

October 4, 1994

Primary Health Systems of Ohio  
Limited Partnership  
1275 Drummers Lane  
Suite 102  
Wayne, PA 19087

Nuclear Regulatory Commission  
Region III  
801 Warrensville Road  
Lisle, Illinois 60532-4351  
Att: John Madera, Section Chief

Re: Sale of Assets

Dear Mr. Madera:

This letter is to notify you of the proposed transfer of ownership of Deaconess Hospital (the "Hospital") which is scheduled to occur on November 30, 1994. The assets of the Hospital are currently owned by Deaconess Health Systems ("Deaconess"), will be sold to Primary Health Services of Ohio Limited Partnership ("Primary Health"). The following paragraphs correspond to the notice requirements outlined in Nuclear Regulatory Information Notice No. 89-25.

a. The name of the organization, if changed.

There will be no change in the name of the organization.

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b. Identification of any changes in personnel named in the license, including any required information on personnel qualifications.

There are no proposed changes in the personnel named in the license as of the time of ownership transfer.

c. An indication of whether the seller will remain in business without the license.

The seller, Deaconess, will not remain in business without the license.

d. A complete and clear description of the transaction.

The transaction will be a sale of assets.

e. An indication of any planned changes in organization, location, facilities, equipment, procedures or personnel.

There are no planned changes in location, facilities, equipment, procedures or personnel at this time. However, in terms of organization, the principal of Primary Health is its general partner, Health Equities Management, Inc.

f. An indication of any changes in the use, possession or storage of the licensed materials.

There are no proposed changes in the use, possession or storage of licensed materials.

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g. An indication of whether all surveillance items and records, including radioactive material inventory and accountability requirements, will be current at the time of transfer. A description of the status of all surveillance requirements and records, e.g. calibrations, leak tests, surveys, etc. should be provided.

All surveillance items and records will be current at the time of transfer.

h. A description of the status of the facility. Specifically, the presence or absence of contamination should be documented. If contamination is present, will decontamination occur before transfer? If not, does the successor company agree to assume full liability for the decontamination of the facility or site?

To our knowledge, there is no contamination on the site of the facility. In the event contamination is present, Primary Health, as successor, agrees to assume full liability for any decontamination of the facility or site.

i. A description of any decontamination plans, including financial assurances arrangements of the transferee, should be provided.

There are no decontamination plans because, to our knowledge, none are needed.

j. An indication of whether the transferor and transferee agree to the change in ownership or control of the licensed material and activity. If so, documentation stating this should be provided.

Pursuant to the proposed sale of assets, agreement to the change in ownership is indicated by the signature of the transferor and the transferee (Deaconess and Primary Health) at the bottom of this letter.

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k. A commitment by the transferee to abide by all constraints, conditions, requirements, representations and commitments identified in the existing license. If not, the transferee must provide a description of its program to assure compliance with the license and regulations.

Primary Health, as transferee, agrees to abide by all constraints, conditions, requirements, representations and commitments identified in the existing license.

Sincerely,

Primary Health Systems of Ohio  
Limited Partnership  
By: Health Equities Management, Inc.,  
its general partner

By:  \_\_\_\_\_

Title: President

Deaconess Health Systems

By:  \_\_\_\_\_

Title: President and CEO