



418 East College Drive
Cheyenne, WY 82007
Tel: 307.638.6648
Fax: 307.637.4315
www.frmiimaging.com

Mail Control Number: 642005
Docket Number : 3037854
License Number : 49-29310-01
Licensee Name : Front Range Mobile Imaging, Inc.
ML24211A168

July 12, 2024

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

Dear NRC:

Front Range Mobile Imaging (FRMI), per the requirement of its' NRC Radioactive Materials License Number 49-29310-01, is hereby notifying the NRC of a majority interest ownership change.

On July 31, 2024, Lyle Johnson will be retiring and selling his shares of FRMI to members of Heritage Imaging. Heritage Imaging also holds Washington and Oregon state radioactive materials licenses. The current co-owner of FRMI, John Mastin (myself), is retaining and shares of FRMI, and will remain the operating owner and RSO for FRMI.

FRMI is retaining its' name and Employer Identification Number. All current policies, procedures, personnel, and items relevant to FRMI's radioactive materials licenses will remain intact and in full force per the terms of their licenses.

If you have any question, comments, or concerns, please contact me directly at (307) 631-8973 and/or john.mastin@frmiinc.com.

Sincerely,

John Mastin
Radiation Safety Officer
Chief Executive Officer
Front Range Mobile Imaging

From: [Latischa Hanson](#)
To: [Roberto Torres](#); [Casey Alldredge](#); [R4 Licensing Action Submittals](#)
Subject: FW: FW: Request for Additional Information (RAI): Front Range Mobile Imaging, Inc.
Date: Friday, July 26, 2024 11:12:30 AM
Attachments: [image006.png](#)
[Heritage - Memo for Transfer of Radioactive Materials License \(No. 49-29310-01\)\(5642942.v1\).pdf](#)
[WA RAM License Expires 20240930.pdf](#)
[ORE-91186-11.amd \(1\).pdf](#)
[FRMI NRC RAML 49-29310-01 No-Impact Onwership Change Notification.pdf](#)
[NUREG-1556 Vol 15 Rev 1 Appendix E template -FRMI Complete.pdf](#)
Importance: High

FYI, I believe this to be a amendment request.

From: John Mastin <john.mastin@frmiinc.com>
Sent: Friday, July 26, 2024 11:10 AM
To: Latischa Hanson <Latischa.Hanson@nrc.gov>; Carol Hill <Carol.Hill@nrc.gov>
Subject: [External_Sender] FW: Request for Additional Information (RAI): Front Range Mobile Imaging, Inc.

Good morning Latischa and Carol,
Sorry to be a pest on this. I also left you a voicemail this morning Carol. I apologize for the short notice, but I'm hoping we can get consent by this coming Wednesday (7/31/2024) if at all possible. I greatly appreciate your help!

Below are answers to some of your specific questions that I hope assist in making your decision.

- Complete, sign & date the attached **Appendix E, NUREG 1556, Volume 15, Revision 1 Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses (June 2016)** to document the required current license operations. Additionally, I have attached Appendix C of the above-referenced NUREG, for your review.

<https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v15/index.html>

This has been submitted. Please see the attached memo for additional information.

- Submit the organization charts before & after the business transfer due to the retiring owner, Lyle Johnson ***The organization chart is attached to the memo for reference.***
- Your letter stated that shares were sold to Heritage Imaging. I did not find where they had an active NRC license. If you have a copy of their NRC, please submit it to me for my review ***Heritage Imaging does not have an NRC license. We are seeking consent for the transfer of FRMI's existing NRC license to Heritage as part of the acquisition.***
- Submit a copy of the Bill of Sale ***There is no Bill of Sale. Please see the attached***

memo for a description of the deal. Please let us know if you require additional information.

- Do you have a Secretary of State filing document for this transaction or any TID/EIN information you can send me? ***There is no Secretary of State filing documents for this transaction.***

We're happy to pay any expediting fees of course.
Thank you for your time and consideration!

John Mastin

Chief Operating Officer

Front Range Mobile Imaging

418 E. College Dr., Cheyenne, WY 82007

Website: www.frmiimaging.com

Mobile: (307)631-8973

Office: (307)638-6648

Email: john.mastin@frmiinc.com

From: John Mastin <john.mastin@frmiinc.com>

Sent: Monday, July 22, 2024 4:06 PM

To: Latischa Hanson <Latischa.Hanson@nrc.gov>

Subject: RE: Request for Additional Information (RAI): Front Range Mobile Imaging, Inc.

Oh goodness! I just realized I didn't send their attorney's answers to some of your questions. Sorry for the redundant emails. Here you go:

John, see attached. Also, below in red are answers to her questions for you to also send her. Steve, does Heritage have an existing NRC license? The below answers assume it does not, but let me know if that's not right.

- Complete, sign & date the attached **Appendix E, NUREG 1556, Volume 15, Revision 1 Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses (June 2016)** to document the required current license operations. Additionally, I have attached Appendix C of the above-referenced NUREG, for your review.

<https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v15/index.html>

This has been submitted. Please see the attached memo for additional information.

- Submit the organization charts before & after the business transfer due to the retiring owner, Lyle Johnson ***The organization chart is attached to the memo for reference.***

- Your letter stated that shares were sold to Heritage Imaging. I did not find where they had an active NRC license. If you have a copy of their NRC, please submit it to me for my review **Heritage Imaging does not have an NRC license. We are seeking consent for the transfer of FRMI's existing NRC license to Heritage as part of the acquisition.**
- Submit a copy of the Bill of Sale **There is no Bill of Sale. Please see the attached memo for a description of the deal. Please let us know if you require additional information.**
- Do you have a Secretary of State filing document for this transaction or any TID/EIN information you can send me? **There is no Secretary of State filing documents for this transaction.**

John Mastin

Chief Operating Officer

Front Range Mobile Imaging

418 E. College Dr., Cheyenne, WY 82007

Website: www.frmiimaging.com

Mobile: (307)631-8973

Office: (307)638-6648

Email: john.mastin@frmiinc.com

From: John Mastin <john.mastin@frmiinc.com>

Sent: Monday, July 22, 2024 3:48 PM

To: Latischa Hanson <Latischa.Hanson@nrc.gov>

Subject: FW: Request for Additional Information (RAI): Front Range Mobile Imaging, Inc.

Hello Latischa,

Here's the full Change of Control request and supporting documents. I think you have most of this information, but the attached memo from Heritage Imaging's attorney is new and includes the remainder of the info I believe you were needing. Again, I will remain the RSO of the license. No P&P or personnel changes will occur.

I'll also send this via mail ASAP today.

I do apologize for the short notice, and humbly ask the NRC to expedite the request if at all possible as the sale is set to occur 7/31/2024. FRMI is happy to pay any expediting fees necessary. Thank you for your time and consideration!

John Mastin

Chief Operating Officer

Front Range Mobile Imaging

418 E. College Dr., Cheyenne, WY 82007

Website: www.frmiimaging.com

Mobile: (307)631-8973

Office: (307)638-6648

Email: john.mastin@frmiinc.com

From: John Mastin <john.mastin@frmiinc.com>

Sent: Friday, July 12, 2024 1:23 PM

To: Latischa Hanson <Latischa.Hanson@nrc.gov>

Subject: RE: Request for Additional Information (RAI): Front Range Mobile Imaging, Inc.

Hello again Latischa,

We're back on the path of FRMI selling its' majority interest to Heritage Imaging. I completed the Transfer of Control Application you sent previously (attached here). I also refreshed the amendment letter. Attached as well. I'll send the organizational charts and Heritage Imaging's RAMLs next week.

I'll need to check with our attorneys, but I don't believe that we'll be filing anything with the Secretary of State as our name and EIN are not changing. But if so, I'll absolutely send you copies.

I'll try to also get you a Bill of Sale, but I'm unsure I'll get a copy of that prior to the date of the actual sale, which is 7/31/2024.

Please let me know what else you need from me. Feel free to call my cell anytime. Thank you!

John Mastin

Chief Operating Officer

Front Range Mobile Imaging

418 E. College Dr., Cheyenne, WY 82007

Website: www.frmiimaging.com

Mobile: (307)631-8973

Office: (307)638-6648

Email: john.mastin@frmiinc.com

From: Latischa Hanson <Latischa.Hanson@nrc.gov>

Sent: Tuesday, January 23, 2024 12:39 PM

To: John Mastin <john.mastin@frmiinc.com>

Subject: Request for Additional Information (RAI): Front Range Mobile Imaging, Inc.

Importance: High

John,

Front Range Mobile Imaging, Inc.

49-29310-01/030-37854

MC 637647

I am assigned the review of your notification letter dated October 11, 2023, and need to request the following additional information:

- Complete, sign & date the attached **Appendix E, NUREG 1556, Volume 15, Revision 1 Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses (June 2016)** to document the required current license operations. Additionally, I have attached Appendix C of the above-referenced NUREG, for your review.

<https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/v15/index.html>

- Submit the organization charts before & after the business transfer due to the retiring owner, Lyle Johnson
- Your letter stated that shares were sold to Heritage Imaging. I did not find where they had an active NRC license. If you have a copy of their NRC, please submit it to me for my review
- Submit a copy of the Bill of Sale
- Do you have a Secretary of State filing document for this transaction or any TID/EIN information you can send me?

Submit the completed above-mentioned documents to me, signed & dated to me, so that I can continue with my review. If you have any questions, feel free to contact me for any question you may have.

Thank you for your prompt assistance with this request,

Latischa

Latischa Hanson, M.Sc., Health Physicist
USNRC/Division of Radiological Security and Safety (DRSS)
Region IV

1600 E. Lamar Blvd.
Arlington, TX 76011-4511
(817) 200-1286 (o)
(817) 200-1188 (f)
Latischa.Hanson@nrc.gov



EXTERNAL EMAIL: This email came from an external source. Do not open attachments, click on links, or enter your username and/or password from unknown senders or unexpected emails.

July 22, 2024

TO: United States Nuclear Regulatory Commission (“NRC”)

FROM: Luke E. Sturgeon, Attorney at Law

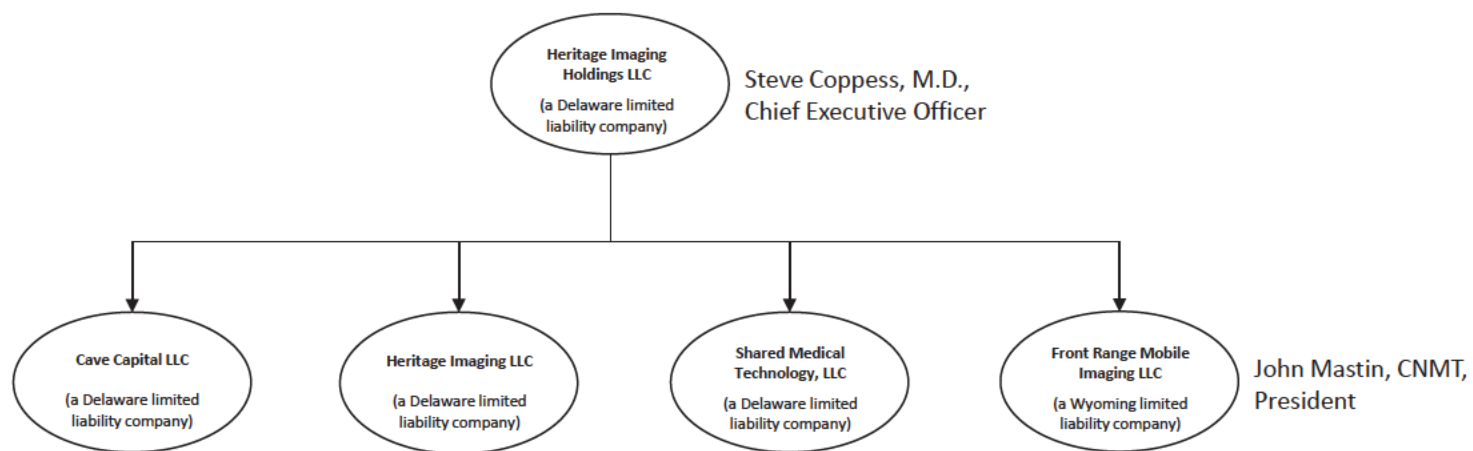
RE: Transfer of Front Range Mobile Imaging, Inc.’s Radioactive Materials License

Karr Tuttle Campbell is acting as legal counsel to Heritage Imaging Holdings LLC, a Delaware limited liability company (“**Heritage**”), in connection with Heritage’s planned acquisition (the “**Acquisition**”) of Front Range Mobile Imaging Inc., a Wyoming corporation (“**FRMI**”). This memorandum is provided in support of FRMI’s request for NRC’s prior written consent to transfer control of its existing NRC Radioactive Materials License, Number 49-29310-01, to Heritage in conjunction with the Acquisition. Details of the Acquisition are as follows:

- The acquisition will be structured as a “stock” purchase, whereby Heritage will acquire 100% of the equity interests of FRMI from the current shareholders of FRMI, Lyle Johnson and John Mastin.
- Prior to the acquisition, FRMI will convert, pursuant to Wyoming statute, from a corporation to a limited liability company.
- Following the Acquisition, FRMI will maintain its existence as a separate entity (a Wyoming LLC); the only change will be with respect to ownership.
- Following the Acquisition, John Mastin, FRMI’s current Radiation Safety Officer, will continue in the role of Radiation Safety Officer and will serve as President of FRMI.
- Following the acquisition, FRMI will be a wholly owned subsidiary of Heritage, which currently owns and operates two other companies, Heritage Imaging LLC (a Delaware limited liability company) and Shared Medical Technology, LLC (a Delaware limited liability company) that are engaged in the same business as FRMI, mobile medical imaging and nuclear medicine, throughout the Mountain West and upper Midwest (please refer to the attached organization chart of Heritage and its subsidiaries).
- The Chief Executive Officer of Heritage is Steve Coppess, M.D.
- The target closing date of the Acquisition, pending the necessary approvals, is July 31, 2024.

If you have any questions about the structure or details of the acquisition, please contact Luke Sturgeon at 206-334-8039, lsturgeon@karrtuttle.com, or Brett Elliott at 206-224-8136, belliott@karrtuttle.com.

Post-Closing Structure of Heritage Imaging





**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
REGION IV
1600 E. LAMAR BLVD.
ARLINGTON, TX 76011-4511

**Change of Control and/or Change of Ownership
(Includes Change of Name)**

10 CFR 30.34(b) states that "no license issued or granted pursuant to the regulations...nor any right under a license shall be transferred, assigned or in any manner disposed of, either voluntarily or involuntarily, directly or indirectly, through transfer of control of any license to any person, unless the Commission shall...find that the transfer is in accordance with the provisions of the Act and shall give its consent in writing. Although not specifically addressed by 10 CFR 30.34, licensees undergoing a name change may also be affected by this regulation.

Control over licensed activities can be construed as the authority to decide when and how a license (licensed material and/or activities) will be used. A change of ownership may be an example of a change of control. The central issue is whether the authority over the license has changed. In all cases, determining whether a change of control has taken place or whether a change is in name only is the Commission's responsibility.

Licensees must notify the Commission when they are undergoing a possible change of control and/or a change of name. While this notification is not required within a certain time frame, NRC needs adequate time to review the submittal to ensure that the transfer is in accordance with the regulations.

For further information, see Regulatory Issue Summary (RIS) 2014-08, Revision 1, "Regulatory Requirements for Transfer of Control (Change of Ownership) of Specific Materials Licenses," dated May 5, 2016 (Agencywide Documents Access and Management System Accessions No. ML15181A223) (<https://www.nrc.gov/docs/ML1518/ML15181A223.pdf>). Please note that this document clarifies that all transfer of control applications or requests for specific materials licensees will be posted to the NRC public website for 30 days. This RIS can also be found on the NRC's Generic Communications Web page under "Regulatory Issue Summaries" at <http://www.nrc.gov/reading-rm/doc-collections/gen-comm/>.

In order to process your request for a change of control/ownership and/or a name change, the information on the following pages is required. If you have any questions regarding our previous discussion or this email, please contact me. When responding to this email, please include the license, docket, and mail control numbers, located on the cover page. Thank you.

Information Needed for Transfer of Control Application
(Includes Change of Name)
Source: NUREG-1556, Volume 15, Rev. 1

Include a contact name and either U.S. Nuclear Regulatory Commission (NRC) regional office or Headquarters telephone numbers for follow-up information, as required.

NRC Region: IV
Telephone: (307) 631 - 8973

Contact: John Mastin
Fax: (307) 637- 4315

Definitions:

Control: Control of a license is in the hands of the person or persons who are empowered to decide when and how that license will be used. That control is to be found in the person or persons who, because of ownership or authority explicitly delegated by the owners, possess the power to determine corporate policy and, thus, the direction of the activities under the license.

Transferee: A transferee is an entity that proposes to purchase or otherwise gain control of an NRC-licensed operation.

Transferor: A transferor is an NRC licensee selling or otherwise giving up control of a licensed operation.

Information Needed for Transfer of Control

Licensees must provide full information and obtain NRC's **prior written consent** before transferring control of the license. Provide the following information concerning changes of control by the applicant (transferor and/or transferee, as appropriate). **If any items are not applicable, so state.**

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. Lyle Johnson owns 80% of FRMI. I, John Mastin, own 20%. Lyle is selling 100% of his shares to Heritage Imaging. I am retaining a portion of my shares, but it's unclear what percentage currently. However, I am and will continue to be a minority shareholder. Heritage Imaging will become majority shareholder. FRMI is not undergoing a name or EIN change. I am, and will continue to be, COO, RSO, and operating manager. All Radiation Safety Program P&P, and all other P&P and personnel will be unchanged and remain in full effect moving forward. There will be no name, address, or contact information changing. This is solely a majority vested interest change. The new partners have not intent of changing the operations or personnel of FRMI.**
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. **There will be no changes pertaining to this section.**

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. **There will be no changes pertaining to this section.**
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. **All items pertaining to this section are in good-standing in accord with our normal and ongoing operations per NRC guidelines.**
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. **There will be no changes pertaining to this section.**
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. **There will be no changes pertaining to this section. Nothing is being decommissioned.**
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. **Both transferor and transferee are in agreement of the transfer. I am the operating vested partner, COO, and RSO for the current company and will be for the new entity.**
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. **Operationally and compliance wise, I am the transferor and transferee and will abide by all constraints, conditions, requirements, representations, and commitments of FRMI's NRC RAM license.**
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. **FRMI does not have fuel cycle facilities.**

John Mastin, COO & RSO of FRMI:



7/12/2024



ACKNOWLEDGEMENT - RECEIPT OF CORRESPONDENCE

Name and Address of Applicant and/or Licensee

Front Range Mobile Imaging, Inc.
John L. Mastin, RSO
418 East College Drive
Cheyenne, WY 82007

Date

07/26/2024

License Number(s)

49-29310-01

Mail Control Number(s)

642005

Licensing and/or Technical Reviewer or Branch

Giavanna Muffelletto

This is to acknowledge receipt of your: ☒ Letter and/or ☐ Application Dated: 07/26/2024

The initial processing, which included an administrative review, has been performed.

☒ Amendment ☐ Termination ☐ New License ☐ Renewal

☐ There were no administrative omissions identified during our initial review.

☐ This is to acknowledge receipt of your application for renewal of the material(s) license identified above. Your application is deemed timely filed, and accordingly, the license will not expire until final action has been taken by this office.

☐ Your application for a new NRC license did not include your taxpayer identification number. Please complete and submit NRC Form 531, Request for Taxpayer Identification Number, located at the following link: <http://www.nrc.gov/reading-rm/doc-collections/forms/nrc531.pdf>
Follow the instructions on the form for submission.

☐ The following administrative omissions have been identified:

Your application has been assigned the above listed MAIL CONTROL NUMBER. When calling to inquire about this action, please refer to this control number. Your application has been forwarded to a technical reviewer. Please note that the technical review, which is normally completed within 180 days for a renewal application (90 days for all other requests), may identify additional omissions or require additional information. If you have any questions concerning the processing of your application, our contact information is listed below:

Select a location (Use keyboard arrows to select). . .

BETWEEN:

Accounts Receivable/Payable
and
Regional Licensing Branches

[FOR ARPB USE]
INFORMATION FROM WBL

Program Code: 02220
Status Code: Pending Amendment
Fee Category: 7C
Exp. Date: 06/30/2034
Fee Comments:
Decom Fin Assur Req: N

License Fee Worksheet - License Fee Transmittal

A. REGION

1. APPLICATION ATTACHED

Applicant/Licensee: Front Range Mobile Imaging, Inc.
Received Date: 07/26/2024
Docket Number: 3037854
Mail Control Number: 642005
License Number: 49-29310-01
Action Type: Change of Control

2. FEE ATTACHED

Amount: N/A

Check No.: N/A

3. COMMENTS

Signed: Giavanna Muffelletto

Date: 07/26/2024

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered / /)

1. Fee Category and Amount: _____

2. Correct Fee Paid. Application may be processed for:

Amendment: _____

Renewal: _____

License: _____

3. OTHER _____

Signed: _____

Date: _____

Agency: NRC

WBL WORKSHEET

DOCKET NUMBER: 3037854	LICENSE NUMBER: 49-29310-01	STATUS: Pending Amendment
MAIL CONTROL NUMBER: 642005	RECEIPT DATE: 07/26/2024	ACTION TYPE: Change of Control
DUE DATE: 01/22/2025	INST. CODE: 29310	LICENSE REGION: Region 4
LICENSE TYPE: 30	ENTITY TYPE: C	LICENSE GROUP: Medical
ISSUE DATE:	ORIGINAL DATE: 01/19/2009	EXPIRATION DATE: 06/30/2034
DECOMMISSIONING CATEGORY: Group 1	LAST ISSUE DATE:	
LICENSEE NAME: Front Range Mobile Imaging, Inc.	DECOM FIN ASSUR REQD: N SUBM: N	
MAILING ADDRESS LINE1: 418 East College Drive	CONT PLAN REQD: N APPRV: N	
MAILING ADDRESS LINE 2:		
CITY: Cheyenne	STATE: WY	ZIP: 82007
CONTACT PERSON: PREFIX: Mr.	FIRST NAME: John	MIDDLE INITIAL: L.
LAST NAME: Mastin	SUFFIX: Radiation Safety Officer	
JOB TITLE: Chief Operating Officer	PHONE: 307-638-6648 FAX: 307-637-4315	EMAIL: john.mastin@frmiinc.co
BILLING ADDRESS LINE 1:		
BILLING ADDRESS LINE 2:		
CITY:	STATE: Wyoming	ZIP:
BILLING CONTACT PERSON: FIRST NAME:	MIDDLE INITIAL:	LAST NAME:
PHONE:	EMAIL:	FAX:
PRIMARY PGM CODE: 02220	SECONDARY PGM CODE:	
INSPECTION REGION: Region 4	PRIORITY: 3	
RSO: PREFIX:	FIRST NAME: John	MIDDLE INITIAL: L. LAST NAME Mastin
SUFFIX:	RSO JOB TITLE: Radiation Safety Officer	
RSO PHONE: 307-638-6648	RSO FAX: 307-637-4315	RSO EMAIL: john.mastin@frmiinc.com
STATES WHERE USE IS AUTHORIZED: 3	0- ALL LISTED STATES 1- SAME AS STATE IN ADDRESS 2- ALL STATES 3- NON-AGREEMENT-STATES	
AUTHORIZED STATES (USE ONLY IF ABOVE IS ZERO):		