December 16, 2022

Nuclear Materials Licensing Branch
U.S. Nuclear Regulatory Commission, Region IV
1600 E. Lamar Blvd.
Arlington, TX 76011-4511

Subject: Transfer of Control Application
NRC License No. 53-35181-01
Docket No. 030-38778

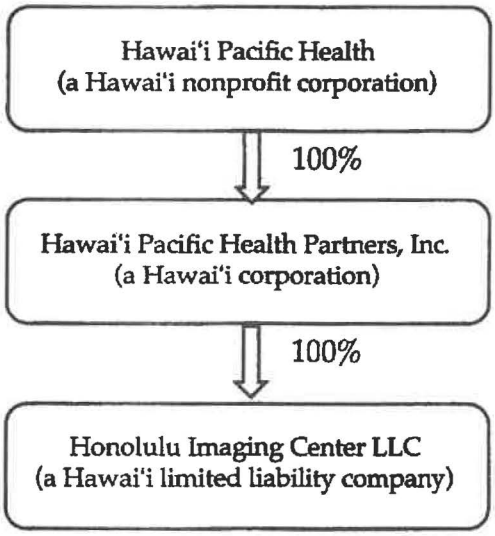
Dear License Reviewer:

We are writing to request that the nuclear materials license currently held by Avanti Imaging, LLC dba InSight Imaging ("**InSight**") (license #53-35181-01) be transferred to Honolulu Imaging Center LLC ("**HIC**") effective June 30, 2023. This notice and the contents herein are provided pursuant to the instructions in the U.S. NRC "Consolidated Guidance About Materials Licenses – Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses" (NUREG-1556, Volume 15, Rev. 1). Pursuant to the Appendix E, "Information Needed for Transfer of Control Application," we provide the following necessary information:

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.*

- Pending State Health Planning & Development Agency approval, InSight will merge into HIC. Pursuant to the Articles of Merger to be filed with the state Department of Commerce and Consumer Affairs, HIC will remain as the surviving entity and will become the owner and operator of the imaging services currently furnished by InSight at 500 Ala Moana Boulevard, Suite #5B, Honolulu, Hawai'i. InSight will merge into HIC, and therefore will not survive as a separate legal entity. We anticipate closure of the merger on June 30, 2023.
- Please note that HIC currently holds nuclear materials license #53-29402-01 in connection with its operations at 1401 Beretania Street, Suite 107, Honolulu, Hawai'i, 96814.
- Concurrent with the Closing, HIC will begin to do business at all its locations (including the former InSight location at Ala Moana Boulevard, Suite #5B, Honolulu, Hawai'i) under the trade name "InVision Imaging".
- The members of HIC's governing body are: Art Gladstone, David Okabe and Eric Hannum.
- HIC's officers are:
  - Art Gladstone — Chair
  - Eric Hannum — President
  - David Okabe — Secretary / Treasurer
  - Carrie-Ann Tsutsui — Assistant Treasurer
  - Jessica Lewis — Assistant Secretary
- HIC's contact information is as follows:
  - Mailing Address: 500 Ala Moana Boulevard, Suite 5B, Honolulu, HI

96813
  - Contact Name: Joshua Rosen, Manager
  - Contact Phone: (808) 275-2008
- The following diagram represents an organizational chart showing the intended ownership structure of HIC upon Closing pursuant to the Articles of Merger with InSight.



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.*

   - No change to personnel or duties related to the licensed program (Ronald Frick will remain as Radiation Safety Officer)
   - No change to training 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.*

   - None

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 facilities, equipment, and radiation safety program are currently in good standing. There is no known contamination. Decontamination will not occur prior to the transfer of control to HIC pursuant to the Articles of Merger. Calibrations, leak tests, area surveys, wipe tests, training, quality control, and related records are up to date.

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 license is transferred, and as required by*

10 CFR 30.35(f), the licensee must, within 30 days, submit financial instruments reflecting such changes.

- No DFPs will be changed as a result of the transfer.
- No financial assurance documents will be changed as a result of the transfer.

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.*

    - InSight will transfer all records concerning the safe and effective decommissioning of the facility to HIC.

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.*

    - InSight and HIC agree to transferring control of the licensed material and activity, and the conditions of transfer. HIC has been made aware of any open inspection items and its responsibility for possible resulting enforcement actions.

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.*

    - There are no constraints, conditions, requirements, representations, and commitments applicable to InSight as the transferor.

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

If you require any additional information, please contact HIC's Radiation Safety Officer, Ronald Frick, at 808-373-7009.

Sincerely,

Avanti Imaging, LLC		Honolulu Imaging Center LLC	
Signed:	Eric Hannum	Signed:	
By:	Eric Hannum	By:	
Title:	President	Title:	

4887-1178-4516v.1 0059711-000134

Date: December 16, 2022

Date: _____

If you require any additional information, please contact HIC's Radiation Safety Officer, Ronald Frick, at 808-373-7009.

Sincerely,

Avanti Imaging, LLC		Honolulu Imaging Center LLC	
Signed:	_____	Signed:	_____
By:	_____	By:	Art Gladstone
Title:	_____	Title:	Chair
Date:	_____	Date:	12/16/2022

HAWAI'I PACIFIC HEALTH
Kapi'olani • Pali Momi • Straub • Wilcox

55 Merchant Street | Honolulu, Hawai'i 96813-4333

attn: L Borton 23rd floor

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