

From: Bryant, Rachel K <Rachel.Bryant@bannerhealth.com>

Sent: Wednesday, November 10, 2021 1:14 PM

To: Muessle, Mary <Mary.Muessle@nrc.gov>

Cc: Bellomy, Bob <Bob.Bellomy@bannerhealth.com>

Subject: [External_Sender] Reply to a Notice of Violation

To: U.S. Nuclear Regulatory Commission

ATTN: Document Control Desk, Regional Administrator, Region IV

This is the reply to the notice of violation that is required by the NRC. The attached document is the requested action plan that outlines what steps we will take in the future should we need to complete the "Transfer of Control" again. Thank you for your support and attention to this matter.

Kind regards,

Rachel Bryant MBA, RN

Chief Operating Officer

Banner Wyoming Medical Center

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Wyoming Medical Center

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To all concerned:

Please review below information as requested by:

Neil O’Keefe, Chief
Materials Licensing & Decommissioning Branch
Division of Nuclear Materials Safety

1. The reason for violation or, if contested, the basis for disputing the violation or severity level.

- a. The reason for this violation is directly related the affiliation process itself. This has been a multi-staged approach which involves multiple dates of department affiliations. Additionally, to the direct process of “transfer of control”, there is not any change in program or process at Banner Wyoming Medical Center, the only change is the name of the legal entity, and I was not aware that the name change required permission from the NRC. All program processes are maintaining historical integrity.
 - i. Further, the rule of “transfer of control” is a challenge to establish prior to the date of transfer due to the nature of confidential circumstances.

2. The corrective steps that have been taken and the results achieved?

- a. Banner Wyoming Medical Center has reported the “transfer of control” to follow necessary descriptive rules as described by the NRC. Corrective actions for any future “transfer of control” processes will be implemented as followed:
 - i. Start the investigative process with organizational leaders to define who can speak to specific changes that may occur prior to any affiliations being observed. have those individuals speak to the respective NRC lawyers on any necessary topics. This process will preserve confidential matters and still accomplish the requisite steps for the “transfer of control” process.

3. The corrective steps that have been taken

- a. (see #2)

4. The date when full compliance will be achieved?

- a. Banner Wyoming Medical Center received the consent for the “transfer of control” on October 25, 2021 from Roberto J. Torres. Therefore, Banner Wyoming Medical Center is in full compliance with a tangible “transfer of control”.



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If you should have any further needs, please reach out to Bob Bellomy, Director of Imaging Services, at 307-577-4370 or via email Bob.Bellomy@bannerhealth.com.

Best Regards,

A handwritten signature in blue ink that reads "Rachel Bryant".

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