials (I131).
 - b. The Transferee pledges to abide by all commitments and representations previously made to the NRC by the licensee under prior control. In short, the transferee agrees to abide to all terms of the license.
3. The locations, facilities, equipment, radiation safety program, use, possession, waste management, and other procedures relating to the license remain the same.
4. The status of the licensee's facilities remains unchanged. There have been no known contamination occurrences to be managed in conjunction with this license transfer. Equipment calibrations, surveys, wipe testing, and training are ongoing. Record keeping continues uninterrupted and documentation is ongoing.
 - a. The location of records has been changed to 6650 Highland Road, Ste 116, Waterford, MI 48327
5. There are no changes necessary for decommissioning funding plans. The Transferee is technically and financially capable and assumes liability for decommissioning.
6. All records regarding safe and effective decommissioning of the facility have been transferred to the Transferee.
7. Both Parties agree to transfer control of the licensed material and activity. Neither Party is aware of any open inspection items nor pending actions.
8. The Transferee agrees to abide by all constraints, conditions, requirements, representations, and commitments of the Transferor, and there are no proposed changes to the license program.
9. CRITC does not operate any fuel cycle facilities.

10. It is not expected that this transfer will have any effect on public health and safety, or on the security of licensed material.

Acknowledged and agreed,

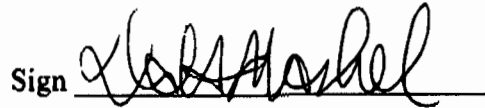
Date 5-23-2019

Sign 

Steven J. Bailey
Transferee
Sole owner & president of CRITC
6650 Highland Rd, Ste 116
Waterford, MI 48327

Acknowledged and agreed:

Date 5/23/19

Sign 

Dan H. Marshall
Transferor
Formerly: owner & president of CRITC
70 Gallup
Mount Clemens, MI 48043