

Song, Taehoon

From: Casey, Colleen
Sent: Friday, April 09, 2021 1:10 PM
To: Song, Taehoon; Pavon, Sandy; Tomczak, Tammy
Subject: Please place in ADAMS.....FW: Control # 623927 Capital Region Physicians-Central Missouri Cardiology Additional Information
Attachments: Addendum dated 4.8.21.pdf

...and send the 665 to me. Thank you so much!

Colleen

From: Qualls, Arla <Arla.Qualls@crmc.org>
Sent: Friday, April 09, 2021 11:26 AM
To: Casey, Colleen <Colleen.Casey@nrc.gov>
Subject: [External_Sender] Control # 623927 Capital Region Physicians-Central Missouri Cardiology Additional Information

Colleen,
Thank you for the call yesterday.

Please see the attached additional information.

Sincerely,

Arla Qualls

Arla Qualls, RN, BSN
Director
Phone : 573-659-2001
Fax: 573-659-4685
Arla.Qualls@crmc.org





UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, ILLINOIS 60532-4352

December 16, 2020

Patrick J. Morello, M.D.
Radiation Safety Officer
Central Missouri Cardiology, P.C.
3501 A West Truman Blvd.
Jefferson City, MO 65109

Dear Dr. Morello:

This refers to the letter dated November 23, 2020, signed by someone whose signature is essentially illegible and no title is indicated, although the signature line below it states that a name and title for the signatory would be indicated.

This letter requests a change in the name of this license and states "This is a change in name only. Management of the facilities' license will remain the same. Thank you for the opportunity to supply NRC with this information. If you have any questions or concerns, please contact us at 573-636-2001."

We are unable to complete our review because the information in the letter, especially the language quoted above, is insufficient to support your request. It is not clear to us whether a change in ownership and/or control of your license has taken place or will take place.

Within 30 days of the date of this letter (by close of business on January 18, 2021) please provide only one response to the items below.

Please only send us one complete, written, currently dated and legibly, physically signed (by an appropriate senior management official) correspondence document, such as either an NRC Form 313 or a business-style letter containing the same information as an NRC Form 313.

The response letter requested should include the printed title and name of the signatory, in addition to a legible signature.

Please ensure that the requested information is answered completely and accurately.

Please do not send multiple copies of responses and please do not submit any information that is identical to what you have already sent us unless we direct you to do so. If you resubmit such information for the sake of adding context and other details to enhance its meaning, that is acceptable.

Please do not email a PDF document to me, and transmit a faxed version, and/or a hard copy sent by mail. Only one copy transmitted in only one of these ways is appropriate to prevent administrative processing errors, although emailing a PDF document is the least efficient mechanism for responding to me.

The most reliable and fastest way to respond is to send a fax of one complete copy only to me at (630) 515-1078.

Please address your written response to my attention as "additional information to control number 623927" to facilitate proper handling in our offices.

Please consider scheduling a telephone call with me. Arranging the call by email is preferable as we are primarily teleworking and our offices are closed. My email address is colleen.casey@nrc.gov. My telephone number is (630) 829-9841 but using email is encouraged.

A telephone discussion of these items may serve to clarify the information required by our regulations so that your response will be complete and accurate.

The letter dated November 23, 2020, appears to reflect a potential misunderstanding regarding name changes for NRC licensees, changes in ownership and/or control of NRC licensees, and management of NRC licensees.

You do not need to contact NRC if the "management" of your license has changed, unless by "management" you mean that the ownership and/or control of the license has changed, or will be changing.

For example, if the administrator or executive "managing" your practice has changed but they are not owners of the practice and license and/or do not have partial or full control over the practice and license, then you do not need to contact us.

But if the actual ownership and/or control of your practice and license have changed or are going to change, you must obtain NRC's written consent prior to that circumstance. NRC has been requiring prior written consent for changes of ownership and control since at least 1989, as you will see from the Information Notice below. Depending on the circumstance, an amendment to your license may be required, as you stated that the name of this license is changing.

Here is some additional information to help facilitate your understanding:

Please refer to NUREG 1556 Vol. 15, Rev. 1, "Consolidated Guidance About Materials Licenses: Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses, Final Report (NUREG-1556, Volume 15, Revision 1), published June 2016, including, but not necessarily limited to, section 5 in the front of the book; Appendix C, which describes direct and indirect transfers and sample transactions; and Appendices D and E it can be found at: <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v15/index.html>.

Please also refer to NUREG 1556 Vol. 9, Rev. 3, "Consolidated Guidance About Materials Licenses Program-Specific Guidance About Medical Use Licenses" at: <https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v9/index.html> Section 9 is the most relevant section for this amendment.

The following is a Regulatory Issue Summary (RIS) from 2014 and 2016 on this subject:

<https://www.nrc.gov/docs/ML1518/ML15181A223.pdf>

This is a link to Information Notice (IN) 89-25, originally sent to all NRC licensees in 1989 and again in 1994:

<https://www.nrc.gov/reading-rm/doc-collections/gen-comm/info-notices/1989/in89025r1.html>

This is a link to our public website where changes of ownership and control are posted for public comment and transparency:

<https://www.nrc.gov/about-nrc/regulatory/adjudicatory/hearing-license-applications.html#top>

Your response must contain only publicly releasable information as we will have to post your response for comment on our public website for 30 days.

In preparing your response, please also be reminded of the provisions in 10 CFR 30.9(a), "Completeness and accuracy of information, ..." (a) Information provided to the Commission by an applicant for a license or by a licensee or information required by statute or by the Commission's regulations, orders, or license conditions to be maintained by the applicant or the licensee shall be complete and accurate in all material respects."

However, you are correct in requesting that the license name be changed when that is scheduled to occur, as an amendment to the license is then necessary, of course.

Your letter does not provide us with the name of a point of contact (POC) for our questions, his/her position, direct telephone number, fax number and email address. This is essential information for every amendment request so that we may reach your POC efficiently and effectively.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <https://www.nrc.gov/reading-rm/adams.html>.

Sincerely,



Colleen Carol Casey
Materials Licensing Branch

License No. 24-32441-01
Docket No. 03036211
Control No. 623927