

June 14, 2024

Via Email: (jonathan.pfingsten@nrc.gov)

Jonathan Pfingsten
Sr. Health Physicist
U.S. NRC Region I
475 Allendale Rd., Suite 102
King of Prussia, PA 19406-1415

**Re: Notice of Transaction Impacting Delaware Radioactive Material License
Held by Delaware Cardiovascular Associates, P.A. - License No. 07-30420-01**

Dear Mr. Pfingsten:

Delaware Cardiovascular Associates, P.A. (“DCA”), hereby notifies the U.S. Nuclear Regulatory Commission (the “USNRC”) of a proposed transaction implicating the Materials License, License No. 07-30420-01, (the “License”), issued by USNRC to DCA. The License is active for the following six (6) locations (the “Facilities”):

1. Suite 100, 1113 S. State St., Dover, Delaware 19901
2. 34453 King St. Row, Lewes, Delaware 19958
3. 415 S. DuPont Highway, Milford, Delaware 19963
4. Suite 105, 537 Stanton-Christiana Rd. Newark, Delaware 19713
5. 92A Atlantic Ave., Ocean View, Delaware 19970
6. Suite 200, 121 Beckswoods Dr., Bear, Delaware 19701

Currently, eight physician owners each hold 12.5% of the ownership interests in DCA (the “Current Physician Owners”). Pursuant to the terms of an asset transaction, DCA will sell its non-clinical assets to US Health Delaware, LLC, owned by ultimate parent company US Health Partners, LLC (the “Buyer”), an entity in which the Current Physician Owners will hold equity interests. The clinical assets will be purchased by Cardiology Physicians, LLC (“Clinical Buyer”), which is owned by Dr. Aaron Snyder, M.D. (the “Transaction”). Dr. Snyder is a known entity to the USNRC and has completed the requisite background screening. The Clinical Buyer engages the Buyer to provide certain non-clinical management services to the Clinical Buyer; however, the parties expressly agree that such management does not and will not interfere with the ultimate authority of the Clinical Buyer in connection with the License. The Transaction is anticipated to close on or before July 20, 2024.

The Transaction will have no impact on the Facilities’ physicians or other personnel, locations, provision of medical and professional services, or any other licensed activities. Post-Transaction, the Facilities’ day-to-day clinical operations and professional and licensed activities will remain

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unchanged. The Facilities will continue to conduct operations under the License at the same locations, using the same materials and personnel as before the Transaction, including but not limited to the Radiation Safety Officer, William J. Gunkel, Jr., and authorized users, Rajinder Prasad, M.D., Gurmeet Singh, M.D., and Mark E. Zweben, M.D.

We refer you to the two (2) attachments included with this notice, which contain the information required by the USNRC to evaluate the Transaction. Specifically, Attachment A provides the following information: (a) a description of the transaction; (b) a description of any changes of personnel, location, equipment, and procedures; (c) DCA's surveillance records; (d) decommissioning and related record transfers; and (e) the transferee's commitment to abide by the transferor's commitments. Attachment B presents pre- and post-transaction organizational charts.

The parties to the Transaction recognize that the consummation of the Transaction will effectuate a change of ownership and authority over the License. **As such, we respectfully request an expedited review of this filing in order that the License be placed into the name of the Clinical Buyer.**

DCA is committed to working with the USNRC to effectuate this transfer as expeditiously as possible as part of the proposed Transaction. The parties desire the Transaction to close on or before July 20, 2024. If you have any questions or comments pertaining to this submission, please contact Elizabeth Sullivan at McDonald Hopkins LLC (216-348-5401 or esullivan@mcdonaldhopkins.com), or Patrick Campbell at McDonald Hopkins LLC (216-348-5405 or pcampbell@mcdonaldhopkins.com).

Sincerely,

DocuSigned by:

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Mark Zweben
President
Delaware Cardiovascular Associates, P.A.

Enclosures:

Attachment A, Information Needed for Change of Control Notice
Attachment B, Pre- and Post-Transaction Organizational Charts

ATTACHMENT A

Below is a list of the information required by USNRC to review a change of control application related to a Materials License. Information is being provided in response to these requests to assist USNRC in its review of the request made by Delaware Cardiovascular Associates, P.A., in the foregoing letter.

INFORMATION NEEDED FOR CHANGE OF CONTROL NOTICE

1. Description of Transaction

Currently, eight physician owners each hold 12.5% of the ownership interests in DCA (the “Current Physician Owners”). Pursuant to the terms of an asset transaction, DCA will sell its non-clinical assets to US Health Delaware, LLC, an entity wholly-owned by ultimate parent company, US Health Partners, LLC (the “Buyer”). The Current Physician Owners will have equity interests in Buyer. The clinical assets will be purchased by Cardiology Physicians, LLC (the “Clinical Buyer”) which will be owned by Dr. Aaron Snyder, M.D. (the “Transaction”). Both Cardiology Physicians, LLC and Dr. Snyder are known entities to the USNRC as they hold existing radioactive materials in the state of Delaware. The Clinical Buyer engages the Buyer to provide certain non-clinical management services; however, the parties expressly agree that such management does not and will not interfere with the ultimate authority of the Clinical Buyer in connection with the License. The Transaction is anticipated to close on or before July 20, 2024.

The Transaction will have no impact on the Facilities’ physicians or other personnel, locations, provision of medical and professional services, or any other licensed activities. Post-Transaction, the Facilities’ day-to-day clinical operations and professional and licensed activities will remain unchanged. The Facilities will continue to conduct operations under the License at the same locations, using the same materials and personnel as before the Transaction, including but not limited to the Radiation Safety Officer, William J. Gunkel, Jr., and authorized users, Rajinder Prasad, M.D., Gurmeet Singh, M.D., and Mark E. Zweben, M.D.

2. Changes of Personnel

The Transaction will not result in any change to personnel listed on and associated with the License, including, but not limited to, the Radiation Safety Officer, William J. Gunkel, Jr., and authorized users, Rajinder Prasad, M.D., Gurmeet Singh, M.D., and Mark E. Zweben, M.D. The Facilities will continue to conduct operations under the License at the same locations, using the same materials and personnel as before the Transaction. Dr. Aaron Snyder, M.D. (“Dr. Snyder”) will own the Clinical Buyer which will hold the License after the Transaction. Of note, Dr. Snyder is the owner of Materials License 07-30713-01.

3. Changes of Location, Equipment & Procedures

The Transaction will not change the locations, equipment, or procedures under the License. The Facilities will continue to conduct operations under the License at the same locations, using the same materials and personnel as before the Transaction.

4. Surveillance Records

All surveillance has been performed, documented, and reviewed on a timely basis. Surveillance activities will not change as a result of the Transaction.

5. Decommissioning and Related Records Transfers

As stated above, the Transaction will not result in any changes to the Facilities' operations, services, locations, equipment, procedures, or personnel. Therefore, no decommissioning will be required as a result of the Transaction. However, all records relating to activities under this License transferred to the Clinical Buyer.

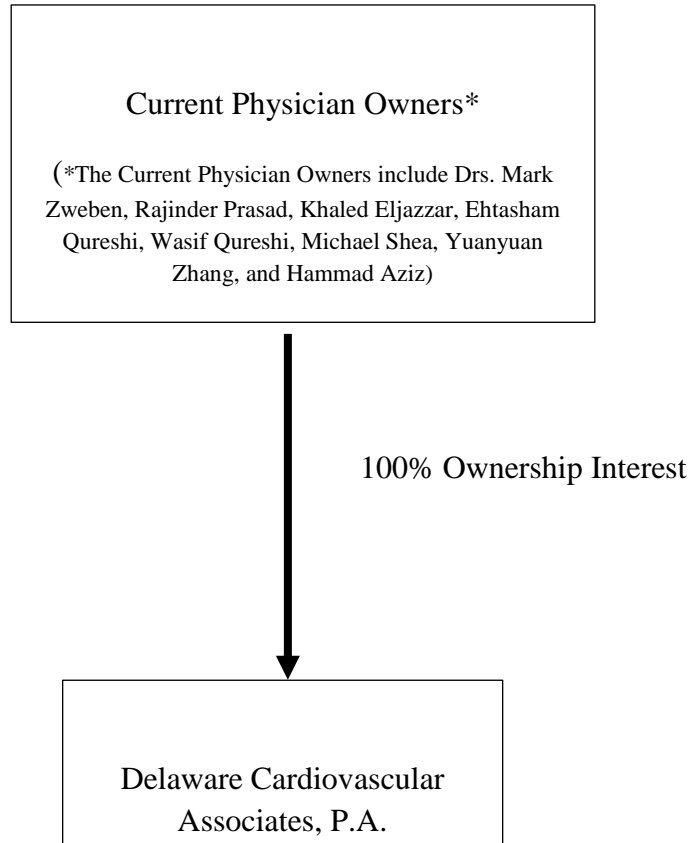
6. Transferee's Commitment to Abide by the Transferor's Commitments

The Clinical Buyer agrees to abide by all constraints, license conditions, requirements, representations, and commitments identified in and attributed to the License.

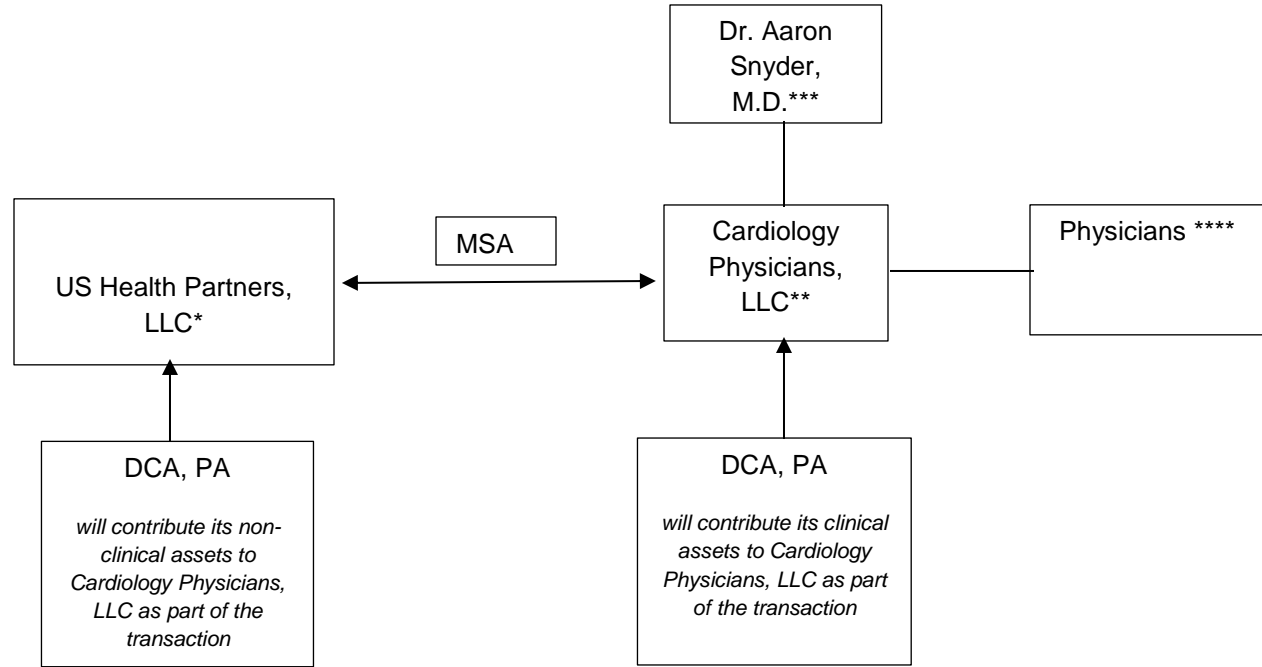
ATTACHMENT B

PRE- AND POST-TRANSACTION ORGANIZATIONAL CHARTS

PRE-TRANSACTION ORGANIZATIONAL CHART



POST-TRANSACTION ORGANIZATIONAL CHART



* US Health Partners, LLC, a USNRC known entity, will be engaged to perform non-clinical management services for Cardiology Physicians, LLC, pursuant to a Management Services Agreement.

** Cardiology Physicians, LLC, a known USNRC entity, will hold the Materials License and other clinical assets.

*** Dr. Aaron Snyder, M.D., a known USNRC entity, is the owner of Cardiology Physicians, LLC.

****The Physicians will be engaged by Cardiology Physicians, LLC via employment agreements to perform medical services, including the same activities licensed under the Materials License currently held by Delaware Cardiovascular Associates, P.A.