

**From:** [Roma, Amy C.](#)  
**To:** [Gallagher, Robert](#)  
**Cc:** [Matsick, Rob](#)  
**Subject:** [External\_Sender] RE: Re: Information re: License Transfer of License No. 37-30120-01 (held by CDL Nuclear Technologies)  
**Date:** Tuesday, October 26, 2021 10:02:09 AM  
**Attachments:** [image001.png](#)

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Hi Bob—yes, that is correct. Thank you!

Amy

**Amy Roma**

Partner and Global Energy Practice Area Leader

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**From:** Gallagher, Robert <[Robert.Gallagher@nrc.gov](mailto:Robert.Gallagher@nrc.gov)>  
**Sent:** Tuesday, October 26, 2021 8:27 AM  
**To:** Roma, Amy C. <[amy.roma@hoganlovells.com](mailto:amy.roma@hoganlovells.com)>  
**Cc:** Matsick, Rob <[rob.matsick@hoganlovells.com](mailto:rob.matsick@hoganlovells.com)>  
**Subject:** RE: Re: Information re: License Transfer of License No. 37-30120-01 (held by CDL Nuclear Technologies)

**[EXTERNAL]**

Good Morning Amy,

Am I correct that the name of the licensee will change from CDL Nuclear Technologies, Inc. to CDL Nuclear Technologies, LLC? If this is the case I will amend the license accordingly.

Bob

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**From:** Roma, Amy C. <[amy.roma@hoganlovells.com](mailto:amy.roma@hoganlovells.com)>  
**Sent:** Friday, October 22, 2021 4:42 PM  
**To:** Gallagher, Robert <[Robert.Gallagher@nrc.gov](mailto:Robert.Gallagher@nrc.gov)>  
**Cc:** Matsick, Rob <[rob.matsick@hoganlovells.com](mailto:rob.matsick@hoganlovells.com)>  
**Subject:** [External\_Sender] Re: Information re: License Transfer of License No. 37-30120-01 (held by CDL Nuclear Technologies)

Wonderful! Thanks, Bob! Have a great weekend!

On Oct 22, 2021, at 4:31 PM, Gallagher, Robert <[Robert.Gallagher@nrc.gov](mailto:Robert.Gallagher@nrc.gov)> wrote:

**[EXTERNAL]**

Amy,

Perfect, this is exactly what I need. The only information I will put in a public document, which will be the Safety Evaluation Report (SER) that I will send along with the approval letter, will be the certification/registration numbers for the various documents I will use to support my determination of known entity status.

Regards,

Bob

Robert L. Gallagher  
Health Physicist  
Medical & Licensing Assistance Branch  
U.S. NRC, Region I  
2100 Renaissance Blvd.  
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**From:** Roma, Amy C. <[amy.roma@hoganlovells.com](mailto:amy.roma@hoganlovells.com)>

**Sent:** Friday, October 22, 2021 12:24 PM

**To:** Gallagher, Robert <[Robert.Gallagher@nrc.gov](mailto:Robert.Gallagher@nrc.gov)>

**Cc:** Matsick, Rob <[rob.matsick@hoganlovells.com](mailto:rob.matsick@hoganlovells.com)>

**Subject:** [External\_Sender] Information re: License Transfer of License No. 37-30120-01 (held by CDL Nuclear Technologies)

Robert,

Following up on our conversation from Wednesday regarding the license transfer application for License No. 37-30120-01 held by CDL Nuclear Technologies, attached is supporting evidence that the largest, controlling shareholder of the licensee post-closing, Excellere Capital Management II, LLC ("Excellere"), should be considered a "known entity." Excellere owns companies that are intensively regulated by federal and state agencies, through permits, registrations, and other ongoing regulatory commitments

1. **Attachment 1** is a spreadsheet listing 93 Environmental Protection Agency

("EPA") pesticide registrations for **SePRO Corporation, a company wholly-owned by Excellere** that specializes in plant protection and plant management products and services. Acquiring and maintaining these pesticide registrations is an intensive regulatory undertaking that involves detailed legal, administrative, and scientific processes and procedures. Please see the EPA's website (<https://www.epa.gov/pesticide-registration/about-pesticide-registration>) for more information. SePRO Corporation's website is here: <https://www.sepro.com/>.

2. **Attachment 2** is a list from AIS Healthcare of various pharmacy licenses and other permits from state regulators across the country and from the Drug Enforcement Administration ("DEA"). AIS Healthcare is wholly-owned by Excellere and specializes in targeted drug delivery, infusion care and ophthalmic solutions. AIS Healthcare's website is here: <https://aiscaregroup.com/>.
3. **Attachments 3 and 4** are spreadsheets from **SCA Pharmaceuticals ("SCA Pharma") – wholly-owned by Excellere** – that list a variety of different types of non-resident state permits allowing shipment of pharmaceutical products into the listed states. The spreadsheets also provide manufacturing and analytical lab permits held by SCA Pharma and regulated by the DEA. SCA Pharma's website is here: <https://scapharma.com/>.
4. Additionally, SCA Pharma is a Food and Drug Administration ("FDA")-registered Outsourcing Facility pursuant to Section 503B of the Federal Food, Drug and Cosmetic Act (21 U.S.C. 353b). SCA Pharma's FDA registration numbers are as follow:
  - **FDA – Little Rock, AR facility**  
Federal Identification number ("FEI"): 3010683157  
Data Universal Number System ("DUNS"): 037559301
  - **FDA – Windsor, CT Facility**  
FEI: 3013736415

Let me know if you would like to discuss or require any further information to support your review. Also, I have not reviewed to see if any of this information is public, so if you're posting anything to ADAMS, please let me know and I can review for any 2.390 information. (My understanding with transmittals like this is that it's for your own internal review and generally not posted.)

Best regards,

Amy

**Amy Roma**

Partner and Global Energy Practice Area Leader

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If you would like to know more about how we are managing the impact of the COVID-19 pandemic on our firm then take a look at our brief [Q&A](#). If you would like to know more about how to handle the COVID-19 issues facing your business then take a look at our [information hub](#).

**About Hogan Lovells**

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