

September 2, 2021

Via Overnight Mail

U.S. Nuclear Regulatory Commission
Region I
2100 Renaissance Blvd., Suite 100
King of Prussia PA 19406-2713
Attention: Medical Branch

Re: Request for Transfer of NRC License in connection with Sale of Medical Practice
Licensee: Greater Hartford Cardiology, P.C.
Materials License No.: 06-30812-01

Dear Sir or Madam:

In accordance with 10 CFR section 30.34(b) and 10 CFR section 35.14(b), Greater Hartford Cardiology Group, P.C. (“GHC”) and Trinity Health Of New England Provider Network Organization, Inc. d/b/a Trinity Health Of New England Medical Group (“Trinity”) submit this request for approval to transfer GHC’s Materials License No. 06-30812-01 to Trinity. This request is being made in connection with the proposed sale of substantially all of the assets of GHC to Trinity to be effective on or about December 1, 2021 (the “Sale”). The following information is provided about the Sale and the NRC materials license:

1. GHC owns and operates a nuclear camera and holds an NRC license, No. 06-30812-01. Gladys A. Kagaoan, M.D., Steven R. Cohen, M.D. and Peter P. White, M.D. are the shareholders of GHC. GHC and Trinity intend to enter into an Asset Purchase Agreement (the “Purchase Agreement”) with a closing date scheduled on or around effective as of December 1, 2021 (the “Closing Date”). Pursuant to the Purchase Agreement, effective as of the Closing Date, Trinity will purchase substantially all of the assets of GHC used in the operation of GHC’s business, including its nuclear imaging equipment and materials located at 1000 Asylum Avenue, Suite 4300, Hartford, CT 06105 and used in connection with the NRC license. After the Closing Date the Board of Directors of Trinity would have the power to determine corporate policy with respect to clinical operations of the former GHC medical practice and the direction of the activities under the licensed program.
2. Effective as of the Closing Date, GHC requests that its NRC License No. 06-30812-01 be transferred to Trinity and the name of the licensee shall be changed to “Trinity Health Of New England Medical Group-GHC Nuclear Laboratory”.
3. Effective on the Closing Date, Dr. Kagaoan will become an employee of Trinity in accordance with terms of an employment agreement between Dr. Kagaoan and Trinity.

4. Dr. Kagaoan is a licensed physician in Connecticut. She is Board Certified in Cardiovascular Disease and Board Certified in Nuclear Cardiology. Dr. Gladys A. Kagaoan is currently the Authorized User and the Radiation Safety Officer on GHC's NRC License No. 06-30812-01. She will continue to be the Authorized User and Radiation Safety Officer for this facility after the Closing Date. She can be reached at (860) 527-0073 should additional information be needed.

5. The licensed nuclear camera and materials relating to the NRC License No. 06-30812-01 is currently managed by Dr. Gladys A. Kagaoan, who will continue to manage the nuclear camera and materials of the license program subsequent to the Closing Date. There is no anticipated change in personnel or duties that relate to the licensed program.

6. There is no anticipated change in the location, facilities and equipment that relates to the licensed program. All equipment used in the licensed program will remain in place at the same locations.

7. There shall be no changes in the procedures for the licensed program, including routine operating and emergency procedures.

8. Currently the status of surveillance programs of GHC meets all recommended standards proscribed by the NRC, which include but are not limited to (1) daily, weekly and quarterly surveys; (2) daily, weekly and quarterly wipe tests; (3) quality assurance and control; (4) ALARA being observed and documented by the RSO; and (5) quarterly review by Peter Mas, MS, Health Physicist.

9. After the Sale, no equipment or facilities used by GHC will be decommissioned. Trinity accepts financial responsibility for the decontamination or decommissioning that may be required in the future with respect to its facilities and equipment after the Closing Date.

10. Effective as of the Closing Date, Trinity confirms that it will exercise control of the practice, accept the transfer of GHC's materials maintained under License No. 06-30812-01 as is, and will thereafter maintain and be responsible for the surveillance programs proscribed by the NRC in substantially the same manner maintained by GHC prior to the Closing Date.

11. Trinity confirms that, as of the Closing Date, it will abide by all constraints, conditions, requirements and commitments of GHC as they relate to the licensed program. There are currently no open inspection items or enforcement actions against GHC.

12. Trinity intends to continue providing medical imaging services at the licensed program maintaining the same standards of safety and quality without interruption, subsequent to the Closing Date.

GHC and Trinity request that the NRC approve this request for licensure changes made in connection with the Sale. In the event that the NRC requires additional information or has any questions concerning this request, please contact Dr. Gladys Kagaoan at (860) 527-0073.

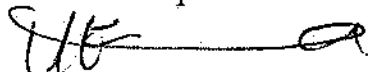
Sincerely,

Greater Hartford Cardiology Group, P.C.

By: _____
Steven R. Cohen, M.D.
President


By: _____
Gladys A. Kagaoan, M.D.
Secretary and Treasurer

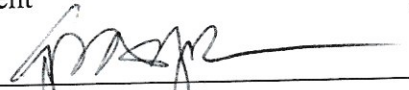
Trinity Health Of New England Provider Network
Organization, Inc. d/b/a Trinity Health Of New
England Medical Group

By:  _____
Ugochukwu Uwaoma, M.D., MBA, MPH
President

Sincerely,

Greater Hartford Cardiology Group, P.C.

By: 
Steven R. Cohen, M.D.
President

By: 
Gladys A. Kagaoan, M.D.
Secretary and Treasurer

Trinity Health Of New England Provider Network
Organization, Inc. d/b/a Trinity Health Of New
England Medical Group

By: _____
Ugochukwu Uwaoma, M.D., MBA, MPH
President