



1 November 2023

Materials Licensing Branch
Division of Nuclear Material Safety
United States Nuclear Regulatory Commission, Region III
Attn: Ms. Colleen C. Casey
2443 Warrenville Road
Suite 210
Lisle, IL 60532-4325

Subject: Request for Additional Information Related to Transfer of Control of U.S. NRC
License 22-00057-61, 3M Brookings Gamma Irradiator

Dear Ms. Casey,

This letter provides the additional information requested to answer questions and clarify statements regarding the request to transfer the subject license from 3M Company to 3M Healthcare US OPCO, LLC.

To begin, the transfer of control from 3M Company to 3M Healthcare US OPCO, LLC will be a complete separation from 3M Company. This will be a change in ownership of the entire facility and property at Brookings including the irradiator. After the transfer of control, 3M Company will have no ownership, influence, or control over any property or operations associated with the facility or irradiator at Brookings.

The date of the transfer of control (date of separation) is anticipated to be 01 April 2024. This is an estimate of a tentative date. The actual date is to be determined, subject to the approval of the new Health Care company's board of directors, and the approval of the Securities and Exchange Commission (SEC). We commit to communicate the actual date to the NRC once the date is established.

Records associated with the irradiator at Brookings will be transferred from 3M Company to the new company before 31 December 2023. These records are stored in two forms. Electronic copies of records are stored on a SharePoint site. These will be transferred as part of an overall transfer of electronic documents and online applications on 01 November 2023 from 3M Company servers to the new company servers. Hard copies of records will be physically reviewed and separated before 31 December 2023. The separated hard copies of the records will be physically transferred to the Brookings location by 31 December 2023.

Also, attached to this letter, I have provided an updated Organizational Chart showing the reporting structure of the Radiation Safety Officer, Alternate Radiation Safety Officer, and Irradiator Operators. The changes in the attached chart from the chart provided with the original request is an update in the titles of a couple of positions, and the addition of the second Staff Health Physicist to the chart.

Please contact me at shuneycutt@mmm.com if you have any questions or require additional information.

Sincerely,

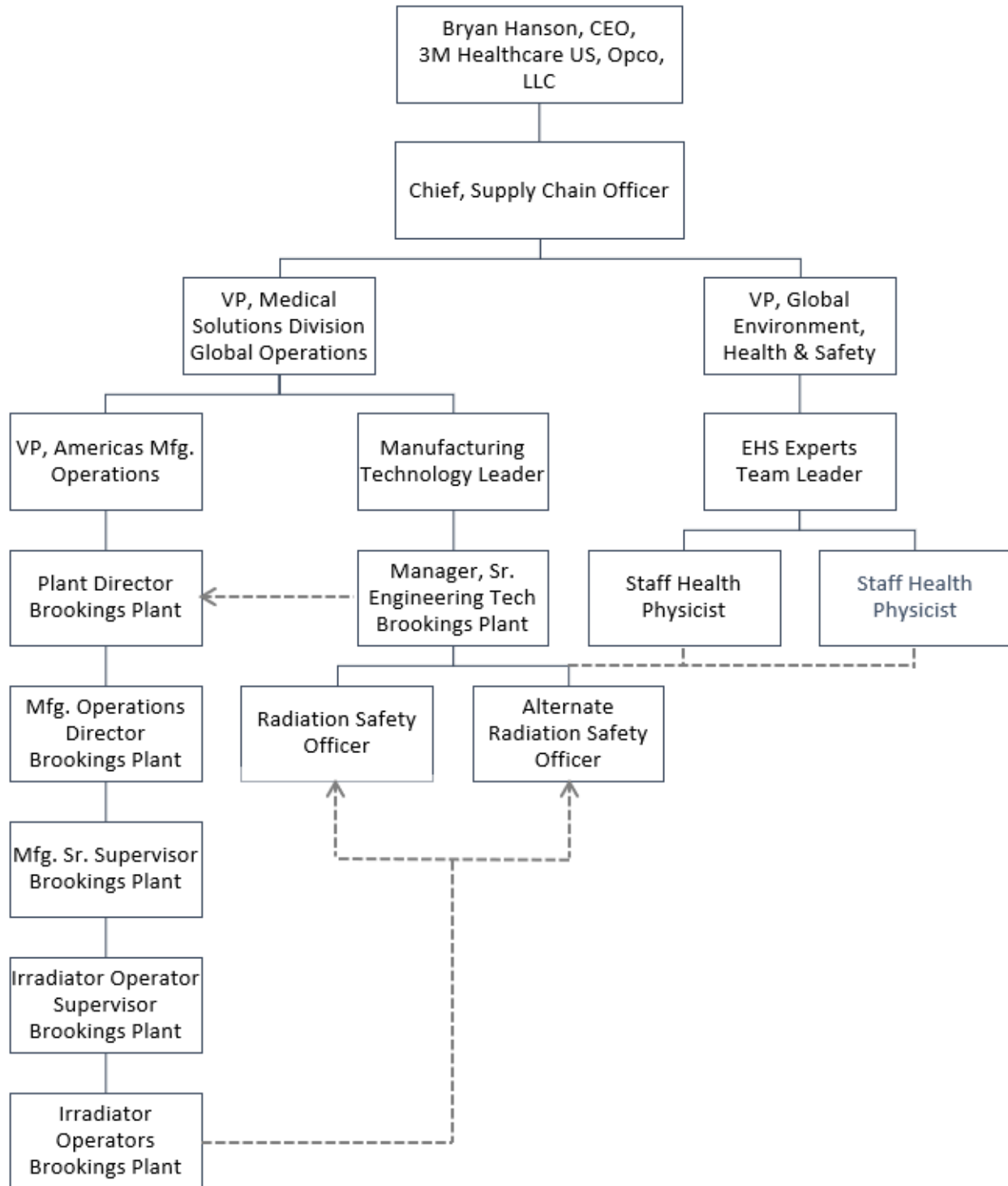
A handwritten signature in black ink, appearing to read "Scott Huneycutt". The signature is fluid and cursive, with a large initial "S" and a long, sweeping underline.

Scott Huneycutt
Senior Health Physicist

CC: Jessica Goerdt – Radiation Safety Officer
Trenton Yadro – Senior Health Physicist
Michael Lewandowski – Corporate Radiation Safety Officer

Attachment: Updated organization chart

Attachment Organizational Structure for the Transferee



Martha Pavon

From: Tammy Tomczak
Sent: Wednesday, November 1, 2023 8:33 AM
To: Martha Pavon
Cc: Sandy Pavon; Colleen Casey
Subject: FW: Information request for Change of Control - 22-00057-61
Attachments: Information request for Change of Control - 22-00057-61.pdf

Good morning, Martha 😊

Can you please add the attached to ADAMS?

Thank you!!
Tammy

From: Scott Huneycutt <shuneycutt@mmm.com>
Sent: Wednesday, November 1, 2023 8:28 AM
To: R3-DRSSMail Resource <R3-DRSSMail.Resource@nrc.gov>; Colleen Casey <Colleen.Casey@nrc.gov>
Cc: TRENTON YADRO <tyadro@mmm.com>; Jessica Goerdts <jgoerdts@mmm.com>; Michael Lewandowski <malewandowski@mmm.com>; Denise Albrecht <dmalbrecht@mmm.com>
Subject: [External_Sender] Information request for Change of Control - 22-00057-61

Good Morning Colleen,
We have attached a letter that provides the additional information and clarifications requested during our Teams meeting on 17 October 2023.
Please contact me at shuneycutt@mmm.com if you have any additional questions.

Scott Huneycutt
Senior Health Physicist
Global Radiation Protection
3M Center, Bldg 0225-01-N-22 | St. Paul, MN 55144-1000 | United States
Office Phone: +1 651.737.3352 | shuneycutt@mmm.com
GRP Phone: +1 651.736.0498 | 3m-rso@mmm.com

