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07/06/2021

July 6, 2021

VIA EMAIL

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United States Nuclear Regulatory Commission  
Region IV  
1600 E. Lamar Blvd.  
Arlington, TX 76011-4511  
Attn: Carol Hill  
Carol.Hill@nrc.gov

Re: Diagnostic Health of Anchorage, LLC – Radioactive Materials License – 50-23214-01

Dear Carol:

On behalf of Diagnostic Health of Anchorage, LLC (the “Licensee”), we are writing to provide you notice that pursuant to the terms of a binding share purchase agreement (the “Agreement”), the Licensee will be undergoing an indirect change of control (the “Transaction”).

Under the terms of the Agreement, Thaihot Investment Co., LTD. (“Thaihot”), will sell its shares in Thaihot Investment Company US Limited (“Thaihot Holdings”) to Akumin Corp. Thaihot Holdings is the sole owner of Alliance HealthCare Services Inc. (“Alliance”), which is the owner of the Licensee. See the pre- and post-closing organizational charts attached as Exhibit A. The Transaction is expected to be effective on or about August 1, 2021.

The Transaction will not result in any assets or operations being transferred from the Licensee. The Transaction will not change the Licensee’s legal name, federal tax identification number, provider numbers, location, supervising personnel, Radiation Safety Officer, operating procedures, or services. We have attached additional information about the Transaction in response to the NRC’s Transfer of Control Questionnaire as Exhibit B.

We appreciate the opportunity to provide the Department with this notice letter, and we request that the Department process any changes necessary to reflect the Transaction as soon as possible. If you have any questions regarding this letter or the Transaction, or require additional documentation, please contact Gina Bonica at [gbonica@aiq-us.com](mailto:gbonica@aiq-us.com) or 516-287-8995.

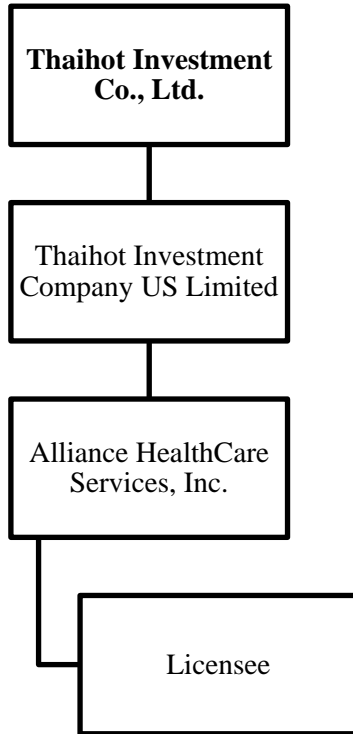
Sincerely,

Gina Bonica  
Assistant Secretary & General Counsel  
Alliance HealthCare Services, Inc.

Matt Cameron  
Senior Vice President and General Counsel  
Akumin Corp.

EXHIBIT A  
Transaction Structure

**PRE-TRANSACTION STRUCTURE**



**POST-TRANSACTION STRUCTURE**

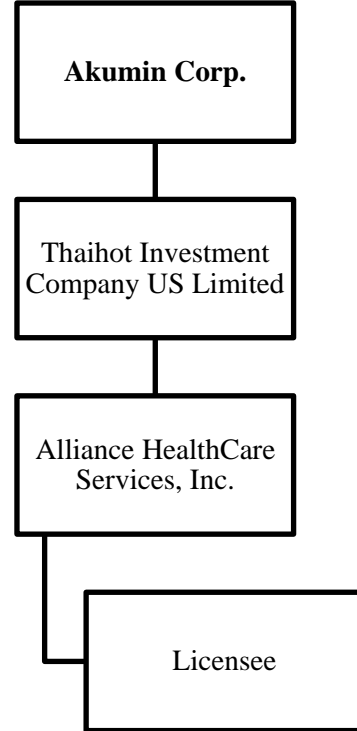


EXHIBIT B

NRC Information Needed for Transfer of Control Application (NUREG-1556, Appendix E)

*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 Licensee's direct ownership, governing body, tax identification number, name, location, mailing address, radiation safety officer, operations, and contact information will all remain the same.

*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.*

There will be no changes in personnel or duties related to the licensed program.

*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.*

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

*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 Licensee's facilities, equipment and radiation safety program are maintained in accordance with applicable law and there is no known contamination. The Licensee currently maintains all records of its surveillance program, including surveys, wipes, and quality control, in compliance with the applicable regulations. After the Transaction is consummated, all records will continue to be maintained in the same manner.

*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 E-2 license is transferred, and as required by 10 CFR 30.35(f), the licensee must, within 30 days, submit financial instruments reflecting such changes.*

Not applicable; none of the above documents will change.

*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.*

Not applicable, as the license and all records will remain with the Licensee.

*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 Licensee will retain control of the licensed material and licensed activity.

*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 retain control of the licensed material and licensed activity and will continue to abide by all constraints, conditions, requirements, representations, and commitments made by the Licensee under the program.

*9. The transferee, in the case of fuel cycle facilities, shall provide documentation showing that it is financially qualified to conduct normal operations. The information can be in the form of income statements and balance sheet forecasts.*

Not applicable.

**From:** [Lindsay McKeever \(Soule\)](#)  
**To:** [Hill, Carol](#)  
**Subject:** [External\_Sender] Diagnostic Health of Anchorage, LLC – Radioactive Materials License – 50-23214-01  
**Date:** Tuesday, July 6, 2021 1:23:47 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[Project Birch - RAM Notice Letter NRC Region IV Alaska.pdf](#)

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United States Nuclear Regulatory Commission - Region IV  
1600 E. Lamar Blvd.  
Arlington, TX 76011-4511  
Attn: Carol Hill  
[Carol.Hill@nrc.gov](mailto:Carol.Hill@nrc.gov)

Please see the attached correspondence for your immediate attention

Thanks,

Lindsay McKeever  
*Legal Operations Manager*  
*Certificated Paralegal & Notary Public*



PO Box 19532, Irvine, CA 92623 //  
18201 Von Karman, Suite 600, Irvine, CA 92612  
Direct: 949.242.5302 / Fax: 602.773.3532  
[lmckeever@alliancehealthcareservices-us.com](mailto:lmckeever@alliancehealthcareservices-us.com)

- This message (including any attachments) is intended only for the individual or entity to which it is addressed. It may contain privileged, confidential information that is exempt from disclosure under applicable laws. If you are not the intended recipient, please note that you are strictly prohibited from disseminating or distributing this information (other than to the intended recipient) or copying this information. If you have received this communication in error, please notify me immediately by e-mail or by telephone.

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**ACKNOWLEDGEMENT - RECEIPT OF CORRESPONDENCE**

**Name and Address of Applicant and/or Licensee**

Kay Kassel, MS, CNMT  
Radiation Safety Officer  
Diagnostic Health Center of Anchorage, LLC  
A wholly owned subsidiary of  
Alliance HealthCare Services  
4100 Lake Otis Parkway #102  
Anchorage, AK 99508

**Date**

07/14/2021

**License Number(s)**

50-23214-01

**Mail Control Number(s)**

627275

**Licensing and/or Technical Reviewer or Branch**

C. Hill

This is to acknowledge receipt of your:  Letter and/or  Application Dated: 07/06/2021

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:

[Empty box for administrative omissions]

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**

BETWEEN:

Accounts Receivable/Payable  
and  
Regional Licensing Branches

[ FOR ARPB USE ]  
INFORMATION FROM WBL

Program Code: 02200  
Status Code: Pending Amendment  
Fee Category: 7C  
Exp. Date: 03/31/2025  
Fee Comments:  
Decom Fin Assur Reqd: N

## License Fee Worksheet - License Fee Transmittal

### A. REGION

#### 1. APPLICATION ATTACHED

Applicant/Licensee: Diagnostic Health Center of Anchorage, LLC  
Received Date: 07/06/2021  
Docket Number: 3020372  
Mail Control Number: 627275  
License Number: 50-23214-01  
Action Type: Change of Control

#### 2. FEE ATTACHED

Amount:     N/A    

Check No.:     N/A    

#### 3. COMMENTS

Signed:     Carol L. Hill    

Date:     07/14/2021    

### B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered / / )

1. Fee Category and Amount: \_\_\_\_\_

#### 2. Correct Fee Paid. Application may be processed for:

Amendment: \_\_\_\_\_

Renewal: \_\_\_\_\_

License: \_\_\_\_\_

#### 3. OTHER \_\_\_\_\_

\_\_\_\_\_

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

Agency: NRC

WBL WORKSHEET

DOCKET NUMBER: 3020372 LICENSE NUMBER: 50-23214-01 STATUS: Pending Amendment

MAIL CONTROL NUMBER: 627275 RECEIPT DATE: 07/06/2021 ACTION TYPE: Change of Control

DUE DATE: 01/02/2022 INST. CODE: 23214 LICENSE REGION: Region 4

LICENSE TYPE: 30 ENTITY TYPE: C LICENSE GROUP: Medical

ISSUE DATE: ORIGINAL DATE: 06/04/1990 EXPIRATION DATE: 03/31/2025

DECOMMISSIONING CATEGORY: Group 1 LAST ISSUE DATE:

LICENSEE NAME: Diagnostic Health Center of Anchorage, LLC DECOM FIN ASSUR REQD: N  
SUBM: N

MAILING ADDRESS LINE1: 4100 Lake Otis Parkway #102 CONT PLAN REQD: N APPRV: N

MAILING ADDRESS LINE 2:

CITY: Anchorage STATE: AK ZIP: 99508

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

LAST NAME: Jones SUFFIX:

JOB TITLE: President PHONE: 907-550-6137 FAX: EMAIL:

BILLING ADDRESS LINE 1:

BILLING ADDRESS LINE 2:

CITY: STATE: Alaska ZIP:

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

PHONE: EMAIL: FAX:

PRIMARY PGM CODE: 02200 SECONDARY PGM CODE:

INSPECTION REGION: Region 4 PRIORITY: 3

RSO: PREFIX: FIRST NAME: Kay MIDDLE INITIAL: LAST NAME Kassel, MS, CNMT

SUFFIX: Radiation RSO JOB TITLE:  
Safety Officer

RSO PHONE: 561-701-1311 RSO FAX: 480-212-8560 RSO EMAIL: Kkassel@alliancehealthcareservices-us

STATES WHERE USE IS AUTHORIZED: 1  
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):