



Gamma Corporation

850 West Hind Drive #214, Honolulu, HI 96821

Phone (808) 373-7009

FAX (808) 373-7017

May 10, 2021

Nuclear Materials Licensing Branch
U.S. Nuclear Regulatory Commission, Region IV
1600 E. Lamar Blvd.
Arlington, TX 76011-4511

Mail Control Number: 627001
Docket Number : 3020364
License Number : 53-23207-01
Licensee Name : Gamma Corporation

Subject: Transfer of Control Application
NRC License No. 53-23207-01
Docket No. 030-20364

Dear License Reviewer:

We are informing you that Gamma Corporation is in the final stages of negotiations to enter into an agreement with Gamma Medical Physics LLC, a Delaware limited liability company registered to do business in Hawaii ("Buyer"), pursuant to which Buyer will acquire substantially all of the assets of Gamma. Buyer is an affiliate of Apex Physics Partners LLC, a leading medical physics services platform. Gamma Corporation, the current licensee, will remain in operation until all necessary license transfers have occurred and specific wording has been provided in the asset purchase agreement governing the proposed transaction and certain other underlying transaction documents to the effect that control of the licensed material will not be transferred to Buyer until the change of ownership has been approved by the NRC.

The new licensee will be:

Gamma Medical Physics LLC
850 W. Hind Drive #214
Honolulu, HI 96821
Contact name: Ronald W. Frick, M.S., CHP, DABR
Telephone: 808-373-7009
Email: rfrick@gammacorp.com

Pre- and post-transaction organizational charts are attached with this letter.

There will be no changes in personnel or duties that relate to the licensed program. There will be no changes to the training program.

There will be no changes in location, facilities, equipment, radiation safety program, use, possession, waste management, or other procedures that relate to the licensed program.

Gamma Corporation's facilities and radiation safety program are currently in compliance. Equipment calibrations, leak tests, surveys, training and quality control are all up to date.

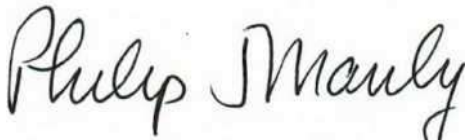
All records concerning the safe and effective decommissioning of the facility will be transferred to the transferee.

A signed agreement to abide by all constraints, license conditions, requirements, representations, and commitments identified in and attributed to the existing license is also attached.

If you require any additional information please contact our Radiation Safety Officer, Ronald Frick, at 808-373-7009.

Sincerely,

Gamma Corporation

A handwritten signature in black ink that reads "Philip J. Manly". The signature is written in a cursive style with a large, prominent "P" and "M".

Philip J. Manly, M.S., CHP, DABR
President

Attachments

Agreement to accept license conditions

As President of Gamma Medical Physics LLC, I agree to abide by all constraints, license conditions, requirements, representations, and commitments identified in and attributed to the existing NRC License No. 53-23207-01.

Gamma Medical Physics LLC

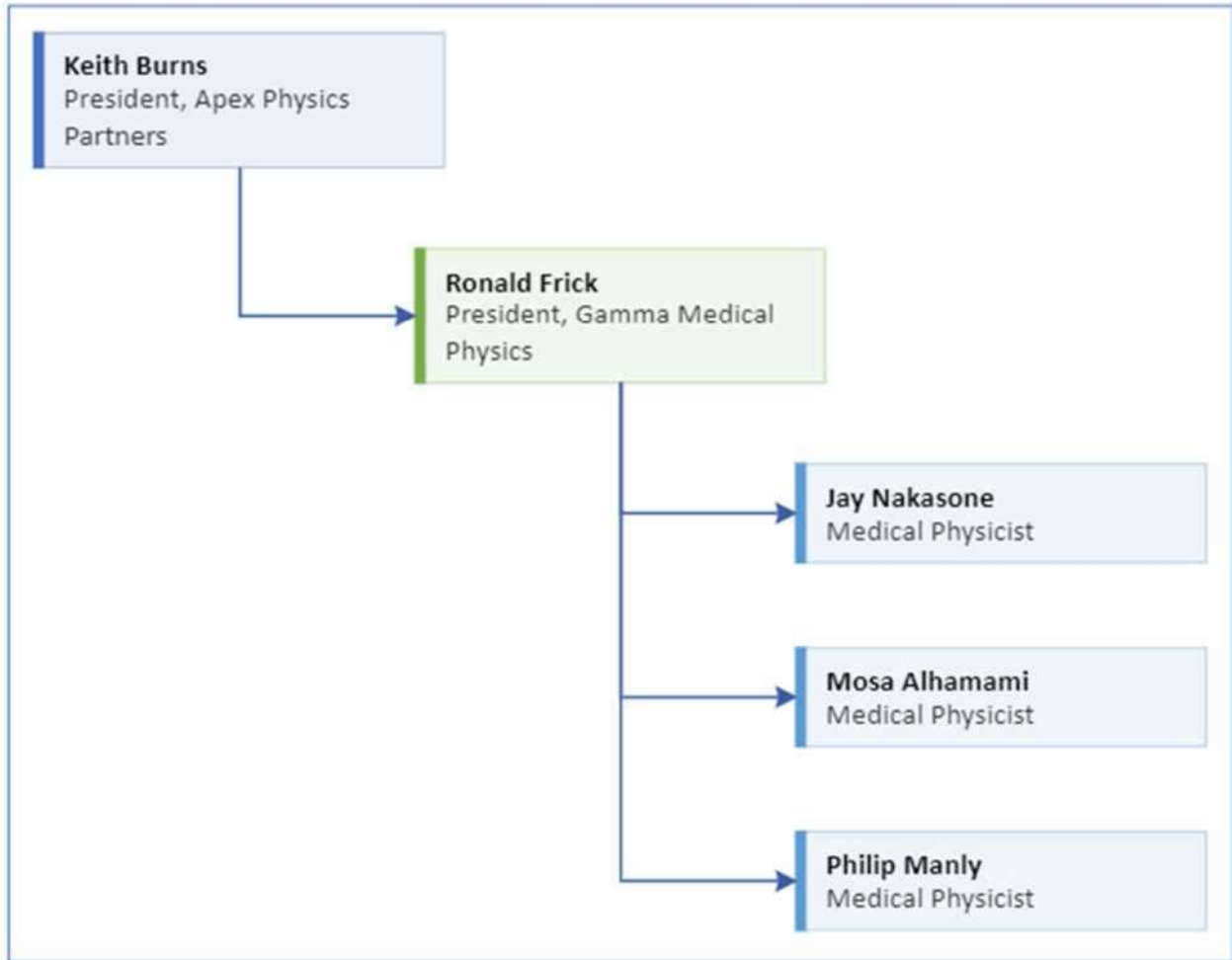
A handwritten signature in black ink, appearing to read "R. Frick", written in a cursive style.

Ronald W. Frick, M.S., CHP, DABR
President

Organization Chart – Pre Transaction



Organization Chart – Post Transaction



(01-2020)
10 CFR 30, 32,
33, 34, 35, 36,
37, 39, and 40



**APPLICATION FOR
MATERIALS LICENSE**

Estimated burden per response to comply with this mandatory collection request: 4.3 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the Information Services Branch (T-6 A10M), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

INSTRUCTIONS: SEE THE CURRENT VOLUMES OF THE NUREG-1556 TECHNICAL REPORT SERIES ("CONSOLIDATED GUIDANCE ABOUT MATERIALS LICENSES") FOR DETAILED INSTRUCTIONS FOR COMPLETING THIS FORM: <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/>. SEND TWO COPIES OF THE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

MATERIALS SAFETY LICENSING BRANCH
DIVISION OF MATERIAL SAFETY, STATE, TRIBAL AND RULEMAKING PROGRAMS
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS
U.S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555-0001

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

IF YOU ARE LOCATED IN:

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO, RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA,

SEND APPLICATIONS TO:

LICENSING ASSISTANCE TEAM
DIVISION OF NUCLEAR MATERIALS SAFETY
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PA 19406-2713

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

IF YOU ARE LOCATED IN:

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING,

SEND APPLICATIONS TO:

NUCLEAR MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
1600 E. LAMAR BOULEVARD
ARLINGTON, TX 76011-4511

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

1. THIS IS AN APPLICATION FOR (Check appropriate item)

- A. NEW LICENSE
- B. AMENDMENT TO LICENSE NUMBER 53-23207-01
- C. RENEWAL OF LICENSE NUMBER _____

2. NAME AND MAILING ADDRESS OF APPLICANT (Include zip code)

Gamma Corporation
850 W. Hind Drive, Suite 214
Honolulu, HI 96821

3. ADDRESS WHERE LICENSED MATERIALS WILL BE USED OR POSSESSED

Same as 2.

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Ronald Frick

BUSINESS TELEPHONE NUMBER
808-373-7009

BUSINESS CELLULAR TELEPHONE NUMBER

BUSINESS E-MAIL ADDRESS
rfrick@gammacorp.com

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

5. RADIOACTIVE MATERIAL

a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.

9. FACILITIES AND EQUIPMENT.

10. RADIATION SAFETY PROGRAM.

11. WASTE MANAGEMENT.

12. LICENSE FEES (Fees required only for new applications, with few exceptions*)

(See 10 CFR 170 and Section 170.31)

*Amendments/Renewals that increase the scope of the existing license to a new or higher fee category will require a fee.

FEE CATEGORY

3P

AMOUNT ENCLOSED \$

0.00

PER THE DEBT COLLECTION IMPROVEMENT ACT OF 1996 (PUBLIC LAW 104-134), YOU ARE REQUIRED TO PROVIDE YOUR TAXPAYER IDENTIFICATION NUMBER. PROVIDE THIS INFORMATION BY COMPLETING NRC FORM 531: <https://www.nrc.gov/reading-rm/doc-collections/forms/nrc531info.html>.

13. CERTIFICATION. (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 37, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

CERTIFYING OFFICER -- TYPED/PRINTED NAME AND TITLE

Philip J. Manly, M.S., CHP, DABR, President

SIGNATURE

DATE

FOR NRC USE ONLY

TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
			\$		
APPROVED BY				DATE	



ACKNOWLEDGEMENT - RECEIPT OF CORRESPONDENCE

Name and Address of Applicant and/or Licensee

Gamma Corporation
850 West Hind Drive
Suite 214
Honolulu, HI 96821

Date

06/22/2021

License Number(s)

53-23207-01

Mail Control Number(s)

627001

Licensing and/or Technical Reviewer or Branch

C. Hill

This is to acknowledge receipt of your: Letter and/or Application Dated: 05/10/2021

The initial processing, which included an administrative review, has been performed.

Amendment Termination New License Renewal

There were no administrative omissions identified during our initial review.

This is to acknowledge receipt of your application for renewal of the material(s) license identified above. Your application is deemed timely filed, and accordingly, the license will not expire until final action has been taken by this office.

Your application for a new NRC license did not include your taxpayer identification number. Please complete and submit NRC Form 531, Request for Taxpayer Identification Number, located at the following link: <http://www.nrc.gov/reading-rm/doc-collections/forms/nrc531.pdf>
Follow the instructions on the form for submission.

The following administrative omissions have been identified:

Your application has been assigned the above listed MAIL CONTROL NUMBER. When calling to inquire about this action, please refer to this control number. Your application has been forwarded to a technical reviewer. Please note that the technical review, which is normally completed within 180 days for a renewal application (90 days for all other requests), may identify additional omissions or require additional information. If you have any questions concerning the processing of your application, our contact information is listed below:

**Region IV
U. S. Nuclear Regulatory Commission
DNMS/NMSB - B
1600 E. Lamar Boulevard
Arlington, TX 76011-4511
(817) 200-1103 or (817) 200-1140**

Agency: NRC

WBL WORKSHEET

DOCKET NUMBER: 3020364 LICENSE NUMBER: 53-23207-01 STATUS: Pending Amendment

MAIL CONTROL NUMBER: 627001 RECEIPT DATE: 06/21/2021 ACTION TYPE: Change of Control

DUE DATE: 12/18/2021 INST. CODE: 23207 LICENSE REGION: Region 4

LICENSE TYPE: 30 ENTITY TYPE: C LICENSE GROUP: Industrial

ISSUE DATE: ORIGINAL DATE: 04/23/1991 EXPIRATION DATE: 03/31/2026

DECOMMISSIONING CATEGORY: Group 2 LAST ISSUE DATE:

LICENSEE NAME: Gamma Corporation DECOM FIN ASSUR REQD: N
SUBM: N

MAILING ADDRESS LINE1: 850 West Hind Drive CONT PLAN REQD: N APPRV: N

MAILING ADDRESS LINE 2: Suite 214

CITY: Honolulu STATE: HI ZIP: 96821

CONTACT PERSON: PREFIX: FIRST NAME: Philip MIDDLE INITIAL:

LAST NAME: Manly SUFFIX:

JOB TITLE: PHONE: 808-373-7009 FAX: EMAIL:

BILLING ADDRESS LINE 1:

BILLING ADDRESS LINE 2:

CITY: STATE: Hawaii ZIP:

BILLING CONTACT PERSON: FIRST NAME: MIDDLE INITIAL: LAST NAME:

PHONE: EMAIL: FAX:

PRIMARY PGM CODE: 03221 SECONDARY PGM CODE: 03220

INSPECTION REGION: Region 4 PRIORITY: 5

RSO: PREFIX: FIRST NAME: Ronald MIDDLE INITIAL: W. LAST NAME Frick

SUFFIX: M.S., DABR RSO JOB TITLE: Radiation Safety Officer

RSO PHONE: 808-373-7009 RSO FAX: 808-373-7017 RSO EMAIL: rfrick@gammacorp.com

STATES WHERE USE IS AUTHORIZED: 3
0- ALL LISTED STATES
1- SAME AS STATE IN ADDRESS
2- ALL STATES
3- NON-AGREEMENT-STATES

AUTHORIZED STATES (USE ONLY IF ABOVE IS ZERO):