

**From:** [Ullrich, Betsy](#)  
**To:** [Jonathan Lucas](#)  
**Cc:** [Gerard Strugala](#); [Plourde, Laura K](#); [Flores, Charlie](#)  
**Subject:** RE: FW: Pharmalogic acquisition of Lantheus MI Radiopharmaceuticals from Lantheus Medical Imaging - Financial Assurance  
**Date:** Thursday, April 15, 2021 2:46:00 PM  
**Attachments:** [image001.png](#)

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Lantheus MI Radiopharmaceuticals Inc.  
NRC License No. 52-25361-02  
Mail Control No. 624610

Thanks very much for this information. Steve and I went through everything, and I now understand why the documents were submitted. They were separated from the other information about the change, so there was no clear reason for them in the e-folder I was provided.

I reviewed the replacement Letter of Credit, and the Standby Trust Agreement [STA] using our guidance in NUREG 1757, volume 3 for financial assurance [ <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1757/v3/index.html>]. I have no questions regarding the Letter of Credit, but I do need some additional information in support of the STA.

1. The STA is missing the "Specimen Certificate of Events" found in A.12.6 of NUREG 1757, and the "Specimen Certificate of Resolution" on A.12.7. Please note that our guidance states that these need only be unexecuted drafts (page A-131). Please provide these documents.
2. The guidance on page A-129 requires that we verify that the institution has the authority to act as a trustee. I am unable to find the US Bank National Association at either the Fort Lauderdale, FL or the St. Paul MN addresses on any of the lists of acceptable trustees in the databases I was able to access. Please provide information that demonstrates that the US Bank National Association has the authority to act as a trustee whose trust operations are regulated and examined by a Federal or State agency.

Information may be provided attached to an email sent directly to R1DRSSMail Resource [R1DRSSMail.Resource@nrc.gov](mailto:R1DRSSMail.Resource@nrc.gov). You may copy me on the email, and should include the license number and mail control number in your response.

If you have any questions, you may contact me (see below). Thank you for your attention, Betsy

Betsy Ullrich, Senior Health Physicist  
USNRC Region I  
2100 Renaissance Boulevard, Suite 100  
King of Prussia, PA 19406  
610-337-5040 (office)  
240-704-4575 (cell)

Elizabeth.ullrich@nrc.gov

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**From:** Jonathan Lucas <jlucas@radiopharmacy.com>  
**Sent:** Wednesday, April 07, 2021 1:35 PM  
**To:** Ullrich, Betsy <Elizabeth.Ullrich@nrc.gov>  
**Cc:** Gerard Strugala <gstrugala@radiopharmacy.com>; Plourde, Laura K <Laura.Plourde@lantheus.com>; Flores, Charlie <Charlie.Flores@lantheus.com>  
**Subject:** [External\_Sender] FW: Pharmalogic acquisition of Lantheus MI Radiopharmaceuticals from Lantheus Medical Imaging - Financial Assurance

Betsy,

Jerry Strugala forwarded your email (attached) requesting information on the Lantheus MI Radiopharmaceuticals, Inc. financial assurance. During the time of the acquisition, we were working with Steven Courtemanche and Janice Nguyen. Attached was the documentation I had provided at the time.

We have completely replaced the previous surety bond with a new trust document and a letter of credit.

Once you've reviewed the attached, please let us know what further information you might require.

Regards,  
Jon

**Jonathan Lucas, CPA, CGMA**  
**Chief Financial Officer**  
Pharmalogic Holdings Corp  
433 Plaza Real, Suite 275,  
Boca Raton, FL 33432  
(O) 561-569-3491  
(C) 407-906-6010  
(F) 561-416-0083

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**From:** Jonathan Lucas

**Sent:** Thursday, February 4, 2021 9:33 AM

**To:** Courtemanche, Steven <[Steven.Courtemanche@nrc.gov](mailto:Steven.Courtemanche@nrc.gov)>

**Cc:** 'Nguyen, Janice' <[Janice.Nguyen@nrc.gov](mailto:Janice.Nguyen@nrc.gov)>; Gerard Strugala <[gstrugala@radiopharmacy.com](mailto:gstrugala@radiopharmacy.com)>; [bingersoll@medequity.com](mailto:bingersoll@medequity.com); Anthony Medel <[anthonymedel@radiopharmacy.com](mailto:anthonymedel@radiopharmacy.com)>; 'Plourde, Laura K' <[Laura.Plourde@lantheus.com](mailto:Laura.Plourde@lantheus.com)>; Lichtmann, Charles <[Charles.Lichtmann@lantheus.com](mailto:Charles.Lichtmann@lantheus.com)>

**Subject:** FW: Pharmalogic acquisition of Lantheus MI Radiopharmaceuticals from Lantheus Medical Imaging - Financial Assurance

Mr. Courtemanche,

Attached please find all of the required fully executed documents required by the NRC to ensure Financial Assurance is in place at acquisition. As requested, the following documents are enclosed:

1. Standby Trust Agreement – Copy attached – Original sent via UPS
2. Letter of Credit – Copy attached – Original sent via UPS – Tracking number 1Z RX6 243 13 9287 5595
3. Certification of Financial Assurance – Copy attached
4. Current Decommissioning Cost Estimate – Copy attached – this is unchanged from the previous cost estimates provided to the NRC.

Please let us know what further items you may require for your review.

Regards,

Jon

**Jonathan Lucas, CPA, CGMA**

**Chief Financial Officer**

Pharmalogic Holdings Corp

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Boca Raton, FL 33432

(O) 561-569-3491

(C) 407-906-6010

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**From:** Hedgecock, Robert E <[Robert.Hedgecock@usbank.com](mailto:Robert.Hedgecock@usbank.com)>  
**Sent:** Thursday, February 4, 2021 8:04 AM  
**To:** Jonathan Lucas <[jucas@radiopharmacy.com](mailto:jucas@radiopharmacy.com)>; [Steven.Courtemanche@nrc.gov](mailto:Steven.Courtemanche@nrc.gov)  
**Cc:** Anthony Medel <[anthonymedel@radiopharmacy.com](mailto:anthonymedel@radiopharmacy.com)>  
**Subject:** RE: Pharmalogic acquisition of Lantheus MI Radiopharmaceuticals from Lantheus Medical Imaging - Financial Assurance

Good morning all,

Please find a scanned copy of the fully executed Standby Trust Agreement (included in the scan is a copy of the Letter of Credit with Bank of America as well as the Certificate of Financial Assurance).

The original executed copy will arrive at the NRC via UPS overnight tomorrow morning, Friday, February 5<sup>th</sup>.

UPS label with tracking number also attached for your reference and tracking purposes.

Best Regards,

Robert

**Robert Hedgecock**  
Assistant Vice President | **U.S. Bank Wealth Management**  
p. 954.938.2471 | [robert.hedgecock@usbank.com](mailto:robert.hedgecock@usbank.com)  
**Global Corporate Trust**  
500 West Cypress Creek Road, Suite 460  
Fort Lauderdale, Florida 33309 | [www.usbank.com](http://www.usbank.com)

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<https://www.usbank.com/securemail>

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**From:** Jonathan Lucas <[jucas@radiopharmacy.com](mailto:jucas@radiopharmacy.com)>  
**Sent:** Tuesday, February 2, 2021 10:50 AM  
**To:** Hedgecock, Robert E <[Robert.Hedgecock@usbank.com](mailto:Robert.Hedgecock@usbank.com)>; [Steven.Courtemanche@nrc.gov](mailto:Steven.Courtemanche@nrc.gov)  
**Cc:** Anthony Medel <[anthonymedel@radiopharmacy.com](mailto:anthonymedel@radiopharmacy.com)>  
**Subject:** [EXTERNAL] RE: Pharmalogic acquisition of Lantheus MI Radiopharmaceuticals from Lantheus Medical Imaging - Financial Assurance

Mr. Courtemanche,

The original LC is being sent via UPS from Bank of America. It should arrive today. The tracking number is 1Z RX6 243 13 9287 5595.

Thank you for your assistance in this matter.

Regards,  
Jon

**Jonathan Lucas, CPA, CGMA**  
**Chief Financial Officer**

Pharmalogic Holdings Corp  
433 Plaza Real, Suite 275,  
Boca Raton, FL 33432  
(O) 561-569-3491  
(C) 407-906-6010  
(F) 561-416-0083

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**From:** Hedgecock, Robert E <[Robert.Hedgecock@usbank.com](mailto:Robert.Hedgecock@usbank.com)>

**Sent:** Tuesday, February 2, 2021 10:44 AM

**To:** [Steven.Courtemanche@nrc.gov](mailto:Steven.Courtemanche@nrc.gov)

**Cc:** Jonathan Lucas <[jlucas@radiopharmacy.com](mailto:jlucas@radiopharmacy.com)>; Anthony Medel <[anthonymedel@radiopharmacy.com](mailto:anthonymedel@radiopharmacy.com)>

**Subject:** FW: Pharmalogic acquisition of Lantheus MI Radiopharmaceuticals from Lantheus Medical Imaging - Financial Assurance

Good morning Mr. Courtemanche,

Please find attached the backup documents, including Certificate of Assurance and Letter of Credit issued by Bank of America to go along with the Standby Trust Agreement.

FYI: The original Letter of Credit was overnighted by Pharmalogic

I will include a copy in the UPS overnight along with the executed copy of the Standby Trust Agreement.

I hope to have all executed signatures pages to send you a scanned executed copy by Wednesday morning, February 3<sup>rd</sup>, with the original signed copy to arrive via UPS delivery the morning of Thursday, February 4<sup>th</sup>.

I will send you the scanned executed copy via email on Wednesday morning as I will have all the signed/executed pages by this afternoon from both Pharmalogic and US Bank.

Thanks much,

Robert

**Robert Hedgecock**

Assistant Vice President | **U.S. Bank Wealth Management**

p. 954.938.2471 | [robert.hedgecock@usbank.com](mailto:robert.hedgecock@usbank.com)

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<https://www.usbank.com/securemail>

U.S. BANCORP made the following annotations

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U.S. BANCORP made the following annotations

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