



Nuvance Health  
1351 Route 55, Suite 200  
LaGrangeville, NY 12540

June 19, 2019

U.S. NRC Region 1  
2100 Renaissance Blvd, Suite 100  
King of Prussia, PA 19406-2713

Re:

Licensee: Norwalk Hospital  
License Number: 06-06941-01  
Docket Number: 030-01267  
Mail Control Number: 611910

Licensee: Vassar Health Connecticut, Inc.  
License Number: 06-08020-02  
Docket Number: 030-01272  
Mail Control Number: 611719

Licensee: Danbury Hospital  
License Number: 06-08544-01  
Docket Number: 030-01274  
Mail Control Number: 611915

Licensee: New Milford Hospital  
License Number: 06-17892-01  
Docket Number: 030-13596  
Mail Control Number: 611918

Dear Ms. Lanzisera,

Please find our responses below to your deficiency letter dated May 23, 2019. There has been no change to the identity of the sole member of each of the hospitals and other affiliated provider organizations as a result of the affiliation.

Health Quest Systems, Inc. (Health Quest) and Western Connecticut Health Network, Inc. (WCHN) have affiliated through formation of a new common parent. This new common parent is a new NY based not-for-profit parent corporation, Nuvance Health (originally named NewCo in the April 1 and March 19 letters), which has become the new sole member of each of Health Quest and WCHN.

A Certificate of Amendment of the Certificate of Incorporation to change the name to Nuvance Health was filed and approved on June 18, 2019.

1. Since these actions involve an indirect transfer of control, the April 1, 2019, and March 19, 2019, letters should have been signed by senior management of Western Connecticut Health Network (WCHN), HealthQuest (HQ), and NewCo. In your reply to this request, please have correspondence signed by senior management of all entities, and please confirm that they abide by all statements and commitments made in the April 1, and March 19, 2019 letters.
2. Please indicate if there will be any changes in members on WCHN's or HQs Board of Directors as a result of the transfer of control.

**Response:**

Nuvance Health is the sole member and active parent of each of Health Quest and WCHN and the active grandparent of the Health Quest and WCHN subsidiaries and affiliates located in NY and CT. Health Quest will continue to be the sole member of Northern Dutchess Hospital, Putnam Hospital Center, Vassar Brothers Medical Center, Northern Dutchess Residential Care Facility, Health Quest Home Care, and Sharon Hospital. WCHN will continue to be the sole member of its two CT hospitals – The Danbury and New Milford Hospital and The Norwalk Hospital Association. Nuvance Health is governed by a newly appointed Board of Trustees comprised of eight (8) individuals nominated by Health Quest, eight (8) individuals nominated by WCHN, the CEO of Nuvance Health and the President of Nuvance Health both *ex officio*. The Board of Directors of Health Quest and WCHN mirror the Nuvance Health Board of Directors.

As the active parent/grandparent under New York law, Nuvance Health has the reserved power to approve the system-wide budget.

3. Please submit pre- and post- transaction organizational charts showing the corporate structure of the license holder and its parent companies.

**Response:** See attached

4. Please indicate if there will be any changes in the training program as a result of the transfer of control.

**Response:** No changes in the organizations location, facilities, equipment, radiation safety program, use, possession, or procedures with respect to licensed activities have been made as a result of this affiliation.

5. Please confirm that equipment calibrations for survey instrumentation, dose calibrators, well counters, electrometers, etc. will be up to date at the time of the transfer.

**Response:** There is no transfer of ownership contemplated as part of this affiliation. No changes in the organizations location, facilities, equipment, radiation safety program, use, possession, or procedures with respect to licensed activities have been made as a result of this affiliation.

6. Please confirm that the transferee will accept the facility "as is" on the date of transfer, including any contamination of facilities.

**Response:** There is no transferee involved in this transaction. The above-mentioned facilities will continue to comply with all regulations, constraints, conditions, requirements and commitments applicable to the license facility.

7. 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.

**Response:** No facility or equipment at the above-mentioned sites will be decommissioned, therefore there are no records to be transferred.

8. Please confirm that both transferor and transferee agree to transferring control of the licensed material and activity, and the conditions of transfer, and that the transferee has been made aware of any open inspection items and its responsibility for possible resulting enforcement actions.

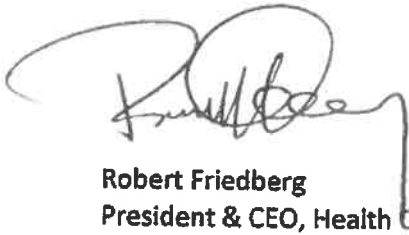
**Response:** There is no transferee involved in this transaction. The above-mentioned facilities will continue to comply with all regulations, constraints, conditions, requirements and commitments applicable to the license facility. There are no current open inspection items.

9. If NewCo would choose to exercise any indirect control over the above reference radioactive material licenses, please confirm that NewCo will abide by all constraints, conditions, requirements, representations, and commitments of WCHN and/or HQ or that NewCo will submit a complete description of the proposed licensed program.

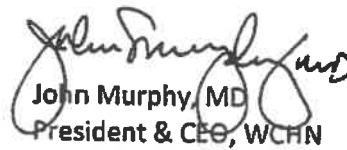
**Response:** Nuance Health will abide by all constraints, conditions, requirements and commitments of Sharon Hospital as they are related to licensed activities.

Additionally, leadership of Nuvance Health, Vassar Health Connecticut, Inc., Danbury Hospital, Norwalk Hospital and New Milford Hospital abide by all statements and commitments made in the April 1, and March 19, 2019 letters.

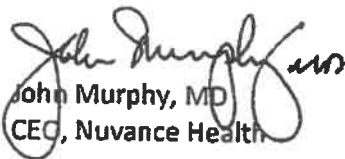
Sincerely,



Robert Friedberg  
President & CEO, Health Quest

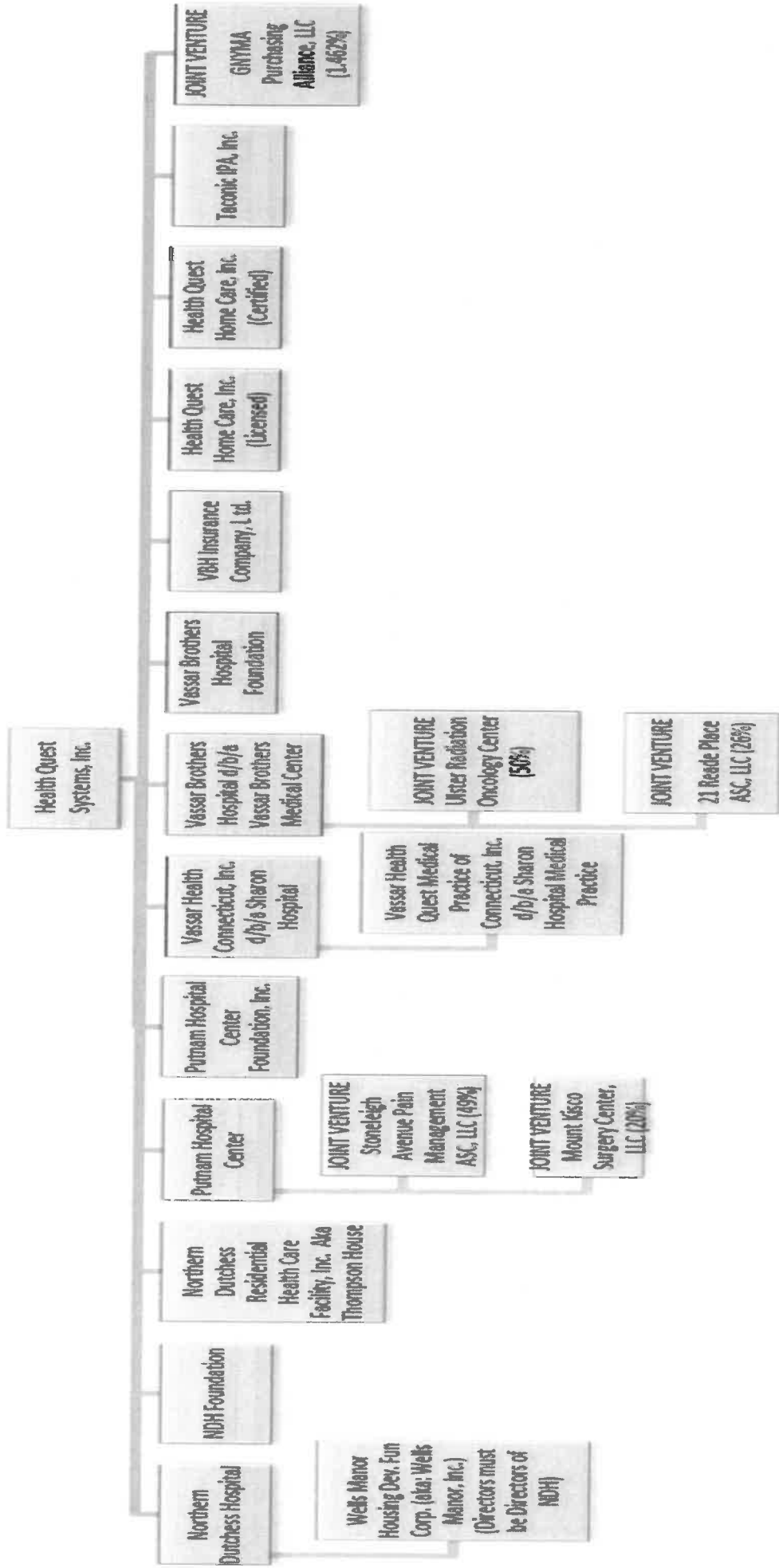


John Murphy, MD  
President & CEO, WCHN



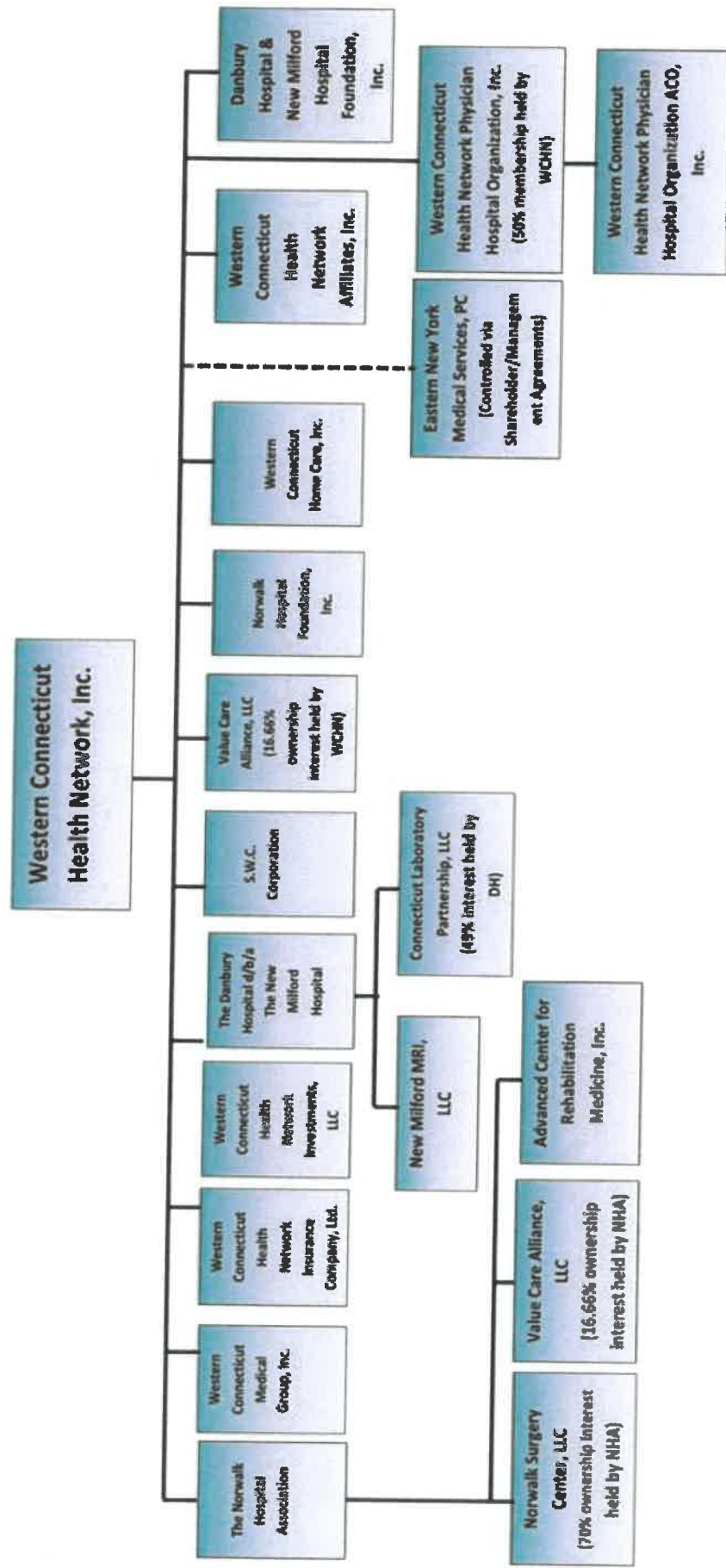
John Murphy, MD  
CEO, Nuvance Health

Health Quest Pre-Affiliation Organizational Chart



\*Stoneleigh Avenue Pain Management ASC, LLC is an active entity with NYS Department of State, however it is an inactive entity as the Joint Venture CON was withdrawn on 8/9/16.

WCHN Pre-Affiliation Organizational Chart



HQ-WCHN Health System Pre- and Post-Affiliation Organizational Chart

**Current State:**  
Separate Corporate Parents

**Future State:**  
Active Ultimate Parents

