

July 6, 2021

VIA CERTIFIED MAIL

United States Nuclear Regulatory Commission
Region III
2443 Warrenville Road
Suite 210
Lisle, Illinois 60532-4352
Attn: Frank Tran

Re: Alliance HealthCare Services Inc. – Radioactive Materials License – 47-25570-01

Dear Frank:


On behalf of Alliance HealthCare Services Inc. (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 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, locations, 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 or 516-287-8995.

Sincerely,



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

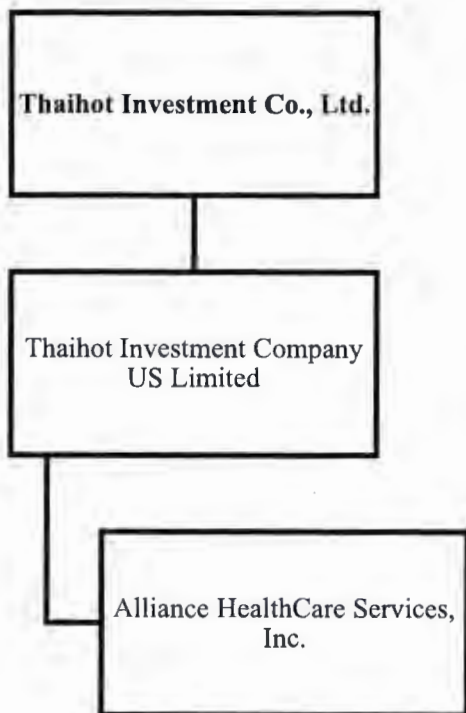


Matt Cameron
Senior Vice President and General Counsel
Akumin Corp.

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EXHIBIT A
Transaction Structure

PRE-TRANSACTION STRUCTURE



POST-TRANSACTION STRUCTURE

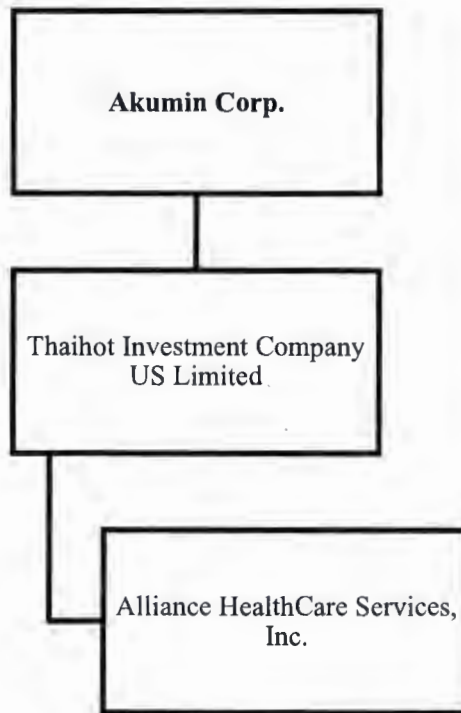


EXHIBIT B

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, locations, 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 locations, 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.

 **ALLIANCE**
HEALTHCARE SERVICES

18201 Von Karman Avenue, Suite 600
Irvine, California 92612

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OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

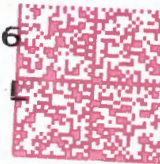
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