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June 27, 2019

Via Email and Overnight Mail

U.S. Nuclear Regulatory Commission Office of the General Counsel Attn: Ian Irvin 2100 Renaissance Blvd., Suite 100 King of Prussia, PA 19406-2713 lan.Irvin@nrc.gov

RE: U.S. Nuclear Regulatory Commission ("NRC") Materials License 47-

31126-01 ("NRC License")

Dear Mr. Irvin:

The Summersville Regional Medical Center Commission ("SRMCC") currently operates 53 licensed hospital beds and 52 licensed skilled nursing beds in Summersville, West Virginia. The hospital/skilled nursing facility does business under the name of Summersville Regional Medical Center ("SRMC"). The West Virginia Health Care Cooperative, Inc. ("WVHCC") has agreed to assume operation of SRMC from Summersville Regional Medical Center Commission, and to lease the properties owned by the City of Summersville Building Commission, (the "Transaction") effective July 1, 2019.

In anticipation of the Transaction, a Transfer of Control Application dated March 18, 2019, was filed with the NRC seeking the necessary consent to transfer the NRC License to WVHCC. It is our understanding that this Transfer of Control Application remains under review, and that the formal review process may not be completed on or before July 1.

In conversations with the NRC, and based on NRC Regulatory Issue Summary ("RIS") 2014-08, Revision 1, Regulatory Requirements for Transfer of Control (Change of Ownership) of Specific Materials Licenses dated May 5, 2016, it is further our understanding that an expedited review process may be considered by the NRC if extenuating circumstances exist.

Such extenuating circumstances exist in the current circumstance. Without the ability of WVHCC to access and operate medical equipment made possible by the NRC License in question after July 1, hospital and skilled nursing patients will not receive necessary, and perhaps life-saving, medical testing. Accordingly, due to these extenuating circumstances, SRMCC and WVHCC jointly request an expedited review of the Transfer of Control Application, and the NRC's consent to said transfer, as required by 10 C.F.R. §§ 30.34 and 70.36. This expedited review and consent is requested to ensure the public health and safety of the citizens of Nicholas County, West Virginia, and the immediately surrounding area.

If you have any questions or concerns about this request, please contact me at your earliest convenience at (304) 340-1185.

Sincerely,

Rachel D. Ludwig

RDL/ncj