



August 21, 2019

VIA EMAIL ([Robert.Gallagher@nrc.gov](mailto:Robert.Gallagher@nrc.gov))

U.S. NRC Region I  
Attn: Bob Gallagher  
2100 Renaissance Blvd., Suite 100  
King of Prussia, PA 19406-2713

Re: Reorganization of Trinity Health System In Connection with St. Francis Hospital, Inc. (Materials License # 07-16862-01)

Dear Mr. Gallagher:

In follow up to our letter, dated June 17, 2019, this letter serves as written notice of the reorganization of the Trinity Health system of which St. Francis Hospital, Inc. ("St. Francis") is a part. The reorganization occurred effective as of July 1, 2019 (the "Effective Date"). In connection therewith, as of the Effective Date, the sole member of St. Francis changed from Trinity Health Corporation ("Trinity Health") to a subsidiary of Trinity Health, Mercy Health System of Southeastern Pennsylvania, which, as of the Effective Date, changed its name to Trinity Health of the Mid-Atlantic Region ("Trinity Mid-Atlantic"). This constitutes a change of control transaction as to St. Francis.

Please see attached as Exhibit A St. Francis's responses to the Nuclear Regulatory Commission's questions with respect to a change of control transaction.

If you have any questions, please feel free to contact me.

Very truly yours,

ST. FRANCIS HOSPITAL, INC.

A handwritten signature in black ink, appearing to read "Daniel J. Sinnott".

Daniel J. Sinnott  
President and CEO

**EXHIBIT A**  
**RESPONSES TO NRC'S QUESTIONS**

1. Describe any planned changes in the organization, including but not limited to, transfer of stocks or assets and mergers, change in members on Board of Directors, etc. Provide the new licensee name, mailing address, and contact information, including phone numbers. Clearly identify when the amendment request is due to a name change only.

The reorganization of the Trinity Health system, which St. Francis Hospital, Inc. ("St. Francis" or "Licensee") is a part, occurred effective as of July 1, 2019 (the "Effective Date"). In connection therewith, as of the Effective Date, the sole member of St. Francis changed from Trinity Health Corporation ("Trinity Health") to a subsidiary of Trinity Health, Mercy Health System of Southeastern Pennsylvania, which, as of the Effective Date, changed its name to Trinity Health of the Mid-Atlantic Region ("Trinity Mid-Atlantic"). This constitutes a change of control transaction as to St. Francis.

The name, EIN, mailing address, and contact information of the Licensee did not change as result of the change of control transaction.

2. Describe any changes in personnel or duties that relate to the licensed program. Include training and experience for new personnel and any changes in the training program.

The personnel or duties that relate to the licensed program did not change as a result of the change of control transaction.

3. Describe any changes in the location, facilities, equipment, radiation safety program, use, possession, waste management, or other procedures that relate to the licensed program.

The location, facilities, equipment, radiation safety program, use, possession, waste management, or other procedures that relate to the licensed program did not change as a result of the change of control transaction.

4. Describe the status of the licensee's facilities, equipment, and radiation safety program, including any known contamination and whether decontamination will occur prior to transfer. Include the status of calibrations, leak tests, area surveys, wipe tests, training, quality control, and related records.

The status of the Licensee's facilities, equipment, and radiation safety program did not change as a result of the change of control transaction.

5. If current decommissioning funding plans (DFP) will be changed as a result of the transfer, the revised DFP should be submitted. If other financial assurance documents will be changed as a result of the transfer, confirm that all financial assurance instruments associated with the license will be held in the transferee's name before the license is transferred, and as required by 10 CFR 30.35(f), the licensee must, within 30 days, submit financial instruments reflecting such changes.

The decommissioning funding plans (DFP) did not change as a result of the change of control transaction. No financial assurance documents were changed as a result of the change of control transaction.

6. Confirm that all records concerning the safe and effective decommissioning of the facility will be transferred to the transferee or to NRC, as appropriate. These records include documentation of surveys of ambient radiation levels and fixed and/or removable contamination, including methods and sensitivity.

All records concerning the safe and effective decommissioning of the Licensee remain at the Licensee's licensed program.

7. 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.

The control of the licensed material and activity remains with the Licensee.

8. Confirm that the transferee will abide by all constraints, conditions, requirements, representations, and commitments of the transferor or that the transferee will submit a complete description of the proposed licensed program.

The Licensee will continue to abide by all constraints, conditions, requirements, representations, and commitments with respect to the licensed program.