



Mallinckrodt
Pharmaceuticals

March 4, 2020

Bryan Parker, Senior Health Physicist
Materials Licensing Branch
U.S. Nuclear Regulatory Commission, Region III
2443 Warrenville Road
Lisle, IL 60532

Re: Supplemental Information - Notification to NRC and Request for Approval to Change of Control of Materials License Number 24-17450-01 held by Mallinckrodt LLC

Dear Mr. Parker:

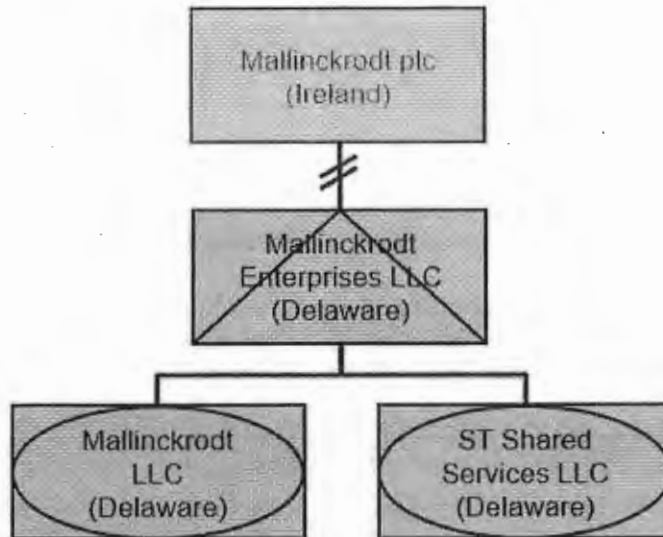
Pursuant to our telephone conversation on January 30, 2020, I provide supplemental information in support of the request to modify materials license 24-17450-01 as described in our November 22, 2019 correspondence. I summarize the three matters we spoke of as well as provide a response for your continued review of this proposed licensing action:

- 1. Has the formal intracompany reorganization, as described in the November 22, 2019 request, been completed, or has an anticipated transaction date been identified?**

Response: The intracompany reorganization is ongoing and there is no specific transaction date for this reorganization. Please find attached an executed Assignment Agreement specific to materials license 24-17450-01.

- 2. Is a "before and after" company organizational chart or diagram available to include with the pending licensing action?**

Response: A "before and after" organizational chart is not available relative to the current intracompany reorganization. However, ST Shared Services LLC is part of the Mallinckrodt Pharmaceuticals family of companies and is an affiliate of Mallinckrodt LLC. ST Shared Services LLC is being used for general Specialty Brands and Corporate contracting and other similar assets (i.e., licenses, permits, etc.). A truncated portion of our organizational chart is provided below:



3. **Has an agreement between Mallinckrodt LLC and ST Shared Services LLC been finalized and certified by both parties?**

Response: The Assignment Agreement (attached) is evidence that both Mallinckrodt LLC and ST Shared Services LLC are approving the assignment and transfer of responsibility.

Please contact me at (314) 654-7444 or scott.surovi@mnk.com if you have any questions regarding this matter.

Sincerely,



Scott J. Surovi
Radiation Safety Officer

Attachment: Assignment Agreement

cc: Cathi Ponciroli, Mallinckrodt

ASSIGNMENT AGREEMENT

THIS ASSIGNMENT AGREEMENT (the "Assignment Agreement") is dated as of the 3rd day of March 2020, by and between Mallinckrodt LLC ("Mallinckrodt") and ST Shared Services LLC ("ST SS LLC").

RECITALS:

WHEREAS, Mallinckrodt currently holds a Materials License Number 24-17450-01 issued by the Nuclear Regulatory Commission ("NRC") and dated January 24, 2018 (as amended from time to time, the "License");

WHEREAS, Mallinckrodt desires to transfer all of its rights and obligations under the License to ST SS LLC;

WHEREAS, by letter dated November 22, 2019, Mallinckrodt requested the NRC's consent to said change of control of the License; and

WHEREAS, Mallinckrodt and ST SS LLC are corporate affiliates and are both wholly-owned, indirect subsidiaries of Mallinckrodt plc.

AGREEMENT

NOW, THEREFORE, in consideration of the foregoing recitals and the agreements contained herein:

1. Mallinckrodt hereby agrees to transfer of all its rights, title and interest under the License to ST SS LLC and ST SS LLC hereby agrees to accept such transfer.
2. ST SS LLC agrees that ST SS LLC will assume all of the obligations of Mallinckrodt under the License, and hereby agrees to be bound by the terms and conditions thereof.
3. To the extent required under the terms of the License, this Assignment Agreement remains subject to NRC's consent to the change of control described herein. Accordingly, the effective date of the assignment and assumption contemplated in Sections 1 and 2 above shall be the date that such consent is obtained. This Assignment Agreement may be executed in one or more counterparts, each of which shall be deemed an original, but all of which together will constitute one and the same instrument.

IN WITNESS WHEREOF, the parties hereto have executed and delivered this Assignment Agreement as of the date first written above.

MALLINCKRODT LLC <i>Cathi Ponciroli</i> _____ Signature Cathi Ponciroli, Associate General Counsel	ST SHARED SERVICES LLC <i>Cathi Ponciroli</i> _____ Signature Cathi Ponciroli, Vice President & Assistant Secretary
---	--

Song, Taehoon

From: Surovi, Scott J <Scott.Surovi@mnk.com>
Sent: Wednesday, March 04, 2020 1:03 PM
To: Parker, Bryan
Cc: Ponciroli, Cathi M; Fitch, Rick M
Subject: [External_Sender] NRC Materials License #24-17450-01 - Response/Supplemental Information
Attachments: NRC #24-17450-01 Response to B. Parker (04MAR2020) - Attachment.pdf; NRC #24-17450-01 Response to B. Parker (04MAR2020).pdf

Bryan,

Attached please find a formal response to the matters we discussed during our recent telephone conversations.

Please contact me if you have questions or require further information. Thank you for your on-going assistance.

Scott

Scott J. Surovi | Radiation Safety Officer
Mallinckrodt Pharmaceuticals
675 McDonnell Boulevard | Hazelwood, MO 63042 | USA

T: 314.654.7444 | M: 314.267.9142 | F: 314.654.9183

scott.surovi@mnk.com | www.mallinckrodt.com

This information may be confidential and/or privileged. Use of this information by anyone other than the intended recipient is prohibited. If you receive this in error, please inform the sender and remove any record of this message.